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# Victorian Big Battery Fire: July 30, 2021

## REPORT OF TECHNICAL FINDINGS

ANDY BLUM, PE, CFEI  
SENIOR FIRE PROTECTION ENGINEER

TOM BENSEN, PRINCIPAL FOUNDER  
PAUL ROGERS, PRINCIPAL FOUNDER  
CASEY GRANT, PE, SENIOR CONSULTANT  
GEORGE HOUGH, SENIOR CONSULTANT

**Fisher Engineering, Inc.**  
10475 MEDLOCK BRIDGE ROAD  
SUITE 520  
JOHNS CREEK GA 30097

**Energy Safety Response Group**  
8350 US HIGHWAY N 23  
DELAWARE OHIO 43015

## Background

The Victorian Big Battery (VBB) is a 300-Megawatt (MW)/450-Megawatt hour (MWh) grid-scale battery storage project in Geelong, Australia. VBB is one of the largest battery installations in the world and can power over one million Victorian homes for 30 minutes during critical peak load situations.<sup>1</sup> It is designed to support the renewable energy industry by charging during times of excess renewable generation. The VBB is fitted with 212 Tesla Megapacks to provide the 300-MW/450-MWh of energy storage. The Megapack is a lithium-ion battery energy storage system (BESS) consisting of battery modules, power electronics, a thermal management system, and control systems all pre-manufactured within a single cabinet that is approximately 7.2 meters (m) in length, 1.6 m deep and 2.5 m in height (23.5 feet [ft] x 5.4 ft x 8.3 ft).

On Friday, July 30th, 2021, a single Megapack at VBB caught fire and spread to a neighboring Megapack during the initial installation and commissioning of the Megapacks. The fire did not spread beyond these two Megapacks and they burned themselves out over the course of approximately six hours. There were no injuries to the general public, to site personnel or to emergency first responders as the Megapacks failed safely (i.e., slowly burned themselves out with no explosions or deflagrations), as they are designed to do in the event of a fire. Per the guidance in Tesla's Lithium-Ion Battery Emergency Response Guide<sup>2</sup> (ERG), emergency responders permitted the Megapack to burn and consume itself while nearby exposures were being monitored at a safe distance. The total impact to the site was two out of the 212 Megapacks were fire damaged, or less than 1% of the BESS.

Following the emergency response, a detailed, multi-entity fire investigation commenced on August 3, 2021. The investigation process included local regulatory entities, Tesla, outside third-party engineers and subject matter experts. The investigation process involved analyzing both the fire origin and cause as well as the root cause of the fire propagation to the neighbor Megapack. In addition, given this is the first fire event in a Megapack installation to date, a review of the emergency response has been performed to identify any lessons learned from this fire event.

This report summarizes those investigations and analyses and has been prepared by Fisher Engineering, Inc. (FEI) and Energy Safety Response Group (ESRG), two independent engineering and energy storage fire safety consulting firms. In addition, this report provides a list of lessons learned from the fire and also highlights the procedural, software and hardware changes that have been implemented based on those lessons learned.

## Incident Timeline

At the time of the fire, the VBB was fitted with approximately one-half of the 212 total Megapacks intended for the site. The Megapacks that were installed at VBB were undergoing routine testing and commissioning on the day of the fire. At 7:20 AM Australian Eastern Standard Time (AEST) on the morning of July 30, 2021, commissioning and testing of a number of Megapacks commenced. One such Megapack (denoted herein as MP-1), was not going to be tested that day and was therefore shut off manually by means of the keylock switch.<sup>3</sup> At the time MP-1 was shut down via the keylock switch, the unit displayed no abnormal conditions to site personnel. Around 10:00 AM, smoke was observed emitting from MP-1 by site personnel. Site personnel

