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Subject: 83E Round 1 Comments By David Wojick, Ph.D., CFACT
Date: Friday, March 14, 2025 3:37:33 PM

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To: 83E RFP Drafting Parties

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These brief comments are for Rounds 1 & 2. Additional information upon request.

Massachusetts multi-billion dollar battery buy RFPs raise serious safety concerns as many hundreds of container sized batteries may be bought. Here are the stakeholder comment questions:

"9. *Safety:*

- a. Which safety standards should be required as a minimum baseline.*
- b. The safety systems, insurance requirements, relationships with emergency responders and host communities, emergency response plans, and any other necessary protections to keep adjacent communities safe."*

Here are my comments:

The central issue is how to prevent or respond to a major fire. That these huge battery chemical units can spontaneously ignite or explode is well established.

It is imperative that the battery units be spaced far enough apart to prevent a unit fire from spreading to its neighboring units, which could catastrophically ignite the entire facility. The required spacing standards do not exist. The AIG insurance company discusses this issue here: <https://www.aig.com/content/dam/aig/america-canada/us/documents/business/risk-engineering/energy-and-construction/bess-utility-scale-aig.pdf>

They call for at least 10' spacing but I suggest a safer 20' spacing and a limit of 10 containers per site.

What is needed is careful thermal engineering based on the specific battery technology being used. These battery chemicals burn at an incredible 5,000 degrees F.

There should be no host community or adjacent communities. Sites should be rural and as isolated from communities as possible.

Liability insurance should be required for full facility fire offsite impacts. If there are nearby communities then on the order of a billion dollars including loss of life may be necessary.

Require on-site fire suppression or containment systems. Require large on-site water supply with containment of contaminated runoff. Fighting these fires requires special training and equipment. The facility should pay for these.

See my <https://www.cfact.org/2024/10/01/grid-scale-battery-fires-loom-large/> for more information.

Respectfully submitted,

David Wojick, Ph.D.