

| DOCKETED | |
|-------------------------|--|
| Docket Number: | 24-OPT-02 |
| Project Title: | Compass Energy Storage Project |
| TN #: | 259965 |
| Document Title: | Michael McGrady Comments - An Alternate Location |
| Description: | N/A |
| Filer: | System |
| Organization: | Michael McGrady |
| Submitter Role: | Public |
| Submission Date: | 11/11/2024 11:22:03 AM |
| Docketed Date: | 11/12/2024 |

*Comment Received From: Michael McGrady
Submitted On: 11/11/2024
Docket Number: 24-OPT-02*

An Alternate Location

Additional submitted attachment is included below.

An Alternate Location

It was just a month ago the California Energy Commission made a number of observations, and requests for additional information, regarding the Compass Energy Storage Project.¹

One such observation was regarding ENGIE North America's (ENGIE) latest submission detailing the types of batteries intended. And while ENGIE has made numerous references to Lithium Iron Phosphate (LFP) batteries, they have yet to rule out lithium-ion, saying that they will use "*Lithium-iron phosphate, or similar technology.*"

This is what the California Energy Commission (CEC) thinks about ENGIE's latest lithium battery specification:

"CEC Worker Safety and Fire Protection staff's initial review of UL9540A test results for this type of battery energy storage system (BESS) indicates that the chances for cell thermal runaway are high and for escalation to a unit or units are moderately high. Potentially significant impacts to worker safety and fire protection and public health could result from a fire in a BESS producing toxic gas emissions to the atmosphere, with limited site and fire water access, and the proximity to populations, sensitive receptors, railways, and heavily traveled highways or roadways."

The CEC went further by requesting...:

"Please identify additional alternative locations (sites) that may be better suited in terms of site and fire water access, distances to populations, sensitive receptors, railways, and heavily traveled highways or roadways, which could reduce or avoid potential impacts resulting from emissions to the atmosphere of toxic gases from a BESS fire. Provide an assessment of potential feasibility of locating the project at the alternative sites and describe the ability to attain the project objectives at the alternative sites. "

"Identify additional alternative locations..."

ENGIE will tell you that they have spent several million dollars on the project so far, including a 2-year interconnectivity study as required by the CAISO (CA Independent System Operator). They will say that that the capacity to transmit/receive 250MW of power must be selectively located,

¹ Docket Number: 24-OPT-02 Project Title: Compass Energy Storage Project TN #: 259469 Document Title: Determination of Incomplete Application and Request for Information for the

and not all powerlines can accommodate it, and ENGIE will tell you that the current proposed Compass location is perfect.

The San Onofre Nuclear Generating Station (SONGS), located on over 80-acres south of San Clemente, is permanently closed and is in the process of being deconstructed. The substation and transmission lines located at SONGS have the capacity to transmit 2.2 gigawatts of electricity.

That's nearly nine times the 250MW ENGIE is proposing for San Juan Capistrano.

The 80+ acres at SONGS is located on land leased from the United States Marine Corp. And while the deconstruction of SONGS will take years, they have already cleared away many of the facilities with more underway.

I am sure with the assistance from the California Governors office, from both California state and federal agencies, and from the leadership of Congressional District 49, ENGIE will not lose their investment in an interconnectivity study and that, already knowing the installed capacity of the SONGS facilities, the California Independent System Operator will be convinced that the former San Onofre Nuclear Generating Station would be an ideal location for a green energy facility – the poetic justice of such a move is palpable.

I further would suggest that the United States Marine Corp would welcome such a change in location since many of their employees and service members live in Laguan Niguel and San Juan Capistrano, and the USMC cares about their service members and employee's safety. This includes this man's own family who lives 1200 feet downwind from the current proposed location.