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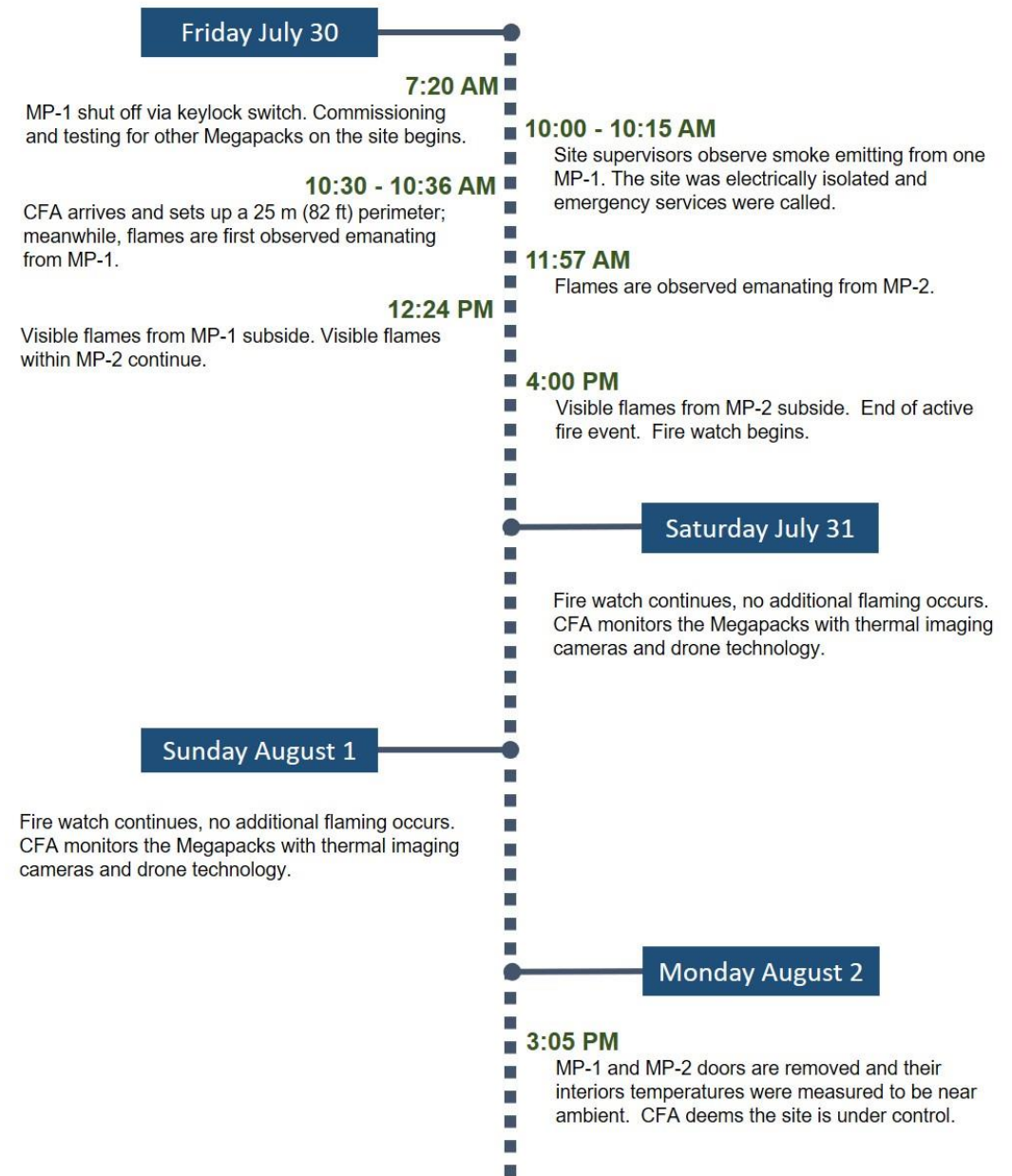
<sup>1</sup> <https://victorianbigbattery.com.au/>

<sup>2</sup> [https://www.tesla.com/sites/default/files/downloads/Lithium-Ion\\_Battery\\_Emergency\\_Response\\_Guide\\_en.pdf](https://www.tesla.com/sites/default/files/downloads/Lithium-Ion_Battery_Emergency_Response_Guide_en.pdf)

<sup>3</sup> The keylock switch is a type of "lock out tag out" switch on the front of the Megapack that safely powers down the unit for servicing.

electrically isolated all the Megapacks on-site and called emergency services: Country Fire Authority (CFA). The CFA arrived shortly thereafter and set up a 25 m (82 ft) perimeter around MP-1. They also began applying cooling water to nearby exposures as recommended in Tesla’s ERG. The fire eventually spread into a neighbor Megapack (MP-2) installed 15 centimeters (cm), or 6 inches (in), behind MP-1. The CFA permitted MP-1 and MP-2 to burn themselves out and did not directly apply water into or onto either Megapack, as recommended in Tesla’s ERG. By 4:00 PM (approximately six hours after the start of the event), visible fire had subdued and a fire watch was instituted. The CFA monitored the site for the next three days before deeming it under control on August 2, 2021, at which time, the CFA handed the site over for the fire investigation to begin.

