

| <b>DOCKETED</b>         |                                                                                                             |
|-------------------------|-------------------------------------------------------------------------------------------------------------|
| <b>Docket Number:</b>   | 24-OPT-05                                                                                                   |
| <b>Project Title:</b>   | Corby Battery Energy Storage System Project                                                                 |
| <b>TN #:</b>            | 272461                                                                                                      |
| <b>Document Title:</b>  | Linda Geller Comments - EMERGENCY-RESPONSE CAPABILITY, DIXON FIRE RESOURCES, AND BESS-SPECIFIC PREPAREDNESS |
| <b>Description:</b>     | N/A                                                                                                         |
| <b>Filer:</b>           | System                                                                                                      |
| <b>Organization:</b>    | Linda Geller                                                                                                |
| <b>Submitter Role:</b>  | Public                                                                                                      |
| <b>Submission Date:</b> | 9/10/2026 10:12:27 AM                                                                                       |
| <b>Docketed Date:</b>   | 9/10/2026                                                                                                   |

*Comment Received From: Linda Geller*  
*Submitted On: 9/10/2026*  
*Docket Number: 24-OPT-05*

**EMERGENCY-RESPONSE CAPABILITY, DIXON FIRE RESOURCES,  
AND BESS-SPECIFIC PREPAREDNESS**

*Additional submitted attachment is included below.*

**BEFORE THE CALIFORNIA ENERGY COMMISSION**

In the Matter of:

Corby Battery Energy Storage System Project

Docket No. 24-OPT-05

**COMMENTS REGARDING EMERGENCY-RESPONSE CAPABILITY,  
DIXON FIRE RESOURCES, AND BESS-SPECIFIC PREPAREDNESS**

Submitted by Linda Geller

September 10, 2026

**I. Purpose of Comment**

This comment addresses whether the present record establishes that the fire and emergency-response infrastructure available for the Corby Battery Energy Storage System Project is sufficient for the hazards posed by a 300 MW / 1,200 MWh lithium-ion BESS, and whether a completed, coordinated, BESS-specific emergency-response framework exists on which Staff can presently rely.

The record demonstrates that Dixon Fire Department and neighboring agencies possess ordinary municipal fire, EMS, hazardous-materials, apparatus, and mutual-aid capabilities. The issue is not whether these agencies are competent fire departments. The issue is whether the record demonstrates that the personnel, equipment, water supply, specialized training, toxic-plume monitoring, incident-command capability, evacuation procedures, runoff controls, and other resources necessary for a foreseeable utility-scale lithium-ion battery emergency are presently sufficient and coordinated for Corby.

The record raises substantial questions on that point. It also indicates that important Corby-specific training, joint exercises, emergency procedures, and final planning are contemplated before energization rather than demonstrated as completed components of the present environmental review.

**II. Early Fire-Department Coordination Did Not Establish Corby-Specific Preparedness**

CEC's fire-department coordination record is important because it shows the state of local preparedness during environmental review. In July 2025, Dixon Fire representatives indicated that they had limited information concerning the specific Corby Project and had not recently been in direct contact with the Applicant concerning project details. CEC Staff agreed to provide additional project materials and continue the discussion.

That chronology matters. General statements concerning ordinary department staffing or service capability made before a detailed Corby-specific operational review cannot, without more, establish that the department had evaluated the demands of a 300 MW / 1,200 MWh lithium-ion BESS incident.

What Corby-specific information had Dixon Fire reviewed when Staff first evaluated fire-protection adequacy? What BESS-specific incident scenarios had the department evaluated at that time? What subsequent analysis changed or confirmed the initial assessment? Where is that analysis disclosed in the Staff Assessment?

**III. Response Time Does Not Establish Response Capability**

Applicant data identify an estimated response time of approximately 13 minutes from Dixon Fire Station 81. Later project materials identify nearby Vacaville stations as potentially faster responders and anticipate that Vacaville may function as the primary responding agency based on proximity.

