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Comments on Staff Assessment Section 7 Public Benefits

Please See Attached Comment Letter

Additional submitted attachment is included below.

COMMENTS ON STAFF ASSESSMENT SECTION 7

PUBLIC BENEFITS

CORBY BATTERY ENERGY STORAGE SYSTEM PROJECT (24-OPT-05)

California Energy Commission

Docket No. 24-OPT-05

Commissioners:

Section 7 identifies three categories of public benefit from the proposed Corby Battery Energy Storage System: economic benefits, environmental benefits, and electric-reliability benefits. I do not dispute that battery storage can provide important grid services or that construction of a large project can generate tax revenue and employment. The issue is whether Section 7 distinguishes benefits of battery storage generally from benefits that require, or are uniquely attributable to, the proposed Kilkenny Road location.

Staff expressly states that Public Resources Code section 25523(h) calls for a discussion of public benefits, that a qualitative discussion is appropriate, and that there is no specific threshold of benefit necessary for project approval. These comments therefore do not ask the Commission to create a numerical cost-benefit test that the statute does not require. They ask that the benefits Staff chooses to identify be characterized accurately, with material qualifications and project-created costs disclosed, so that generic benefits of a 300 MW battery are not mistaken for reasons to approve this particular site.

I. STAFF'S ECONOMIC FIGURES ARE GROSS BENEFITS, NOT A NET FISCAL ANALYSIS

Staff identifies construction employment and payroll, property taxes, sales and use taxes, equipment rentals, local spending, and a minimal level of post-construction employment as economic benefits. Staff reports approximately \$18.2 million in sales and use tax revenue during construction, including approximately \$3.4 million accruing to the County, and approximately \$70.5 million in operational property-tax revenue over the life of the Project.

Those are legitimate revenues to identify, but Section 7 presents them without a corresponding accounting of project-created public-service costs. Elsewhere in the Staff Assessment, Staff concludes that Corby would create additional fire-protection demands and relies on project funding, equipment, training, and additional staffing associated with Dixon Fire Department response. The Commission should therefore describe the \$70.5 million and \$18.2 million figures as gross projected tax revenues, not as a demonstrated net fiscal benefit.

The distinction matters because Section 7 itself says property-tax revenue would help offset potential fire-response and law-enforcement costs. If those costs are material enough to require mitigation and continuing financial support, the public-benefit discussion should at least identify their existence and explain that the section does not calculate the net fiscal benefit remaining after those obligations.

II. THE ENVIRONMENTAL BENEFIT IS CONDITIONAL, NOT AN OPERATING REQUIREMENT

Staff states that Corby would contribute to California's SB 100 objectives by capturing and storing renewable energy when renewable generation is plentiful and dispatching that energy when it is scarce. Staff also cites more than 2,742 GWh of renewable curtailment during the first five months of 2025 and states that Corby could store energy that otherwise might be curtailed.

The statewide curtailment problem is real, and battery storage is one recognized tool for reducing it. But Section 7 moves too quickly from what a battery can do to what this Project is required to do. Corby is a grid-connected storage facility. Section 7 does not identify a condition requiring the facility to charge only from renewable generation, to charge only during renewable-curtailment periods, or to demonstrate that each charging cycle prevents an otherwise unavoidable curtailment.

That does not eliminate the potential renewable-integration benefit. It means the benefit should be stated conditionally. The Commission should distinguish between the capability to absorb excess renewable generation and an enforceable operating commitment that assures the claimed environmental benefit.

III. ROUND-TRIP LOSSES SHOULD BE INCLUDED IN THE DESCRIPTION OF THE ENVIRONMENTAL BENEFIT

Section 7 describes the environmental benefit without mentioning the energy required to charge the facility or the losses inherent in storing and returning electricity to the grid. Staff's separate Efficiency and Energy Resources analysis recognizes round-trip efficiency below 100 percent and declining performance over time. Those losses do not mean storage lacks value; they are part of the physical cost of obtaining the storage service.

A balanced Public Benefits discussion should therefore acknowledge that Corby consumes more electricity in charging and auxiliary loads than it later returns as delivered energy. Whether the resulting operation produces a net environmental benefit depends in part on when the facility charges, the marginal generation serving that charging load, when it discharges, and what generation or curtailment the discharge actually displaces.

IV. GRID RELIABILITY IS A REAL BENEFIT OF STORAGE, BUT SECTION 7 DOES NOT SHOW THAT IT IS A BENEFIT OF THIS AGRICULTURAL SITE

Staff correctly explains that a 300 MW / 1,200 MWh BESS can assist grid operators in integrating intermittent renewable resources, storing energy, providing power during peak periods, and increasing grid flexibility. Those are genuine capabilities of utility-scale storage.