# Incident Timeline



Note: The time stamp is AEST (UTC+10) which is 19 hours ahead of USA PDT (UTC-7)

## Investigation

A multi-entity fire investigation commenced on August 3, 2021. The VBB fire investigation process involved analyzing both the root cause of the initial fire in MP-1 as well as the root cause of the fire propagation into MP-2. The investigations included on-site inspections of MP-1 and MP-2 by the CFA, Energy Safe Victoria<sup>4</sup> (ESV), Work Safety Victoria<sup>5</sup> (WSV), local Tesla engineering/service teams and a local third-party independent engineering firm. In addition to the on-site work immediately after the incident, the root cause investigations also included data analysis, thermal modeling and physical testing (electrical and fire) performed by Tesla at their headquarters in California, USA and their fire test facility in Nevada, USA.

### Fire Cause Investigation

On-site inspections commenced on August 3, 2021 and concluded on August 12, 2021. MP-1 and MP-2 were documented, inspected and preserved for future examinations, if necessary. Concurrently, all available telemetry data (such as internal temperatures and fault alarms) from MP-1 and MP-2 were analyzed and a series of electrical fault and fire tests were performed. The on-site investigation findings, the telemetry data analysis, electrical fault tests and fire tests, when combined, identified a very specific series of fault conditions present on July 30, 2021 that could lead to a fire event.

### Fire Origin and Cause Determination

The origin of the fire was MP-1 and the most likely root cause of the fire was a leak within the liquid cooling system of MP-1 causing arcing in the power electronics of the Megapack's battery modules. This resulted in heating of the battery module's lithium-ion cells that led to a propagating thermal runaway event and the fire.

Other possible fire causes were considered during the fire cause investigation; however, the above sequence of events was the only fire cause scenario that fits all the evidence collected and analyzed to date.

### Contributory Factors

A number of factors contributed to this incident. Had these contributory factors not been present, the initial fault condition would likely have been identified and interrupted (either manually or automatically) before it escalated into a fire event. These contributory factors include:

1. The supervisory control and data acquisition (SCADA) system for a Megapack required 24 hours to setup a connection for new equipment (i.e., a new Megapack) to provide full telemetry data functionality and remote monitoring by Tesla operators. Since VBB was still in the installation and commissioning phase of the project (i.e., not in operation), MP-1 had only been in service for 13 hours prior to being switched off via the keylock switch on the morning of the fire. As such, MP-1 had not been on-line for the required 24 hours, which prevented this unit from transmitting telemetry data (internal temperatures, fault alarms, etc.) to Tesla's off-site control facility on the morning of the fire.
2. The keylock switch for MP-1 was operated correctly on the morning of the fire to turn MP-1 off as the unit was not required for commissioning and testing that morning; however, this action caused telemetry systems, fault monitoring, and electrical fault safety devices<sup>6</sup> to be disabled or operate with

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<sup>4</sup> Victoria's energy safety regulator

<sup>5</sup> Victoria's health and safety regulator

<sup>6</sup> These elements include, among other devices, fuses at the cell and module level for localized fault current interruption and a battery module pyro disconnect that severs the electrical connection of the battery module when a fault current is passing through the battery module.

only limited functionality. This prevented some of the safety features of MP-1 from actively monitoring and interrupting the electrical fault conditions before escalating into a fire event.

3. The exposure of liquid coolant onto the battery modules likely disabled the power supply to the circuit that actuates the pyro disconnect.<sup>7</sup> With a power supply failure, the pyro disconnect would not receive a signal to sever and would not be able to interrupt a fault current passing through the battery module prior to it escalating into a fire event.

## Fire Propagation Investigation

The VBB fire investigation process involved analyzing not only the root cause of the initial fire in MP-1 but also the root cause of the fire propagation into MP-2. The Megapack has been designed to be installed in close proximity to each other without fire propagating to adjacent units. The design objective of the Megapack in terms of limiting fire propagation was mainly reliant on the thermal insulation of the Megapack's exterior vertical steel panels and the sheer mass of the battery modules acting as a heat sink (i.e., they are difficult to heat up). With this thermal insulation, the Megapack spacing can be as close as 15 cm (6 in) to the sides and back of each unit with 2.4 m (8 ft) aisles in front of each Megapack, as shown in Figure 1. This product spacing has been validated in UL9540A unit level tests.<sup>8</sup> Similar to the fire origin and cause investigation, the on-site inspections were supported simultaneously with an analysis of telemetry data (such as internal temperatures) from MP-2 and fire testing. The on-site investigation findings, the telemetry data analysis and fire tests, when combined, identified a scenario where Megapack to Megapack fire propagation can occur.

