

DOCKETED	
Docket Number:	24-OPT-05
Project Title:	Corby Battery Energy Storage System Project
TN #:	271801
Document Title:	Joseph Petrillo Comments - Comprehensive Site Selection Study Required for Corby Energy Project
Description:	N/A
Filer:	System
Organization:	Joseph Petrillo
Submitter Role:	Public
Submission Date:	8/3/2026 11:14:40 AM
Docketed Date:	8/3/2026

*Comment Received From: Joseph Petrillo
Submitted On: 8/3/2026
Docket Number: 24-OPT-05*

Comprehensive Site Selection Study Required for Corby Energy Project

Additional submitted attachment is included below.

Comprehensive Site Selection Study Required for Corby Energy Project

I am a member of the *Citizens for Battery Transparency* and *Citizens for Safe Energy Storage* and opposed to the inappropriate siting of mega scale BESS in California. The CFBT group has been very involved opposing two large BESS facilities in Sonoma County. One of these projects has been withdrawn while the other has been paused.

Public concerns and opposition to this relatively new technology at this size and scale have focused on the sites selected by project developers. This has been exacerbated because of accidents and incidents associated with fires at lithium-ion BESS facilities worldwide. The Moss Landing disaster in January of 2025 should give pause to all state regulators regarding site selection, particularly the CEC and CPUC.

The California Environmental Quality Act (CEQA), Section 15126.6(a), requires an Environmental Impact Report (EIR) to “describe a reasonable range of alternatives to a project, or to the location of a project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” CEQA was based in part on the National Environmental Policy Act (NEPA) which states that the evaluation of alternatives is the “heart” of the Environmental Impact Statement. Therefore, it is important for the commission to focus on alternatives, especially alternative sites

The state of California has no site selection requirements for BESS. According to a DOE Pacific Northwest National Lab study entitled “State Siting Authority of Energy Facilities”: *“Energy storage systems are explicitly included under the CEC’s regulatory jurisdiction in the California Code of Regulations, but specific siting requirements for energy storage systems are not outlined in the text of those regulations.”* One wonders how the CEC was able to evaluate alternative sites without state siting regulations and criteria. States with siting regulations and requirements include the use of siting methodologies, criteria and protocols.

How do energy experts determine where to site a new energy facility? In the past, site selection studies were performed as part of the utility generation planning process. It was also a prerequisite required by state public utility commissions before approving or denying an application to build a new energy facility. I have conducted site selection studies for large energy facilities during my 40-year career in the energy and environmental consulting business. Siting methodologies incorporate multi-criteria decision analysis utilizing numerical weights with qualitative and quantitative factors to compare competing sites objectively. The Electric Power Research Institute (EPRI) has published a review of multi-criteria decision-making applications for renewable energy facilities. This includes a systematic literature review of applications for renewable energy site selection methods covering a total of 85 papers published from various sources.

A siting methodology should be used, and important siting criteria should, at a minimum, include the following:

1. Proximity to residential areas, schools, hospitals and businesses
2. Proximity to important cultural resources and historic sites
3. Proximity to sensitive ecological habitat and important natural resources
4. Proximity to faults
5. Proximity to wildfire zones
6. Proximity to areas designated and zoned for industrial development

It appears that the most important criterion is to maximize profit for project developers by taking a less rigorous approach to expedite the site selection process and thereby increasing public health and safety risks. In most cases, proximity to substations has become the most important criterion for BESS project developers. GenTies are important but not a significant part of the cost of BESS projects. Also, high voltage transmission losses typically are very low 2 % or so. Substation proximity should not be the most important factor and needs to be carefully evaluated along with the above criteria

Where should these mega-scale BESS be sited? Ideally, utility scale BESS should preferentially be located in remote areas and co-located with solar and/or wind facilities. The Commission has recently certified the Darden Energy Project which meets these objectives. Otherwise, utility scale BESS needs to be sited at locations where land use and zoning restrictions are under the control of and regulated by county and city agencies.

Several of the alternative sites evaluated by the CEC in the Staff Assessment include prime agricultural land similar to the proposed site. However, one of the alternative sites considered in the Staff Assessment is the Lambie Industrial Park, a 1,400-acre, county-designated industrial and manufacturing zone situated in Solano County. This site is zoned MG-3 and is consistent with large-scale utility operations, aligns with Solano County's BESS ordinances, and is safely away from residential neighborhoods.

According to the Bay Area Air Quality Management District, the Lambie Industrial Park is a designated heavy industrial zone often discussed as a prime location for major energy grid additions. As Solano County navigates the rapid expansion of both renewable infrastructure and battery storage, this site serves as a vital existing transmission and distribution grid.

The applicant has indicated that Lambie is a reasonable alternative but because the applicant has had an interconnection agreement with PG&E and CAISO since 2023, it prefers the proposed Corby site which is prime agricultural land. There is nothing fundamentally wrong with the Lambie Industrial Park site and residents and safety groups want the project moved there instead of the currently proposed agricultural site. The developer, NextEra Energy, acknowledges the Lambie site is feasible, but prefers its original location due in part to prior interconnection agreements with PG&E and CAISO.

In summary, the Staff Assessment for the Corby Energy Project includes a limited qualitative evaluation of alternative sites, several of which are similar, from an agricultural standpoint to the proposed site. The current site is too close to homes, schools, local medical facilities, and Interstate 80. The CEC alternative site evaluation is lacking in terms of methodology, siting

criteria and protocols and gives too much weight to the applicant's prior siting decisions and its interconnection agreement with PG&E and CAISO. If zoning requirements have been enacted by local regulatory agencies for certain areas like industrial parks, then these areas should be given additional weight and consideration when selecting a site for a utility scale lithium-ion battery plant. The Commission should revisit the very important alternative site issue and conduct a more comprehensive review of alternative sites that have land use and zoning requirements that are consistent with utility scale lithium-ion battery storage facilities.

I am confident that the Commission will be able to determine that Lambie is clearly preferred over the proposed location. This will ensure that the Corby BESS Project will be sited appropriately and will not adversely impact important people, places and things in Vacaville and Solano County.

I appreciate the Commission's attention to this matter.

Joseph Petrillo

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