

DOCKETED	
Docket Number:	24-OPT-05
Project Title:	Corby Battery Energy Storage System Project
TN #:	272270
Document Title:	Amber Cargo-Reed Comments - Formal Personal Opposition and Request for Complete Analysis of Homeowner Property-Value, Insurance, and Socioeconomic Impacts
Description:	N/A
Filer:	System
Organization:	Amber Cargo-Reed
Submitter Role:	Public
Submission Date:	8/31/2026 4:55:20 PM
Docketed Date:	8/31/2026

*Comment Received From: Amber Cargo-Reed
Submitted On: 8/31/2026
Docket Number: 24-OPT-05*

Formal Personal Opposition and Request for Complete Analysis of Homeowner Property-Value, Insurance, and Socioeconomic Impacts

Please see attached PDF for formal public comment.

Additional submitted attachment is included below.

CALIFORNIA ENERGY COMMISSION

Docket No. 24-OPT-05

Corby Battery Energy Storage System Project

RE: Formal Personal Opposition and Request for Complete Analysis of Homeowner Property-Value, Insurance, and Socioeconomic Impacts

Dear California Energy Commission Commissioners and CEC Staff:

My name is Amber Cargo-Reed. I am a resident of Vacaville writing to formally oppose the proposed Corby Battery Energy Storage System (BESS) Project and to request that the Commission address significant omissions in the Staff Assessment/Draft Environmental Impact Report (EIR) (TN 271468).

I am speaking solely on my own behalf and on my own account. My statements, opinions, concerns, and questions do not represent any other individual, homeowner, resident, organization, group, or community. I am not claiming to speak for anyone other than myself.

I am submitting this letter to seek clear, factual, and documented answers to reasonable questions that, in my view, have not yet been adequately answered in the available 1,402-page project documentation or environmental review. These questions concern unaddressed economic impacts on surrounding homeowners, including residential property values, homeowners' insurance premiums, insurance availability, policy cancellations or nonrenewals, property damage, taxation, and the resulting financial consequences of locating a large-scale lithium-ion facility near existing homes, precious water sources, and agricultural land.

I am seeking evidence-based answers not assumptions, assurances, or general statements that impacts are unlikely or speculative. Where the Staff Assessment/Draft EIR has analyzed these issues, I ask the CEC to identify the exact page, section, study, data source, expert analysis, or other evidence relied upon. Where an issue has not been analyzed, I ask the CEC to acknowledge that fact and explain why it was excluded.

I. MY CENTRAL QUESTION TO THE CALIFORNIA ENERGY COMMISSION

The Corby BESS project is presented as providing substantial economic benefits, including local job creation and projected tax revenues. However, I have not found an equivalent analysis of the potential private financial costs to existing homeowners living near the proposed facility.

My central question is:

Where in the 1,402-page Staff Assessment/Draft EIR does the CEC actually quantify the potential financial loss to existing homeowners from residential property devaluation, increased insurance costs, loss or nonrenewal of insurance, or off-site residential property damage?

Please identify the exact page numbers. If the CEC cannot identify such pages, I respectfully ask the Commission to acknowledge that these impacts have not been adequately evaluated.

II. RESIDENTIAL PROPERTY VALUES, DIRECT DEVELOPER ADMISSIONS, AND UNADDRESSED VALUE-DEPRESSING FACTORS

Please identify the exact page numbers and sections of the Staff Assessment where the CEC evaluates whether the Corby BESS could adversely affect the market value or marketability of nearby residential properties.

Specifically:

1. Has the CEC performed a quantitative property-value study?

Did the CEC conduct or rely upon an independent appraisal, a real-estate market study, comparable sales data near operating BESS facilities, a hedonic property-value analysis, or any other quantitative evaluation? If yes, please identify the author, date, methodology, and exact EIR pages. If no, what factual evidence establishes that property-value impacts will be zero or insignificant?

