

Meeting Date: February 25, 2025

Agenda Item No. 11

Distribution Date: February 21, 2025

Batch No. 03

From: [Cori Schumacher](#)
To: [FGG, Public Comment](#); [Lawson-Remer, Terra](#); [MontgomerySteppe, Monica](#); [Anderson, Joel](#); [Desmond, Jim](#)
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Subject: [External] 2/25/2025 - Agenda Item #11: SUPPORTING SAFER PRACTICES WHEN SITING BATTERY ENERGY STORAGE SYSTEM PROJECTS
Date: Monday, February 24, 2025 2:25:22 PM
Attachments: [Outlook-23s1t0ta.png](#)
[IBEW 569_OpposeAB303.pdf](#)

Please find attached IBEW 569's comments for Agenda Item #11, BOS Meeting 2/25/2025, "SUPPORTING SAFER PRACTICES WHEN SITING BATTERY ENERGY STORAGE SYSTEM PROJECTS."

I am at your disposal should there be any questions.

Thank you for all you do to keep our county safe and thriving.

Sincerely,

Cori Schumacher

Policy Director/Political Organizer

[IBEW 569](#)

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IBEW 569

February 24, 2025

Hon. Vice Chair Lawson-Remer, Hon. Supervisor Anderson, Hon. Supervisor Montgomery Steppe, and Hon. Supervisor Desmond
County of San Diego
County Administration Center
1600 Pacific Highway
San Diego, CA 92101

RE: OPPOSING AB 303 AS INTRODUCED

Dear Hon. Vice Chair Lawson-Remer, Hon. Supervisor Anderson, Hon. Supervisor Montgomery Steppe, and Hon. Supervisor Desmond,

On behalf of IBEW 569, representing 3,700 union electricians and power professionals, we commend the County for attending to best practices for battery energy storage systems (BESS) in San Diego County. However, the Board Letter submitted by Supervisor Desmond to support Assembly Bill 303 (Addis) as introduced on January 23, 2025 does not further this goal. If passed, AB 303 would enact a de facto BESS moratorium. **We therefore urge the Board of Supervisors to reject Supervisor Desmond's recommendation to support AB 303.**

BESS projects are critical to providing reliable and affordable energy to residential neighborhoods and small businesses. BESS can also pose significant fire, health and safety risks. In general, BESS pose significant fire and life safety risks primarily due to the large amount of energy they store in a confined space and the chemical reactions involved in their operation. BESS, particularly those using lithium-ion batteries, are susceptible to thermal runaway which occurs when a cell in the battery overheats, causing a chain reaction that can lead to a fire or explosion.

IBEW 569 urges the codification of workforce safety standards that prevent incidents that can lead to fires or explosions.

We were thrilled to see that the San Diego County *BESS Best Practices Report* included reference to the Electric Power Research Institute's (EPRI) May 2024 whitepaper "Insights from EPRI's BESS Failure Incident

Database: Analysis of Failure Root Cause” – the most comprehensive analysis available on the root causes of BESS failures.¹ This whitepaper clarifies with data that **the primary root cause of BESS incidents is directly linked to the workforce installing, assembling, testing, commissioning, maintaining, repairing, retrofitting, and decommissioning BESS facilities.**

In an analysis of the root cause of failures within its database, EPRI concluded that the “most common root cause of [BESS] failure” falls under the classification “**Integration, Assembly, and Construction.**”² Failures attributed to “Integration, Assembly, and Construction” are failures “due to poor integration, component incompatibility, incorrect installation of elements of an energy storage system or due to inadequate commissioning procedures.”³

This is why IBEW 569 will continue to urge the County of San Diego to adopt **minimum workforce safety standards for all stages of the BESS lifecycle**, including installation, assembly, testing, commissioning, maintenance, repair, retrofitting, and decommissioning. For example, the County fire code can be amended to require that all electrical work involving the installation, assembly, testing, commissioning, maintenance, repair, retrofitting, and decommissioning of BESS facilities in the Unincorporated Area of San Diego County with an energy capacity exceeding 70 kilowatt-hours be performed by **certified electricians** (e.g., general electrician, trainee electrician, and registered apprentice electrician) employed by **C-10 licensed contractors**.

In addition to the policy recommendation above regarding C-10 licensed contractors employing certified electricians, we recommend proposing a policy that starting in 2025, a minimum of fifteen (15) percent of the onsite certified electricians performing electrical work involving the installation, assembly, testing, commissioning, maintenance, repair, retrofitting, and decommissioning of a BESS facility or Energy Storage Management System (ESMS) shall hold an ESAMTAC certification. By 2030, the number of certified electricians holding an ESAMTAC certification shall increase to thirty-three (33) percent. By 2035, that number shall be fifty (50) percent.⁴

Ensuring workforce safety standards are incorporated into County codes is critical to ensuring the safe, reliable, and sustainable deployment of BESS projects, especially given the complex technical and safety challenges they present.

We recommend that the Fire Protection District incorporate the following workforce safety standards for all BESS projects with an energy capacity exceeding 70 kilowatt-hours (kWh):

¹ Insights from EPRI’s 2024 Whitepaper are found in Appendix D of Jensen Hughes’ “San Diego County BESS Best Practices: Policy Recommendations for Battery Energy Storage Systems Projects,” November 8, 2024, p. D-1.

² Electric Power Research Institute (EPRI), “Insights from EPRI’s Battery Energy Storage Systems (BESS) Failure Incident Database: Analysis of Failure Root Cause,” EPRI.com, May 2024, p.8, accessed November 18, 2024. <https://www.epri.com/research/products/000000003002030360>

³ EPRI Whitepaper, p. 4

⁴ “Electrical Work” as defined by the California Contractors State Board.

1. **C-10 Licensed Contractors and Certified Electricians for All Electrical Work:** Require that all electrical work be performed by C-10 licensed contractors employing state certified electricians (e.g., general electrician, trainee electrician, and registered apprentice electrician).
2. **Energy Storage and Microgrid Training and Certification (ESAMTAC):** Require that a minimum of 15% of the onsite certified electricians performing electrical work hold an ESAMTAC certification.
3. **Skilled and Trained Workforce for Utility-Scale BESS Projects:** Require the use of a skilled and trained workforce for utility-scale BESS projects.

BESS projects throughout the State of California are showing their value in the prevention of blackouts, brownouts, and public safety power shut offs when energy is in high demand, like on sweltering summer days when air-conditioning units are in use. With more electric vehicles and electric infrastructure of all kinds joining California's energy grid, grid resilience must be at the center of our conversations. BESS projects contribute significantly to grid stabilization and guarantee a continuous supply of clean energy, thereby reducing greenhouse gas emissions while keeping the lights on. However, when BESS failures occur, our communities are placed at risk. And data show that BESS failures occur primarily due to the workforce doing the installing, assembling, testing, commissioning, maintaining, repairing, retrofitting, and decommissioning BESS facilities.

IBEW 569 appreciates the County's efforts to develop comprehensive safety and permitting guidelines for BESS installations. By incorporating the recommended workforce standards, the County will address a critical safety gap and further its mission to promote public health, safety, and welfare. Thank you for the opportunity to provide feedback on this important initiative. We welcome the opportunity to discuss our recommendations further or provide additional resources to support this effort.

We are at your disposal to answer any questions.

Your Partner in Service and Community Safety,



Jeremy Abrams
Business Manager
IBEW 569

cc:
CAO Ebony Shelton
County Counsel