March 16, 2026

Dear Mr. Vosvick,

Thank you for your response, it was the first response that I have received from ACE.

In your response, many assurances are stated: the "Beach Haven BESS complies with applicable environmental, fire protection, and safety standards," "has multiple layers of safeguards," is "designed using best practices, even exceeding minimum required standards for detection, isolation, fire suppression, and emergency shutdown." That "ACE has taken extensive, engineering-driven, safety focused, and environmentally responsible measures to ensure the Beach Haven BESS is both safe and appropriate for its location." Regardless of these assurances, they do nothing to address a thermal runaway event (TRE), especially with the Beach Haven BESS located in the center of a tourist island. This is a grave and irresponsible risk to life, safety, public health, and the environment, and needs to undergo a placement review and relocation off the island.

ACE acknowledges that a TRE is a possibility, and maintains that the risks are minimized, but "in the unlikely event of a fire, TRE, or chemical release, the incident will be managed and handled safely and effectively by the Office of Emergency Management (OEM) and the Beach Haven Volunteer Fire Department."

This is extremely disconcerting as there is nothing the OEM and Fire Department can do to extinguish or mitigate the severity of a TRE. Stating that a TRE will be managed and handled safely and effectively is especially unrealistic due to the extreme hazards and dangers to public health by its placement:

- Guide 147 in the 2024 Emergency Response Guidebook (ERG): If a rail car or trailer of Lithium-ion batteries is involved in a fire, ISOLATE for 1/3 of a mile in all directions; also initiate EVACUATION, including emergency responders, for 1/3 of a mile, in all directions. This is for batteries charged to 30% or less. Higher charge states create even more severe TREs with faster propagation, higher temperatures, and greater gas emissions.
- Firefighting resources used to cool adjacent exposures place responders at risk in the evacuation zone, challenging and defying ERG Guide 147.

- It is unrealistic to expect that a 1/3 of a mile evacuation can be cleared and established to keep the public safe. There could be hundreds of people in the evacuation zone during peak summertime population with little, or no, time to vacate the area.
- The Beach Haven Volunteer Fire Department, the Office of Emergency Management, the Police Department, the Beach Haven Municipal Building, the Beach Haven Elementary School, and the Engleside Inn, which served as the base for emergency responders during Superstorm Sandy, are all within the 1/3 of a mile evacuation zone from the BESS. (See satellite view https://maps.app.goo.gl/6EGZUBWoBJQAPFso9)
- With our daily southern winds that can shift rapidly, the evacuation zone could require expansion to include Bay Village and Schooners Wharf.
- First responders, attempting to clear people out of the zone, would need to be on air (using Self-Contained Breathing Apparatus – SCBA) with limited time constraints, and risking their own safety by working within the evacuation zone.
- With a limited number of local emergency responders, TREs quickly progress, with an extreme amount of toxic and caustic emissions produced and released.
- TREs are unstoppable and self-sustaining as current water, foam, and suppression systems are ineffective.
- Water is not used directly on the battery fire, but rather to cool exposures and prevent fire spread. Standard practice is to allow these battery fires to burn itself out over many hours, even days, and in some cases weeks, with risks of reignition.
- TREs release heavy metal nanoparticles, toxic emissions, contaminants, and carcinogens with unknown short term and long term health effects for the public and first responders.

Beach Haven has unique challenges that will greatly hinder and impede emergency response during a TRE:

- Located on a barrier island with one way on and off.
- Significant weekend traffic, with Saturday renter change over day.
- High weekly turnover with new visitors each week precludes educating folks on what to do in case of a serious event at the BESS.

- All evacuation routes are adjacent to the BESS and in the evacuation zone.
- The evacuation zone isolates all areas south of Pearl St. and north of Tayler Ave.
- Hazmat teams, other emergency personnel and resources off island would be severely delayed. According to ACE, any hazmat response will not involve direct interaction with the site until after the event has subsided, which may be *a number of hours*.
- Limited number of island based emergency and first responders.
- Coastal environments for BESS facilities introduce significant additional risks due to high humidity, salt-air corrosion, and high winds which can accelerate degradation and trigger a TRE.
- Environmental concerns due to contamination of the BAY and Aquifers.
- Additionally, without site specific, worst case plume modeling with peak population and localized atmospheric conditions, it is unclear how many people (hundreds/thousands) would be impacted by toxic emissions, or the viability and effectiveness of a 1/3 of a mile evacuation zone.

