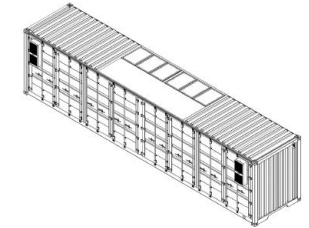


BESS as a Wildfire Ignition Source



4.1 UL9540A TESTING

The CEN BESS system has been subject to testing utilizing the methods of UL 9540A at the cell, module, unit and installation levels. The UL 9540A test results are summarized below. Refer to the UL 9540A Cell, Module and Unit level test reports for detailed information. Full UL 9540A test reports are provided for review in Appendix F.

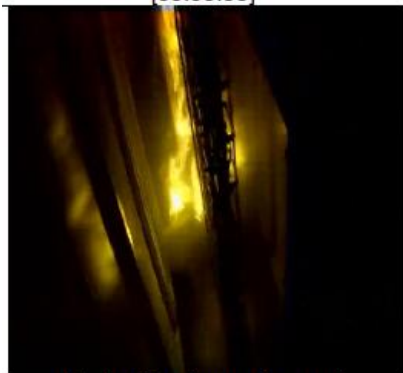
- **Cell Level Testing** – Cell level testing indicates that 423 L of gas may be released per cell when thermal runaway occurs. Testing indicates that the gas is primarily composed of **hydrogen (32.7%)**, carbon monoxide (40.9%), **methane (15.43%)** and carbon dioxide (9.2%) with a LFL of 8.04% at ambient temperature. Refer to the *UL 9540A Cell Level Report* for detailed gas composition data. The average cell surface temperature at thermal runaway was 178°C. The cell vent gas fundamental burning velocity, S_u , was determined to be 88.40 cm/s with a maximum pressure, P_{max} , of 105.3 psig.
- **Module Level Testing** – Module level testing demonstrated that **thermal runaway initiation of a single cell is capable of propagation** throughout a majority of the cells within the module. The testing resulted in **flaming combustion, flying debris, explosive discharge of gas and sparks** or electrical arcs. A peak heat release rate (HRR) of 3935 kW was achieved during testing.
- **Unit Level Testing** – Unit level testing did not result in propagation of a thermal runaway event from the failure of a single cell. **External flaming combustion was observed with a peak HRR of 426.1 kW.** Release of flammable gas with an associated explosion was not observed. The maximum enclosure wall surface temperature observed was 169°C.
- **Installation Level Testing** – The installation level test is intended to collect information regarding the performance of the ESS's fire protection features. The installation level test included the operation of the direct injection clean agent cooling system. The installation level test did not result in propagation of a thermal runaway event from the failure of a single cell. No flaming or flying debris was observed outside of the enclosure. **The maximum enclosure wall surface temperature observed was 670°C.**



(k) Continued Thermal Runaway
04:35:51



(d) Ignition
100:42:301



(c) Ignition flame observed
[00:40:15]

Response to a BESS Fire by Local Fire Fighters

Table 2: Theoretical Momentary Heat Flux as a Function of Distance

Distance	Momentary Maximum Theoretical Heat Flux (kW/m ²)
10'	939
20'	589
30'	348
40'	235
50'	170
60'	127
70'	98
80'	77
90'	62
100'	51

