

From: [REDACTED]
To: [SitingBoard Filing \(DPU\)](#)
Subject: Comments on Site Suitability Strawman Proposal
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Dear State Energy Regulators:

My comments on the Site Suitability Criteria below.

Executive Summary:

Answers to Questions asked to stakeholders:

1. Are the proposed evaluation criteria appropriate? **NO**
2. Are there criteria that should be applied to certain types of infrastructure and not others? **YES, IMMUTABLE AND ADEQUATE SETBACKS FROM RESIDENTIAL PROPERTY LINES SHOULD BE ESTABLISHED AND MANDATED FOR ANY BESS**

BESS Setbacks and Safety Criteria

The omission of Battery Energy Storage System (BESS)-specific criteria in the Massachusetts Site Suitability Strawman proposal is a significant safety concern. Recent catastrophic BESS failures-including a major fire in January 2025-demonstrate that even with adherence to NFPA 855 Standards and UL 9540A testing, too many failure modes remain unaddressed.

For example, in Boston, 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 lines¹⁷. This proposal has faced pushback from residents over safety concerns, particularly in light of recent BESS fires elsewhere that have required mass evacuations¹.

Key risks include:

- Human error during installation or integration (e.g., miswiring, improper fire suppression setup)⁶⁸¹⁰
- Cell/module defects-with potentially thousands of individual cells in a BESS, even a small percentage of failures can lead to catastrophic events⁶⁸¹⁰
- Operational vulnerabilities (e.g., overcharging, thermal management issues)⁶⁸¹⁰
- 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 ignored⁶⁸¹⁰. In fact, 65% of failures are linked to issues with system operation, integration, or commissioning—not just cell defects⁶⁸¹⁰.

These risks are exacerbated by the absence of clear, mandated minimum setbacks from residential property lines and critical infrastructure. The current 25-foot setback in the Flatiron proposal is insufficient given the potential for toxic gas plumes, radiant heat, and emergency response challenges¹.

Recommended Additions:

1. Mandated Minimum Setbacks:

- 300 feet from all residential property lines
- 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.

2. Third-Party Oversight:

- Require independent verification of construction and commissioning quality

3. Enhanced Monitoring:

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

4. Hazard Mitigation Planning:

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

Citations

1. [Bisnow: Flatiron Energy proposed a 62K SF BESS in Brighton, Boston, with a 25-foot setback, facing resident safety concerns](#)
2. [Solar Builder Mag: Analysis of BESS failure points to battery monitoring and system integration as key risk factors; cell/module failures account for 11% of incidents](#)
3. [Energy Storage News: Flatiron Energy gets ISO approval for 1.2GWh indoor BESS in Boston; project details and location](#)
4. [Energy Storage News: BESS failure incident rate dropped 97% between 2018 and 2023, but most failures are due to integration and operational issues, not just cell defects](#)
5. [EPRI Storage Wiki: BESS Failure Incident Database, root cause analysis and incident classification](#)

Matthew Sager, concerned citizen