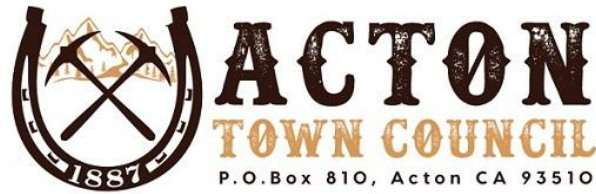


DOCKETED	
Docket Number:	25-OPT-02
Project Title:	Prairie Song Reliability Project
TN #:	265854
Document Title:	The Acton Town Council Comments - Preliminary Comments on the Opt-In Application submitted by the Acton Town Council for the Prairie Song BESS Project
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*Comment Received From: The Acton Town Council
Submitted On: 9/2/2025
Docket Number: 25-OPT-02*

**Preliminary Comments on the Opt-In Application submitted by the
Acton Town Council for the Prairie Song BESS Project**

Additional submitted attachment is included below.



Lisa Worrall, Project Manager
California Energy Commission
715 P Street, MS-40
Sacramento, CA 95814

September 3, 2025

Subject: Initial Comments From the Acton Town Council Regarding the Proposed
"Prairie Song" BESS Development.

Reference: California Energy Commission Docket Number 25-OPT-02.

Dear Ms. Worrall;

The Acton Town Council (Council) understands that an application for a very large Battery Energy Storage System (BESS) project was recently submitted to the California Energy Commission (CEC) for approval under the "Opt-In" licensing program established by Assembly Bill 205 (AB 205). The Council has reviewed several of the documents included in the application filed in the referenced docket, and we have noted errors in various representations that are made. In the hope that these errors can be expeditiously corrected at the very beginning of this licensing proceeding, the Acton Town Council respectfully submits the following preliminary comments, and we ask that they be accorded significant weight in the CEC's consideration of the Prairie Song Project.

The Prairie Song BESS is located in Acton

The Council is troubled by a number of statements in the Prairie Song BESS Project application which assert that the project is located outside of Acton, that it is in the Antelope Valley, and that it is even located in Palmdale. However, the Prairie Song project is located in the rural unincorporated Community of Acton which occupies an area of approximately 100 square miles and has a population of approximately 7,500. Acton is a designated rural community within the Santa Clara River Valley and is located along the foothills of the north slopes of the San Gabriel mountains. On the north, Acton is bounded by the Sierra Pelona mountain range; to the east lies the Antelope Valley and to the west lies the rural community of Agua Dulce. The County of Los Angeles has adopted unique development standards to preserve Acton's rural identity and protect our natural environment; these standards are enumerated in Chapter 22.302 of the County Code.

What is most perplexing of all is that the developer/applicant knows that the Prairie Song BESS Project is located in Acton because the project was presented at a regularly scheduled Acton Town Council meeting in 2023. It is unfathomable why the developer/applicant would tell the CEC that the project is outside of Acton when the developer/applicant knows full well that it is not. The Council respectfully asks that the CEC recognize that the Prairie Song BESS Project is located entirely within the Community of Acton.

The Developer/Applicant Does not Acknowledge BESS Public Safety Concerns

The Council is substantially troubled by the failure of the developer/applicant to acknowledge that BESS facilities which employ lithium battery chemistries are inherently dangerous and prone to fire and toxic gas release. In fact, these concerns are not addressed in either the “Hazardous Materials Handling” or “Wildfire” sections of the application. This is problematic because Acton is a very high fire hazard zone and experiences significant “Santa Ana” wind events which makes wildfire risk in our community a substantial issue. This, coupled with the fact that the Prairie Song BESS is the largest BESS in the world and is just one of several BESS proposed for Acton, substantially elevates the public safety risks posed to our community. The Council respectfully asks that the CEC acknowledge this concern and make it a “centerpiece issue” in the Prairie Song licensing proceeding.

The Developer/Applicant Does not Acknowledge Significant Aesthetic Impacts

The Council is also troubled by developer/applicant assertions that the Prairie Song BESS project will not have significantly adverse visual or scenic resource impacts. The unsightly BESS/substation facilities are more than a mile long and are located between two mapped scenic drives which were established by the Antelope Valley Area Plan precisely for the protection of scenic viewsheds throughout the Community of Acton. These facilities will blight more than 15% of the scenic viewshed provided by the scenic 14 Freeway in Acton. Any project that blights a significant portion of a scenic drive within a community has significant aesthetic impacts, and the Council respectfully asks the CEC to recognize this.

The Developer/Applicant does Not Offer Benefit Programs that Reflect Acton Interests.

The Council is also troubled by statements presented in the Draft Community Benefit Plan filed by the developer/applicant. For instance, the Draft Community Benefit Plan states that outreach on the community benefit plan will begin in early July. However, it is now September and the only thing we are aware of is that last week (specifically, August 25), someone from a company called “Better World Group” emailed select individuals to request “one on one” meetings to discuss how the Prairie Song project will “align with” organization priorities. “One on one” meetings in backrooms with select individuals *is not* how authentic community engagement is done and it is certainly not how “Community Benefit” Plans should be developed. To the contrary, such methods introduce furtiveness, create divisiveness, and engender distrust. A better path would be to convene a community meeting and invite community based organizations to discuss the issue openly to ensure all organizations hear the same message and have the same opportunity to provide initial input on the Benefit Plan.

The Council is also concerned by the fact that the organizations and areas which are targeted by the Draft Community Benefit Plan are not in Acton and they do not represent Acton interests; accordingly, and as the Council understands is, such agreements and programs do not satisfy the requirements imposed by AB 205¹. For example, the Plan says that one of the community benefits provided by the Prairie Song BESS Project is an agreement executed with the “Los Angeles/Orange Counties Building and Construction

¹ Qualified “Community Benefit” agreements must be made with community based organizations that represent the interests of the community in which the proposed project is located.

Trades Council” (LA/OC BCTC) which is an organization that does not exist in Acton and does not represent the interests of the Acton Community. The Plan also explains that, as part of the Community Benefit Plan, the developer/applicant will fund education in Los Angeles County and that discussions with the public schools that will receive these benefits are ongoing. However, none of these ongoing discussions convened by the developer/applicant have involved public schools in Acton. The Plan also indicates that agreements will be put together to fund County Priorities and Antelope Valley programs, but because these agreements do not pertain to Acton, they do not serve or advance Acton Community interests. The Council respectfully asks the CEC to acknowledge that the developer’s/applicant’s Benefit Plan does not advance Acton interests or include agreements with community based organizations which represent the interests of the Acton Community.

The Application Does not Offer a Robust Set of Project Alternatives.

The Council is troubled by the significant lack of reasonable alternatives to the Prairie Song BESS project that are presented by the developer/applicant. In fact, the Application only gives serious consideration to one alternative which, like the proposed project, is also located in the east portion of Acton and therefore creates the same environmental impacts as the proposed project. A number of feasible alternatives to the Prairie Song BESS project are available, including alternative locations (that are outside of fire hazard areas and away from homes) and alternative technologies (that do not involve lithium battery chemistries and are thus intrinsically safer). The Council asks the CEC to ensure that a robust set of project alternatives are considered in the Prairie Song BESS licensing proceeding.

The Acton Town Council greatly appreciates the opportunity to provide the CEC with these preliminary comments on the Prairie Song BESS project docket. If you have any questions or would like additional information, please do not hesitate to contact the Council at atc@actontowncouncil.org.

Sincerely;

/S/ Jeremiah Owen

Jeremiah Owen, President
The Acton Town Council