But Section 7 does not establish that those benefits depend on converting the proposed Kilkenny Road agricultural site. The relevant siting question is whether substantially the same storage and reliability services could be obtained from a feasible industrial alternative with an appropriate electrical interconnection and fewer conflicts with residences, agricultural land, emergency response, and local land-use policy.

Public Benefits should therefore avoid treating a generic benefit of BESS technology as an affirmative benefit of this particular parcel unless the record demonstrates that the location itself is necessary or materially superior for providing that benefit.

V. WHAT ARE THE SIX FULL-TIME OPERATIONAL EMPLOYEES?

The Socioeconomics section identifies six full-time employees per year during operation. Yet the CEC's own Corby project description states that the facility would be unstaffed after construction, controlled from an offsite control room through SCADA, with operational staff performing only periodic inspections and maintenance as necessary. Section 7 itself merely says the Project would employ a minimal number of staff following construction.

Those descriptions need to be reconciled before six jobs are counted as a continuing local economic benefit. Staff should identify the six positions, where those employees would actually work, whether they are new positions or shared regional personnel, what portion of each employee's time is attributable to Corby, and whether any of the six would ordinarily be present at the Project site. An FTE accounting convention is not the same thing as six new permanent local jobs.

VI. EXTREME HEAT, STATE OF CHARGE, AND THE DELIVERABLE RELIABILITY BENEFIT

Section 7 repeatedly describes Corby as a 300 MW / 1,200 MWh resource capable of delivering power for four hours. That headline capability should be reconciled with the operating limits that would apply during the conditions when California most needs peak-period capacity. Summer temperatures in the Sacramento-Vacaville region commonly exceed 100 degrees Fahrenheit, and the Project's thermal-management and fire-safety requirements may impose temperature- or state-of-charge limits.

The present record cited in Section 7 does not establish whether Corby can deliver the full 300 MW for four hours during 100-, 105-, or 110-degree ambient conditions, or whether usable state of charge must be reduced under extreme heat or other safety-related operating limits. The Commission should quantify the guaranteed usable MWh and four-hour deliverability under those conditions. If state of charge is reduced to manage thermal or fire risk, the corresponding reduction in the claimed reliability benefit should be disclosed rather than continuing to describe the resource solely by its nominal 1,200 MWh rating.

VII. STAFF USES INCOMPLETE 2025 CURTAILMENT DATA IN A JULY 2026 ASSESSMENT

Section 7 states that during the first five months of 2025 California ISO curtailed more than 2,742 GWh of renewable energy. That may have been a current statistic when the benefits discussion was first prepared, but the Staff Assessment was released on July 15, 2026. By then, CAISO had published full-year 2025 production and curtailment data on January 7, 2026, and monthly renewable-performance reports for January through May 2026 were also publicly available. Staff should explain why its July 2026 public-benefits discussion stops at May 2025 instead of using the substantially more current information available before publication.

More importantly, a large statewide curtailment number does not establish how much otherwise-curtailed renewable energy would actually be available for Corby to absorb at Vaca-Dixon, nor does it establish that Corby would be dispatched to do so. Staff should update the curtailment data and explain the operational connection between statewide curtailment and this Project's actual charging opportunities before treating avoided curtailment as a project-specific public benefit.

VIII. POTENTIAL EFFECTS ON NEARBY RESIDENTIAL PROPERTY VALUES ARE ALSO AN ECONOMIC CONSIDERATION

Section 7 quantifies tax revenues and other economic benefits but does not address whether locating a large industrial BESS, associated sound walls, substations, and high-voltage transmission facilities in this rural residential and agricultural setting could affect the market value of nearby homes. The Staff Assessment elsewhere identifies significant visual effects and analyzes noise, fire and toxic-release risk, emergency response, and other site-specific impacts that a prospective purchaser could reasonably consider.

I do not assert a particular percentage reduction in residential value because the present record does not support a defensible Corby-specific percentage. Published BESS property-value research remains limited and reports context-dependent results. That uncertainty is a reason to investigate the issue, not to silently assign it a value of zero while presenting projected public revenues to the dollar. If Staff intends Section 7 to describe the Project's economic public benefits, it should disclose whether it evaluated potential economic effects on existing residential property owners closest to the Project and, if not, say so.

