

| <b>DOCKETED</b>         |                                                                                                         |
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| <b>Docket Number:</b>   | 24-OPT-05                                                                                               |
| <b>Project Title:</b>   | Corby Battery Energy Storage System Project                                                             |
| <b>TN #:</b>            | 271638                                                                                                  |
| <b>Document Title:</b>  | Mineni Comments - Opposition to the Corby Battery Energy Storage System Project CEC Docket No 24-OPT-05 |
| <b>Description:</b>     | N/A                                                                                                     |
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| <b>Organization:</b>    | Mineni                                                                                                  |
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*Comment Received From: Mineni  
Submitted On: 7/27/2026  
Docket Number: 24-OPT-05*

## **Opposition to the Corby Battery Energy Storage System Project CEC Docket No 24-OPT-05**

To the California Energy Commission:

My name is Amber Mineni, and I am a resident of Vacaville and a member of the broader community that will be affected by the proposed Corby Battery Energy Storage System Project.

I am submitting this comment to express my strong opposition to approving this project at the proposed location near Kilkenny Road and Byrnes Road.

I understand the importance of reliable energy infrastructure and responsible renewable-energy development. However, supporting renewable energy does not require accepting an industrial-scale battery facility in an inappropriate location surrounded by agricultural land, rural residences, limited evacuation routes, and communities that would bear the consequences of a fire, toxic release, emergency shutdown, equipment failure, or long-term environmental contamination.

The proposed facility would contain an enormous concentration of battery-storage equipment. Even if the probability of a catastrophic event is characterized as low, the consequences could be severe. The CEC must evaluate not only whether the applicant believes the project can comply with minimum standards, but whether placing this particular facility at this particular location is prudent, necessary, and protective of the surrounding community.

Solano County and local residents have raised serious concerns regarding fire protection, hazardous materials, agricultural impacts, road access, emergency response, noise, visual impacts, adjacent properties, and the applicant's ability to compensate the public for potential damages. These concerns should not be minimized or overridden merely because the applicant selected the state's expedited opt-in certification process.

I request that the CEC provide clear, evidence-based responses to the following questions and address each issue in the environmental analysis and final decision:

### **Fire, Thermal Runaway and Emergency Response**

What is the maximum reasonably foreseeable fire, explosion, or thermal-runaway event evaluated for this facility, and what assumptions were used to define that event?

Does the analysis evaluate a cascading incident involving multiple battery containers, rather than assuming a fire will remain confined to a single unit?

What independent evidence demonstrates that thermal runaway cannot spread from one battery enclosure to another under extreme heat, high winds, equipment failure, delayed suppression, or multiple simultaneous failures?

How long could a battery fire at this facility burn, and what quantities of water, specialized equipment, firefighting foam, personnel, air-monitoring equipment, and mutual-aid resources could be required?

## **Formal Opposition to the Corby Battery Energy Storage System Project CEC Docket No. 24-OPT-05**

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### **Fire, Thermal Runaway and Emergency Response**

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2. Does the analysis evaluate a cascading incident involving multiple battery containers, rather than assuming a fire will remain confined to a single unit?
3. What independent evidence demonstrates that thermal runaway cannot spread from one battery enclosure to another under extreme heat, high winds, equipment failure, delayed suppression, or multiple simultaneous failures?
4. How long could a battery fire at this facility burn, and what quantities of water, specialized equipment, firefighting foam, personnel, air-monitoring equipment, and mutual-aid resources could be required?

5. Which fire agency will have primary responsibility for responding to an incident, and has that agency confirmed in writing that it currently possesses the necessary staffing, training, apparatus, protective equipment, water supply, and hazardous-material capability?
6. What is the estimated response time to the project under normal conditions and during a regional wildfire, roadway obstruction, power outage, extreme-heat event, or simultaneous emergency?
7. Who will pay for additional firefighter training, equipment, staffing, emergency drills, air monitoring, water infrastructure, and long-term replacement of specialized equipment?
8. Will the applicant be required to fund these resources before beginning operation, or would local taxpayers initially bear these costs?
9. What water source will be used during a major fire, how much water will be immediately available, and is that supply sufficient for a prolonged incident?
10. If firefighters determine that allowing a battery fire to burn is safer than actively suppressing it, what evacuation, shelter-in-place, air-monitoring, public-notification, and containment procedures will apply?
11. Has the CEC modeled an incident occurring during dry, hot, windy conditions when surrounding vegetation and agricultural land are most vulnerable to ignition?
12. What legally enforceable minimum separation distances will be required between battery equipment, neighboring residences, agricultural operations, roads, and property boundaries?

