

**From:** [noreply@noreply.mass.gov](mailto:noreply@noreply.mass.gov)  
**To:** [SitingBoard Filing \(DPU\)](#)  
**Subject:** EFSB Permitting Reform Comment Form  
**Date:** Friday, May 16, 2025 12:09:45 PM  
**Attachments:** [Flatiron-Energy-site-proposal.docx](#)

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**Name**

Cheryl Wright

**Email**

[REDACTED]

**I am a...**

Member of the public

**Are you commenting on a straw proposal?**

Yes

**If yes , which one?**

Cumulative Impacts Analysis

**Comment/Question**

Flatiron Energy is proposing a 300-MW/1,200-MWh BESS on Electric Avenue in Brighton that will be approximately 25 FEET from residential property lines. That is dangerously close to scores of neighbors. In light of recent BESS fires elsewhere that have required mass evacuations, this needs to be reconsidered for such a site so close to the neighborhood.

Key risks include:

Human error during installation or integration.

Cell/module defects-with potentially thousands of individual cells in a BESS, even a small percentage of failures can lead to catastrophic events

Operational vulnerabilities (e.g., overcharging, thermal management issues)

Inadequate real-time monitoring and delayed fault detection

External hazards (e.g., flooding, seismic events, vandalism)

While cell or module failures account for about 11% of BESS incidents, the sheer number of cells in a large facility means the risk cannot be ignored. In fact, 65% of failures are linked to issues with system operation, integration, or commissioning-not just cell defects.

The current 25-FOOT setback in the Flatiron proposal is insufficient given the potential for toxic gas plumes, radiant heat, and emergency response challenges.

Recommended Additions:

Mandated Minimum Setbacks:

AT LEAST 300 feet from all residential property lines

AT LEAST 300 feet from critical infrastructure, including commuter rail lines, water mains, and electrical substations

This is consistent with emerging best practices in other states, such as Michigan.

Third-Party Oversight:

Require independent verification of construction and commissioning quality

Enhanced Monitoring:

Mandate real-time thermal and gas detection with automated emergency shutdowns

Hazard Mitigation Planning:

Require air dispersion and fire modeling for any BESS within 1,000 feet of protected uses

PROTECT OUR CITIZENS! This is a catastrophe waiting to happen.

#### Attachments

- [Flatiron-Energy-site-proposal.docx](#)