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Comments on Opt-In Certification Amendments

Thank you for inviting comments on the proposed Opt-In Certification Program amendments. I appreciate the Commissionâ€™s work to address community benefits, emergency readiness, and continuing project responsibilities as the program develops.

My name is Roshan Saxena. Iâ€™m a student in Santa Clara County and serve as a youth member of the Santa Clara County Sustainability Commission. I also help lead the FUHSD Climate Collective. Iâ€™m commenting in my personal capacity.

The proposed community-benefits agreement filing and progress-reporting provisions in section 1879.5 provide a useful foundation for accountability. A consistent reporting format could help residents distinguish promised benefits from funds actually disbursed, activities completed, and obligations still outstanding. A brief public annual summary drawn from existing compliance reports could make that information easier to follow without creating a separate reporting system.

For ownership or operational-control changes under section 1882(f), the proposed requirement that the new owner or operator agree to comply with the conditions of certification is useful. I encourage clarification of how outstanding community-benefit obligations will be identified and maintained through that process. Residents should be able to determine who is responsible for a continuing commitment after a transfer.

I also appreciate the proposed coordination with local fire-response authorities. Under section 1881.5, a clear record of inspection status, outstanding recommendations, and their resolution would help explain the basis for decisions concerning battery-storage testing or operation. This is particularly important when the Compliance Project Manager considers authorization after the fire-response authority has not completed an inspection within 90 days of receiving notice that the system is ready for inspection.

A public-facing emergency-coordination summary could explain response responsibilities and community-notification arrangements without disclosing sensitive security information.

Thank you for considering these suggestions. Clear, accessible reporting would help communities understand how commitments and safety responsibilities are being carried out throughout a facilityâ€™s operation.

Roshan Saxena