US BESS failure rates are alarmingly high, require analysis, and a useful failure rate expression.

There were at least 16 BESS TREs at US facilities from April 2022 through the end of 2025, a period of less than four years. With approximately 900 BESS facilities operational at the time, this represents a stunning 1.8% TRE failure rate, which does not include other serious events or TREs before 2022. Even more alarming, the US had five TREs in 2025 which represented 50% of the global TREs (5 of 10), yet the US makes up only about 16% of global utility size BESS total storage capacity with 40 of 250 plus gigawatts. The five TREs for 2025 represents a year over year alarming 66% increase in failures, as there were three TREs in 2024.

The nuclear power industry looks at failures per reactor, not failures per megawatt of energy produced. The BESS industry needs to adapt a similar methodology to track failures based upon facility count, instead of storage, for a more accurate and useful indicator. A TRE at a BESS facility is an unparalleled hazard, and a TRE failure is a failure, regardless of its occurrence at a one megawatt or 300 megawatt

facility. The dangerous consequences surrounding a TRE involve the total number of people exposed to the toxic emissions, not the total megawatts of storage, or the total number of containers. The goal is to limit TREs to only one container, but that hasn't been the case as a number of recent TREs in the US have involved multiple containers. The updated 2026 NFPA 855 BESS standard mandates large scale fire testing to prove thermal runaway does not propagate to adjacent containers supporting the "let it burn" approach. A TRE failure counts as a failure regardless of the number of containers involved. Should one container burn out of 100, it is not expressed as a 1% TRE. Expressing failures based upon facilities is clearly the more useful matrix for tracking failure rates.

Problems with using EPRI's Declining Failure Rate Chart.

The industry continues to echo and promote the 97% drop in global grid scale BESS failure rates provided by the utility funded Electric Power Research Institute (EPRI). Their 2024 update reports a 98% drop in global failure rates due to improvements in design and industry best practices. This is not necessarily true as, TRE failures have remained relatively constant while the reporting denominator, "deployment," is expanding due to rapid growth in storage. The change in reporting to gigawatt hours rather than gigawatts in 2024 further increased deployment by up to 4X for many facilities. The denominator could further be increased by using racks, modules, or even individual battery cells, to demonstrate a 99.99% drop in failure rates, (if that were the goal). A drop in failure rates does not provide useful information regarding the actual failure rate or risk profile. EPRI's data base relies on voluntary reporting and local media coverage so failure rates are underreported. Some countries, like China, which accounts for over 50% of global deployment, control their media. EPRI tracts incidents and failures worldwide, while, we should be highly concerned and focused on BESS TREs at US facilities.

Global Deployment and Failures Are NOT the Correct Metrics for the US

Global failures and global deployment, factors we have no control or influence over, dilutes and creates inaccuracies when looking at US TRE failure rates due to significant differences in global deployment speed, regulatory environments, and

safety standards, as compared to the US BESS market. We need to examine the specific risk profiles of the rapidly expanding US market where over 26 utility-scale fires were recorded between 2012 and 2025, with 16 occurring since April 2022, five occurring in 2025, and three occurring in 2024. The failure rate in the US went up 66% in one year. Data confirms that the U.S. utility-scale BESS market faces a distinct risk profile, with a high concentration of recent fire incidents that contrasts with global trends. With rapid deployment, another serious fact and concern, is that most failures happen early within the first two years of operation and are site specific with assembly, installation, integration, maintenance, and design related issues.

