

DECATUR BATTERY ENERGY STORAGE FACILITY

Exhibit A-1.10 FIRE RESPONSE PLAN

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Appendices

Appendix 1.10-A: FIRE RESPONSE PLAN



EXHIBIT A-1.10 – FIRE RESPONSE PLAN (FRP)

A-1.10.a – The FRP shall include the following:

- 1. Evidence of consultation or a good-faith effort to consult with local fire department representatives to ensure that the FRP is in alignment with acceptable operating procedures, capabilities, resources, etc. If consultation with local fire department representatives is not possible, provide evidence of consultation or a good-faith effort to consult with the State Fire Marshal or other local emergency manager.**
- 2. A description of all on-site equipment and systems to be provided to prevent or handle fire emergencies.**
- 3. A description of all contingency plans to be implemented in response to the occurrence of a fire emergency.**
- 4. For energy storage projects, a commitment to offer to conduct, or provide funding to conduct, site-specific training drills with emergency responders before commencing operation, and at least once per year while the facility is in operation. Training should familiarize local fire departments with the project, hazards, procedures, and current best practices.**
- 5. For wind and solar projects, a commitment to conduct, or provide funding to conduct, site-specific training drills with emergency responders before commencing operation, and upon request while the facility is in operation. Training should familiarize local fire departments with the project, hazards, procedures, and current best practices.**
- 6. A commitment to review and update the FRP with fire departments, first responders, and county emergency managers at least once every 3 years.**
- 7. An analysis of whether plans to be implemented in response to a fire emergency can be fulfilled by existing local emergency response capacity. The analysis should include identification of any specific equipment or training deficiencies in local emergency response capacity and recommendations for measures to mitigate deficiencies.**
- 8. Other information the applicants find relevant.**

Refer to the Fire Response Plan (FRP) provided in **Appendix 1.10-A – Fire Response Plan**.

A-1.10.b – Changes to the design, type, manufacturer, etc. of facilities or equipment after the initial filing must be analyzed to determine if changes are necessary to the FRP. Additional consultation with local fire departments, first responders, and county emergency managers is required for amended plans.

If the Project's design, type, or manufacturer of facilities and equipment changes after the initial filing, The Applicant is committed to analyzing the FRP for any necessary updates and consulting with local fire departments, first responders, and county emergency managers regarding any amended emergency response protocols.

Appendix 1.10-A: FIRE RESPONSE PLAN



EXHIBIT A-1.10

FIRE RESPONSE PLAN

DECATUR BATTERY STORAGE PROJECT

Prepared for

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CONFIDENTIAL: DO NOT DISTRIBUTE

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ACRONYMS AND ABBREVIATIONS

Atwell	Atwell, LLC
BMS	Battery Management System
EMS	Emergency Management System
FRP	Fire Response Plan
LEL	Lower Explosive Limit
LPC	Local Plant Controller
MPSC	Michigan Public Service Commission
PPE	Personal Protection Equipment

1 INTRODUCTION

This Fire Response Plan (FRP) is intended to fulfill the Exhibit A-1.10 requirement of Decatur Battery Storage Project's (Project) application for Michigan Public Service Commission (MPSC) approval of a Renewable Energy Certificate. It summarizes all means and procedures for a rapid response in case of a fire emergency. A separate Emergency Response Plan which outlines response measures for other emergencies is found in **Exhibit A-1.9** of this application.

This plan has been developed to prevent, mitigate, and effectively respond to a fire emergency, should one occur. It includes a comprehensive overview of the Project, detailing on-site fire prevention equipment and systems, battery-specific fire safety features, contingency plans for rare fire emergencies, fire response training for local emergency managers, and an assessment of the local emergency response capacity.

Please note that the emergency protocols described herein only pertain to the regular operation of the project and do not include construction activities. The Engineering, Procurement, and Construction Team will provide separate safety measures and protocols before and during construction of the Project.

Decatur Energy Storage, LLC (Applicant) will review and update this FRP with local fire departments, first responders, and county emergency managers at least once every 3 years. The Applicant's goal is to ensure the FRP remains comprehensive, up-to-date, and fully aligned with local and industry standards, thereby enhancing overall preparedness and response capabilities for all types of emergency incidents.

