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Opposition to Corby Battery Energy Storage System Project

Additional submitted attachment is included below.

To the California Energy Commission Staff and Commissioners,

I am writing to formally submit my opposition to the conclusions presented in **Section 5.5 (Efficiency and Energy Resources)** of the Staff Assessment for the proposed Corby Battery Energy Storage System (BESS) project. The current assessment erroneously finds that the project's energy impacts are less than significant. This conclusion relies on a narrow, flawed definition of energy efficiency that ignores the operational realities of massive battery storage arrays.

I request that the CEC revise this section to address the following critical deficiencies:

1. Failure to Account for "Round-Trip Efficiency" losses

The assessment glosses over the inherent energy waste built into large-scale battery storage. Lithium-ion systems suffer from significant efficiency losses during the continuous cycle of charging and discharging (known as round-trip efficiency loss). Additionally, the project relies on active, high-demand auxiliary energy to run its advanced liquid cooling and thermal management systems (TMS). By constantly drawing power from the local PG&E grid to keep the batteries stabilized, the project functions as a net energy sink. The Staff Assessment fails to adequately quantify this parasitic load, meaning the project will consume a substantial amount of electricity in an unproductive manner.

2. Acceleration of Battery Degradation and Inefficient Lifecycle Resource Use

The Project Description explicitly states that the batteries will degrade so rapidly that the applicant must execute an "augmentation activity" –installing new batteries every 3 years starting in year 6 just to maintain the 300-MW output. Manufacturing, transporting, and constantly replacing up to 341 BESS enclosures over a 30-year lifespan represents an incredibly wasteful lifecycle use of energy and global resources. Labeling a project "efficient" when it requires continuous heavy-industrial equipment replacements to combat rapid degradation is a contradiction.

3. Grid Inefficiencies and System Overloading Issues

Section 4.3 (Transmission System Engineering) explicitly points out that the project creates transmission grid overloading and circuit breaker short-circuit faults that require extensive upgrades at PG&E's Tesla, Metcalf, and Vaca-Dixon substations. These grid disturbances and required hardware overhauls indicate that the project introduces severe localized inefficiencies to the transmission system. Section 5.5 fails to evaluate how these broader system stresses conflict with the goal of maintaining a streamlined, efficient energy resource network.

I have questions:

1. What is the precise, quantified baseline auxiliary power demand (in megawatt-hours per year) required to operate the project's thermal management HVAC and liquid cooling chillers?
2. How does the maximum continuous consumption of the cooling system under peak localized summer weather conditions affect the project's net efficiency profile?
3. What is the verified minimum round-trip efficiency (RTE) percentage guaranteed for the specific inverter and transformer configuration proposed for this facility?
4. What is the total estimated lifecycle energy expenditure required to manufacture, transport and install the additional battery enclosures and inverters scheduled for the multi-year augmentation cycles?

5. What are the operational energy requirements and fuel efficiencies associated with the transport trucks needed for continuous water hauling if the fallback groundwater is not approved?

Conclusion

Because Section 5.5 fails to properly calculate round-trip efficiency losses, ignores the massive energy footprint of the continuous 3-year replacement cycles, and overlooks systemic transmission inefficiencies, its “less than significant” finding is unsupported by the operational facts of the project.

I urge the California Energy Commission to reject the current findings of Section 5.5, require the applicant to submit a comprehensive lifecycle energy efficiency analysis, and mandate strict mitigation measures to minimize parasitic grid loss and battery waste.

Respectfully submitted,

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