Important Statistics about BESS Failures and Recent Inspections

- According to the EPRI May 2024 White Paper on BESS Failures, 72% of BESS failures (where system age was known) occurred during construction, commissioning, or within the first two years of operation. This statistic is alarming true when examining the 16 BESS TREs since April 2022 and their commissioning dates. There is rapid deployment without the proper and needed oversight, standards, regulations, and inspections. For example, the NJ statewide fire code has not been updated since 2018 and does not address the unique safety risks of BESS facilities, like TREs.
- Even more concerning, only 36% of failures (2018-2023) had an identifiable root cause. When failures were identified, they were due to electrical issues like short circuits, overcharging, manufacturing defects, physical damage, poor design, installation, assembly, construction, integration, and inadequate environmental management such as temperature and humidity control. Even a lightning strike and a coolant leak have been reported as potential causes of some TREs.
- The past several years have shown that thermal runaway poses a significant risk to the Energy Storage Industry, according to the 2024 Clean Energy Associates BESS Quality Risks Report.
- 26% of BESS units that CEA inspected had defects in the Fire Detection and Suppression System, while 18% of units had Thermal Management System defects. Fire suppression and thermal management systems are critical for

functional safety, and defects in these systems can lead to increased risk of fire.
https://info.cea3.com/hubfs/CEA%20BESS%20Quality%20Risks%20Report.pdf

Strategic Placement Key to Public Safety and the Environment

Federal agencies, fire safety and standards organizations acknowledge BESS facilities can fail in a catastrophic way and have developed Fact Sheets and guidance regarding these unique hazards. Since TREs cannot be extinguished, standard practice is to allow the batteries to burn themselves out while releasing enormous amounts of toxic corrosive and explosive gases along with nanoparticles of heavy metals and other contaminants.

Texas A&M Engineering Extension Service in their report, dated November 2024, "Lithium-ion Fires and Emissions Characterization," concluded TREs are extreme emission events and measured 24 heavy metals and 75 semi-volatile organic compounds (SVOCs).

San Jose State University's Moss Landing Marine Lab (MLML) published their findings from the Moss Landing TRE in January of 2025 in Scientific Reports on November 26, 2025. Heavy metal contamination (nickel, cobalt, manganese) from the battery fire was deposited at levels hundreds to a thousand times higher than previously measured in the marsh at Elkhorn Slough.

Hazmat Magazine's editorial team, February 15, 2026, published, "The Moss Landing Fallout: Rethinking Hazmat Protocols for the Gigawatt Era." For the hazmat community, the lesson is clear: "The risk of a BESS fire does not end when the flames are out. The environmental and health liabilities are microscopic, persistent, and require a multi-disciplinary approach that blends fire science with advanced environmental toxicology."

ACE stated they are restricted from sharing manufacturer-specific fire testing results when questioned about what heavy metals and contaminants would be released during a TRE. Knowing these events happen quickly and without warning, strategic placement with proper set-backs from residential areas is critical to

ensure public safety. Installing BESS facilities where allowing them to burn themselves out with toxic cloud emissions in densely populated areas is irresponsible. Out of the 10 BESS facilities in New Jersey, the Beach Haven BESS presents the greatest risk to public safety due to its dangerous placement. It should never be commissioned and needs to be moved off island to a less perilous location, as our environmentally sensitive areas and sole source aquifers also need protection. Attached is the list of the 16 US BESS TREs with aerial photos showing these facilities were all in industrial or remote areas which facilitated and enabled setting up of evacuation zones. In some cases, the nearest residents were miles away.

ACE Neglected to Disclose Any Hazards of BESS When Probed by Beach Haven Land Use Board (LUB)

ACE's contention that this BESS system was fully disclosed as a battery storage system to the LUB is disingenuous. During the Beach Haven LUB meeting in April 2022, a member asked, "What are the hazards with the batteries?" ACE's project manager informed board members that the ***"worst case scenario battery storage would be in the lines of a fire."*** Further along in the meeting, a board member asked about suppression systems to ensure our volunteer firefighters safety. ACE's project manager stated, ***"Just to add, in the unlikely event of a fire, the facility is equipped with automatic detection and suppression systems, as well as, pre-piped water systems. So in the event that first responders are arriving, this will avoid the need for them to enter the enclosure. So they can address the potential fire without having to enter that facility."*** At the Montague Township Land Use Board meeting on April 13, 2023, when the Ormat Montague Energy Storage System was heard for site approval, this was stated "***the way you treat these types of fires is to allow them to burn themselves out within their enclosures, and that the fire department is really there to prevent any spreading of the fire."***

These statements do not disclose the real hazards, **the worst case scenario for battery storage is an unstoppable, self-sustaining, "let it burn" itself out TRE, along with the release of toxic, corrosive, explosive gases, heavy metals, and other contaminants.** When referring to a "fire" there is a general assumption, "fire" can be extinguished, especially, when the conversation moved to suppression systems, as it did in the LUB meeting.