1.1 PROJECT DESCRIPTION

The Project is located in Decatur Township, Van Buren County, Michigan. The Project, a proposed 50-MW battery energy storage system (BESS) facility, will utilize approximately 7.3 acres of fenced-in area located on approximately 8.9 acres of participating land. The Project components consist of the following: thirty-one (31) Tesla Megapack 2XL batteries, thirty-one (31) pad-mounted transformers, thirty-one (31) inverters, underground electrical collection system, substation, gen-tie, laydown yard, access road, security fencing, and retention basin.

The Project site plan is depicted in **Exhibit A-1** of this application.

In the event of a fire emergency, dial 911

1.2 LOCAL CONSULTATION

The Applicant is in the process of consultation to collaborate with local first responders and county emergency managers to ensure this FRP aligns with existing operating procedures,

capabilities, and resources. Feedback received from those conversations, will be incorporated into this FRP to ensure that it aligns with the capabilities of local emergency managers and first responders.

Additionally, the Applicant provided access to site layouts, maps, and the designated ingress and egress point to facilitate site access during emergencies. The Applicant remains committed to ongoing collaboration with these stakeholders to ensure that the FRP remains comprehensive, effective, and fully aligned with local emergency response requirements.

1.3 ON-SITE FIRE PREVENTION EQUIPMENT & SYSTEMS

Decatur Energy Storage is committed to keeping the community and on-site operations personnel safe during operation of the Project. Decatur Energy Storage will present basic fire-prevention training to all personnel working at the Project. Additionally, the following parameters will be retained on-site to prevent or handle fire emergencies:

- All employees, contractors, and employees of contractors to do everything reasonable within their power, expertise, and assessment of human safety to prevent and suppress fires resulting from Project construction or maintenance activities on the lands to be occupied under this permit. Decatur Energy Storage is responsible to ensure that each employee, subcontractor, or any other individual or company working on the Project site is aware of the provisions of this fire prevention and suppression plan, is familiar with the location and proper use of firefighting equipment and conducts themselves in a fire-safe manner.
- Exhaust systems of vehicles will have an acceptable muffler and will be in proper working condition. All motorized equipment and machinery will be equipped with spark arresters.
- Vehicles will only be parked in cleared areas.
- No smoking will be permitted on site.
- Fuels and flammable materials, if required, will be stored in accordance with all applicable state and federal laws and industry best practices.
- The Project site will be equipped with fire extinguishers and other equipment sufficient to extinguish small fires.
- Decatur Energy Storage will isolate or shutdown the electrical power at the site of the fire, if possible.
- Electrical components produce gas during combustion. All responders should use a self-contained breathing apparatus.

- All inverters contain energy storage devices that require 15 minutes to safely deenergize to non-lethal voltages. It is important to remember not to touch inverters until they are safely deenergized.
- First responders as well as Project personnel on-site shall not touch electrical components without wearing required Personal Protection Equipment (PPE).

1.4 FIRE OR THERMAL RUNWAY INCIDENTS

1.4.1 Conditions Associated with Lithium-Ion Battery Storage

Electrical, vehicle or other fires not directly involving Lithium-ion batteries should be managed and controlled using typical firefighting and response efforts. In addition, efforts shall be made to limit fire and heat impacts to the battery storage enclosures.

Lithium-Ion battery storage systems present a unique challenge for fire fighters.

A battery energy storage system does not have a single point of disconnect. Disconnects will de-energize select parts of the system, however batteries will remain energized. Stranded electrical energy in fire-damaged storage batteries and other BESS has the potential for reignition long after initial extinguishment. Proper response to electrochemical BESS thermal runaway is automated within the enclosure, but additional site actions may be required for control or for other fires and may include the following procedures and steps:

- System isolation and shutdown
- Hazard confinement
- Fire suppression
- Ventilation

The following hazards may be encountered when fighting fires in lithium-ion battery energy storage systems:

- Electrical enclosures and batteries may not allow water intrusion from the high-pressure stream of a fire hose.
- Shock hazard due to direct contact with energized components.
- Toxic gases
- Thermal runaway
- Explosion hazard

1.4.2 Thermal Runaway

Fires in electrochemical BESS are often a result of a process called thermal runaway resulting in dynamic temperature increase. Initial signs of thermal runaway might include pressure increase at the cell level, temperature increase, and off-gassing. As the process continues, additional signs might include vent gas ignition, exploding cells, projectile release, heat propagation, and flame propagation. As the failure cascades, responders should also be prepared for toxic and potentially explosive gas release. Responders should treat them as highly dangerous and use their full suite of PPE and breathing apparatus when responding.

