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Calculating Risk Supplemental to TN 271887

Additional submitted attachment is included below.

Calculating Risk

Recent CEC staff comments have been made in the Corby Staff Assessment (7/15/26, Section 5.1-25 Air Quality) that a BESS facility is only estimated to have a failure every 11 to 67 years. Respectfully, that is absurd.

Calculating BESS failure rates using skewed data such as from the EPRI BESS Failures Database--- which EPRI themselves openly admit to only including incidents that they deem to be a “threat to public health and safety”, not simply “operational failures”--- falls far short of being accurate. The EPRI documented incidents are supported using mostly media driven sources such as news articles and videos.

Every BESS failure should be recorded in the database, even “operational failures”. Why?

Because these incidents may very well have resulted in threats to public health and safety if the siting of the BESS were in proximity to sensitive receptors, such as the Corby BESS if approved in the site location as proposed.

Are we not trying to calculate the *total number of failures* so we can then accurately calculate *probability of occurrence*, which then can accurately ascertain the *risk to a community* from a project? Cherry picking which events are counted in the database only skews the BESS Failure Incident data.

For instance, the 821MW Edwards Sanborn in Mojave CA had 4 fire incidents in 2024 which were substantiated through Kern County Fire Dept incident reports. Yet, when these failure incidents were twice submitted to the EPRI BESS Failure Database along with the Kern County Incident reports, they were all initially rejected by EPRI and only one incident (#2408035 on 2/22/2024) has been added to the database. This is because they consider these incidents to be “operational failures” because there was no evacuation, no sheltering in place, no road closures, business closures, school closures etc--no risk to public health and safety. And this is because the Edwards Sanborn Facility is *properly, safely and remotely sited* away from sensitive receptors. ***But there were still 4 fire incidents and these still qualify as BESS failures.***

The CPUC creates a mandatory BESS fire incident reporting requirement.

Up until the CPUC GO-167C was amended and adopted in March 2025, there was no mandatory requirement to report BESS fires/failures. Why would a developer want to document a failure when public outcry and organized opposition to BESS was growing? Opposition = delays, denials and litigation.

Also, BESS failure rates cannot be ascertained when BESS failure incident reporting compliance cannot be guaranteed. Therefore, estimated failure rates based on flawed data should not be considered in a project’s risk calculations.

In closing.....

The risk assessment for the Corby BESS should be based on the battery technology used and the proximity to sensitive receptors. The probability rate as calculated through industry data which cannot be truly verified to reflect all BESS fire/failure incidents should not be considered in the Corby BESS risk assessment.

Please deny the Corby BESS in the proposed site location as the risks to sensitive receptors cannot be fully mitigated. However, approving the project in the Lambie Industrial Park alternative site will greatly lessen these impacts

Ruthie Brock

Californians for Safe Energy Storage (CSES)--Los Angeles County Representative