Lithium-ion battery BESS TREs, unlike traditional fires, represent a unique hazard. These “fires” cannot be “addressed” or extinguished with current water, foam, or suppression systems, and are therefore, allowed to burn themselves out.

ACE failed to disclose on any of their documents related to the BESS project that these are lithium-ion batteries. If the Beach Haven LUB was informed these were lithium-ion batteries, and any of the unique hazards were discussed, the LUB would not have approved this facility. Since this was approved, there have been at least 16 TREs at BESS facilities in the US with growing public awareness. BESS fires are uniquely dangerous, requiring specialized hazard designations. ***(See attached, Beach Haven Land Use Board 4/4/2022 meeting transcript and recording of the hazards and suppression discussion.)***

The International Organization for Standardization (ISO) introduced Class L in the January 2026 update of ISO 3941 to distinguish fires specifically involving lithium-ion batteries and Energy Storage Systems (BESS) from traditional fires. This update to global fire safety standards recognizes and addresses the unique and severe risks of Li-ion battery fires, including rapid thermal runaway, high-temperature (>1000°C) fires, toxic gas release, and re-ignition risks.

On August 21, 2025, The Environmental Protection Agency (EPA) released a 3-page fact sheet, "Battery Energy Storage Systems: Main Considerations for Safe Installation and Incident Response," to address growing safety concerns and fire risks associated with lithium-ion BESS (see attached.)

In February 2024, The National Fire Protection Association (NFPA) released an “Energy Storage Systems (ESS) Safety” Fact Sheet to highlight the hazards associated with battery energy storage systems, including thermal runaway, fire propagation, and toxic gas release (see attached.)

It is critical that utilities and operators of BESS facilities, with their superior knowledge, share the unique hazards associated with Lithium-ion battery BESS facilities with zoning, planning, and land use boards when obtaining variance and site approvals. That was not the case when ACE presented the BESS in April 2022 to the Beach Haven Land Use Board.

Nuclear Power Plant, Built, Closed, Dismantled, Impossible to Evacuate

Exelon Corp, the largest operator of nuclear power plants in the US, is well aware of the utilities landmark mismanagement case, The Shoreham Nuclear Power Plant on Long Island, NY. Completed in 1984 at a cost of six billion, it never received an operating license for commercial commissioning. It was ordered closed in 1989 and completely dismantled by 1994. Why? The inability to establish a viable evacuation plan. Many state and local officials concluded a safe evacuation of the surrounding area was impossible in a crisis. The 1979 Three Mile Island Accident and the 1986 Chernobyl Disaster led Suffolk County officials to reject evacuation plans citing inadequate roads and geography, due to a peninsula with limited and heavily congested road outlets.

A TRE at the Beach Haven BESS during peak summertime population progresses into an impossible situation with grave consequences, trying to clear the public from toxic emissions.

Pepco cancels BESS at Oxon Hills substation in MD due to public outcry.

In July 2023, Pepco Holding halted the controversial one-megawatt Lithium-ion Battery Energy Storage System (BESS) project planned for the Oxon Hill substation in Prince George's County due to community, environmental, and safety concerns. Residents strongly opposed the project, citing fire and explosion risks, and raising concerns about its proximity (less than 200 feet) to homes and a daycare center. Frightened by the possibility that the batteries might spew flammable gas in a chain reaction failure called thermal runaway, residents convinced the Prince George's County Council to oppose it in 2023. For nearly two years, residents and community leaders pushed back, expressing that the project's safety concerns were not adequately addressed. "Pepco's Livingston Road Battery Energy Storage System project in Oxon Hill … has been canceled," said Chuck McDade, a spokesperson for Pepco. If Pepco can halt and cancel the Oxon Hills BESS, it certainly can do the same for Beach Haven, which represents an even greater risk to the community, and local government has requested its removal.