## **Toxic Smoke, Air Quality and Public Health**

13. Which toxic gases and combustion products could be released during thermal runaway, fire, explosion, equipment failure, or emergency venting?
14. Has the CEC modeled the movement of smoke and toxic emissions under worst-case wind conditions, atmospheric inversions, and nighttime weather patterns?
15. What geographic area could be affected by concentrations exceeding health-protective exposure levels?
16. Does the public-health analysis specifically evaluate risks to children, older adults, pregnant people, individuals with asthma, people with chemical sensitivities, people with cardiovascular conditions, outdoor workers, and livestock?
17. What real-time air-monitoring equipment will be permanently installed, which substances will it detect, and how quickly will results be shared with emergency officials and the public?
18. What specific measurements will trigger evacuation or shelter-in-place orders?
19. Who will have authority to issue those orders, and how will nearby rural residents be notified if cell service, electricity, or internet access is disrupted?
20. Will the applicant be required to disclose the complete chemical composition and safety information for all battery cells, coolants, suppressants, solvents, and other hazardous materials stored onsite?

## **Evacuation and Transportation**

21. What evacuation routes are available to nearby residents, workers, farmers, and motorists if Kilkenny Road, Byrnes Road, or another local roadway becomes inaccessible?
22. Has the evacuation analysis considered simultaneous evacuation traffic, emergency-vehicle access, smoke-related visibility loss, disabled vehicles, road closures, and residents who require assistance?
23. What happens if the safest evacuation route would require members of the public to travel toward or through the affected area?
24. Will a public evacuation drill be conducted before the facility begins operation?
25. How will the public be warned about an incident occurring overnight or when residents are away from phones and electronic notification systems?
26. Has the CEC independently reviewed the adequacy of the surrounding road network, or is it relying primarily on information supplied by the applicant?

## **Agricultural Land, Soil and Water**

27. Why should agricultural land be permanently or functionally converted to industrial energy infrastructure when alternative industrially zoned or previously disturbed locations may exist?
28. What alternative locations were considered, and what objective criteria were used to reject sites farther from homes, farms, and environmentally sensitive areas?
29. Does the alternatives analysis genuinely evaluate relocation, reduced project size, different battery technology, distributed storage, or previously developed industrial sites?
30. What chemicals could enter soil, groundwater, drainage systems, agricultural land, or nearby waterways following fire suppression, battery rupture, flooding, equipment failure, or contaminated runoff?
31. How will contaminated firefighting water be contained during an incident involving thousands of gallons of water?
32. What happens if the containment system is overwhelmed, damaged, inaccessible, or already holding stormwater?
33. Who will test neighboring soil, groundwater, crops, wells, and livestock following an incident?
34. Who will compensate farmers and neighboring property owners if crops, soil, groundwater, livestock, or agricultural certification are harmed or suspected of contamination?
35. What baseline soil and groundwater testing will be completed before construction so future contamination can be identified?

## **Noise, Lighting and Quality of Life**

36. What will the facility's actual nighttime noise levels be at the nearest residences, including inverters, transformers, cooling equipment, alarms, maintenance activity, and emergency operations?

37. Will noise limits apply to low-frequency and tonal noise, rather than only average decibel levels?
38. How will compliance be independently verified after operations begin?
39. What immediate remedy will residents have if noise, vibration, lighting, glare, or alarms interfere with sleep, health, livestock, or use of their property?
40. Will the applicant be required to fund independent monitoring selected by the community rather than relying solely on its own consultants?

## **Battery Technology, Safety Claims and Operational Changes**

41. What precise battery chemistry, manufacturer, model, cell arrangement, enclosure design, cooling system, fire-detection system, and suppression system will be used?
42. Can the applicant change the battery manufacturer, chemistry, enclosure, capacity, software, cooling system, or fire-protection design after approval without a new public environmental review?
43. If equipment is changed after certification, what criteria determine whether additional environmental review and public notice are required?
44. What independent full-scale fire testing has been performed on the exact equipment configuration proposed for this location?
45. Were those tests performed by laboratories or consultants financially independent from the manufacturer and applicant?
46. Do the tests evaluate aged, damaged, overcharged, flooded, overheated, manufacturing-defective, and poorly maintained batteries?
47. How does the analysis account for degradation and increased failure risk over the facility's full operational life?
48. What cybersecurity protections will prevent malicious interference with battery controls, cooling systems, alarms, communications, or grid connections?
49. What backup systems will remain functional during a total power failure, communications outage, cyberattack, earthquake, extreme-heat event, or wildfire?