A response-time estimate answers only how quickly an apparatus might arrive. It does not establish what personnel, specialized equipment, respiratory protection, monitoring capability, water supply, or command resources will arrive with it, nor whether those resources are adequate for the duration and hazards of a utility-scale BESS incident.

The Applicant has also asserted that existing fire-protection resources are expected to be adequate because the Project will not increase local population and therefore will not increase ordinary demand for fire-protection services. That reasoning raises a separate question: is the relevant demand created by population growth, or by the addition of a new industrial hazard with potentially unusual fire, toxic-gas, monitoring, and prolonged-response characteristics?

What evidence demonstrates that the emergency-service demand created by Corby is comparable to existing ordinary call volume? Where does Staff quantify the personnel and resources required for a credible Corby BESS emergency rather than infer adequacy from the absence of population growth?

The record repeatedly identifies an approximately 13-minute response time from Dixon Fire Department Station 81 to the Project site. The materials reviewed, however, do not appear to identify the route used to calculate that estimate or explain the methodology by which the 13-minute figure was derived.

The same concern applies to the approximately eight-minute estimate identified for Vacaville Fire Department Station 73. A stated travel or response time is difficult to evaluate without knowing the starting point, route, Project access point, source of the estimate, and which components of emergency response are included.

What route was used to calculate the approximately 13-minute estimate from Station 81? What was the assumed mileage and Project access point? Was the figure derived from Fire Department CAD/GIS or historical response data, an actual emergency-vehicle timed run, ordinary mapping software, or another source? Does the figure include dispatch processing and firefighter turnout time, or does it represent travel time alone? Were traffic, intersections, railroad crossings, road conditions, or other potential delays incorporated?

The record also identifies an approximately eight-minute estimate from Vacaville Fire Department Station 73, while subsequent coordination indicates that Vacaville Stations 72 or 73 may arrive first because of their proximity. Which station does Staff actually assume will provide the initial response to a Corby BESS emergency? What automatic-aid or mutual-aid arrangement supports that assumption, and what route and methodology support the Vacaville response-time estimate?

Without disclosure of the route, endpoint, methodology, and response-time components used to derive these figures, it is unclear what evidence supports reliance on the stated 8- and 13-minute estimates in evaluating emergency-response capability.

#### **IV. The Record Contains an Unresolved Water-Supply Discrepancy**

The September 3, 2025 CEC coordination discussion identified a material disagreement concerning emergency water supply. The Applicant objected to a 1,500-gallon-per-minute requirement and proposed a 24,000-gallon onsite tank designed for approximately 250 gallons per minute, primarily for protection of vegetation and inverters rather than cooling a BESS container adjacent to one involved in fire.

Dixon Fire explained that it relies on NFPA 1142, which establishes a 500-gpm minimum, and that the department had also adopted Appendix B specifying 1,500 gpm. The meeting record states that the discrepancy needed to be resolved through direct dialogue between the Applicant and the fire department.

The numerical difference is substantial. A 24,000-gallon supply corresponds mathematically to approximately 96 minutes at 250 gpm, 48 minutes at 500 gpm, or 16 minutes at 1,500 gpm, before accounting for unusable volume, simultaneous demands, replenishment, or other operational factors. These calculations do not determine the correct firefighting strategy; they demonstrate why the applicable flow requirement and intended use of the water supply are material.

Has the 250/500/1,500-gpm discrepancy been resolved? What flow and duration does Staff assume for the credible emergency scenarios evaluated in the Staff Assessment? Does the onsite supply meet Dixon Fire's requirements? If the strategy is not to apply water directly to the involved BESS enclosure, what water demand remains for exposure protection, vegetation, structures, rescue, and other

simultaneous needs? What replenishment source is available if an incident continues beyond the onsite supply?