The BESS is a Temporary Measure, Needed for 2023, Still Not Activated

According to ACE's Principal Project Manager, in the April 2022 LUB meeting, the BESS was needed to supplement load demand that was forecasted to be surpassed by the summer of 2023. In order to offset that, construction of the BESS was planned for fall of 2022, and it was to be in service by spring of 2023. Additionally, the BESS was explained as being a *temporary* measure, with the long-term fix, a GSI Substation. The BESS, having not been commissioned, was not used during the past three summers, with extreme and record breaking heat waves and high power demands, with seemingly no power outages or issues.

Many years ago, there were numerous voltage and power issues in Beach Haven, and, during one summer, emergency generators were operating on ACE's substation property and at other locations. Since that time, extensive capital investments and projects have been undertaken to enhance grid resiliency, distribution, and storm readiness. Improvements were made to replace poles and power lines coming onto and down the island, a third transformer was added to the Ship Bottom Substation, and banks of regulators were added at three different locations. These many upgrades resulted in marked improvements. We question the need for the BESS when load demand was projected to surpass in the summer of 2023, as we have experienced three extremely hot summers without its use.

Conclusion

The Beach Haven BESS represents an unfathomable risk to our community and the environment. ACE claims to have fully disclosed the hazards of the battery storage system, yet these hazards are so unique and dangerous ISO recently established the new "Class L" to differentiate these systems. Comparing NFPA and EPA BESS fact sheets to ACE's (see attached), it is apparent ACE obviously chooses not to disclose any of the associated hazards of BESS facilities. Please review the transcript and listen to the exchanges to make your own determination of these material omissions.

The resulting dangers and consequences of a TRE are not just the toxic, corrosive, explosive gases released during the TRE, but the well documented heavy metals

and other contaminants and carcinogens that settle and remain in the area beyond our lifetimes.

TREs are a real danger, and the US has a high failure rate. The 98% drop in failures promoted by the industry is a meaningless figure, which ignores the real risk that failures remain constant while deployment is increasing rapidly.

A TRE during the summertime population peak could have grave consequences, exposing hundreds, even thousands, to toxic emissions with serious long-term health and environmental effects. If a six billion nuclear power plant can be built, closed, and dismantled over evacuation concerns, so can a BESS facility located in the worst possible location.

Beach Haven's local government and its citizens have requested its removal. Pepco Holdings changed course on the Oxon Hills, MD BESS due to public opposition, shouldn't Beach Haven receive the same consideration?

We are hopeful with all of this new data that you consider relocating the BESS to a more appropriate location, off island, where a failure would have a much lower impact on public safety and the environment. We encourage ACE to move quickly with your plan toward the permanent solution: a new substation.

Regards and thank you for your consideration.

Robert Jacobson

Beach Haven Resident

APPENDIX 1

Below is a sample of the questions ACE answered. ***Clearly, ACE reiterates the responsibility of the Emergency Response to a TRE at the Beach Haven BESS rests completely under the direction of the Beach Haven Volunteer Fire Department and the OEM.***

1. How will real time public alerts be issued during a TRE?

ACE will continue to partner closely with OEM so that, in the unlikely event of a TRE, residents receive prompt and reliable information through the established public-alert systems that are already familiar and proven within the community.

2. How will off-island hazmat response delays be mitigated?

The fire department and OEM have command will take all possible steps to expedite emergency response to the site. Any hazmat response will not involve direct interaction with the site until after the event has subsided, which may be a number of hours.

3. How will an evacuation zone of 330 feet or a zone of 1740 feet, 1/3 of a mile be enforced given the town's layout?

The EOP developed for the site focuses on practical location-specific mitigation strategies that allow first responders to manage an incident safely and effectively?

4. What would the evacuation or isolation zones be, considering EPA and US DOT guidance?

There is currently an Emergency Operating Plan (EOP) in Place. The EOP is updated annually and addresses all aspects of the emergency from cyber-attacks on the electrical systems, to hurricanes, floods, fires, and the like. The EOP outlines how events are handled, including interactions with local governments and first responders. Specific to fires, a pre-fire plan was developed for Beach Haven and training of Beach Haven first responders has been completed.

