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*Comment Received From: Eric Romingquet
Submitted On: 9/14/2026
Docket Number: 24-OPT-05*

**The Corby Battery Energy Storage Project Should Not Be Located
at the Proposed Vacaville Site**

Additional submitted attachment is included below.

September 14, 2026

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 24-OPT-05
Corby Battery Energy Storage System Project
715 P Street
Sacramento, CA 95814

Submitted electronically through the CEC e-Commenting System

Subject: The Corby Battery Energy Storage Project Should Not Be Located at the Proposed Vacaville Site

Dear California Energy Commission and Commission Staff:

I am writing as a Vacaville resident to formally oppose locating the Corby Battery Energy Storage System at its proposed site near Kilkenny and Byrnes Roads.

I am not opposed to responsible energy storage. I am opposed to placing a 300-megawatt, 1,200-megawatt-hour industrial battery facility at a location where the risks are unnecessarily concentrated near residents, active farmland, domestic wells, Interstate 80, important water infrastructure, schools, businesses, and Solano County's only Level II trauma center.

The Staff Assessment's proposed Conditions of Certification do not eliminate these location-based risks. Instead, many of the most important protections would be designed, evaluated, or approved after the Commission has already certified the project.

1. The proposed location is too close to critical community institutions

Kaiser Permanente Vacaville, Solano County's only Level II trauma center, is approximately 1.25 miles from the proposed project. Other nearby institutions and facilities include Solano Community College, The Father's House school, residential neighborhoods, Interstate 80, and the Lonza manufacturing facility.

My previously docketed comments, TN 272601, explain that the Staff Assessment's reported fire modeling extends only approximately 0.38 mile from the battery units. That analysis does not adequately address institutions and populations outside that limited distance that could nevertheless be affected by smoke, toxic gases, road closures, evacuation orders, or shelter-in-place instructions. (efiling.energy.ca.gov)

A project should not be placed near a regional trauma center unless the Commission has fully evaluated:

- Whether hospital access could be interrupted by road closures or evacuations;

- Whether patients, employees, and emergency vehicles could safely remain at or reach the hospital;
- How an evacuation or shelter-in-place order would affect nearby schools and colleges;
- Whether Interstate 80 or connecting roads would need to be closed;
- How a prolonged or multi-day battery incident would affect emergency medical services; and
- What protective actions would be required under changing wind conditions.

These questions should be answered before the location is approved—not through an Emergency Response Plan submitted shortly before operation.

2. The Staff Assessment acknowledges that the proposed fire-water supply may be inadequate

The Staff Assessment recognizes that the proposed 24,000-gallon fire-water tank may not be adequate. Dixon Fire has identified a potential need for approximately 1,200 gallons per minute for life safety and possible cooling of adjacent battery units.

Nevertheless, proposed Condition WORKER SAFETY-7(n) leaves the actual fire-water capacity, flow duration, replenishment method, hydrant configuration, and related infrastructure to future consultation and design.

That is a location problem, not simply a final-design detail.

The proposed site is not connected to a municipal water main. The Commission therefore does not currently know whether the necessary amount of water can be stored, delivered, and replenished during an extended battery fire.

The fire-water problem is especially serious because proposed Conditions WORKER SAFETY-1, WORKER SAFETY-2, WORKER SAFETY-6, and WORKER SAFETY-7 generally allow Dixon Fire to review and comment, but do not clearly require Dixon Fire's written concurrence before construction or operation.

If Dixon Fire concludes that the final water system is inadequate, the Conditions of Certification do not clearly state that Dixon Fire can stop the project from proceeding.

The Commission should not approve this location while the availability of adequate firefighting water remains unresolved.

3. Vacaville should not bear the consequences of an incomplete emergency plan

Proposed Condition PH-1 postpones the operational Emergency Response Plan until approximately 120 days before operation.

As a result, the public is being asked to accept this location without seeing the final:

- Evacuation zones and triggers;
- Shelter-in-place standards;
- Public-notification procedures;
- Road-closure plans;
- Hospital and school response procedures;
- Mutual-aid responsibilities;
- Re-entry requirements;
- Plans for multi-day incidents; or
- Procedures for protecting people who are elderly, disabled, medically dependent, or without transportation.

Proposed PH-2 also allows the third-party air-monitoring consultant as long as two hours after notification to begin monitoring. That delay could leave firefighters, health officials, and residents without reliable information during the earliest and potentially most critical part of an incident.

The Commission should determine whether an emergency plan is workable at this specific location before deciding that the location is acceptable.

4. The project creates unnecessary risks to Vacaville's water and flood-control infrastructure

The Solano County Water Agency has now informed the Commission that it was not properly notified and did not have adequate time to review the Staff Assessment and Draft EIR.

The Agency states that the project would involve new 230-kV transmission facilities crossing its Ulatris Flood Control Project channel and easement. It also reports that this regional flood-control facility is approximately 0.25 mile from the proposed battery-storage project.

The Water Agency has expressed concerns about water supply, groundwater, water quality, flood control, environmental resources, and its continuing ability to operate heavy maintenance equipment in its flood-control channels. (efiling.energy.ca.gov)

These concerns are significant because the Agency manages more than 55 miles of flood-control channels protecting Vacaville, Dixon, Fairfield, Cordelia, and surrounding unincorporated areas.

