

From: [Guillen, Christopher R.](#)
To: [Koutoufidis, Nicholas](#)
Subject: [External] JVR Energy Park Project
Date: Tuesday, August 17, 2021 3:37:45 PM
Attachments: [Letter_JVR Energy Park 9-17-20.PDF](#)

Nick,

Please include the attached letter in the record for this matter.

Best,

Chris

Christopher R. Guillen
Brownstein Hyatt Farber Schreck, LLP
1021 Anacapa Street, 2nd Floor
Santa Barbara, CA 93101
805.882.1452 tel
cguillen@bhfs.com

STATEMENT OF CONFIDENTIALITY & DISCLAIMER: The information contained in this email message is attorney privileged and confidential, intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this email is strictly prohibited. If you have received this email in error, please notify us immediately by calling (303) 223-1300 and delete the message. Thank you.

9/17/2020

10743

David Sibbet
Deputy Fire Marshal
San Diego County Fire Authority

Subject: *JVR Energy Park Fire Protection Plan Amendment*

Dear Mr. Sibbet:

This letter requests an amendment to the accepted JVR Energy Park Fire Protection Plan (April 2020) regarding Section 5.2.3, De-Energizing (Project Shut-off). The FPP requires that a shut-off switch be installed near all entrance gates and substation, if needed, to enable firefighters to de-energize/disconnect components that can be de-energized, per below:

5.2.3 De-Energizing (Project Shut-off)

The Project will provide a shut-off switch near all entrance gates and near the collector substation site, if needed, that will enable responding firefighters to de-energize/disconnect the components of the solar facility that can be de-energized (inverters, substation, switchyard, etc.). An illuminated sign will be installed at the entrance gates that clearly indicates inverter and electrical grid layout and entire site de-energizing disconnect switch identification and location.

Although included in the accepted FPP, it has come to our knowledge that de-energizing the facility is not technically feasible and not recommended. Requiring a remote shutoff outside the project control room is unsafe and would cause grid stabilization problems and could damage equipment. It is not recommended to provide a Project shut-off at each facility gate entrance and at the substation based on multiple technical risks shutting the facility off instantaneously. Some of these risks are: possible damage to equipment without following the necessary shutdown/ramp down of equipment, the instantaneous disturbance of the utility grid and other facilities in the area due to the reduction of power, and the inability to monitor the site remotely based on the operations and maintenance requirements of the facility. Additionally, the California Independent System Operator (CAISO) requires notification for outages or the grid could become unstable and could undermine grid integrity.

As an alternative to this FPP requirement, a 24 hour monitored number to the remote operations center would be provided to the Fire Authority and on the project fence signs. The control center is responsible for monitoring and controlling the facility and has the ability to shut the plant off in a safe manner and notify the CAISO of the immediate outage if requested by the Fire Authority. The fire agency training program required by the FPP in Section 5.1.3 and the mitigation measures discussed in Section 7 will include training on how to de-energize the project.

Mr. David Sibbet

Subject: JVR Energy Park FPP Amendment

Further, the California Fire Code (2019) and the 2020 San Diego County Consolidated Fire Code do not include specific de-energizing requirements for a photovoltaic facility like the JVR Energy Park Project, so the project would still be consistent with code requirements.

Please let me know if you have any questions regarding this FPP amendment. You can contact me at mhuff@dudek.com or at 619.992.9161.

Sincerely,



Michael Huff
Fire Protection Planning Manager