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ENGIE NA Comments on BESS Safety Workshop

Additional submitted attachment is included below.



April 1, 2024

Elizabeth Huber
Director, Siting, Transmission and Environmental Protection Division
California Energy Commission
Sent by way of: docket@energy.ca.gov

Re:ENGIE North America Comments on and CEC Staff Workshop on BESS Safety (24-BSS-01)

Dear Director Huber,

ENGIE North America ("ENGIE") appreciates the time and effort you and your colleagues put in to hosting the February 23rd, 2024 S "CEC Staff Workshop on Battery Energy Storage System (BESS) Safety". The insights shared during this workshop are invaluable as we collectively strive to enhance safety standards and promote the responsible deployment of BESS's across the state.

As a global energy company with a presence in over 70 countries, ENGIE is deeply committed to advancing clean energy systems and promoting safety standards in every aspect of our operations. In California, where ENGIE is developing 5 GWs of BESS projects, we understand the critical importance of fostering a safe and reliable energy landscape.

We commend the CEC and its partners for their dedication to promoting BESS safety and facilitating constructive dialogue among stakeholders. The workshop provided a comprehensive overview of safety considerations related to BESS projects, underscoring the significance of collaborative efforts in addressing safety concerns.

California's Clean Energy Goals: A Shared Responsibility

Moving forward, we believe it is imperative to continue working together to achieve California's ambitious clean energy goals outlined in the California Public Utilities Commission's Integrated Resource Plan. BESS plays a pivotal role in this transition, offering grid reliability, renewable energy storage, and greenhouse gas emissions reduction. As we work towards California's IRP goals of 22 GWs of battery energy storage by 2030, and 32 GW's by 2035 it is imperative that we address safety concerns head-on.

A number of points were raised in the CPUC presentation and others that need to consistently be emphasized regarding BESS. First, they are an important grid resource by providing valuable energy storage capabilities, helping with grid reliability and stability, reducing greenhouse gas emissions and supporting clean energy procurement. Second, the discussions around the Moss Landing BESS incident with local, state and industry representatives highlighted that there are clear remedies to address concerns and clear recommendations local communities can take to mitigate fire risks.

Outreach to Local Governments

In light of the workshop discussions and the challenges highlighted, ENGIE proposes further initiatives to enhance BESS safety awareness and collaboration.



While BESS projects continue to grow in scale and significance, public awareness and education remain crucial. The workshop presentations on the Moss Landing BESS project and the recommendations by the Lumen Energy Storage Presentation should be summarized and packaged by the state to take on a road show for discussing BESS options to local communities. These and other presentations discussed the current state of BESS safety practices in design and operations, highlighting the findings from the 2023 CPUC Energy Storage Procurement Study and emphasized the need for a collaborative approach to address knowledge barriers and improve communication and coordination among various stakeholders involved in BESS safety.

ENGIE wholeheartedly agrees that more collaborative communications like in this workshop are warranted between government, industry and interested stakeholders in California. Otherwise we will not reach our BESS targets.

Finally, the Lumen presentation mentioned the growing local dilemma, where some California communities have slowed down BESS development due to safety concerns, and the need for a centralized knowledge exchange to support a faster and more efficient local approval process.

Expanding BESS Safety Workshops Statewide

To build upon the success of the BESS Safety Workshop, ENGIE proposes organizing similar events across California. These workshops should target regions where BESS projects are under consideration. By bringing together industry experts, regulators, and local communities, we can collaboratively address safety concerns, share best practices, and ensure that BESS installations align with the highest safety standards. ENGIE can offer its expertise as an experienced energy storage developer to support these efforts.

These efforts should focus on disseminating information about the significant strides being made in BESS safety, fire risk mitigation, and emergency response protocols. By engaging with local authorities, we can foster a better understanding of BESS technology and its role in California's energy landscape.

In conclusion, we are committed to collaborating with the CEC and other stakeholders to create a resilient and sustainable energy future for California. Thank you once again for your dedication to this critical cause. We look forward to continued collaboration and progress.

Sincerely,

s/Margaret Miller

Margaret Miller
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