## **V. Toxic-Gas and Plume Hazards Require Capabilities Beyond Ordinary Fire Suppression**

The September 2025 coordination record also reflects Dixon Fire's concern regarding hydrogen fluoride and other toxic gases and the need for responders to rapidly identify the affected container. Local wind conditions were specifically identified as relevant to emergency planning.

These hazards raise questions that cannot be answered solely by identifying fire engines and water tenders. Who has responsibility for real-time offsite air monitoring during a Corby incident? What equipment is immediately available to measure hydrogen fluoride, particulate matter, volatile organic compounds, or other relevant constituents? Where is that equipment located? How quickly can it be deployed?

How many responders expected in the initial response possess BESS-specific respiratory-protection training? What SCBA duration and replacement-cylinder capability are available for a prolonged event? What decontamination capability exists? Who interprets monitoring data and determines whether nearby residents should evacuate or shelter in place? What thresholds trigger those decisions, and how will residents be notified under actual local wind conditions?

## **VI. The Record Contemplates Future BESS-Specific Training and Joint Exercises**

The September 2025 coordination record states that the proposed Worker Safety condition would be revised to make clear that the Project owner must fund additional fire-department training and joint exercises. Applicant materials likewise contemplate training emergency-response personnel on the Corby Emergency Response Plan before energization and refresher training thereafter.

Those measures may be valuable. They also raise a timing issue for the environmental record. If the specialized training and joint exercises needed for Corby will occur after certification but before energization, what evidence presently demonstrates that the resulting response system will be sufficient?

Which agencies and personnel must participate? What minimum BESS-specific competencies are required? Is training limited to classroom or tabletop instruction, or will it include full-scale exercises involving toxic-plume monitoring, evacuation/shelter-in-place decisions, water supply, mutual aid, incident command, medical response, runoff control, and prolonged operations? Who evaluates performance? What happens if an exercise identifies deficiencies shortly before energization?

## **VII. The Emergency Response and Action Plan Has Previously Been Identified as Incomplete**

The adequacy of the emergency plan was raised well before publication of the Staff Assessment. Solano County's December 2024 comments reported that the emergency management plan submitted during the earlier County process had been reviewed by the County Office of Emergency Services and found to have serious issues, with many sections unfilled or incomplete and significant information lacking for an Emergency Response and Action Plan capable of protecting the public as required before commissioning.

The County again raised this issue in its November 19, 2025 CEQA scoping comments. It requested analysis of fire-department staffing, equipment, BESS thermal-runaway training, response times, water supply, pre-incident planning, specialized equipment, evacuation, air monitoring, runoff containment, incident command, and post-incident cleanup. It again identified the gaps in the earlier emergency plan.

Applicant hazard-mitigation materials contemplate finalization of the emergency-response plan and first-responder training before energization. The record therefore raises a basic sequencing question: is Staff's present environmental conclusion based on a completed and evaluated emergency-response system, or on the expectation that important elements will be finalized later?

What is the current version of the Corby Emergency Response and Action Plan? Which previously incomplete sections have been completed? Which responding agencies have formally reviewed it? What

unresolved comments remain? Has the plan been tested against the accident scenarios used in Staff's environmental analysis?

### **VIII. Mutual Aid Does Not by Itself Demonstrate Adequacy**

The record identifies potential assistance from Vacaville and other regional agencies. Mutual aid is an important component of emergency response, but identifying agencies that may respond does not establish what resources will actually be available during a Corby incident.

What minimum response is assumed from Dixon, Vacaville, and other agencies during the first 15, 30, and 60 minutes? Which resources are guaranteed by existing agreements and which depend upon availability at the time of the incident? How does the analysis account for simultaneous wildland fires, freeway incidents, medical emergencies, or another major event?

If substantial regional resources are committed to Corby for hours or days, what effect does that have on ordinary emergency coverage elsewhere? Where is that service-demand consequence evaluated?

### **IX. Site Access and Project Personnel Response Remain Relevant**

The September 2025 coordination record also reflects discussion of continuous remote monitoring and Applicant personnel who might require up to 60 minutes to arrive onsite. CEC Staff noted that other BESS projects had negotiated a 30-minute response and expressed concern regarding the longer delay. The Applicant discussed possible local security arrangements for faster access.