Rescue personnel should keep their distance unless actively rescuing a person if batteries are in thermal runaway condition.

Refer to the information in the Tesla Safety Manual, Section 7 for information provided by the BESS enclosure manufacturer for additional information on Emergency Response, provided in Appendix 8.

The BESS enclosures are under the control of a site Emergency Management System (EMS) or Local Plant Controller (LPC), which in turn communicate with an offsite fleet controller, SCADA operations center, or other third-party dispatch and monitoring entity. The BESS enclosure alarms will be forwarded to the remote operations and remote operations, or staff personnel on the site, can shut down the BESS enclosure(s) remotely if determined necessary. Note that a system shutdown will not de-energize the battery bank or guarantee that a fault or thermal runaway event has been stopped. Responders and staff should not approach the BESS enclosure or attempt to open the BESS enclosure until deemed safe to do so by the O&M Manager, Emergency Response Coordinator, and Subject Matter Expert.

On-site personnel witnessing an emergency should not assume that automated alarms have reached the Local Plant Controller or Emergency Management System or that such alarms have been passed on to remote operations. Such personnel are advised to call 911 and contact remote operations directly, in addition to other key stakeholders described herein.

1.4.3 Response to Fire Event

In the event of an incipient stage (beginning, small) fire, employees should notify adjacent individuals of this situation and exit the area. Contractors, maintenance staff, or visitors should immediately exit the area upon notification of an emergency condition and proceed to the designated muster point. Only employees trained in the use of fire extinguishers or other manual fire suppression systems should attempt to use them. Employees are not expected or authorized to respond to fires beyond the incipient stage. The fire department should be immediately notified by dialing 911 when any type of unintended fire has taken place. Site management shall also be immediately notified of any emergency.

For a fire occurring related to the Battery Enclosure:

- Call 911
- Make sure the immediate area of the fire is clear of personnel.
- Account for all employees, contractors, and visitors who were working in the immediate area of the fire. If any personnel are unaccounted for from the immediate fire area, issue a communication throughout the facility to attempt to locate the person(s) missing.
- Contact the O&M Manager and Emergency Response Coordinator immediately.
- Remove obstructions that might impede response to the scene.
- Station available personnel at road intersections to stop traffic flow into the fire scene.
- Evacuate the BESS area immediately if the fire warning alarm sounds or fire warning lights illuminate.
- Proceed to designated muster point for head count. If onsite, the Emergency Response Coordinator will do the head count and relay information/instructions.
- If encountering heavy smoke, stay low, and breathe through handkerchief or other fabric. Move away from the area.
- Assist anyone having trouble leaving the area so long as doing so does not put the assistant at additional risk.
- Do not leave the designated muster point until advised to do so. If risk requires evacuation of the muster point, the secondary muster point must be used and that fact announced via radios and alarms as available.
- The Emergency Response Coordinator will issue an “all clear” only when the fire department informs them that it is safe to do so.
- The BESS is not to be accessed until the O&M Manager or designated Emergency Response Coordinator gives authorization.

Refer to the information in the Tesla Safety Manual, Section 7 for information provided by the BESS enclosure manufacturer for additional information on Emergency Response, provided in Appendix 8.

The BESS enclosures are under the control of a site Emergency Management System (EMS) or Local Plant Controller (LPC), which in turn communicate with an offsite fleet controller, SCADA operations center, or other third-party dispatch and monitoring entity. The BESS enclosure alarms will be forwarded to the remote operations and remote operations, or staff personnel on the site, can shut down the BESS enclosure(s) remotely if determined necessary. Note that a system

shutdown will not de-energize the battery bank or guarantee that a fault or thermal runaway event has been stopped. Responders and staff should not approach the BESS enclosure or attempt to open the BESS enclosure until deemed safe to do so by the O&M Manager, Emergency Response Coordinator, and Subject Matter Expert.

