

| <b>DOCKETED</b>         |                                                                                        |
|-------------------------|----------------------------------------------------------------------------------------|
| <b>Docket Number:</b>   | 24-OPT-05                                                                              |
| <b>Project Title:</b>   | Corby Battery Energy Storage System Project                                            |
| <b>TN #:</b>            | 272445                                                                                 |
| <b>Document Title:</b>  | Jeffrey J Jaeckel Comments - Opposition to Corby Battery Energy Storage System Project |
| <b>Description:</b>     | N/A                                                                                    |
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| <b>Organization:</b>    | Jeffrey J Jaeckel                                                                      |
| <b>Submitter Role:</b>  | Public                                                                                 |
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*Comment Received From: Jeffrey J Jaeckel*  
*Submitted On: 9/10/2026*  
*Docket Number: 24-OPT-05*

## **Opposition to Corby Battery Energy Storage System Project**

*Additional submitted attachment is included below.*

To the California Energy Commission:

I am writing to formally submit my opposition to the proposed Corby Battery Energy Storage System Project. While clean energy infrastructure is critical for California's grid infrastructure, the specific facts, technological choices, and severe fire risks outlined in **Section 4.4 (Worker Safety and Fire Protection)** of the CEC Staff Assessment present significant threats to safety of nearby residents, agricultural lands, and first responders.

The primary objections regarding worker safety and fire protection are detailed below:

**1. High Propensity for Thermal Runaway and Catastrophic Fire Events**

The Staff Assessment confirms that the applicant plans to use **LG JF2 DC LINK 5.1 LFP batteries**. Despite manufacturer claims regarding the stability of lithium iron phosphate (LFP) chemistry, Section 4.4 explicitly indicates that a thorough investigation and rigorous oversight are required because these BESS units carry an undeniable propensity for **thermal runaway, toxic gas emission, fire, and rapid propagation** between containers. The massive scale of this project (300 MW/1,200 MWh) vastly compounds this systemic failure risk, creating an industrial hazard zone in a rural landscape.

**2. Immediate Threat of Toxic Gas Emissions to Surrounding Communities**

The Staff Assessment details the requirement for the project owner to supply the Dixon Fire Department with **specialized hand-held toxic gas detectors and a toxic chemical detecting drone**. The explicit necessity for this type of advanced military/industrial-grade monitoring equipment proves that a thermal runaway event at this facility will release highly lethal gases into the atmosphere. The project site sits roughly 250 feet from the City of Vacaville boundary and features rural residences immediately to the north and west along Kilkenny and Byrnes Roads. Wind patterns could push a chemical cloud directly into these homes before an evacuation could be completed.

**3. Unreasonable Burden and Risk Imposed on the Dixon Fire Department**

The facility relies heavily on the **Dixon Fire Protection District**, which holds the local responsibility for preventing and suppressing wildfires and responding to industrial emergencies in this Local Responsibility Area. Forcing local firefighters to respond to complex, long-burning lithium-ion battery fires places an unacceptable burden on community resources. Local departments are engineered for rural fire protection, not long-term mitigation of high-voltage chemical deflagrations.

**4. Continuous Hazardous Incursion and Site Augmentation**

The facility's hazard profile will continuously expand over its operational life. The Project Description and Safety evaluations confirm that due to battery degradation, additional batteries will be installed **every 3 years starting in year 6**, expanding the yard from 303 enclosures to **341 enclosures at full build-out**. This means nearby residents will face perpetual construction hazards, recurring heavy equipment traffic transporting volatile components, and an ever-increasing fuel load of hazardous materials on site.

Questions:

1. Why is the applicant relying on a passive approach for mitigating thermal runaway propagation rather than integrating active, compartment-level continuous chemical suppression?
2. Since these batteries are manufactured by Contemporary Amperex Technology Company (CATL), an area of known public controversy, what independent, third-party manufacturing audits have been conducted to guarantee structural and chemical cell integrity?

3. What special training timelines and operational protocols will be mandated under the Emergency Action Plan to ensure local firefighters are not exposed to toxic chemical off-gassing?
4. Why is the project planning to supply handheld toxic gas detectors and a gas-detection drone the Dixon Fire Department instead of installing a permanent, facility-wide automated chemical monitoring array?
5. Since the BESS array is remotely operated and completely unpopulated, what is the guaranteed physical arrival time for NextEra's technical emergency response team if a software or monitoring failure occurs?
6. If a grid disturbance or cascading inverter failure cuts off local auxiliary power, how long can the backup emergency systems independently run the thermal management and cooling system?
7. What concrete fail-safes exist to prevent cyber-intervention or remote system override commands from disabling the automated thermal shutdown systems?
8. Given that the facility sits only 0.6 miles from Interstate 80, what modeling has been done to prove that a major chemical fire plume would not cause zero-visibility or toxic hazards necessitating a shutdown of the highway?

The sheer volume of mitigation measures, specialized toxicity drones, and strict conditions of certification required for Section 4.4 proves that this project is fundamentally unsafe for its chosen location. A facility with a recognized potential for partial volume deflagrations and toxic chemical release does not belong near family farms and residential boundaries. I strongly urge the **Lambie Industrial Park** for this type of facility.

I urge the California Energy Commission to deny certification for the Corby BESS project.

Sincerely,

Jeff Jaeckel, Willow Rd., Vacaville, Ca