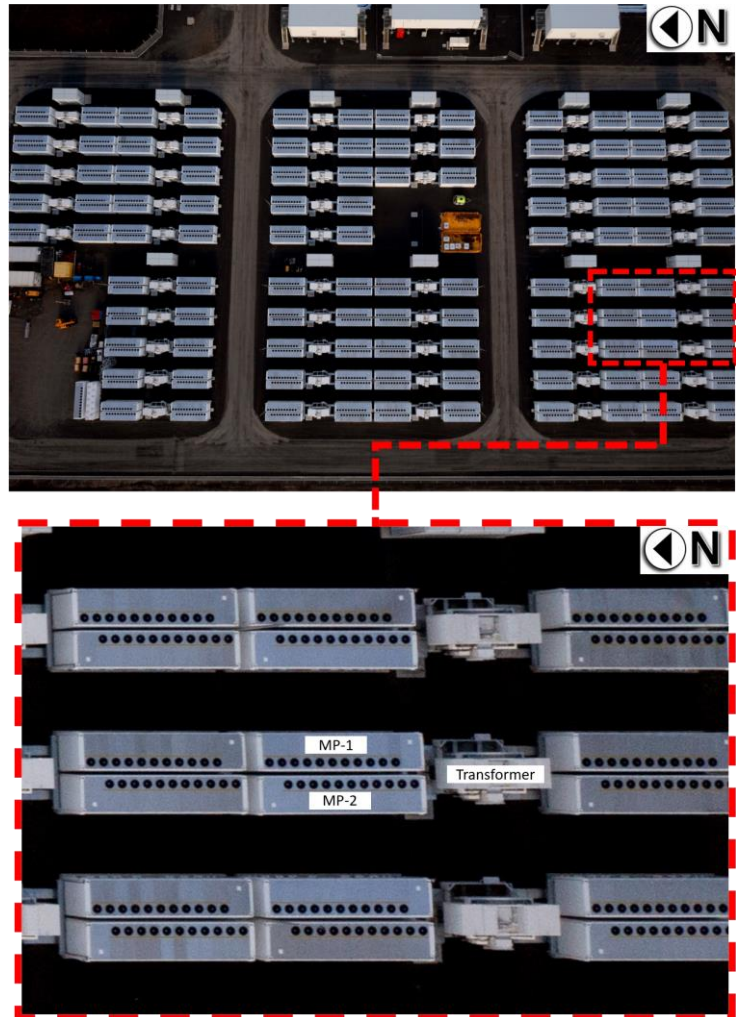


Figure 1 VBB Megapack layout (top) and area of fire origin (bottom)

<sup>7</sup> The pyro disconnect is a Tesla proprietary shunt-controlled pyrotechnic fuse that allows for rapid one-time actuation. There is one pyro disconnect per battery module.

<sup>8</sup> UL9540A, *Test Method for Evaluating Thermal Runaway Fire Propagation in Battery Energy Storage Systems*. UL9540A is a test method developed by UL to address fire safety concerns with BESS. The test method provides a method to evaluate thermal runaway and fire propagation at the cell level, module level, and unit level. In addition to cell and module level tests, Tesla performed unit level tests to evaluate, among other fire safety characteristics, the potential for fire propagation from Megapack-to-Megapack. During unit level testing, fire propagation did not occur between Megapacks when they were installed with a spacing of 15 cm (6 in) to the sides and back of each unit.



## Fire Propagation Determination

Flames exiting the roof of MP-1 were significantly impacted by the wind conditions at the time of the fire. Wind speeds were recorded between 20-30 knots<sup>9</sup> which pushed the flames exiting the roof of MP-1 towards the roof of MP-2. This direct flame impingement on the top of the thermal roof of MP-2 ignited the internal components of MP-2, most notably, the plastic overpressure vents that seal the battery bay<sup>10</sup> from the thermal roof. Once ignited, the overpressure vents provided a direct path for flames and hot gases to enter into the battery bays, thus exposing the battery modules of MP-2 to fire and/or elevated temperatures. Exposed to temperatures above their thermal runaway threshold of 139°C (282°F), the cells within the battery modules eventually failed and became involved in the fire.