On-site personnel witnessing an emergency should not assume that automated alarms have reached the Local Plant Controller or Emergency Management System or that such alarms have been passed on to remote operations. Such personnel are advised to call 911 and contact remote operations directly, in addition to other key stakeholders described herein.

1.4.4 Recommended Suppression

Water spray has been deemed safe as an agent for use on high-voltage systems. The possibility of current leakage back to the nozzle, and ultimately the fire fighter, is insignificant based on testing data published in the Fire Protection Research Foundation report “Best Practices for Emergency Response to Incidents Involving Electric Vehicles Battery Hazards: A Report on Full-Scale Testing Results.”

- Fire-fighting foams are not considered to be effective for these chemistries (lithium-ion batteries) because they lack the ability to cool sufficiently and can conduct electricity.
- Fire-fighting dry chemical powders will not cool the thermal runaway event / battery components.
- Carbon dioxide and inert gas suppressing agents will also eliminate visible flame but will likely not provide sufficient cooling to interrupt the thermal runaway process.

1.4.5 Tesla Enclosure Fire Protection System Summary

The battery storage containers located at Decatur battery site will have the following characteristics:

- Thermal runaway management
- Overpressure vents / deflagration panels and sparker system
- Fire detection system
- No dry chemical fire suppression
- No clean agent (Novec 1230 or FM-200) fire suppression
- No overall (ceiling) sprinkler system or a deluge system

The Tesla enclosures are IP66 rated steel containers with ten (10) door-swing cabinets. Eight

(8) cabinets contain three (3) battery storage modules each, one cabinet contains the customer interface, and another contains the thermal system. The battery storage enclosures located at the Decatur battery site are provided with the following fire protection systems:

1. Fires or explosion hazards will be mitigated with an explosion prevention venting system designed to maintain flammable gas concentrations below 25% of the lower explosive limit (LEL), also known as the lower flammability limit (LFL), to reduce/eliminate the presence of an explosion hazard with the potential to injure service personnel and emergency responders. The system incorporates passive over-pressure vents that are fitted at the top of the enclosure in combination with an internal proprietary sparker system. This sparker system ignites the hot gases produced during thermal runaway event. Following ignition of the gases by the sparker system, overpressure vents allow the flames and smoke to safely exit via the top of the enclosure.
2. In lieu of ventilation systems, the thermal management system maintains optimal operating temperatures through a liquid cooling system that circulates liquid coolant throughout the battery module and power electronics systems.

Refer to the information in the Tesla Safety Manual for additional information, provided in Appendix 8.

1.4.6 Explosion Control

The Tesla Lithium-Ion batteries may release detectable levels of flammable gases such as hydrogen (H₂) and other hydrocarbons in the event of fire or high temperatures. In the event that flammable gases are present the sparker system will constantly ignite the hot gases produced during thermal runaway event. Following ignition of the gases, overpressure vents allow the flames and smoke to safely exit via the top of the enclosure.

A minimum of seventy-five feet (75') should be maintained between individuals and the incident enclosure whenever explosive conditions may be present as indicated by the enclosure and site fire alarm control panels. Staging of personnel and equipment shall be on the angles of the enclosure to stay out of the blast pressure wave as much as possible, as well as the blast radius of any doors or other potential projectiles.

Only attempt to extinguish fire if imminent threat to life safety exists. Lithium batteries off-gas when heated or when subjected to electrical or physical damage. These gasses can accumulate inside the enclosure at levels well above the Lower Explosive Limit (LEL).

Extreme caution shall be taken prior to any attempts to open any compartments or access panels on the system as the introduction of fresh air may bring atmospheric condition back into the explosion range and result in an explosion if a fire or another ignition source is present.

Gas monitoring must be continuously conducted at all times and gas meters should be affixed to all responders to warn of potential atmospheric risks. If possible, gas readings from inside the enclosure should be attempted to be gathered from an exterior point prior to any entry.