2. Direct Precedent of Property Depreciation Recognized by the Applicant (NextEra):

The contention that utility infrastructure does not devalue adjacent residential property is contradicted by the project proponent's own business practices. Documented correspondence from agent representatives (Atwell, LLC) acting on behalf of **NextEra Energy** regarding a substation project in Rice County, KS (Walker Family homestead) explicitly demonstrates that NextEra recognized substantial property depreciation caused by nearby energy infrastructure. In that instance, NextEra offered an adjacent homeowner a **\$200,000 "good-faith depreciation payment"** (plus a \$25,000 signing bonus) to offset anticipated property devaluation on a homestead valued at \$310,000—representing an acknowledged **64% property value depreciation** due to a standalone substation.

- **The Corby Question:** If NextEra formally acknowledges that a standalone substation creates a \$200,000 (64%) loss in adjacent homestead value, what level of depreciation will be imposed on Vacaville homeowners living adjacent to a massive **300 MW / 1,200 MWh BESS facility**, an associated project substation, and high-voltage transmission interconnects? Where in the EIR does the CEC address this direct industry admission that energy infrastructure causes severe private property devaluation?

3. Cumulative Value-Depressing Environmental and Operational Impacts Unaddressed in the EIR:

The EIR fails to link operational and construction-phase environmental impacts to market value diminution. The marketability and value of neighboring homes are directly eroded by a combination of cumulative factors that have not been adequately evaluated or quantified from an economic perspective, including:

- **Construction Vibrations & Structural Damage:** Ground vibrations generated by heavy earthmoving machinery, site grading, pile driving, and heavy equipment traffic can shake structural components of nearby residences, resulting in physical damage such as cracked interior/exterior walls, compromised foundations, and structural settling.
 - **Construction Dust, Heavy Traffic, and Road Degradation:** Severe increases in construction-related dust, heavy equipment traffic, and the accelerated erosion/damage of local county roads impair peaceful enjoyment, access, and neighborhood desirability.
 - **Operational Noise:** Low-frequency continuous hums and noise pollution from massive BESS HVAC cooling units and high voltage transformers reduce quality of life and turn away prospective buyers.
 - **High-Voltage Corona Disruption & Electrical Interference:** Corona discharge from adjacent high-voltage transmission lines and interconnects can cause electromagnetic interference (EMI) that disrupts home electronics, cellular signals, and television reception, creating an unaddressed nuisance for residents.
 - **Negative Visual & Aesthetic Impacts on Private Views:** Industrialization of rural landscapes, loss of scenic vistas, loss of agricultural character, and bright security lighting visible from private residential properties reduce buyer demand and lower appraisal values.
 - **Public Health & Off-Gas Risks:** Unquantified public health risks associated with living next to a 300 MW BESS including chronic exposure to off-gas emissions during thermal runaway incidents or off gassing events create significant health concerns that drive down residential demand.
4. **Has the CEC analyzed buyer behavior and market stigma?**

Has the CEC evaluated whether prospective buyers could perceive proximity to a large lithium-ion facility as a negative location factor due to concerns over fire, thermal runaway, toxic smoke, emergency evacuation, hazardous materials, off-gas deposition, noise, industrial appearance, or loss of rural/residential character? Has the CEC evaluated whether this reduced pool of buyers could force sellers to accept substantial price discounts or result in longer market exposure?

5. **Has the CEC analyzed loss of home equity?**

A residential property is a family's primary financial asset. If an existing homeowner experiences a measurable decline in market value post construction, where is that loss accounted for? What is the CEC's estimated dollar value of potential property-value loss across the surrounding area?

III. HOMEOWNERS' INSURANCE & MORTGAGE CONSEQUENCES

Where in the EIR does the CEC analyze the effect of the Corby BESS on homeowners' insurance availability and pricing? Please identify the exact pages.

Specifically:

1. Consultation with Insurance Professionals:

Did the CEC or applicant consult insurance carriers, underwriters, brokers, actuarial experts, or the California Department of Insurance regarding insurance underwriting around large BESS installations? If so, please provide the analysis. If not, how can the CEC determine that the project will not impact insurance availability or pricing?