Who will provide responders immediate physical access to all necessary areas if a Corby alarm occurs when no Project employee is onsite? Who has authority and technical knowledge to identify the affected enclosure, isolate equipment, interpret battery-management-system information, and communicate hazards to incident command? What is the enforceable maximum response time for qualified Project personnel, and what happens during the interval before they arrive?

### **X. Emergency Response Must Address Offsite Consequences, Not Only the Battery Enclosure**

A Corby emergency may involve more than the battery enclosure itself. The record raises potential offsite consequences involving toxic smoke or gases, neighboring residences and agricultural property, Interstate 80, evacuation or shelter-in-place, contaminated fire water or runoff, and post-incident monitoring.

Who is responsible for each of these functions? Who performs offsite plume monitoring? Who provides public notification? Who controls traffic and evacuation? Who protects or monitors agricultural drainage and SID facilities? Who samples soil, water, vegetation, or other media after an incident? What criteria govern re-entry and termination of emergency conditions?

Where does the Staff Assessment demonstrate that the agencies assigned these responsibilities possess the personnel, equipment, training, and authority to carry them out under a credible Corby incident scenario?

### **XI. Staff Assessment**

The chronology of the record therefore raises an additional question: what matters had actually been resolved before the Staff Assessment was issued, what matters remained dependent on future implementation, and what evidence did Staff independently rely upon in reaching its conclusions.

The Staff Assessment (TN 271468) is the CEC's own environmental analysis. The central administrative-record question is therefore not merely whether the Applicant supplied estimates or proposed future safeguards, but what Staff independently verified before relying on those matters in its environmental conclusions.

The Applicant's May 2025 Data Request Response Set #2 states that Dixon Fire Department Station 81 has a 12-to-14-minute response range and gives an estimated response time of approximately 13 minutes to the Project site. It separately estimates approximately eight minutes from Vacaville Fire Department Station 73. The Applicant's cited basis for the Dixon range is an August 8, 2024 email communication involving Dixon Fire personnel and Tetra Tech. The response does not disclose the actual travel route, mileage, Project entrance, dispatch interval, turnout time, traffic assumptions, railroad-crossing assumptions, emergency-driving assumptions, or a timed emergency run supporting the 13-minute figure.

CEC Staff later spoke directly with Dixon Fire on July 22, 2025. That CEC Report of Conversation again records an approximately 13-minute response from Dixon Station 81, while also recording that Vacaville has two stations closer to the site and that, under mutual-aid arrangements, Vacaville Station 72 or 73 would likely be first onsite. The same record indicates that Dixon Fire representatives had limited knowledge of Project specifics at that stage and that additional coordination would follow.

The Staff Assessment was published approximately one year later. The question is what independent evidentiary step connects those earlier estimates and evolving coordination to Staff's ultimate emergency-response analysis. Where does the Staff Assessment identify the route used for the 13-minute Dixon estimate or the approximately eight-minute Vacaville estimate? Where does it distinguish travel time from total emergency response time? Where does it identify the actual first-due station and the aid arrangement on which that assumption depends? If Staff independently verified those estimates, where is that verification disclosed?

The same distinction applies to emergency-response resources. Earlier CEC/fire-department coordination identified questions concerning water-flow requirements, toxic-gas hazards, strong local winds, Project-personnel response, additional training, and joint exercises. Applicant materials contemplate finalizing the Emergency Response Plan and training responders before energization. The Staff Assessment must therefore be read against the chronology of the record: what matters had actually been resolved before the Staff Assessment was issued, what matters remained dependent on future implementation, and what evidence did Staff independently rely upon in reaching its conclusions?