Table 2: Heat Flux over Distance, pg. 34

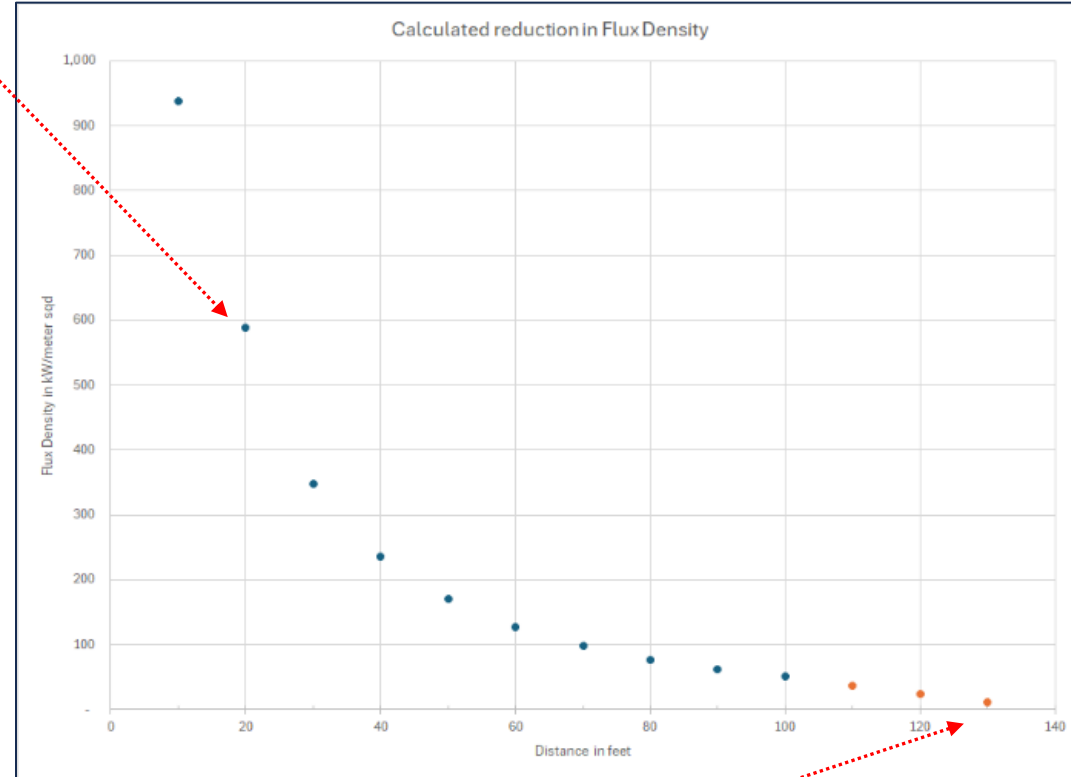


Table 5: Physiological Effects of Thermal Radiation [82]

Time for Physiological Effects (on bare skin) to Occur Following Exposure to Specific Thermal Radiation Levels		
Radiation Intensity (kW/m ²)	Time for Severe Pain (seconds)	Time for 2 nd Degree Burn (seconds)
1	115	663
2	45	187
3	27	92
4	18	57
5	13	40
6	11	30
8	7	20
10	5	14
12	4	11