2. Specific Insurance Risks:

I request explicit evaluation regarding:

- Premium increases and higher deductibles;
- Policy exclusions, cancellations, and nonrenewals;
- Difficulty securing replacement coverage or conventional policies; and
- Forced reliance on the California FAIR Plan.

3. The Mortgage Impact:

Homeowners' insurance is not optional; mortgage lenders strictly require adequate property coverage (particularly fire insurance). Has the CEC analyzed the cascade effect if a homeowner loses coverage or faces unaffordable premiums, including impacts on refinancing, maintaining a mortgage, selling a home, or preserving accumulated home equity?

IV. THE 64% DEPRECIATION IMPACT & INDIVIDUAL ECONOMIC BURDEN

Applying the 64% depreciation rate recognized by NextEra in other energy infrastructure projects reveals a catastrophic financial impact when applied to local property values:

If an existing Vacaville homestead is valued at \$800,000 prior to construction, a 64% devaluation equates to a **\$512,000 private economic loss** to a single family, reducing their home's market value to just \$288,000.

Where in the 1,402 page EIR does the CEC account for a potential private loss of this magnitude? If the CEC contends that a 64% decline will not occur here, what empirical, site-specific evidence establishes that the outcome in Solano County will be different from NextEra's own projections in other jurisdictions?

Furthermore, project-wide economic benefits (such as construction jobs, energy grid stabilization, or regional tax revenues) must not be conflated with localized private economic losses. A project can produce macro-level public benefits while simultaneously stripping neighboring homeowners of over half their accumulated home equity. Where does the EIR explicitly distinguish between public regional benefits and private homeowner economic losses?

See attachment:

ATWELL, LLC

5/8/2025

Boyd J. Walker and Sharon Family Trust



McPherson, KS 67460

Dear Walker Family,

NextEra is working on securing a substation location for a wind project in Rice County, KS. Mr. Baldwin's tract to the north is our best prospect, so we would like to move forward with the deal while being considerate of your interest and position as well. Zillow values your homestead (Legal description: 11.4 acres in the NW/c SW/4 in Sec. 15-T20-R4; Tax ID: 0591751500000003000) at \$310k. Originally, NextEra thought 75k-100k would be a reasonable offer to offset depreciation. After hearing your feedback regarding the home's value, NextEra would like to extend a good-faith depreciation payment of \$200k that would go into effect as follows: (1) Mr. Baldwin's realty purchase-option is exercised for construction of the substation, or (2) a deed of sale is provided for the above-described property (including home and land). The term of this good neighbor agreement (i.e., Participation Agreement) would mirror the term of the Mr. Baldwin's agreement (five years) so that there's no lapse in coverage so to speak.

Additionally, NextEra is offering your family a **\$25,000 signing bonus**.

This project would provide renewable energy for 100,000 homes. That's 300,000 people that would benefit as the U.S. faces an energy shortage in the next two years from the increase in electricity usage from cell phones, electric cars, data centers, and a steadily growing population. In short, this project would help advance national interests and would add to your legacy while eliminating financial risk to your homestead. I would like to say thank you with utmost gratitude for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read 'Ryan Duffield'.

Ryan Duffield, MLS, CPL

Rduffield@atwell-agent.com

918.850.0821

V. PHYSICAL PROPERTY DAMAGE & THE QUESTION OF LIABILITY

While the Staff Assessment may discuss equipment hazards or on-site operational hazards, my question concerns off-site private property:

1. Vibration Damage to Nearby Homes:

Where in the EIR does the CEC analyze ground-borne vibration transmission during construction and heavy compaction operations? Has the CEC evaluated the financial cost of physical damage to neighboring homes such as wall cracking, foundation stress, and structural shaking and established pre-construction baseline inspections?

2. Off-Site Incident Analysis:

Where does the EIR analyze potential physical damage to privately owned off-site homes resulting from a credible BESS incident (e.g., thermal runaway, radiant heat, explosion, toxic smoke, soot deposition, hazardous material release, air/water/soil contamination, or emergency response operations)? Please provide the exact analysis and supporting engineering or fire safety studies.