The Commission should not approve a location before the regional agency responsible for protecting these water and flood-control systems has completed its review.

5. The project would industrialize and permanently convert active agricultural land

The proposed site is agricultural land rather than an established industrial location. The project would introduce an industrial-scale energy facility, transmission infrastructure, roads, fencing, battery enclosures, fire-protection equipment, and other permanent improvements into a rural agricultural area.

Proposed Condition LAND-1 would require an off-site agricultural conservation easement. That may provide compensation elsewhere, but it would not prevent the physical conversion of the farmland at the proposed site.

Protecting other land does not restore the soil, agricultural productivity, rural setting, or land-use compatibility permanently lost at this location.

The Commission's own alternatives analysis reportedly recognizes that Lambie Industrial Park has sufficient acreage, can accommodate a BESS while avoiding underground pipelines, can meet the project's grid-stability and renewable-energy objectives, and is not rendered infeasible merely by a longer generation-tie line. (efiling.energy.ca.gov)

Locating industrial infrastructure on industrially planned land is a more responsible approach than attempting to compensate for the permanent conversion of agricultural land.

6. The proposed site depends on unresolved water and property assumptions

Proposed Conditions WATER-3 and WATER-4 identify Solano Irrigation District water, trucked water, or an onsite groundwater well as possible project water sources.

However, the record does not establish that any particular source is both legally and physically available for the project's construction, operational, and fire-protection needs.

The proposed site is surrounded by agricultural and domestic water users. The project could require up to 30 acre-feet of water during construction, while its onsite fire-water storage and replenishment requirements remain unresolved.

The Commission should not certify the proposed location unless it first establishes:

- A secured construction-water source;
- A secured operational-water source;

- A secured fire-water source;
- Adequate well yield;
- No unreasonable interference with neighboring wells;
- Acceptable groundwater quality;
- The ability to replenish fire-water supplies during a continuing incident; and
- Written approval for every necessary property and infrastructure crossing.

Possible future water arrangements are not an adequate basis for deciding that this location is suitable.

7. Remote operation increases the consequences of choosing the wrong location

The facility would be primarily remotely operated. WORKER SAFETY-7(k) permits reliance on a mobile command center or a project representative arriving within approximately 15 minutes with access to telemetry.

During a rapidly developing thermal-runaway event, firefighters should not have to wait for a representative carrying a laptop before obtaining critical technical information.

The condition does not adequately explain what happens if the representative is delayed, roads are closed, communications fail, or the emergency occurs simultaneously with another major incident.

Remote operation may be manageable at an appropriately isolated industrial location. It is much more concerning at a location surrounded by transportation corridors, agricultural operations, critical institutions, water infrastructure, and other sensitive uses.

8. The Conditions of Certification cannot correct an inherently poor location

Conditions of Certification can impose operating requirements, but they cannot create greater physical separation from hospitals, schools, homes, highways, farmland, wells, or regional water facilities.

They also cannot eliminate every consequence of:

- Toxic smoke or gas traveling off site;
- A prolonged battery fire;
- An evacuation or shelter-in-place order;

- Closure of Interstate 80 or nearby roads;
- Contamination of soil or water;
- Interruption of hospital access;
- Insufficient firefighting water;
- Damage to agricultural operations; or
- Interference with flood-control and irrigation infrastructure.

When a project requires numerous future plans and conditions merely to make its location potentially acceptable, the Commission should question whether it has selected the right location at all.

Requested Commission action

I respectfully request that the California Energy Commission:

1. Decline to certify the Corby BESS at the proposed Vacaville-area site.
2. Require a location that is industrially planned and provides greater separation from hospitals, schools, residences, active farmland, domestic wells, major transportation corridors, and regional water infrastructure.
3. Complete a full and equal analysis of Lambie Industrial Park, including a direct connection to the nearby Lambie 230-kV transmission infrastructure.
4. Resolve the required fire-water capacity, source, flow rate, duration, and replenishment method before selecting or approving any location.
5. Require written concurrence from Dixon Fire and Vacaville Fire regarding the fire-protection design and Emergency Response Plan.
6. Complete and circulate the core Emergency Response Plan, evacuation analysis, toxic-gas dispersion modeling, and sensitive-receptor mapping before certification.
7. Allow the Solano County Water Agency and other affected local agencies sufficient time to complete their technical reviews.

Conclusion

Vacaville and Solano County should not be required to accept an avoidable concentration of public-safety and environmental risks simply because the proposed property is convenient to the Vaca-Dixon Substation.

The need for energy storage does not establish that this is the right location.

The Staff Assessment's unresolved fire-water supply, deferred emergency planning, limited dispersion analysis, agricultural conversion, uncertain water source, proximity to critical institutions, and potential interference with regional water infrastructure collectively demonstrate that the proposed location is inappropriate.

The Commission has the authority and responsibility to require a safer and more suitable location. I respectfully request that it do so.

Thank you for your consideration and for providing a written response before project certification.

Sincerely,

Eric Romingquet
Vacaville Resident

Suggested docket title:

Eric Romingquet Comments – The Corby Battery Energy Storage Project Should Not Be Located at the Proposed Vacaville Site

Suggested categories: Alternatives; Land Use; Public Health; Worker Safety and Fire Protection; Hazardous Materials; Traffic and Transportation; Soil and Water; Project Description.