Table 5: Heat Flux Effects on People, pg. 39

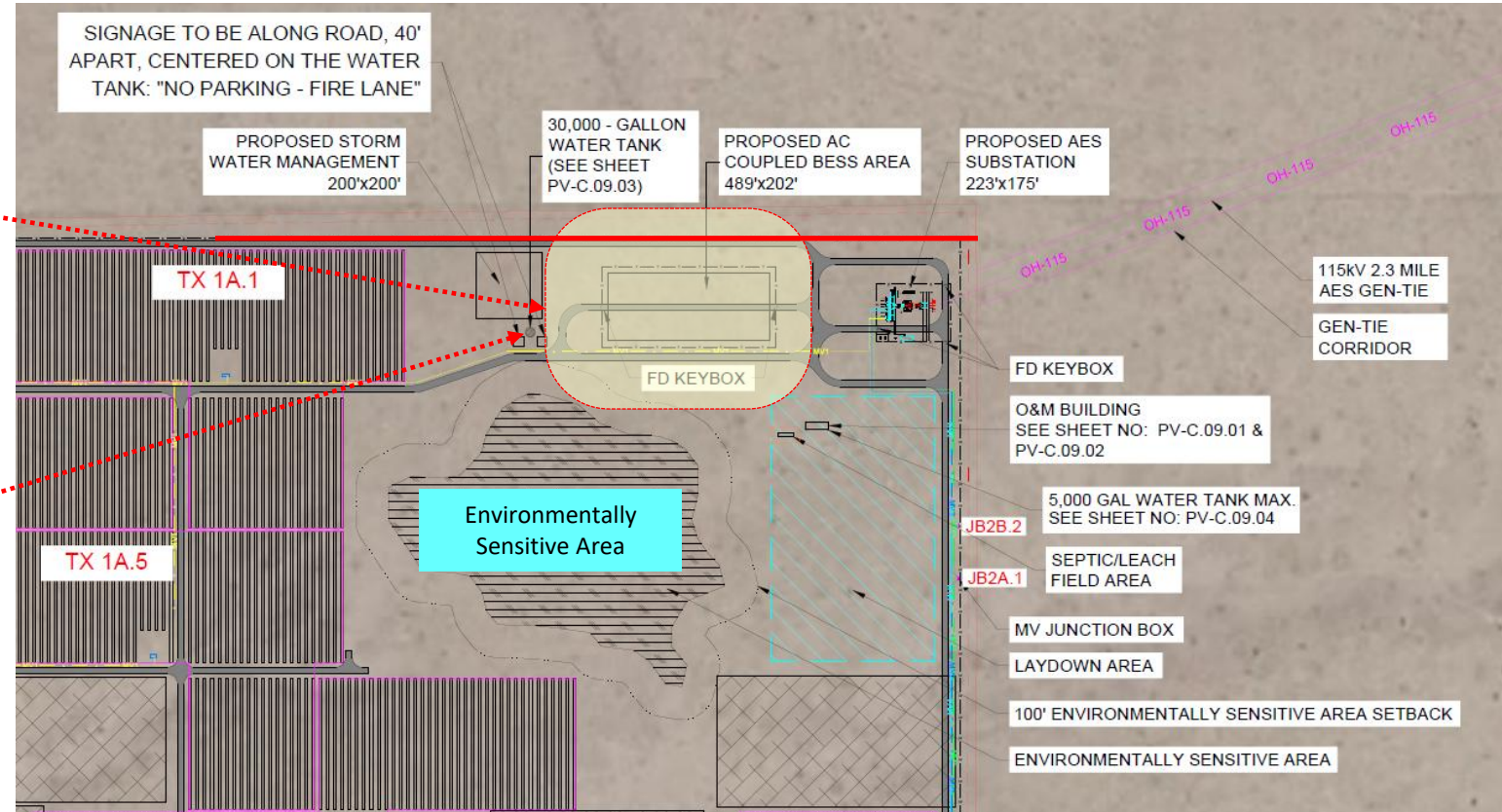
Radiant heat flux above 10 kW/m² in the presence of a spark could cause ignition in dry grass. Grasses at ~130 feet would experience a heat flux sufficient for ignition. Within ~130 ' of a burning enclosure, First Responders without significant protective gear would have difficulty performing.

150' Stand-off Area - Zone of Dangerous Heat from Radiant Thermal Flux

A stand-off of ~ 150 feet is shown surrounding the BESS units.

The stand-off area extends beyond the proposed fence line.

30,000 water source is local just beyond the stand-off area



It has already been determined that 30,000 gallons of water is marginally effective. The stand-off area demonstrates that in a fire event, not just adjacent containers, but all the containers and grounds within the area will require cooling spray.

Anything within the Stand-off area is subject to a heat flux greater than 10 kW/m².

Not only grasses, but responders, vehicles, all the BESS containers and their support systems (chillers, BMS, sensors, inverters and switch gear).

**View from 53 Camerada Rd. showing
general wildfire fuel potential. Grass and
shrubs, a mix of short and tall grasses
depending on seasonal conditions.**



KOP 1: View from Camerada Road looking west - Simulated Condition



NM Gas Line not
shown on AES
Application
Environmental Impact
Report, Figure 3.6

Distance to 47 Encantado Loop

7,628 feet to corner of BESS
1.45 miles to corner of BESS

150' distance from BESS
Enclosure Area, Zone of
potential ignition from
radiant thermal flux

Grasslands most
vulnerable to ejected
burning particles
(Spotting)

Late Summer
Prevailing Winds

Excess fuel in the
arroyo can serve as
a fire conduit

NM Gas Line not
shown on AES
Application EIR,
Figure 3.6

Pictures at 53 Camerada
Rd, above ground gas
lines