

DOCKETED	
Docket Number:	24-OPT-04
Project Title:	Potentia-Viridi Battery Energy Storage System
TN #:	269344
Document Title:	Sierra Club Comments - Sierra Club Comment on Potentia-Viridi Battery ES 3.27.26
Description:	N/A
Filer:	System
Organization:	Sierra Club
Submitter Role:	Public
Submission Date:	3/27/2026 10:43:26 AM
Docketed Date:	3/27/2026

*Comment Received From: Sierra Club
Submitted On: 3/27/2026
Docket Number: 24-OPT-04*

Sierra Club Comment on Potentia-Viridi Battery ES 3.27.26

Additional submitted attachment is included below.



Serving Alameda, Contra Costa, Marin and San Francisco counties

Eric Veerkamp
CEC Project Manager
Potentia-Viridi Battery Energy Storage System Project

Dear Mr. Veerkamp:

Thank you for the opportunity to comment on the Staff Assessment (SA), including the Draft Environmental Impact Report (DEIR), for the Potentia-Viridi Battery Energy Storage Project (Project). Sierra Club is a national nonprofit organization, dedicated to exploring, enjoying, and protecting the wild places of the earth; to practicing and promoting the responsible use of the earth's ecosystems and resources; and to educating and enlisting humanity to protect and restore the quality of the natural and human environment. Comments included in this letter are submitted by Sierra Club on behalf of its many members and supporters in California.

Sierra Club supports the transition to renewable energy and protection of natural ecosystems, biodiversity, and human communities. Encouraging the rapid development of well-sited, appropriately designed and managed renewable energy projects and infrastructure will allow us to replace fossil fuels with renewable energy while ensuring we meet the Sierra Club's and California's goal of protecting 30% of our lands and waters by 2030. With proper siting and design to avoid, minimize or mitigate impacts to the biological resources, air quality, public health, and the environment, we can successfully build out the renewable energy system that is an essential part of the change needed to avert the existential crisis of climate change.

Project description

The Project consists of a 400-megawatt (MW), 3,200 MW-hour (MWh) Battery Energy Storage System (BESS) on a 70-acre leased portion of approximately 102 acres in rural eastern Alameda County. The Alameda County General Plan – East County Area Plan designates the project site primarily as Large Parcel Agriculture (LPA). This area is also within the Altamont Pass Wind Resource Area (APWRA). Of the 32 acres evaluated for the overhead, generation intertie (gen-tie) line study area, 1.9 acres are expected to be permanently disturbed for installation of the transmission and interconnecting facilities, with 6.7 acres temporary disturbance, yielding a total of 60.7 acres within the approximately 102-acre project area to be permanently disturbed as part of project implementation. The project includes a proposed 1,600-foot segment of 500 kv gen-tie line connecting to an approximately 1,300-foot gen-tie segment and other infrastructure to be constructed and owned by Pacific Gas and Electric Company (PG&E).



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Land uses in the immediate vicinity of the project include undeveloped rural agricultural lands suitable for grazing, multiple high-voltage transmission lines and electrical substations, rural roads, and railroad lines. The nearest municipality to the project site is the city of Tracy approximately 2.5 miles to the northeast. There are a few single-family residences near the existing PG&E substation's southern and eastern boundaries. The nearest residence is about 1,500 feet southeast of the project site and 560 feet south of the proposed gen-tie line; it is owned by the same landowner leasing the lands for the project. The project location was selected because the site is large enough to support development of the project, and because of its proximity to existing electrical infrastructure and PG&E's Tesla Substation, thereby minimizing length of the proposed gen-tie line, and because it is immediately adjacent to existing roadways for construction and O&M access.

Comments

Sierra Club submits the following comments for the proposed Project:

- Sierra Club prefers siting renewable energy facilities on structures or lands which have already been converted from their natural state and remain impacted, disturbed, or degraded by human activities, and which are near existing electrical infrastructure. As described above and in the SA, the proposed Project site currently consists of fallowed annual grasslands near an existing substation, and is generally consistent with Sierra Club's preferences.
- Battery storage facilities are critical for displacing gas plants in California. The Sierra Club understands both the urgent need for additional BESS on the grid and concerns about the safety of batteries. Accordingly, the Club appreciates that this project, as described in the SA, complies with strict fire safety standards, including the National Fire Protections Association (NFPA) 855 Standard for the Installation of Stationary Energy Storage Systems. Part of the NFPA 855 requirements include UL 9540A. This standard requires tests for fire suppression and explosion control to ensure that BESS facilities can prevent battery explosions and the spread of battery fires between units, as well as tests for whether a sample unit (a group of batteries housed together) of the battery system can experience thermal runaway, and whether a BESS facility's fire suppression system responds effectively. Additional standards created since the fire at Moss Landing have added new safety standards for the maintenance and operation of battery energy storage systems, and require battery storage facility owners to develop emergency response and emergency action plans.



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- It was anticipated that project construction and operation could have a potentially significant impact on certain species, especially the California red-legged frog and California tiger salamander. The mitigation measures described in the draft EIR appear to adequately address these concerns.

Sierra Club supports certification by the California Energy Commission of the Potentia-Veridi Project.

We thank the CEC for its detailed and transparent evaluation of the proposed Project, for its outreach to community and Tribal interests, and for this opportunity to comment on the SA for the Project.

Sincerely,

Rebecca Franke, Energy and Climate Committee Chair
Sierra Club, San Francisco Bay Chapter