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## **Rebuttal to prior supportive comments**

While the majority of people who comment in support of Prairie Song Reliability Project are union workers who are so “supportive” that they can’t even write their own comment and continue to submit the same pre-written three paragraphs over and over, there are occasionally people who do support this project who create their own comment. I would like to respond to a supportive comment that was recently submitted, though I will not mention commenter by name.

This individual’s comment starts off by saying that “California has suffered through extreme rate increases over the last 10 years.”

This statement is very true.

He then states “These rate increases, are unsustainable for many ratepayers and businesses.”

Also very true.

Here’s where we begin to disagree.

“Load growth to meet changing economy is expected to raise rates even further. To meet the states, economic growth, aspirations, carbon, reduction requirements, and driving down cost, the state needs the PSRP and more projects like it.”

In my opinion, this project will not drive down costs. California has an excess of clean, mostly solar

energy on the grid that we have had to pay other states to take in order to avoid grid overload. Just late last year the LA Times, Newsweek and many other online publications featured this story.

This overload is mostly due to the lack of battery storage facilities in which to store the power that is generated during the day, which can then be injected to the grid in the evening during peak usage. And why is there a lack of battery storage? Because developers insist on utilizing lithium-ion and LFP batteries and refuse to site their projects responsibly away from communities. These substantial capacity lithium battery facilities are met with fierce opposition by residents who fear their reputation of catching fire and releasing toxic hydrogen gases for hours to days while they are allowed to burn themselves out.

On Sept 23 and Oct 1 2025 there were another two BESS fires—one in Boulder City NV and the other in Glendale-Peoria AZ. Both utilized LFP TESLA Mega Packs. The Boulder City incident spread to a second container, refuting what this individual had stated in his comment, that LFP fires do not spread to other containers. The positive side of these incidents is that both BESS are sited far enough from communities that they did not trigger an evacuation, unlike the Prairie Song which would most certainly trigger an evacuation and the closure of busy State Route 14 and the Metro Rail.

Our commenter states that LFP BESS have fewer incidents than other “already accepted” energy sources such as natural gas facilities. These “already accepted” energy source projects have a much longer history and a much greater presence so of course the incident statistics will be much higher. It should be noted that the only fatalities (to date) from a BESS failure were from LFP batteries in Beijing in April 2021 where two firefighters died and another was mutilated by an explosion. And they never accounted for a power center employee who merely vanished with the explosion, as reported by CTIF.

Prairie Song is an enormous LFP project and is proposed in a VHFHSZ on all Ag-zoned property in a rural preserve full of homes, ranches and animal facilities. This residential development area is served almost exclusively by dirt roads for ingress and egress. This would be an extremely unsafe situation.

The commenter speaks of the Vincent Substation that would not require extra build out. This is true.

The Vincent is a very large transmission substation with approximately 20 major transmission lines connecting there and it is the southern terminus of the Pacific AC Intertie.

Siting PSRP further away from the substation would not change this fact. It would only require a more lengthy (and more costly) gen-tie line.

Nothing that renewable energy has brought to the grid has resulted in lowering costs for ratepayers.

In Southern CA we will forever be paying for the thousands of homes and many lives lost in wildfires ignited by transmission lines owned by SCE, the most recent being the Eaton Fire. The SCE Public Safety Power Shutoffs only de-energize distribution lines serving communities like Acton dozens of times each year during fire season”but transmission lines are never de-energized.

How will PSRP help drive down rates when their goal is to buy energy at low prices during the day and then sell it back to the grid at higher prices during peak demand. What about practicing energy arbitrage results in savings for ratepayers?

We have plenty of capacity on the grid, actually it appears we have excess according to the sale of excess power to neighboring states. The Southwest blackout in 2020 was triggered by CAISO with 9% still in energy reserves. This was in violation of their agreement with FERC that they would not cut power unless the reserves were down to 3%. This violation cost CAISO \$6M in a settlement with FERC and NERC. Perhaps this premature power shutoff was to create the illusion of a dire need for more energy capacity on the grid, and of course BESS to store that energy. In 2022, rolling blackouts were reported to have been narrowly avoided, with CAISO crediting the addition on 3,300 MW of grid storage batteries as being helpful during the event. Truth or manipulation? After the manufactured 2020 episode, who knows.

While I can appreciate the commenter's enthusiasm for renewable clean energy, we must remember to responsibly site projects utilizing fire-prone and toxic battery technologies. The first consideration should always be public safety, not developer gen-tie costs savings.

Prairie Song's LGIA states the site location was to be 24.4 miles from the Vincent Substation. That would be nowhere near the community of Acton, yet that site is not even mentioned as an alternative location. And why? Because they can save a lot of money by siting in Acton with a gen-tie line that would need to be less than 2 miles in length.

There is indeed a need for BESS like the Prairie Song Reliability Project. Denying a site location does not deny the future development of the project in an alternative and SAFE location.

Public safety first.  
Developer profits last!