3. Financial Responsibility and Remedies:

If a Corby related incident or construction vibration causes physical damage or loss of use to a neighboring property, who pays? Is it the homeowner's insurance, the project owner, the operator, or the homeowner?

4. Applicant Protection Commitments:

Given that NextEra has utilized "Participation Agreements" and direct "depreciation payments" on other infrastructure projects to eliminate financial risk to nearby homesteads, has the applicant proposed equivalent binding financial protections for Vacaville homeowners surrounding the Corby facility, such as:

- A homeowner compensation / depreciation protection fund;
- Pre-construction home inspection baseline programs and vibration damage guarantees;
- A buyout mechanism;
- Enforceable property-value protection agreements; or
- Insurance premium subsidies?

If not, why are neighboring homeowners expected to absorb these financial risks without the same protections NextEra offers elsewhere?

VI. CHALLENGING THE CLAIMED NET ECONOMIC BENEFIT & FEASIBLE ALTERNATIVES

I formally challenge the Staff Assessment's characterization of the project as yielding a net positive economic benefit. A project cannot validly claim a net economic gain when its fiscal analysis completely excludes the predictable private financial losses and municipal tax erosion caused by the project itself.

Specifically:

1. Erosion of Property Tax Revenues:

If nearby residential property values decrease due to market stigma and operational nuisances, local property tax assessments will drop accordingly. Has the CEC analyzed how reductions in surrounding residential home values will reduce long-term property tax revenue for local jurisdictions and schools?

2. Market Stigma of Lithium BESS Fires & Health Risks:

High-profile thermal runaway fires at utility scale lithium BESS facilities have created significant public market stigma regarding fire safety, toxic off-gassing, and long-duration emergency responses. When prospective buyers discount nearby homes due to fire stigma and health concerns, the resulting regional housing market contraction represents a tangible economic loss. Why was this market stigma excluded from the project's socioeconomic impacts?

3. Absorbing Increased Homeowners' Insurance Costs:

Every dollar an adjacent homeowner is forced to pay in increased insurance premiums, higher deductibles, or forced FAIR Plan policies represents money extracted directly from the local economy. When multiplied across affected neighborhood properties, the cumulative increase in insurance burdens can easily exceed the project's claimed local economic benefits.

4. Feasible Alternative Site: The Lambie Industrial Park:

Virtually all of these adverse socioeconomic and private property impacts can be completely eliminated by relocating the proposed facility to the **Lambie Industrial Park**. Moving the project to an appropriately zoned industrial location:

- Protects surrounding homeowners from property devaluation, structural vibration damage, insurance cancellation, noise, dust, view obstruction, and corona discharge interference;
- Fully respects and adheres to local land use protections, county zoning plans, and agricultural preservation goals; and

- Enjoys broad community support as a sensible, responsible site for heavy industrial energy infrastructure.

Why has the CEC not given full priority to analyzing and adopting the Lambie Industrial Park alternative to avoid severe residential and agricultural land use conflicts?

5. Incomplete Net Fiscal Calculation:

Did the project's economic projections deduct municipal costs for specialized fire/hazmat emergency response training, equipment, county road repair from construction equipment, public safety overhead, and residential tax base erosion? A calculation that counts gross tax revenues while ignoring localized economic damages and public service costs is fundamentally flawed. Where is the complete, true net fiscal analysis?

VII. RELATIONSHIP TO FIRE RISK AND CUMULATIVE IMPACTS

1. Fire Risk & Economic Linkage:

If the EIR concludes that fire and safety risks are mitigated to insignificance, what evidence proves that insurance underwriters and home buyers will reach the same conclusion? Conversely, if there remains any risk of a major fire, evacuation, or contamination event, why were the potential economic consequences to neighbors excluded?

2. Cumulative Regional Impacts:

With multiple BESS facilities proposed across Solano County and the Vacaville region, has the CEC evaluated the cumulative effect on regional homeowner insurance underwriting, market stability, property values, and emergency resources? Why were cumulative economic impacts omitted?

