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Comment Received From: Cathleen Pryor
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Off ramps will save developers time and money

Dear Commissioner Gallardo and CEC staff,
Thank you for allowing the public to participate in this discussion and make comments.

I believe early decisions by the CEC on projects with significant unacceptable aspects to their applications will save developers time and money. These projects are complex but they hinge on only a few very important items. Location, community support, ownership of the land, and financing are among these few items.

If the location is unsuitable or unsafe with current firefighting technology, then there is good reason to halt further expenditures by the developer or the California Energy Commission as the application is reviewed. Some problems cannot be mitigated. Some mitigation solutions do not solve the problem, they just talk over it and waste everyone's time. Simply implying a mitigation solution should solve the problem is not enough. There should be proof.

Local communities are the best source of information on endangered species. Developers may not be supportive of paying for a comprehensive environmental report and prefer to pay a fine if additional endangered species are identified by the local community environmentalists after they file their report. That solution does not satisfy the general public. These type of reports require years of experience in a location. These projects are too rushed to be comprehensive. I recommend the CEC ask the Developers to consult with the local governments and environmentalists before submitting a report.

Normal hazards like fire should not be glossed over. The general public is very concerned about fire. In the case of a lithium battery storage facility fire, there is no means of extinguishing a large fire consuming lithium batteries. Containment is the solution. That requires considerable space between the containers as we learned at Moss Landing and millions of gallons of drinking water to keep surrounding containers cool as we learned in Escondido. Drinking water is a scarce resource in California. If either of these requirements cannot be met, then the application should not proceed.

We have millions of acres of desert. Projects using hazardous substances and located close to human populations, major transportation corridors, or the ocean have to be derailed early. This makes perfect sense. Mitigation solutions are more than just verbiage. These have to be proven to work. Utilities and the general public should not have to absorb financial risk when other locations are available and insurance is not.

We appreciate the CEC creating a better approach to reviewing applications. We sincerely want your time not to be wasted. Under this legislation, there is no review at

the local level to screen out undesirable projects. Instituting rules and guidelines for developers to follow will help everyone. Off ramps are an excellent solution for the projects destined for denial.

Developers should consider their investors' interests too. Investors can accept the off ramp when compared to investing more money and be denied. Hopefully, the developer has explained the process to the investors and they accept the risk of being derailed during the process. This is much like oil, gas or mineral exploration projects, investors know there will be many wells dug before one is successful. With green energy, developers just have to keep looking for better locations, they will find them.

California is buying energy from Arizona, Nevada and Mexico among other distant places. Our deserts are closer. The distance the electricity travels will be shorter. Loss of energy as electricity travels doesn't seem to be a factor in sourcing our electricity now. We do need transmission lines. We know how to build that infrastructure and the CEC could advise Sacramento to fund more transmission lines. The point is to safely locate lithium or similar technology battery storage facilities. We will need our deserts and can help our impoverished counties at the same time.

Thank you for improving this process.