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Comment Received From: Joseph Aquino Camaddo
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Solano GSA Letter of Concern

Additional submitted attachment is included below.

SOLANO SUBBASIN

GROUNDWATER SUSTAINABILITY AGENCY



September 11, 2026

California Energy Commission
Docket Unit, MS-4
Docket No. 24-OPT-05
715 P Street
Sacramento, California 95814
docket@energy.ca.gov

RE: Formal Letter of Concern – Corby Battery Energy Storage System Project (Docket No. 24-OPT-05), APN 0141-030-090, Solano County, California

Dear California Energy Commissioners and Staff:

The Solano Subbasin Groundwater Sustainability Agency (SSGSA) respectfully submits this letter to express its concerns regarding the proposed Corby Battery Energy Storage System Project (“Project”), proposed by Corby Energy Storage, LLC and North Bay Interconnect, LLC, on Assessor’s Parcel Number 0141-030-090 in unincorporated Solano County. The SSGSA is the governing groundwater agency under the Sustainable Groundwater Management Act (SGMA) for the proposed Battery Storage Project.

The Solano Subbasin GSA is concerned that it did not receive direct notice of the Project or a meaningful opportunity to participate in its planning and environmental review. As a result, the SSGSA has not had an adequate opportunity to evaluate potential impacts to groundwater, surface water quality, drainage, and the long-term protection of reliable water supplies within the Solano Subbasin. Furthermore, the underlying Solano Subbasin provides municipal water supplies to the Cities of Vacaville, Dixon, and Rio Vista and agricultural water supplies across much of eastern Solano County.

While we recognize the California Energy Commission’s (CEC’s) authority under the Opt-In Certification Program and its role as CEQA lead agency, the streamlined permitting process should not eliminate meaningful consultation with local agencies responsible for groundwater and water-resource protection or prevent consideration of site-specific technical information. Additionally, the Project’s scale and nature warrant evaluation of reasonably foreseeable risks associated with battery failures, fires, fire-suppression water, spills, leaks, contaminated runoff, emergency response, and long-term operations. A battery incident could result in contaminated water or other materials entering soil, drainage facilities, surface water, or groundwater. Since groundwater supports municipal, industrial, agricultural, and other beneficial uses throughout the Solano Subbasin, impacts could extend well beyond the Project site.

The environmental review should therefore specifically evaluate existing soil and groundwater conditions, depth and seasonal fluctuations of groundwater, hydraulic connectivity, contaminant pathways, stormwater infiltration and retention facilities, releases from batteries and associated equipment, and appropriate containment, monitoring, response, remediation, and decommissioning measures. The Project should include enforceable requirements for immediate containment, isolation, testing, treatment, and appropriate disposal of potentially contaminated water generated by battery incidents, fires, spills, or emergency response. Such water should not be discharged to creeks, drainage channels, stormwater systems, groundwater recharge areas, or other waterways without appropriate testing, treatment, and regulatory approval. Adequate containment capacity should be provided for credible battery-fire and emergency-response scenarios, with clear notification and coordination procedures for affected water and emergency-response agencies.

SSGSA also requests the opportunity to review the Project's Stormwater Pollution Prevention Plan (SWPPP), drainage and stormwater management plans, construction dewatering procedures, groundwater protection measures, spill-response plans, fire-suppression water containment measures, groundwater monitoring requirements, and related environmental protection measures before construction begins. The SSGSA respectfully requests that the CEC formally recognize the SSGSA as an affected and interested local agency; provide direct notice of future Project proceedings, filings, environmental documents, technical reports, meetings, and significant revisions; provide access to the complete Project record; and provide sufficient time for meaningful review and comment before final certification or other significant Project decisions.

SSGSA further requests that the CEC require a comprehensive assessment of potential groundwater and Solano Subbasin impacts, appropriate groundwater and surface-water monitoring, notification, corrective-action, and remediation requirements; adequate containment and isolation of potentially contaminated water, prohibition of unauthorized discharge to surface waters or groundwater recharge areas, and coordination with affected local water and emergency-response agencies before construction and throughout Project operation. The CEC should also evaluate whether the proposed location is appropriate for a battery energy storage facility of this scale, considering groundwater conditions, surrounding land uses, proximity to waterways, emergency-response considerations, and the potential consequences of a significant battery incident.

The SSGSA is not opposed to improving electrical-grid reliability or responsibly developing energy-storage resources. However, such development must protect water resources and avoid unacceptable risks to existing municipal, industrial, agricultural, and community water supplies. Given the importance of groundwater to the region, the SSGSA respectfully requests that the CEC pause or extend applicable review opportunities, as appropriate, to allow affected local agencies sufficient time to evaluate the Project and provide substantive technical comments.

We also request a meeting with CEC staff and the Project applicant to discuss groundwater protection, stormwater management, fire-response water containment, emergency-response protocols, and local agency coordination. The SSGSA is in agreement with Solano County's

request to extend the DEIR comment period to allow our agency adequate time to complete thorough reviews of the potential Project impacts.

Please include the SSGSA on the Project's service and notification list and confirm that our agency will receive all future Project notices and filings. We appreciate your attention to this matter. If you have any questions, please contact me at (707) 455-1105 or email at CLee@scwa2.com.

Respectfully,

A handwritten signature in blue ink, appearing to be 'CL' or 'Chris Lee'.

Chris Lee,
General Manager

CC: *Alex Rabidoux, SCWA | Assistant General Manager*
Deborah Barr, SCWA | Engineering Manager
Joseph Camaddo, SCWA | Associate Water Resources Engineer