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*Comment Received From: Theresa Ford
Submitted On: 12/29/2024
Docket Number: 24-OPT-02*

Inaccurate Information Regarding Battery Type

Additional submitted attachment is included below.

December 29, 2024

DOCKET NUMBER

24-OPT-02

LOCATION

San Juan Capistrano

Re: Opposition to Proposed Battery Energy Storage System (BESS) Project in San Juan

Capistrano

Dear California Energy Commission:

I recently attended a community meeting hosted by Engie. There were 6 people representing the company, some of whom were consultants.

At the meeting, I asked a question regarding the application's reference to "lithium iron phosphate, or similar technology batteries (LFP)..." I asked what they mean by similar technology and why they could not be more specific.

The question was answered by Renée L. Robin, J.D. Director, Permitting and Planning Engie North America LLC for Compass Energy Storage LLC. She told me that an addendum had been submitted to clarify the issue.

As follow up to that meeting, I searched the docket to find the referenced addendum. What I found was Appendix 4-7A Battery Information accepted and recorded on 04/08/24. Since there was no other document relating to the type of battery, I assume this is the document Ms. Robin had referenced in our discussion.

I did not find that document as evidence or further clarification of the type of battery to be used at The Compass Project. I did find that it was product information from the manufacturer, Tesla, revision 1.8 June 23, 2020. In that document, there is no mention of the composite of the battery, no mention of lithium iron phosphate. However, on page 5 of said document, there is a reference to lithium-ion batteries.

In summary, I find the information presented to the CEC in the project description and this addendum to be confusing at the least and perhaps misleading. As presented at the 12/19/24 small community meeting, held in San Juan Capistrano, the company representatives explained that there have been no fires associated with the lithium iron phosphate batteries. They felt this was an important issue to present and mentioned it more than once. As also presented, these lithium iron phosphate batteries have only been in use since 2022. How can the company accept battery information and data presented by the manufacturer and dated 2020 as valid? It appears that the material was not reviewed before accepting it as accurate and submitting to CEC.

In my opinion, this is an example of a very large conglomerate trusting the manufacturer way too much with pertinent information about the type of batteries being utilized. It also causes concern with other issues in which the conglomerate may trust information provided by subcontractors or consultants.

I ask the California Energy Commission to request and obtain the detailed information regarding the type of batteries to be used at this facility. I feel compelled to also point out the lack of oversight in presenting erroneous and misleading information.

Regards,

Theresa Ford

A handwritten signature in cursive script that reads "Theresa Ford". The signature is written in black ink and is positioned below the typed name.