This is especially important because the Applicant previously reasoned that existing fire-protection capacity would remain adequate because the Project would not increase local population and therefore would not increase ordinary demand for fire services. A utility-scale BESS may create a specialized emergency-service demand without adding population. Where does the Staff Assessment independently evaluate that distinction rather than carry forward the Applicant's public-services premise?

The record therefore presents four separate evidentiary layers that should not be conflated: (1) Applicant representations; (2) statements made during CEC coordination with responding agencies; (3) future Conditions of Certification, plans, training, and exercises; and (4) Staff's own analysis supporting the Draft EIR conclusions. Where does the Staff Assessment show that the first three were independently evaluated and were sufficient to support the fourth?

## **XII. Questions Preserved for the Administrative Record**

1. What Corby-specific BESS incident scenarios have Dixon Fire and the anticipated primary responding agencies reviewed?
2. What minimum staffing will actually be available at the site during the first 15, 30, and 60 minutes of a major Corby incident?
3. How many initial responders are presently trained specifically in utility-scale lithium-ion thermal runaway, toxic-gas hazards, re-ignition, and defensive BESS response?
4. What BESS-specific training has already occurred, as distinguished from training planned before energization?

5. What specialized monitoring, respiratory-protection, decontamination, and HAZMAT equipment is presently available and immediately deployable?
6. Who will conduct real-time offsite plume monitoring, with what instruments, and from what location?
7. Who determines evacuation versus shelter-in-place, what thresholds govern that decision, and how will nearby residents be notified?
8. Has the discrepancy between the Applicant's proposed approximately 250-gpm water system and Dixon Fire's identified 500/1,500-gpm criteria been resolved?
9. What water-flow rate and duration does Staff actually assume for a credible Corby emergency?
10. What replenishment source is available if the onsite water supply is exhausted during a prolonged incident?
11. How much water is needed during a prolonged incident? What does the data from other BESS accidents show?
12. What minimum mutual-aid resources are assumed, and are those resources committed or merely anticipated to be available?
13. How does the analysis account for simultaneous emergencies and continued fire/EMS coverage to the surrounding community?
14. What is the current status of the Corby Emergency Response and Action Plan, and which agencies have formally reviewed and accepted it?
15. Have the deficiencies previously identified in the earlier emergency plan been resolved, and where are the revisions disclosed?
16. Has a full-scale Corby-specific exercise been conducted? If not, what present evidence demonstrates that the plan can be successfully executed?
17. What happens if pre-energization training or exercises identify material deficiencies?
18. What is the enforceable response time for qualified Project personnel capable of providing technical support and site access?
19. Who is responsible for contaminated runoff containment, environmental sampling, cleanup, public notification, and re-entry after a BESS incident?
20. What evidence supports Staff's conclusion that existing emergency-response resources are adequate for Corby apart from the fact that the Project does not increase local population?
21. To what extent does Staff's present conclusion depend upon future plans, training, exercises, agreements, equipment, or procedures that will not be completed until after certification?
22. What route, mileage, and Project access point were used to derive the approximately 13-minute estimate from Dixon Fire Station 81?
23. What methodology produced the 13-minute figure: actual Fire Department CAD/GIS or historical response data, an emergency-vehicle timed run, ordinary mapping software, or another source?
24. Does the approximately 13-minute figure represent dispatch-to-arrival time, turnout-and-travel time, or travel time alone?
25. What traffic, intersection, railroad-crossing, road-condition, or other delay assumptions were included in the Dixon response-time estimate since the site is Highway 80 accessible?
26. What route, methodology, and Project access point support the approximately eight-minute estimate from Vacaville Fire Department Station 73?