IX. THE PUBLIC-BENEFIT SUMMARY SHOULD ACKNOWLEDGE THE PUBLIC COSTS IDENTIFIED ELSEWHERE IN THE STAFF ASSESSMENT

Section 7 is only two pages long and is expressly a summary, so it need not repeat every environmental analysis in the Staff Assessment. But a summary of 'key benefits' can become misleading if it lists gross revenues, renewable-integration capability, and reliability benefits without acknowledging the principal public costs that accompany those benefits at this location.

Elsewhere Staff identifies or analyzes permanent conversion of Important Farmland, significant visual effects, BESS fire risk requiring extensive mitigation, additional fire-protection obligations, construction traffic, shallow groundwater and contaminated-water concerns, noise controls, and other site-specific effects. Those impacts do not cease to exist because they appear in other chapters.

The Commission need not turn Section 7 into a full balancing analysis. It should, however, make clear that Section 7 is a catalog of claimed benefits rather than a finding that the benefits exceed the Project's public costs or demonstrate the superiority of the Kilkenny Road site.

X. THE CENTRAL DISTINCTION: PUBLIC BENEFITS OF CORBY'S STORAGE CAPACITY ARE NOT NECESSARILY PUBLIC BENEFITS OF THE KILKENNY ROAD LOCATION

This distinction is particularly important in this proceeding because opposition to the proposed location should not be confused with opposition to energy storage. Construction employment, tax revenue, renewable integration, peak-period discharge, and grid flexibility can all be benefits of a properly located BESS.

If those same or substantially similar benefits can be obtained at a feasible industrial location while reducing impacts to agricultural land, nearby residences, rural emergency-response resources, and other site-specific receptors, then Section 7 does not provide a reason to prefer Kilkenny Road. To the

contrary, preserving the public benefits while reducing the public costs is precisely the function an alternatives analysis should serve.

XI. REQUESTED COMMISSION ACTION

1. State whether Staff evaluated potential effects on nearby residential property values; if not, acknowledge that Section 7's economic discussion does not quantify that potential private economic cost.
2. Update the renewable-curtailment discussion using the full-year 2025 and then-available 2026 CAISO data, and explain how statewide curtailment translates into actual charging opportunities for Corby at Vaca-Dixon.
3. Quantify the Project's guaranteed usable energy and four-hour deliverability during extreme summer heat and under any temperature- or state-of-charge restriction imposed for battery protection or fire safety.
4. Reconcile the six full-time operational employees identified in Socioeconomics with CEC's statement that Corby will be unstaffed and SCADA-controlled, and identify the positions, work locations, and Corby-specific time commitment.
5. Describe the cited tax figures as gross projected revenues and identify the project-created public-service costs that must be funded from or alongside those revenues.
6. Clarify whether any enforceable condition requires Corby to charge during renewable-curtailment periods or otherwise assures that the claimed renewable-integration benefit will occur.
7. Acknowledge round-trip efficiency losses and auxiliary consumption when describing the Project's environmental benefit.
8. Distinguish the general grid-reliability value of a 300 MW / 1,200 MWh BESS from any demonstrated benefit uniquely attributable to the Kilkenny Road site.
9. State expressly that Section 7 is a qualitative summary of claimed benefits and does not establish that those benefits exceed the site-specific public costs identified elsewhere in the Staff Assessment.
10. Consider whether a feasible industrial alternative could preserve substantially the same economic, renewable-integration, and reliability benefits while reducing the site-specific impacts of the proposed location.

XII. CONCLUSION

Section 7 identifies real categories of benefit associated with utility-scale battery storage, but it does not establish that those benefits require approval of the proposed Kilkenny Road site. The economic figures are gross revenues rather than a net fiscal calculation, and the operational-employment claim requires reconciliation with CEC's statement that the facility will be unstaffed. The renewable-energy benefit is a capability that depends on actual charging and dispatch, while Staff relies on curtailment data that stop in May 2025 despite issuing the Staff Assessment in July 2026. The reliability benefit should also reflect any reduction in usable state of charge or deliverable energy during extreme heat or safety-limited operation. Finally, Section 7 quantifies public revenues without evaluating whether nearby homeowners may bear a private economic cost through reduced property value.

For those reasons, the Commission should not treat Section 7 as an affirmative justification for approving Corby at Kilkenny Road. The more appropriate question is whether the State can obtain the same storage, renewable-integration, reliability, employment, and tax benefits at a location that avoids or materially reduces the significant and site-specific burdens identified elsewhere in the Staff Assessment. The availability of an appropriate industrial alternative should be weighed on that basis before certification.

In addition to these comments, I formally incorporate by reference and fully support the technical comment letter submitted by Keep Vacaville Safe.

Respectfully submitted,

Michael Geller