Other possible fire propagation root causes were considered during the investigation; however, the above sequence of events was the only fire propagation scenario that fits all the evidence collected and analyzed to date. Of note, at the time when fire was observed within the thermal roof of MP-2, internal cell temperature readings of MP-2 had only increased by 1°C (1.8°F) from 40°C to 41°C (104°F to 105.8°F)<sup>11</sup>. Around the same time that fire was observed within the thermal roof of MP-2, around 11:57 AM (approximately 2 hours into the fire event), communication was lost to the unit and no additional telemetry data was transmitted. However, given the internal cell temperatures of MP-2 had only recorded a 1°C (1.8°F) temperature rise 2 hours into the fire event and while the unit's roof was actively on fire, fire propagation across the 15 cm (6 in) gap via heat transfer is not the root cause of the fire propagation. Furthermore, this telemetry data from MP-2 demonstrates that the Megapack's thermal insulation can provide significant thermal protection in the event of a fire within an adjacent Megapack installed only 15 cm (6 in) away.

## Contributory Factors

The wind was the dominant contributory factor in the propagation of fire from MP-1 to MP-2. At the time of the fire, a 20-30 knot (37-56 km/hr, 23-35 mph) wind was recorded out of the north. The wind conditions at the time of the fire pushed the flames exiting out of the top of MP-1 towards the top of MP-2 leading to direct flame impingement on the thermal roof of MP-2. This type of flame behavior was not observed during previous product testing or regulatory testing per UL9540A. In UL9540A unit level testing, the maximum wind speed permitted<sup>12</sup> during the test is 10.4 knots (19.3 km/hr, 12.0 mph); whereas, wind conditions during the VBB fire were two to three times greater in magnitude. As such, the wind conditions during the VBB fire appear to have identified a weakness in the Megapack's thermal roof design (unprotected, plastic overpressure vents in the ceiling of the battery bays) that allows Megapack-to-Megapack fire propagation. This weakness was not identified previously during product or regulatory testing and does not invalidate the Megapack's UL9540A certification, as the cause of fire propagation was primarily due to an environmental condition (wind) that is not captured in the UL9540A test method.

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<sup>9</sup> This equates to 37-56 kilometers per hour (km/hr) or 23-35 miles per hour (mph).

<sup>10</sup> The battery bay is an IP66 enclosure that houses the battery modules. It is distinct from the thermal roof installed above it. Plastic overpressure vents are installed in the ceiling of the battery bay, sealing the two enclosures from one another.

<sup>11</sup> As a reference, the Megapack's normal operating cell temperature is between 20-50°C and cell thermal runaway does not occur until 139°C (98°C above cell temperatures of MP-2 before telemetry data was lost).

<sup>12</sup> This threshold is necessary for test reliability and reproducibility. If wind conditions are not bounded in some fashion in an outdoor fire test, large variances on product performance could be introduced due to varying wind conditions.

## Mitigations

The investigation of the VBB fire identified several gaps in Tesla's commissioning procedures, electrical fault protection devices and thermal roof design. Since the fire, Tesla has implemented a number of procedural, firmware, and hardware mitigations to address these gaps. These mitigations have been applied to all existing and any future Megapack installations and include:

### Procedural Mitigations:

- Improved inspection of the coolant system for leaks during Megapack assembly and during end-of-line testing to reduce the likelihood of future coolant leaks.
- Reduce the telemetry setup connection time for new Megapacks from 24 hours to 1 hour to ensure new equipment is transmitting telemetry data (internal temperatures, fault alarms, etc.) to Tesla's off-site control facility for remote monitoring.
- Avoid utilizing the Megapack's keylock switch during commissioning or operation unless the unit is actively being serviced. This procedural mitigation ensures telemetry, fault monitoring, and electrical fault safety devices (such as the pyro disconnect) are active while the Megapack is idle (such as during testing and commissioning).

### Firmware Mitigations:

- Added additional alarms to the coolant system's telemetry data to identify and respond (either manually or automatically) to a possible coolant leak.
- Keep all electrical safety protection devices active, regardless of keylock switch position or system state. This firmware mitigation allows electrical safety protection devices (such as the pyro disconnect) to remain in an active mode, capable of actuating when electrical faults occur at the battery modules, no matter what the system status is.
- Active monitoring and control of the pyro disconnect's power supply circuit. In the event of a power supply failure (either through an external event such as a coolant exposure or some other means), the Megapack will automatically actuate the pyro disconnect prior to the loss of its power supply.

### Hardware Mitigations

- Installation of newly designed, thermally insulated steel vent shields within the thermal roof of all Megapacks. These vent shields protect the plastic overpressure vents from direct flame impingement or hot gas intrusion, thus keeping the IP66 battery bay enclosures isolated from a fire above in the thermal roof. Their performance was validated through a series of fire tests, including unit level fire testing of entire Megapack units.<sup>13</sup> The vent shields are placed over the top of the overpressure vents and will come standard on all new Megapack installations. For existing Megapacks, the vent shields can be installed in the field (retrofit) with minimal effort or disruption to the unit. At the time of this report, the vent shields are nearing production stage and will be retrofitted to applicable Megapack sites shortly.

