

## BESS is not an associated development

The applicant argues the BESS is an associated development because it can only store four hours of generation of the solar farm which it described verbally at the Issue Specific Hearing on November 1st as having a capacity of 2.4GWhr. When challenged to then have the DCO say the battery should only be allowed to store energy generated by the solar farm, it says no, the National grid should be allowed to store any generated energy from anywhere on the grid in the battery. This is because such storage represents significant revenue streams for Sunnica. And of course, although they describe the battery as having four hour capacity, this is not particularly relevant because for much of the year when there are fewer daylight hours and the Sun is lower, the array will generate much less power and for instance in the winter months, there will not be enough generated by the solar array to make use of the battery at all. This says conclusively that the battery is not primarily associated with the solar generation but is there for other revenue streams from storing energy generated in other ways. As such, it does not need to be sited with the solar array but could be in a much safer area where the dangers from fire and release of toxic materials were less threatening to the local population. Hence it is not an Associated Development and should be excluded from the scheme. Indeed, if given the Carte Blanche they have requested, they might increase the battery storage capacity even more to enhance such revenue streams. They have also argued, incomprehensibly, that the hazards presented by the battery are not related to its capacity (in the Issue Specific Hearing on November 1st). This illustrates further their lack of experience and knowledge related to BESS. The normal way to assess hazards for safety critical projects is to consider the severity of an adverse event and the probability of such events by a team independent from the design team. The design team then proposes mitigating measures which reduce the risk for severe hazards to low. It is well reported in the press and the literature that high-capacity lithium-ion batteries present a significant fire risk from thermal runaways, even with much lower capacity BESS. Such accidents have caused injury and loss of life to firefighters and significant damage to energy security for the time it takes to restore the plant to an operational condition.