3. Baseline Determination:

What baseline was established to measure future economic harm? Has the CEC documented current property values, structural home conditions (via pre-construction inspection baselines), comparable sales, current insurance availability/costs, and the exact number of impacted residences? Without a baseline, how can future economic causation be determined?

VIII. DOCUMENTED PUBLIC CONCERNS & SPECIFIC REQUESTS

The CEC administrative record (including comments from the scoping process) already contains explicit public concerns regarding property devaluation, market stigma, insurance cancellations, and financial instability. The Commission has actual notice that these issues are material to local residents.

Therefore, before certifying the EIR or approving the Corby BESS project, I respectfully request that the California Energy Commission:

1. **Identify EIR Pages:** Provide exact page citations in the Staff Assessment addressing residential property values, homeowners' insurance, off-site property damage, construction vibration damage, and net fiscal calculations.
2. **Supplemental Expert Studies:** Commission independent, professional studies on residential property-value diminution, structural vibration risks and cracking, market stigma from lithium BESS fires, public health risks, noise impacts, visual impacts from private properties, corona discharge interference, construction dust, and road degradation.
3. **Fully Analyze the Lambie Industrial Park Alternative:** Rigorously evaluate and prioritize the community supported Lambie Industrial Park location as a superior alternative site that satisfies project energy goals while completely eliminating negative impacts on residential property values, structural home integrity, homeowners' insurance, and rural land use.
4. **Address Developer Precedent:** Address NextEra's documented practice of offering direct depreciation compensation to adjacent property owners, and evaluate whether similar Good Neighbor / Property Depreciation Agreements should be mandated as a mitigation measure or condition of certification for the Corby project.
5. **Re-evaluate Net Economic Benefit:** Revise the socioeconomic analysis to account for property tax revenue reductions, market stigma losses, road repair costs, structural repair costs, and elevated homeowners' insurance costs to reflect a true net economic calculation.
6. **Cumulative & Baseline Analysis:** Conduct a regional cumulative economic analysis for Solano County BESS projects and establish a clear baseline of existing home values, structural conditions, and insurance conditions.
7. **Require Enforceable Protections:** Require the applicant to establish enforceable financial protection mechanisms (such as property value guarantees, pre-construction home condition baselines, vibration damage repair guarantees, road repair funds, and insurance assistance funds) for affected neighbors.
8. **Formal Written Responses:** Provide specific, evidence-based written responses to each point raised in this letter within the Final EIR prior to any certification vote.

CONCLUSION

I support the responsible development of reliable and clean energy infrastructure. However, the transition to clean energy must not require individual homeowners to privately subsidize industrial infrastructure built adjacent to their homes, agricultural lands, and water resources—especially when viable industrial alternatives exist.

Moving this project to the **Lambie Industrial Park** offers a clear path forward that protects local homeowners, respects local land use protections, and receives community support, all while advancing California's clean energy goals.

Our homes represent our largest financial assets and years of hard-earned equity. When a project brings structural construction vibrations that risk cracking walls, persistent operational noise,

high voltage corona interference, heavy traffic and road damage, spoiled private views, unaddressed public health risks, and severe fire stigma, property devaluation is inevitable. If NextEra recognizes that utility infrastructure devalues adjacent homesteads by up to 64% in other jurisdictions, the CEC cannot turn a blind eye to property devaluation, physical damage, and insurance inflation in Solano County while claiming the project produces a net economic benefit.

If the Commission is confident that the Corby project will have no impact on surrounding property values, structural home integrity, or insurance, that conclusion must be backed by transparent, expert evidence in the EIR. Without such evidence, the environmental review remains fundamentally incomplete.

I respectfully oppose certification of the Staff Assessment/Draft EIR in its current form and oppose approval of the Corby Battery Energy Storage System Project at its proposed location until these critical homeowner economic and physical impacts are fully evaluated, disclosed, and addressed, or until the project is relocated to an appropriately zoned site like the Lambie Industrial Park.

Thank you for your time and consideration.

Respectfully submitted,

Amber Cargo-Reed

Speaking solely on my own behalf

Vacaville Resident

CEC Docket No. 24-OPT-05

Date: August 31, 2026