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<sup>13</sup> The tests confirmed that, even with the entire thermal roof fully involved in fire, the overpressure vents will not ignite and the battery modules below remain relatively unaffected by the fire above. For instance, the cells within the battery modules saw a less than 1°C temperature rise while the entire thermal roof was fully involved in fire.

## Emergency Response

Beyond the origin and cause and propagation investigations, another key aspect of the VBB fire was the emergency response. The CFA is the responsible fire service organization for VBB, and the facility is in their initial response jurisdiction. The location of the VBB facility is in a semi-rural location. The nearest fire station is the CFA Lovely Banks, approximately 4 km (2.5 miles) distance from VBB and thus relatively close, though other resources had more extended travel distances.

Upon arrival around 10:30 AM, CFA immediately established incident command (IC) in accordance with their protocols, and the IC worked closely with the facility representatives and subject matter experts (SMEs). This close coordination continued throughout the entire event. The facility was evacuated and all-site personnel accounted-for upon notification of the emergency event and the commencement of fire service operations. A 25 m (82 ft) perimeter was established around MP-1 while water application and cooling strategies were discussed with facility representatives and subject matter experts (SMEs). The decision was made to provide exposure protection to Megapacks and transformers adjacent to MP-1 and MP-2 using water hose lines, as recommended in Tesla's ERG. The fire eventually propagated into MP-2; however, flame spread did not advance any further than MP-1 and MP-2. The two Megapacks were permitted to burn themselves out, during which time the CFA did not directly apply water into or onto either Megapack. By 4:00 PM (approximately six hours after the start of the event), visible flames had subdued and a fire watch was instituted. The CFA continued to monitor the site for the next three days before deeming it under control on August 2, 2021, at which time, the fire investigation began.

## Key Takeaways

A thorough review of the VBB fire emergency response yielded the following key takeaways:

- **Effective Pre-incident Planning:** VBB had both an Emergency Action Plan (EAP) and an Emergency Response Plan (ERP). Both plans were available to emergency responders and were effectively used during the VBB fire. For example, all site employees and contractors followed proper evacuation protocols during the fire and as a result, no injuries occurred to those personnel.
- **Coordination with SMEs:** VBB had thorough pre-incident plans that clearly identified the SMEs, how to contact them, their role and other key tasks. It was reported that the facility SMEs stayed in close contact with the CFA IC throughout the VBB fire, providing valuable information and expertise for the CFA to draw upon. For example, site representatives and SMEs worked closely with the CFA in determining water application and cooling strategies of adjacent exposures.
- **Water Application:** A key question regarding water application is the necessary amount and duration for effective fire containment. Tesla's design philosophy is based on inherent passive protection (i.e., thermal insulation), with minimal dependence on active firefighting measures like external hose lines. As such, water was not aimed at suppressing the fire but rather protecting the exposures as directed by Tesla's ERG and the SMEs on site. All available data and visual observations of the fire indicates water had limited effectiveness in terms of reducing or stopping fire propagation from Megapack-to-Megapack. The thermal insulation appears to be the dominant factor in reducing heat transfer between adjacent Megapacks. However, water was effectively used on other exposures



(transformers, electrical equipment, etc.) to protect that equipment, which are not designed with the same level of protection as a Megapack is (i.e., thermal insulation).<sup>14</sup>

- The fire protection design approach of the Megapack has inherent advantages over other BESS designs in terms of safety to emergency responders. The Megapack approach minimizes the likelihood of fire spread using passive compartmentation and separation, eliminates the danger to fire fighters of an overpressure event due to design features and a lack of confinement (e.g., outdoor versus indoor), does not rely on active firefighting measures like external hose lines and minimizes the dangers from stranded electrical energy to those involved with overhaul and de-commissioning with a fire response approach permitting the Megapack to burn itself out.

## Environmental Concerns

The Environment Protection Authority Victoria (EPA) deployed two mobile air quality monitors within 2 km (1.2 miles) of the VBB site. Locations were chosen where there was potential to impact the local community. The EPA monitors confirmed “good air quality in the local community” after the incident; however, the measurements were not taken during the peak of the fire event. They were sampled around 6:00 PM, or approximately 2 hours after the fire was out. Therefore, the data cannot be used to understand the airborne hazards during the actual fire event. The data does demonstrate that two hours after the fire event, the air quality in the surrounding area was “good” and no long-lasting air quality concerns arose from the fire event.<sup>15</sup>

During the fire event, the CFA coordinated with site personnel to control the water run-off from fire hoses into a catchment. Water samples, collected by Tesla site personnel under the supervision of CFA, were extracted from the catchment. Laboratory results from those samples indicated that the likelihood of the fire having a material impact on the water was minimal. After the incident, as a precaution, the water was removed from the catchment, via suction trucks, and was transported to a licensed waste facility for treatment and disposal. It is estimated that approximately 900,000 liters of water was disposed of from the site after the event.