5. What is the evacuation strategy during peak summer population periods?

The fire department, EMO, and other legally and practical responsible authorities play the lead role in determining whether protective actions such as evacuations are necessary, as only local governments have the authority to implement protection actions beyond "No Action Needed." Public warnings are ultimately disseminated in coordination with these agencies under the applicable Emergency Operations Plan.

6. What plume modeling was done? Under what weather conditions? How many people could be exposed in a worst case -case TRE scenario during peak tourism? What are responder exposure risks?

For Beach Haven, no plume modeling specific to local meteorological conditions was required under applicable codes, because the system is designed so that any abnormal condition is detected, isolated, and suppressed long before a release capable of off-site impact could occur. The Beach Haven BESS is a small-scale, 2 MWh installation, and the equipment has been engineered with multiple layers of protection—early warning detection, isolation controls, and fire-suppression features—intended to prevent a TRE from escalating into a scenario requiring population level protective actions. NOTE: This should be a requirement for this location.

7. Did ACE consider a TRE occurring during a flood event, and how would this affect emergency response?

   ACE considered the risk of a flood in the BESS design and elevated it to minimize this risk. The exact response to the BESS during a flood would be driven by current conditions assessed by the first responders and OEM.

8. What metals and chemicals would be released during a TRE? Have baseline contaminant levels been measured?

ACE is restricted from sharing manufacturer-specific fire testing results. All required pre-construction testing was performed for the site.

9. How will the risks to the EPA Sole Sourced Aquifer and EPA Estuary of National Significance Barnegat Bay be mitigated?

The Beach Haven BESS is designed and constructed with additional protections beyond the minimum standard to reduce the potential impact on the environment. In the unlikely event of fire or chemical release that may impact relevant groundwater or surface waters, ACE will perform all necessary and appropriate environmental response actions consistent with the applicable laws and corporate policy.

10. What protections exist to prevent TRE related contaminants from affecting - related contaminants from affecting drinking water and Barnegat Bay?

The primary protective measures on the ***BESS are minimizing the risk of thermal runaway*** *occurring in the first place and reducing the chance of it spreading between cells or racks within the BESS itself.* ***This will minimize the contaminants generated during an event. In the unlikely event of a fire or chemical release*** *that may impact on relevant groundwater or surface waters, ACE will perform all necessary and appropriate environmental response actions consistent with the applicable laws and corporate policies.*

Appendix 2

Beach Haven Land Use Board Meeting, April 4, 2022

ACE made material omissions when asked direct questions regarding the hazards. Transcription of the pertinent exchanges between LUB members and ACE representatives at the BHLUB meeting on April 4, 2022.
https://www.youtube.com/watch?v=DIK9cStEkgE&t=4925s

(Note that the discussion of the ACE application for site plan approval begins at about 1 hours 2 minutes into the meeting).

This exchange starts at 1 hour 22 minutes and lasts 2 minutes.

Jim Stevens LUB asks, "From a hazard standpoint, is there any potential hazard from the battery packs?"

Heather Roberts ACE's Principle Project Manager responds, "so from a safety perspective, safety is always our primary focus, and is the key element in the design and implementation of any project, but, there's a wealth of information on battery storage and the required safety precautions are being followed and we are following the established standards to ensure that we are meeting the industry best practices for safety and security,,,, so we do not feel it is a hazard."

Stevens LUB "If there was a hazard, what would the potential hazard be?"

Heather Roberts ACE responds, "So worst case scenario for battery storage would be in the lines of a fire. And part of our implementation plan involves working with local leaders and emergency management agencies to familiarize every one of the characteristics of the facility. Our first line of defense is our design so it doesn't get to that point of failure. The second line of defense is our monitoring and management system so that we can detect early on so we can address issues before they become a failure itself and the third would be proper training and understanding from an emergency response procedure in the unlikely event of a fire, and we also have our fire protection (expert?) here on the call as well"

Stevens LUB: “now would you provide the local fire department with any special equipment?”