27. Which station does Staff actually assume will provide the initial response, and what enforceable automatic-aid or mutual-aid arrangement supports that assumption?
28. Where does the Staff Assessment reconcile the Applicant's population-growth rationale for fire-service adequacy with the specialized emergency-service demand created by a utility-scale lithium-ion BESS?
29. What independent evidence did Staff develop to establish that existing Dixon and Vacaville resources are sufficient for the specialized demands of a 300 MW / 1,200 MWh BESS emergency, rather than ordinary population-based fire-service demand?
30. Which emergency-response conclusions in the Staff Assessment depend upon future Conditions of Certification, a future finalized ERP, future training, future joint exercises, future equipment, or future agreements?
31. Which unresolved matters identified during CEC/fire-department coordination were resolved before publication of the Staff Assessment, and where is the evidence of resolution disclosed?
32. How did Staff account for route-specific impediments or delays, including traffic, intersections, railroad crossings, road conditions, and access through the actual Corby emergency entrance?
33. Did Staff use historical CAD/GIS response data, an emergency-vehicle timed run, mapping software, department operational data, or another method to validate the response-time assumptions?
34. Which fire station does Staff actually assume will be first due to a Corby BESS emergency, and what automatic-aid or mutual-aid commitment supports that assumption?
35. Where in the Staff Assessment does Staff independently verify the approximately eight-minute Vacaville Station 73 estimate?
36. Does the 13-minute figure represent travel time only, turnout-and-travel time, or dispatch-to-arrival time, and where does the Staff Assessment disclose that distinction?
37. Where in the Staff Assessment does Staff independently identify and verify the route, mileage, Project access point, and methodology supporting the approximately 13-minute Dixon response estimate?

### **XIII. Conclusion**

The record does not establish that Dixon Fire or the surrounding agencies lack competence or ordinary emergency-response capability. Nor is that the issue presented by this comment.

The issue is whether the environmental record demonstrates, before certification, that the actual response system available for a foreseeable emergency at a 300 MW / 1,200 MWh lithium-ion BESS is sufficient for the particular hazards Corby introduces.

The record identifies estimated response times and existing apparatus and mutual-aid relationships, but does not appear to disclose the route, endpoint, methodology, or response-time components used to derive the approximately 13-minute Dixon and eight-minute Vacaville figures. The record also documents an unresolved water-supply disagreement, toxic-gas concerns, the importance of local winds, additional BESS-specific training and joint exercises to occur before energization, an emergency plan previously identified as incomplete, and questions concerning the arrival time of qualified Project personnel.

These matters are not peripheral to the emergency-response analysis. They concern the personnel, equipment, water, monitoring, training, coordination, and procedures upon which protection of nearby residents, responders, agricultural property, transportation routes, and the surrounding environment would depend during an actual incident.

The administrative record therefore remains unclear as to what Staff independently verified before issuing the Staff Assessment, what completed and presently available combination of resources and Corby-specific planning supports Staff's emergency-response conclusions, and to what extent those

conclusions instead depend upon Applicant estimates or measures that remain to be developed, funded, trained, exercised, or finalized after Project certification. The unexplained 13-minute Dixon and approximately eight-minute Vacaville response estimates illustrate the problem: the record states the numbers, but does not appear to disclose the route and methodology necessary to determine what those numbers actually measure.

California Energy Commission, Corby Battery Energy Storage System Project Staff Assessment / Draft EIR, TN 271468 (July 15, 2026).

### **Record References**

- California Energy Commission, Corby BESS, Report of Conversation — Coordination with Local Fire Department Regarding the Corby BESS Project DEIR, TN 265977 (Sept. 2025).
- Corby BESS Data Request Responses Set #2, Part 1, TN 263281.
- Corby BESS Project Description Update #2, Part 2 / Hazard Mitigation Analysis, TN 268433.
- Solano County Initial Comments on Corby BESS Project Application, TN 260461 (Dec. 2024).
- County of Solano, Scoping Comments for Corby BESS Project, TN 267642 (Nov. 19, 2025).
- Health and Safety Code § 25270.6 (Emergency Response and Emergency Action Plan requirements).
- NFPA 1142, Standard on Water Supplies for Suburban and Rural Firefighting, as discussed in the Corby fire-department coordination record.
- NFPA 855, Standard for the Installation of Stationary Energy Storage Systems.