## Community Concerns

Neoen, the project developer and owner, pro-actively engaged with the local community during and following the VBB fire. These engagements included door-to-door visits, phone calls and emails with the residential and agricultural properties within a 2-3 km (1.2-1.9 mile) radius of the VBB site. Neoen found their prior community outreach during the project planning stages to be invaluable as this outreach provided up-to-date contact information for Neoen when reaching out to the local community during and following the fire. In addition, Neoen formed an executive stakeholder steering committee comprising of key organizations within 24 hours of the incident. With multiple parties involved in the emergency response to the fire event

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<sup>14</sup> At the time of this report, final fire department reports were not available for review and inclusion. As that information becomes available, additional information regarding water usage and effectiveness may require inclusion in this report. Although the effectiveness of external water in a Megapack fire may be limited, water should still be made available for exposure protection and other unanticipated events in the future, as required by any applicable regulatory requirements.

<sup>15</sup> It should be noted that prior regulatory testing (UL 9540A module level fire testing) has shown that the products of combustion of a Megapack battery module can include flammable and nonflammable gases. Based on those regulatory tests, the flammable gases were found to be below their lower flammable limit (LFL) and would not pose a deflagration or explosion risk to first responders or the general public. The nonflammable gases were found to be comparable to the smoke you would encounter in a typical Class A structure fire and do not contain any unique, or atypical, gases beyond what you would find in the combustion of modern combustible materials.

actively participating in the steering committee, this helped ensure that from the outset communication was timely, efficient, well-coordinated across different organizations and accurate.

In addition to the community outreach, Neoen and Tesla also briefed multiple industry, State and Federal Government Departments and Agencies immediately following the VBB fire and at the conclusion of the investigation process. These briefings helped ensure the wider energy sector with interests in BESS were able to be kept directly informed as information became available.

## Overhaul and Remediation

On July 29, 2021 nearly half of the Megapacks had been installed and the site was in the testing and commissioning stage of the project. Following the fire event on July 30, 2021, fire department personnel, regulatory agencies and other emergency responders remained on-site for precautionary purposes until August 2, 2021. At that time the site was turned over for regulatory fire investigations to begin. On-site fire investigations started on August 3, 2021 and continued until August 12, 2021. During this time, starting on August 6, 2021, the site was permitted to continue the installation of Megapacks while the area around MP-1 remained cordoned off for the investigation. On September 23rd, 2021, less than two months after the fire, VBB was re-energized and testing and commissioning restarted. Remediation of the damaged equipment followed shortly after, and lasted a total of three days. All testing and commissioning efforts were completed without any further incidents and on December 8, 2021, VBB officially opened.

## Lessons Learned

The VBB fire exposed a number of unlikely factors that, when combined, contributed to the fire initiation as well as its propagation to a neighboring unit. This collection of factors had never before been encountered during previous Megapack installations, operation and/or regulatory product testing. This section summarizes those factors as well as the emergency response to the fire, discusses the lessons learned from this fire event, and highlights the mitigations Tesla has implemented in response.

### 1. Commissioning Procedures

Lessons learned related to commissioning procedures include: (1) limited supervision/monitoring of telemetry data during the first 24 hours of commissioning and (2) the use of the keylock switch during commissioning and testing. These two factors prevented MP-1 from transmitting telemetry data (internal temperatures, fault alarms, etc.) to Tesla's control facility and placed critical electrical fault safety devices (such as the pyro disconnect) in a state of limited functionality, reducing the Megapack's ability to actively monitor and interrupt electrical fault conditions prior to them escalating into a fire event.

Since the VBB fire, Tesla has modified their commissioning procedures to reduce the telemetry setup connection time for new Megapacks from 24 hours to 1 hour and to avoid utilizing the Megapack's keylock switch unless the unit is actively being serviced.

### 2. Electrical Fault Protection Devices

Lessons learned related to electrical fault protection devices include: (1) coolant leak alarms; (2) the pyro disconnect being unable to interrupt fault currents when the Megapack is off via the keylock switch and (3) the pyro disconnect likely being disabled due to a power supply loss to the circuit that actuates it. These three factors prevented the pyro disconnect of MP-1 from actively monitoring and interrupting the electrical fault conditions before escalating into a fire event.

