



TONDA CURRY
Criminal District Attorney
Van Zandt County

400 S. Buffalo, Canton TX 75103

Tel (903) 567-4104

Fax (903) 567-6258

tcurry@vanzandtcounty.org

December 20, 2024
Taaleri Energia
Kasarmikatu 21 B
00130 Helsinki

Re: Request for information – Amador Battery Energy Storage System (BESS)

Your company has initiated construction on the above-referenced BESS located roughly at the intersection of State Highway 47 and Farm-to-Market 1651 in rural Van Zandt County. As legal counsel for Van Zandt County, I am sending this letter to obtain information for the protection of the public health, safety, and welfare of Van Zandt County residents.

This request is in accord with the National Fire Protection Association (hereinafter “NFPA”) Section 855 4.2.2.2. The request is from the Authority Having Jurisdiction (hereinafter “AHJ”) and that Authority shall be defined as the Van Zandt County Fire Marshal and the Van Zandt County Commissioner’s Court. The section numbers below are references to the NFPA 855.

Please note that the AHJ has not authorized the use of ESS dedicated-use buildings without the protection of automatic fire control and suppression systems. To that end, please provide the Fire and Explosion Testing in compliance with 9.1.5.1 and 9.1.5.2 (Test Reports) if you should desire to seek authority to eliminate the fire control and suppression systems. If you have not provided the information required, the AHJ shall be inspecting the dedicated-use buildings for the required protection of automatic fire control and suppression and the constituent systems. According to NFPA 855, it is in the sole discretion of the AHJ to allow the BESS to become operational without the required automatic fire control and suppression systems.

If this site is installing nonmechanical ESS there must be a permanent source of water for fire protection. Please indicate your permanent source of water, at volumes which meet the NFPA 1142 requirements, for the project.

Please provide your complete commissioning plan in accord with 6.1.3.2 which describes the means and methods necessary to document and verify that the system and its associated controls and safety systems, as required by this standard, are in proper working condition. The minimum information required for this request is:

- (1) An overview of the commissioning process developed specifically for the ESS to be installed and narrative description of the activities to be conducted
- (2) Roles and responsibilities for all those involved in the design, commissioning, construction, installation, or operation of the system(s)

- (3) Means and methods whereby the commissioning plan will be made available during the implementation of the ESS project(s)
- (4) Plans and specifications necessary to understand the operation of the ESS and all associated operational controls and safety systems
- (5) A detailed description of each activity to be conducted during the commissioning process, who will perform each activity, and at what point in time the activity is to be conducted
- (6) Procedures to be used in documenting the proper operation of the ESS and all associated operational controls and safety systems
- (7) Testing for any required fire detection or suppression and thermal management, ventilation, or exhaust systems associated with the installation and verification of proper operation of the safety controls
- (8) The following documentation:
 - (a) Commissioning checklist
 - (b) Relevant operational testing forms
 - (c) Necessary commissioning logs
 - (d) Progress reports
- (9) Means and methods whereby facility operation and maintenance staff will be trained on the system
- (10) Identification of personnel who are qualified to service and maintain the system and respond to incidents involving each system
- (11) A decommissioning plan meeting the provisions of Section [8.1](#) that covers the removal of the system from service and from the facility in which it is located and information on disposal of materials associated with each ESS

The commissioning report shall document the commissioning process and the results in accordance with [6.1.5.2.1](#), [6.1.5.2.2](#), and [6.1.5.2.3](#). For your reference, these have been outlined as follows:

6.1.5.2.1

A commissioning report shall summarize the commissioning process and verify the proper operation of the system and associated operational controls and safety systems.

6.1.5.2.2

The report shall include the final commissioning plan, the results of the commissioning process, and a copy of the plans and specifications associated with the as-built system design and installation.

6.1.5.2.3

The report shall include any issues identified during commissioning and the measures taken to resolve them.

Your installation is placing the ESS batteries in a container outdoors and the installation must comply with one of the following:

- (1) The container shall be provided with explosion control complying with [9.6.5.6.3](#).
- (2) Combination of the container and cabinets shall be tested together to show compliance with [9.6.5.6.1.1](#).

Please provide the compliance with 9.6.5.6.1.1 in your response to this request.

Please provide a copy of the approved emergency operations plan for AHJ. Van Zandt County requires the items outlined in this letter to be provided and the AHJ must complete the review and approval prior to the BESS becoming operational.

Please respond to this inquiry within 20 business days.. Your response should be directed to my office and attention.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Tonda Curry
Van Zandt County
District Attorney