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Support for Enhancing Clean Energy Technology Safety, Supply Chains, and Life Cycle Benefits Initiative

I would like to express my support for the intent of this initiative, particularly its focus on improving safety, deployment readiness, and life-cycle benefits for clean energy technologies. These are important barriers to scale, and addressing them can help reduce project risk, improve public confidence, and protect ratepayers.

As a general comment, I encourage the Commission to continue using technology-neutral language where appropriate. While the current topics appear to focus heavily on energy storage, especially batteries, the broader initiative refers to clean energy technologies. Other zero- or low-emission technologies, including wind, geothermal, tidal, and other generation resources, could also benefit from improved safety standards, performance analytics, reliability assessment, and life-cycle evaluation.

On the energy storage safety topic, I find the Hydrogen Tools (h2tools.org) approach, a CEC-funded program, a useful model which provides a centralized and trusted information resource for hydrogen safety, codes, best practices, lessons learned, and technical guidance. A similar resource for battery and energy storage technologies could provide significant value to developers, authorities having jurisdiction, emergency responders, utilities, researchers, and communities. Such a center could compile information on R&D projects, lab and field safety practices, incident learnings, regulatory requirements, testing protocols, and best practices, while drawing on expertise from industry, academia, national labs, fire officials, and standards bodies. Over time, this type of resource could potentially be expanded to other categories of clean energy technologies as well.

On material supply chains, additional clarity on the specific activities and research pathways the initiative intends to fund could further strengthen the proposal. Alongside research on fundamentally new pathways, chemistries, and processes for recycling, reuse, and material recovery, it may be useful to evaluate whether the most important bottlenecks are technical, logistical, economic, regulatory, or related to automation and scale-up.

I would also suggest that references to materials being “available domestically” include cost-effectiveness as a core consideration. The initiative could add value by comparing the cost, performance, and feasibility of domestic recycling and recovery pathways against current alternatives, and by identifying where the largest cost gaps and bottlenecks exist. This type of assessment could help prioritize R&D toward the highest-impact opportunities, whether those involve new recycling chemistries, better sorting and automation, more efficient processing, or other interventions.

Overall, I strongly support this initiative and appreciate the Commission’s attention

to safety, deployment readiness, and life-cycle benefits. I encourage the Commission to refine the initiative in ways that maintain technology-neutral language, clarify the specific activities behind supply-chain improvements, and help ensure EPIC investments produce practical, standardized, and actionable outputs that improve safety, reduce costs, and accelerate deployment.