Since the VBB fire, Tesla has implemented a number of firmware mitigations that keep all electrical safety protection devices active, regardless of keylock switch position or system state, and to actively monitor and control the pyro disconnect's power supply circuit. Furthermore, Tesla has added additional alarms to better identify and respond (either manually or automatically) to coolant leaks. Additionally, although this fire event was likely initiated by a coolant leak, unexpected failures of other internal components of the Megapack could create similar damage to the battery modules. These new firmware mitigations do not only address damage from a coolant leak. They also permit the Megapack to better identify, respond, contain and isolate issues within the battery modules due to failures of other internal components, should they occur in the future.

### 3. Fire Propagation

Lessons learned related to fire propagation include: (1) the significant role external, environmental conditions (such as wind) can have on a Megapack fire and (2) the identification of a weakness in the thermal roof design that permits Megapack-to-Megapack fire propagation. These two factors led to direct flame impingement on the plastic overpressure vents that seal the battery bay from the thermal roof. With a direct path for flames and hot gases to enter into the battery bays, the cells within the battery modules of MP-2 failed and became involved in the fire.

Since the VBB fire, Tesla has devised (and validated through extensive testing) a hardware mitigation that protects the overpressure vents from direct flame impingement or hot gas intrusion via the installation of new, thermally insulated, steel vent shields. The vent shields are placed on top of the overpressure vents and will come standard on all new Megapack installations. For existing Megapacks, the vent shields can be easily installed in the field. At the time of this report, the vent shields are nearing production stage and will be retrofitted to applicable Megapack sites shortly.

### 4. Megapack Spacing

Lessons learned related to Megapack spacing include: no changes are required to the installation practices of the Megapack with the vent shield mitigation (as described above) in place. Based on an analysis of telemetry data within MP-2 during the VBB fire, the Megapack's thermal insulation can provide significant thermal protection in the event of a fire within an adjacent Megapack installed 15 cm (6 in) away. The internal cell temperatures of MP-2 only increased by 1°C (1.8°F), from 40°C to 41°C (104°F to 105.8°F), before communication was lost to the unit, presumably due to fire, around 11:57 AM (approximately 2 hours into the fire event). Fire propagation was triggered by the weakness in the thermal roof, as described above in #3, and not due to heat transfer via the 15 cm (6 in) gap between Megapacks. With the vent shield mitigation in place, the weakness has been addressed and validated through unit level fire testing (i.e., tests involving the ignition of the Megapack's thermal roof). These tests confirmed that, even with the thermal roof fully involved in a fire, the overpressure vents will not ignite and the battery modules remain relatively unaffected with internal cell temperatures rising less than 1°C.

### 5. Emergency Response

Lessons learned from the emergency response to the VBB fire include: (1) effective pre-incident planning is invaluable and can reduce the likelihood of injuries; (2) coordination with SMEs, either on site or remotely, can provide critical expertise and system information for emergency responders to draw upon; (3) the effectiveness of applying water directly to adjacent Megapacks appears to provide limited benefits; however, water application to other electrical equipment, with inherently less fire protection built into their designs (such as transformers), can be a useful tactic to protect that equipment; (4) the fire protection design

approach of the Megapack has inherent advantages over other BESS designs in terms of safety to emergency responders; (5) the EPA indicated that there was “good” air quality 2 hours after the fire demonstrating that no long-lasting air quality concerns arose from the fire event; (6) water samples indicated that the likelihood of the fire having a material impact on firefighting water was minimal; (7) prior community engagement during the project planning stages is invaluable as it enabled Neoen to quickly update the local community and address immediate questions and concerns; (8) early, factual and where possible, face-to-face engagement with the local community is essential when a fire event is unfolding to keep the general public informed; (9) an executive stakeholder steering committee from the key organizations involved in the emergency response can help ensure that any public communications are timely, efficient, coordinated and accurate; and (10) effective coordination between stakeholders at the site allowed for rapid and thorough handover process after the incident, the swift and safe decommissioning of the damaged units and the site’s quick return to service.

In summary, the VBB fire event proceeded in accordance with its fire protection design and pre-incident planning. It presented no unusual, unexpected, or surprising characteristics (i.e., explosions) or resulted in any injuries to site personnel, the general public or emergency responders. It was isolated to the units directly involved, had minimal environmental impact, did not adversely impact the electrical grid, and had appreciably short mission interruption.