Heather Roberts ACE: No special equipment is needed but we would provide the fire department with training and through that training if something happens to be identified that would be additional we could work with them in that event.

This exchange starts at 2 hours and 5 minutes lasts 2 minutes
https://www.youtube.com/watch?v=DIK9cStEkgE&t=7500s

Tom Medal LUB asks, “Is this as many batteries as we are going to put on the site, or will this site expand at all, ever?”

Heather Roberts ACE responds, “so we had designed this site in mind to add the potential for a second battery storage unit, but at the current time, we don’t know that that’s the direction we are heading.”

Tom Medal LUB asks, “they are not necessary, or just not financially responsible?”

Heather Roberts ACE responds, “it’s currently not necessary to have a second battery storage unit on site.”

Tom Medal LUB asks, “ok, second question I have is about safety, they said that you would be training the local fire service if there’s anything, is there going to be any kind of like, Halon Gas that if there’s any fires in there that automatically puts out stuff, so that we don’t have to worry about our volunteers going in there and getting stuck inside. Is the local person, who’s the closest person that going to be our responsive from Atlantic City Electric at time the trouble trucks take some time because we understand they have to come from different areas?”

Joel Fleishman Esc for ACE says, "This may be a good time to have Bill Buirch address that he's our fire suppression expert."

Heather Roberts ACE responds, "sure, I can take the first, sorry, we're talking over each other,
"Just to add, in the unlikely event of a fire, the facility is equipped with automatic detection and suppression systems, as well as, pre-piped water systems. So in the event that first responders are arriving, this will avoid the need for them to enter the enclosure. So they can address the potential fire without having to enter that facility".

Ken Mosca ACE responds, "And we'd will be responding from West Creek."

ACE failed to disclose any of the hazards associated with battery energy storage. This lists the material omissions and hazards that should have been discussed:

1. ACE's response, "worst case scenario for battery storage would be in the lines of a fire,"
    - Does not equate to a TRE, which is the worst case scenario for battery storage.
2. ACE fails to disclose that the batteries would be lithium-ion.
    - On the application, project description, Fact Sheet, and FAQ's Sheet and innumerable times in the LUB meeting, ACE never once discloses these are to be lithium-ion batteries.
3. Lithium-ion batteries can lead to a TRE, a self-sustaining chemical reaction that can't be stopped, resulting in an extreme emission event.
4. ACE citing suppression and pre-piped water systems implies the battery fire can be extinguished.
    - Current water, foam, and suppression systems are ineffective for a TRE.
5. TREs release enormous quantities of explosive gases and toxic vapor clouds.
6. TREs release many contaminants and heavy metal nanoparticles into the environment.

7. Large Isolation, evacuation, hot, and shelter-in-place zones will need to be immediately established to protect first responders and the public from inhaling toxic gases.
8. These batteries are allowed to burn themselves out, over multiple days.
9. Water is used to cool exposures, not directly onto the batteries which can make matters worse. Copious amounts might be needed causing a crippling strain on our limited supply, especially in the summer. Drafting salt water from the bay is used for supplementation and must not come in contact with the batteries.
10. Batteries can reignite after the event due to stored energy.
11. TREs require a well-timed specialized, emergency response including hazardous material teams and other personnel and resources not island based. Our summertime traffic would greatly delay and impede the needed emergency response resulting in a severe outcome.
12. The aftermath, a toxic contaminated site requiring a very long, EPA overseen cleanup.
13. ACE's fire suppression engineer, William (Bill) Buirch was on the 4/2022 LUB call. He sits on the Technical Committee (TC) for Energy Storage Systems (ESS) at National Fire Protection Association (NFPA) which developed and updates the 855 standard for ESS. His LinkedIn profile lists him as principal project manager – fire protection at Pepco (Parent of ACE) specializing in emergency response planning, training, and implementation for electric utilities.
14. These hazard omissions are acutely apparent when comparing ACE's battery energy storage fact sheet to those of the EPA & NFPA.
15. The long-term damage from contaminants will be unknown.
16. The impact to businesses, fishing, and tourism could be catastrophic.