

DOCKETED	
Docket Number:	26-OPT-02
Project Title:	Seahawk Battery Energy Storage System
TN #:	271339
Document Title:	Nina Audino Comments - STOP Lithium BESS in Santa Cruz Couny Comments on Exclusion of UL9540A 2026 6th Edition LSFT Data
Description:	N/A
Filer:	System
Organization:	Nina Audino
Submitter Role:	Public
Submission Date:	7/8/2026 4:52:49 PM
Docketed Date:	7/8/2026

*Comment Received From: Nina Audino
Submitted On: 7/8/2026
Docket Number: 26-OPT-02*

STOP Lithium BESS in Santa Cruz County Comments on Exclusion of UL9540A 2026 6th Edition LSFT Data

STOP Lithium BESS in Santa Cruz County respectfully requests that excluded foundational large-scale fire test data that is based on the updated March 13, 2026 6th edition of the ANSI/CAN/UL 9540A standards for Battery Energy Storage Systems (BESS) be included, extant, into the public record.

Additional submitted attachment is included below.

July 8, 2026

Eric Veerkamp, Project Manager
California Energy Commission
715 P Street, MS-40
Sacramento, CA 95814
Electronic filing of a 2-Page Letter

Subject: Comments by Nina Audino, STOP Lithium BESS in Santa Cruz County, on Developer's Exclusion of Foundational Large-scale Fire Test Data Based on the Updated 6th edition of the ANSI/CAN/UL 9540A standards for Battery Energy Storage Systems (BESS)

Reference: AB-205 Application Submitted for a Proposed Battery Energy Storage Project in Santa Cruz County, CA.
Docket Number 26-OPT-02.

Dear Mr. Veerkamp:

STOP Lithium BESS in Santa Cruz County respectfully files the following comments pertaining to the applicant's, New Leaf Energy's, exclusion of foundational large-scale fire test data that is based on the updated March 13, 2026 6th edition of the ANSI/CAN/UL 9540A standards for Battery Energy Storage Systems (BESS).

There does not appear to be a large-scale fire test (LSFT) report included with the applicant's submitted materials that meets the new 2026 6th edition UL 9540A requirements for an LSFT that evaluates a fully populated BESS unit pushed into a worst-case thermal runaway fire with its active fire suppression and detection systems disabled.

The 5.2 Operational Thermal Runaway Impacts Aermod Methodology section of Application Part 2 (p. 33/2635) references a "CATL EnerC+ Large Scale Burn Test – Document No.: 10520137-HOU-R-01" and lists conclusory statements recommending installation distances based on it.

It is not clear if this is the same test as the "DNV Energy USA, Inc. CATL EnerC+ Large Scale Burn Test, January 13, 2025" that is listed in the MNS Public Health Assessment Reference Section (p. 45/2635).

In any case, neither of these tests are available for public and agency review.

The Hazard Mitigation Analysis (HMA) EnerC+ UL 9540A Testing section of Appendix 3.16B details in its 3.1, 3.2 and 3.3 sub-sections, respectively, the results of cell level, module level and unit level UL 9540A testing and offers conclusory recommendations based on them. The

UL 9540A cell level test “was conducted by UL Solutions in April and May of 2024.” (p. 23/107) “Module level testing was conducted at a UL laboratory on June 13, 2024.” (p.26/107) “Unit level testing was conducted at a UL laboratory on June 13, 2024. (p.27/107)

These tests are also referenced in the 1.3 Reference sub-section (p. 15/107) of the 3.16B HMA Introduction section as follows:

- CATL EnerC+ UL 9540A Cell Level Fire Test Report (4790838636.3), UL (Changzhou) Quality Technical Service Co., LTD Dated 2023.08.24.
- CATL EnerC+ UL 9540A Module Level Fire Test Report (4790931782), UL (Changzhou) Quality Technical Service Co., LTD Dated 2023.09.13.
- CATL EnerC+ UL 9540A Unit Level Fire Test Report (4790931774), UL (Changzhou) Quality Technical Service Co., LTD Dated 2023.10.27.

The applicant has made the full description of these tests confidential, as indicated by the Appendix 3.16A UL 9540A Test Results section. However, these tests were conducted according to outdated UL9540A standards. As stated previously, the applicable UL 9540A standards should be those in the current edition: the March 13, 2026 6th edition of the ANSI/CAN/UL 9540A standards for BESS.

The 3.16B HMA Introduction section of Appendix 3.16 states in its 1.2 Applicable Codes and Standards sub-section (p. 14-15/107) that “the following codes and standards are applicable to the Seahawk BESS installation in Watsonville, California¹: UL 9540A, Test Method for Evaluating Thermal Runaway Fire Propagation in Battery Energy Storage Systems – 2019 4th Edition.” As stated previously, the applicable UL 9540A edition should be the current one: the March 13, 2026 6th edition of the ANSI/CAN/UL 9540A standards for BESS.

STOP Lithium BESS in Santa Cruz County hopes that the Commission finds the information provided herein to be useful in assessing the completeness and accuracy of the developer’s application. Excluding the foundational data and methodologies an agency relies upon violates the principles of administrative transparency and prevents meaningful public participation and decision-making. STOP Lithium BESS in Santa Cruz County looks forward to the addition of large-scale fire test results, extant, into the public record that are based on standards explicitly required in the March 13, 2026 6th edition of the ANSI/CAN/UL 9540A standards for BESS.

Respectfully submitted,

Nina Audino
Founder, STOP Lithium BESS in Santa Cruz County

¹Please note that the proposed BESS site is not in Watsonville; it is in unincorporated Santa Cruz County.