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# Memorandum

To: Docket 07-AFC-03

From: **Brett Fooks, Program Manager**  
**Safety & Reliability Branch**  
California Energy Commission  
715 P Street  
Sacramento, California 95814

Date: January 30, 2024

Subject: **SENTINEL ENERGY CENTER (07-AFC-3C) Corrections to Worker Safety Conditions of Certification per Order No. 24-0124-03e (TN 254112)**

## Introduction

The California Energy Commission staff analysis of Sentinel Energy Center's (SEC) Petition to Amend their Final Commission Decision to add black start capability (TN #253272) erroneously identified the Palm Desert Fire Department (PDFD) as the first responder agency for SEC. As corrected in Order No. 24-0124-03e, the first responder agency for SEC is the Riverside County Fire Department (RCFD). All references in the staff analysis for PDFD have been replaced with RCFD. Corrected Worker Safety Conditions of Certification **WORKER SAFETY-6** through **WORKER SAFETY-8** highlights the appropriate changes with underlines and strikeouts are set forth below.

**WORKER SAFETY-6 The project owner shall submit the fire protection plans for the Battery Energy Storage System (BESS) to the ~~Palm Desert~~ Riverside County Fire Department (~~PDFD~~) (RCFD) for review and comment, to the Delegate Chief Building Official (DCBO) for plan check and inspection, and to the Compliance Project Manager (CPM) for review and approval.**

**Verification: At least sixty (60) days prior to the start of construction of the BESS project, the project owner shall provide the complete set of BESS fire protection drawings and specifications to the ~~PDFD~~ RCFD for review and comment, to the DCBO for plan check approval and construction inspection, and to the CPM for review and approval.**

**WORKER SAFETY-7 The project owner shall submit a BESS hazard mitigation analysis per UL 9540A to the ~~PDFD~~ RCFD for review and comment, to the DCBO for plan check and inspection, and to the CPM for review and approval. The hazard mitigation analysis shall include consideration of potential thermal runaway fault conditions occurring within a single**

**battery storage rack, cell module or cell array. The analysis shall include mitigations to prevent flammable gases released during fire, battery overcharging, and other abnormal operating conditions within the BESS from creating an explosion hazard that could injure workers or emergency first-responders.**

**Verification: At least sixty (60) days prior to the start of construction of the BESS project, the project owner shall provide the hazard mitigation analysis to the PDEFD RCFD for review and comment, to the DCBO for plan check and inspection, and to the CPM for review and approval.**

**WORKER SAFETY-8 The project owner shall provide an approved fire water supply for use by first responders when responding to an emergency related to the BESS. The project owner shall also provide access to information and the facility for the local fire department to conduct training.**

**Verification: At least sixty (60) days prior to the start of construction of the BESS, the project owner shall:**

- a. **Provide the fire water supply plans to the PDEFD RCFD for review and comment, to the DCBO for plan check and inspection, and to the CPM for review and approval.**
- b. **Provide a copy of a letter from the project owner to the PDEFD RCFD offering access to information and the facility for training of PDEFD RCFD personnel for emergencies that could occur at the BESS facility.**

## **Conclusion**

Consistent with Order No. 24-0124-03e, the Worker Safety conditions of certification have been updated.