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Docket Number: 24-OPT-05

Realistic and Potential Consequences

California Energy Commission

RE: Opposition to Corby Battery Energy Storage System Project â€“ Docket No. 24-OPT-05

Dear Commissioners:

I am writing to respectfully request that the California Energy Commission reject the proposed Corby Battery Energy Storage System (BESS) Project near Vacaville.

My opposition is not to energy storage technology itself. It is to the location and scale of this particular project and the potential consequences for nearby residents, farmers, agricultural land, emergency responders, and the environment.

A large battery energy storage facility should not be approved at a location where a serious battery incident could potentially affect surrounding homes, farms, agricultural operations, transportation routes, water resources, or emergency responders.

I urge the Commission to consider the following concerns:

- 1) Proximity to Residential Communities: The proposed facility would place a large industrial battery storage operation near established and growing residential areas. Even if the probability of a major incident is considered low, the consequences of a serious fire, explosion, or hazardous-material release must be considered when determining whether this is an appropriate location.
- 2) Thermal Runaway and Battery Fire Risk: Battery energy storage systems can experience thermal runaway when a battery cell fails and generates heat that can propagate to neighboring cells. Large battery installations therefore require extensive fire detection, suppression, monitoring, separation, and emergency-response measures. The Commission should not approve a location where failure of those measures could endanger surrounding communities.
- 3) Smoke and Hazardous Gases: A major battery fire can produce smoke and hazardous decomposition products. Residents should not be expected to accept the possibility that an industrial battery emergency could require shelter-in-place or evacuation procedures near their homes.
- 4) Difficulty of Emergency Response: A large-scale BESS emergency is different from an ordinary structure or vegetation fire. It can require specialized training, equipment, monitoring, coordination, and prolonged emergency operations. The Commission

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- 4) Difficulty of Emergency Response: A large-scale BESS emergency is different from an ordinary structure or vegetation fire. It can require specialized training, equipment, monitoring, coordination, and prolonged emergency operations. The Commission should carefully consider whether local firefighters and emergency agencies have sufficient resources to manage a worst-case event without compromising their ability to respond to other emergencies in Vacaville and surrounding communities.
- 5) Risk to Farmers and Agricultural Operations: Agriculture is an important part of the character, economy, and history of this area. Farmers near the proposed project should not have to worry about whether smoke, fire debris, contaminated runoff, or emergency restrictions resulting from a BESS incident could affect their crops, livestock, irrigation systems, soil, equipment, or ability to operate their farms.
- 6) Protection of Agricultural Land: Productive agricultural land is a limited resource. Once agricultural property is converted to a large industrial energy facility and associated infrastructure, restoring that land to productive farming may be difficult. Industrial development should be directed toward locations already designated and appropriate for intensive industrial uses whenever feasible.
- 7) Soil and Water Contamination Concerns: The potential consequences of contaminated firefighting water, stormwater runoff, battery debris, or other materials following a major incident

deserve particularly careful analysis in an agricultural area. Farmers and residents depend upon clean soil and water, and prevention should take priority over remediation after contamination occurs.

8) Wildfire and Secondary Fire Concerns: Vacaville and surrounding Solano County communities already face seasonal wildfire hazards. The Commission should fully evaluate whether a battery incident could ignite surrounding vegetation or create additional challenges during high-fire-risk weather conditions.

9) Evacuation and Transportation Impacts: A serious incident could require road closures, evacuation, shelter-in-place orders, or other emergency measures. The Commission should evaluate realistic worst-case conditions, including simultaneous wildfire conditions, traffic congestion, wind-driven smoke, and limited emergency access.

10) Noise and Quality-of-Life Impacts: A utility-scale BESS is an industrial operation. Cooling systems, transformers, inverters and other equipment can operate for extended periods. Residents living near the project should not be required to bear industrial noise and other impacts simply because the facility benefits the broader electrical grid.

11) Cumulative Risk: The Commission should not evaluate each potential impact in isolation. Fire risk, hazardous smoke, emergency response limitations, agricultural impacts, traffic, water resources, wildfire conditions, and residential proximity can interact during an emergency. The relevant question is not simply whether each individual risk can theoretically be mitigated, but whether the combined residual risk is appropriate for this particular location.

12) Safer Alternative Locations Should Be Prioritized: Energy storage may be important to California's electrical system, but that does not mean every proposed location is appropriate. Industrially zoned sites farther from residential neighborhoods, productive farmland, and sensitive resources should receive priority. **Lambie Industrial Park** is a great alternative.

13) Residents and Farmers Should Not Bear Disproportionate Risk: The benefits of a large energy storage project may extend across the electrical grid, while many of its potential safety, environmental, agricultural, and quality-of-life impacts would be concentrated on the people who live and work closest to it. That imbalance should weigh heavily in the Commission's decision.

The question before the Commission should not simply be whether the Corby BESS Project can satisfy minimum technical requirements. The Commission should determine whether this is the right location for a facility of this size and nature.

When a project involving large quantities of batteries is proposed near homes and active agricultural operations, the burden should be on the applicant to demonstrate convincingly that residents, farmers, emergency responders, soil, water, and agricultural resources will be adequately protected under foreseeable and worst-case conditions.

California can pursue renewable energy and energy storage without unnecessarily placing large industrial battery facilities close to residential communities and valuable farmland.

For these reasons, I respectfully request that the California Energy Commission deny the Corby Battery Energy Storage System Project, Docket No. 24-OPT-05, and require energy storage development to be located in areas that provide greater separation from residential neighborhoods, agricultural operations, and other sensitive land uses.

The health and safety of Vacaville residents, the protection of local farmers, and the preservation of Solano County's agricultural resources should come before the convenience of placing this project at the proposed location.

Thank you for considering the concerns of the residents and farmers who would live with the consequences of this decision.

Respectfully,
Carolyn Gopaul
Vacaville, California