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Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
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VIA E-MAIL

**Re: Comments of 24M Technologies on Draft Resolution ESRB-13
Regarding Adoption of General Order 167-C**

Dear Sir or Madam:

Pursuant to the provisions of General Order 96-B, 24M Technologies (24M) submits these comments on Draft Resolution ESRB-13, adopting General Order (GO) 167-C.

24M, which was founded in 2010, has combined decades of battery expertise with innovative thinking to develop a revolutionary approach to battery technology. See <https://24m.com/about-24m> One of its products, called Impervio, is a transformative patented battery separator that provides a fundamental improvement in battery safety. Unlike other technologies that can only monitor symptoms outside the battery cell, when it is already too late to prevent runaway fires, Impervio's technology prevents short-circuits inside the cell itself, thus stopping the direct causes of fires before they can ever start. Specifically, Impervio obstructs the propagation of dendrites (tiny metal filaments that can form internal short-circuits) and monitors the cell's electrochemical signals to trigger a failsafe if an internal short or overcharge condition is detected.

In short, Impervio can prevent battery fires and explosions by containing failures before they propagate. The CPUC's goal is to improve battery energy storage system (BESS) safety and reliability, and 24M's technology addresses safety at the most granular level – inside the cell – which could enhance battery system safety beyond the current state of industry practice by dramatically reducing the risk of catastrophic incidents in energy storage facilities.

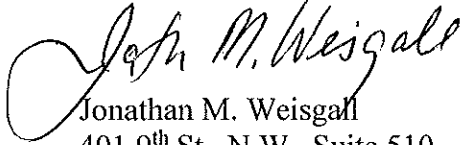
24M strongly supports the Commission's efforts to enhance battery safety. As part of the process, 24M recommends that the Commission recognize and encourage advanced battery safety technologies such as in-cell fire prevention mechanisms as part of the industry's best practices. Technology can and should drive regulation. The battery industry is constantly innovating to meet safety challenges. Indeed, 24M is not the only company working on in-cell safety solutions to prevent battery fires. The Commission should embrace these developments and set high standards for safety expectations and improvements.

In this regard, the Commission should consider adopting performance-based standards for in-cell safety technologies that align with its regulatory safety objectives and are equivalent to industry standards and best practices. The Commission has recognized that battery storage system technologies and standards have matured over time, so its rules should champion a flexible regulatory environment to accommodate new safety improvements that could benefit the entire industry through increased safety (fewer fires and explosions means improved public and worker safety); reliability (fewer outages or damage to facilities); reduced costs of compliance (intrinsic safety can avoid expensive fire system retrofits and/or catastrophic thermal runaways); and environmental and health benefits (preventing fires avoids toxic smoke and water runoff from firefighting).

Recognizing that in-cell safety mechanisms are relatively new concepts and may need vetting, the Commission might consider adopting this performance-based concept contingent upon approval by the Safety and Enforcement Division of the specific technology on a case-by-case basis.

For the reasons stated in these comments, 24M respectfully asks the Commission to modify the Draft Resolution and proposed GO 167-C to take into account these comments and recommendations.

Very truly yours,



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Service Lists for R.23-10-011 and R.20-05-003