1.4.7 Toxic Gas Release

The Tesla Lithium-Ion batteries may release detectable levels of toxic gases including carbon monoxide (CO), Ethylene, Nitrogen Monoxide, Hydrogen Fluoride, Hydrogen Chloride, Nitrogen Dioxide, and Hydrogen Cyanide in the event of fire or high temperatures. The system incorporates passive over-pressure vents that are fitted at the top of the enclosure in combination with an internal proprietary sparker system. This sparker system ignites the hot gases produced during thermal runaway event. Following ignition of the gases by the sparker system, overpressure vents allow the flames and smoke to safely exit via the top of the enclosure.

Personnel should remain clear of the enclosure and no entry shall be permitted during an off-gassing event unless there is imminent threat to life safety at which only properly trained and equipped personnel may approach or enter. This entry shall be with full firefighter protective gear to include self-contained breathing apparatus (SCBA). The entry in this situation shall be at the sole discretion of the Incident Commander.

Chemicals released during a fire or explosion will be in a gaseous form and primarily pose an explosion hazard. However, as water is used in extinguishing flames, these gasses can become acids which may cause skin irritation.

1.5 CONTINGENCY PLANS

Though the potential for fires at the Project site is limited, in the event of a fire emergency on site, Decatur Energy Storage has developed a series of protocols for on-site personnel.

In the event of a fire, the individual discovering the emergency shall:

1. Notify the appropriate authorities by dialing 911 and direct them to the Project access point identified on the site plan.
2. Assess the situation to determine potential safety concerns to life and the environment, with life safety as the priority.
3. Local authorities should contact the Decatur Energy Storage site manager to determine the appropriate response procedures and methods for safe access.

Upon arrival to the Project, first responders shall:

1. Contact the Decatur Energy Storage site manager as directed.

2. Evacuate and secure the area. This may include evacuation of nearby buildings if deemed necessary by fire response personnel.
3. Contain the fire within the facility to ensure that resources are allocated to protecting life and property outside of the Project site.

1.6 EMERGENCY RESPONSE ROUTES

The Project site plan provides the location and identification of the approach and departure route for police, fire, ambulance, and other emergency response vehicles. East South Street provides direct access to the facility's entrance and connects to Old Swamp Road. The perimeter of the facility is surrounded by tree cover and the facility cannot be easily accessed by emergency response vehicles apart from the proposed access road. Therefore, East South Street is the Project's designated primary approach and departure route for all emergency response vehicles.

Maps detailing this access route will be provided to local emergency response teams during pre-construction coordination meetings and annual site safety reviews. This information will also be displayed at Project control points and shared with emergency personnel to ensure a coordinated and effective response to a fire emergency. As outlined in Section 1.2 of this FRP, any feedback from local emergency managers and fire responders regarding emergency response routes will be integrated into this plan.

1.7 FIRE RESPONSE TRAINING

Decatur Energy Storage will notify relevant emergency response agencies and fire departments having jurisdiction of the Project area prior to construction. Fire response personnel will be invited to visit the Project site to obtain an on-the-ground understanding of the Project layout, access point, and protocols in place. Decatur Energy Storage commits to conducting or providing funding to conduct site-specific training drills with emergency responders before commencing operation, and at least once per year while the facility is in operation. Training provided to first responders will familiarize the local fire department with the project, hazards, procedures, and current best practices.

1.8 LOCAL EMERGENCY RESPONSE CAPACITY

The typical operations of the Decatur Battery Storage Project will not create nuisance or safety hazards due to dust, noise, smell, vibration, smoke, or lighting. The Project includes engineering and safety controls that can effectively prevent or detect and respond to fire emergencies. Inspections and preventative maintenance are performed consistent with industry practice and manufacturer recommendations based upon battery usage hours, age, and performance history. Consequently, the Project is not expected to require additional local emergency resources.

The Applicant will coordinate with local emergency services to provide site orientation and familiarize them with access and safety protocols prior to construction, confirming existing local capacity can effectively support emergency response needs. If at any point during construction or operation of the Project the Decatur-Hamilton Fire Department indicates that they do not have the necessary equipment or training to properly deal with a fire emergency, Decatur Energy Storage will fund additional training and equipment as necessary.