

DOCKETED	
Docket Number:	26-OPT-02
Project Title:	Seahawk Battery Energy Storage System
TN #:	272938
Document Title:	Becky Steinbruner Comments - Many Alternative Sites Not in the Minto Road Neighborhoods Should be Considered
Description:	N/A
Filer:	System
Organization:	Becky Steinbruner
Submitter Role:	Public
Submission Date:	9/24/2026 8:52:43 PM
Docketed Date:	9/25/2026

Comment Received From: Becky Steinbruner
Submitted On: 9/24/2026
Docket Number: 26-OPT-02

Many Alternative Sites Not in the Minto Road Neighborhoods Should be Considered

Dear CEC Staff,

Is Invenergy aware of other alternative sites for the Seahawk BESS Project?

There are a number of other existing substations that lend themselves to better site location for large BESS projects because they are not near densely-populated residential neighborhoods, and have better access for construction vehicles, emergency response vehicles, and evacuation routes.

Below is the list of parcel numbers and locations. PG&E substations exist on these parcels, and where noted, have substantial parcels adjacent that could suit a BESS facility site.

The project alternative locations should NOT be limited to the Minto Road area.

There are many other significant substations in Santa Cruz County that merit consideration for a grid-scale BESS project and were in fact examined by the CPUC in the 2014 PG&E application referenced at the November 18, 2025 Santa Cruz County Board of Supervisor meeting discussion.

Please see the maps on pages 17-21 in Attachment A of the document:

https://ia.cpuc.ca.gov/environment/info/panoramaenv/santacruz_115kvreinforcement/PDF/PG&E_Response_to_Data_Request8.pdf

Big Basin Substation, which is located approximately 3 miles northwest of the community of Boulder Creek off of Empire Grade Road in unincorporated Santa Cruz County,

Burns Substation, which is located approximately 2 miles southwest of the community of Boulder Creek off of Empire Grade Road in unincorporated Santa Cruz County and which is also connected by a 21 kV line to Camp Evers Substation,

Crusher Substation, located at the Santa Cruz Resource Recovery Facility at 605 Dimeo Lane, which is off Highway 1, about three miles north of the city limits.

Point Moretti Substation, located in unincorporated Santa Cruz County near the community of Davenport

Camp Evers Substation, located near the intersection of State Highway and Mt. Hermon Road, south of the main Santa Cruz area. This substation was initially included in the

Board of Supervisor's August 13, 2024 consideration of a Draft BESS Overlay Ordinance but was removed from the October 29, 2024 version.

For clarification regarding a reference during the Board meeting that focused on the CPUC approval of the Green Valley Substation approvals in 2014, I am providing the links to the CPUC Decision 15-03-030 that dismissed PG&E's application A-12-01-012 Santa Cruz 115 kV Reinforcement Project:

https://ia.cpuc.ca.gov/environment/info/panoramaenv/santacruz_115kvreinforcement/santacruz_115%20reinforcement%20project.html

"In the late Fall of 2014, PG&E re-assessed its own load forecasts for the Santa Cruz area in light of (i) new load data, including data from a hot weather event in Santa Cruz County from October 2-6, 2014 that approached a 1-in-10-year event, and (ii) the most recent energy efficiency forecasts prepared by the California Energy Commission. PG&E preliminarily determined that while the Project was still needed, it might not be needed within five years.

Consequently, PG&E requested that the CAISO re-evaluate the need for the Project. As noted in the Ruling, the CAISO, by letter dated December 17, 2014, determined that the Project

“is not needed within the 10-year planning horizon, and therefore has approved cancellation of this [P]roject.”

On December 23, 2014, PG&E wrote to the parties and the assigned ALJ and requested that in light of the CAISO’s determination, the Application be dismissed without prejudice. PG&E’s request resulted in the Ruling directing it to file the instant Motion to Dismiss Without Prejudice."

https://ia.cpuc.ca.gov/environment/info/panoramaenv/santacruz_115kvreinforcement/PDF/PGE_MTD_A12-01-012.pdf

I sincerely hope that the CEC and Invenergy will consider these sites as alternatives to the 90 Minto Road agricultural area that is adjacent to densely-populated working class neighborhoods, College Lake and the County's primary emergency evacuation center at the Santa Cruz County Fairgrounds.

Quite honestly, the need for a BESS project is greatest in the northern areas of Santa Cruz County where outages are frequent and often sustained. Having a non-lithium long-duration energy storage project in both South and North areas of the County would provide the greatest benefit to the people, while greatly reducing the very real risks to health and safety of emergency responders, the public and the environment.

The California Energy Commission recognizes the value of Long Duration Energy Storage projects, and is funding them: <https://www.energy.ca.gov/programs-and-topics/programs/long-duration-energy-storage-program>

- 1) APN 058-022-06 Point Moretti Substation (Davenport) with an adjacent parcel APN 0580022-17 on Warnella Road that is 1470 acres.
- 2) APN 080-081-23 Substation on 2.0060 acres on Empire Grade Road with vacant adjacent parcels.
- 3) APN 080-033-103 Substation at 13575 Empire Grade Road on 130.7500 acres, owned by the State of California, located adjacent to CALFIRE Training Center and a minimum-security prison.
- 4) APN 066-091-02 Substation on Graham Hill Road in Felton, near Roaring Camp
- 5) APN 030-241065 Substation near Soquel Creek Water District Offices with adjacent District-owned 4.365 acre parcel APN 030-242-44 (currently being used by Granite Construction for materials adjunct to Capitola Avenue Overcrossing Project.
- 6) APN 029-093-17 Substation on Chanticleer near Capitola Road.
- 7) APN 039-201-15 Substation in Aptos with a large parcel nearby
- 8) APN 034-131-21 41st Avenue near Capitola Mall (parcels in unincorporated area are adjacent)

In conclusion, I honestly feel that the CEC and Invenergy would do well to collaborate with the County of Santa Cruz to support a BESS facility that is located in a site that does not require removing agricultural land from production and is more removed from densely-populated working class neighborhoods.

I also feel strongly that only non-lithium, non-flammable battery technology be considered in the Project Alternative analysis.

Power outages in the North County and Corralitos areas are frequent and prolonged.

Employing Long Duration Energy Storage using non-lithium BESS in both the South County and North County areas would provide the best level of community benefit with the lowest health and safety risk to first responders, the public, and the environment.

Please include non-lithium Long Duration Battery Storage in the Project Alternative

analysis.

The California Energy Commission (CEC) supports Long Duration Energy Storage, and is funding many such projects in California. Long Duration Energy Storage Program

The California Energy Commission's Long Duration Energy Storage (LDES) program invests in projects that accelerate the implementation of long duration energy supplies. <https://www.energy.ca.gov/programs-and-topics/programs/long-duration-energy-storage-program> and should be evaluated in the Project Alternatives analysis.

Please consider these issues.

Thank you.
Sincerely,
Becky Steinbruner