## **Oversight, Enforcement and Financial Responsibility**

50. Which governmental agency will conduct routine inspections after the project is operational, and how frequently will inspections occur?
51. Will inspection reports, alarm events, battery failures, fires, releases, emergency calls, safety-system malfunctions, and corrective actions be publicly available?
52. What penalties will apply when the operator violates safety, noise, hazardous-material, reporting, maintenance, or emergency-response requirements?
53. Can the facility be ordered to suspend operations immediately when a serious safety violation occurs?
54. What financial assurance, bond, insurance policy, or dedicated emergency fund will the applicant be required to maintain?

55. Is that financial assurance sufficient to cover a worst-case fire, evacuation, environmental cleanup, agricultural losses, property damage, health claims, road damage, emergency-response costs, and eventual abandonment?
56. Will neighboring residents and local governments be able to make direct claims against the financial assurance, or would they first have to pursue lengthy litigation?
57. How will the required financial assurance be adjusted for inflation, increased project risks, equipment changes, and rising cleanup costs?
58. What prevents the project owner from transferring the facility to a limited-liability entity without sufficient assets to cover a major disaster?
59. Who will remain financially responsible if the operator declares bankruptcy, dissolves, sells the project, or abandons the facility?

## **Decommissioning and Long-Term Impacts**

60. What is the expected operational life of the batteries and the entire facility?
61. How many battery replacements are anticipated, and how will damaged, degraded, or retired batteries be transported, stored, recycled, or disposed of?
62. What routes will trucks carrying damaged or hazardous batteries use?
63. What financial assurance will guarantee complete decommissioning and restoration of the site without taxpayer funding?
64. Will decommissioning require removal of foundations, underground infrastructure, contaminated soil, transmission equipment, roads, drainage structures, and hazardous materials?
65. To what standard will the agricultural land be restored, and who will determine whether restoration is successful?
66. How long will soil and groundwater monitoring continue after the facility closes?

## **Cumulative Impacts and Environmental Justice**

67. Does the analysis consider the cumulative impact of this project together with other proposed energy, industrial, transportation, residential, and infrastructure developments in Vacaville and Solano County?
68. Has the CEC evaluated the cumulative demand these projects could place on firefighters, law enforcement, roads, water supplies, emergency rooms, evacuation capacity, and hazardous-material teams?
69. Why should the state override or discount the land-use and safety judgments of the local agencies and residents who will experience the project's impacts?
70. How does approving an industrial-scale facility over local opposition demonstrate meaningful community participation rather than merely providing an opportunity to comment after the applicant has selected the location?
71. What project outcome, safety concern, environmental impact, or evidentiary finding would actually cause the CEC to deny the application?

## **Requested Actions**

I respectfully request that the California Energy Commission:

1. Deny certification of the Corby Battery Energy Storage System at the proposed Kilkenny Road location.
2. Require a complete and transparent analysis of alternative sites on industrially zoned, previously disturbed land located farther from residences and agricultural operations.
3. Require independent—not solely applicant-funded—review of fire behavior, toxic emissions, evacuation capacity, water requirements, contaminated runoff, emergency-response readiness, and long-term financial responsibility.
4. Require legally enforceable funding for local emergency services, environmental monitoring, disaster response, property damage, agricultural losses, decommissioning, and site restoration.
5. Prohibit material changes in battery chemistry, manufacturer, capacity, enclosure design, cooling systems, or fire-protection systems without renewed environmental review and public participation.
6. Give substantial weight to the opposition and concerns expressed by Solano County, local fire and emergency personnel, nearby landowners, farmers, and Vacaville-area residents.

The issue is not whether California needs energy storage. The issue is whether this extraordinarily large industrial project belongs on this agricultural site near rural homes and whether the applicant has demonstrated that the public will be protected throughout construction, operation, emergencies, equipment replacement, and decommissioning.

The consequences of an incorrect siting decision would not be borne primarily by the applicant or by state decision-makers. They would be borne by neighboring residents, farmers, firefighters, taxpayers, property owners, and future generations.

For these reasons, I urge the CEC to reject the Corby Battery Energy Storage System Project at the proposed location.

Sincerely,

Amber Mineni  
Vacaville, California