

DOCKETED

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Alternative Site specified in LGIA not addressed

As the Prairie Song Reliability Project continues to add data in response to the CEC requests, it is troubling that the Project has still not addressed the alternative site location as specified in the LGIA on pages 99 and 119.

In the LGIA the interconnection line is stated to be 24.4 miles in length. None of the alternative sites identified in the Project application fit this description as all are within a 6 mile radius or less. Also, none of the alternative sites identified in the application offer any mitigation of the numerous impacts the PSRP will have on the 107 rural acres in the Acton community other than a few alternatives requiring a scaled down version of the Project. Therefore, it is imperative that the original location specified in the LGIA be considered, which is 24.4 miles from the POI at the Vincent Substation. This alternative location will likely mitigate many of the current impacts, such as being; 1) being in a Very High Fire Hazard Severity Zone in close proximity to homes, ranches, animal rescues and boarding facilities with limited egress, 2) directly over the headwaters of the Santa Clara River,

3) directly adjacent and traversing the SEA, 4) directly adjacent to State Route 14 which is a major transportation corridor, 5) directly adjacent to the Metro Rail which is a busy commuter passenger transport and also serves a high volume rail freight, 6) in close proximity to the active San Andreas fault, 7) located on Agriculture A1 and A2 zoning on which energy storage devices are expressly prohibited under the Los Angeles County Title 22 Zoning Code, and 8) not allowed under the Los Angeles County Dept of Regional Planning Interpretation Memo 2021-03, (as the Project application previously implied). A recent ruling by a LA County Superior Court judge on October 14th found the the Interpretation (based on a "similarity determination") was made in violation of the Zoning Code. According to the Code, 22.22.030 (D), interpretations based on "similarity determinations" are only allowed on Heavy Industrial M1.5 and M2 zoning"-not on Light Industrial M1. And therefore interpretations are also not allowed where such uses are expressly prohibited, as in A1 and A2 zoning.

Many homes will be taken by this project either through parcels being located in the mapped project site, being in the pathway of the transmission interconnection, or being directly adjacent to the project where their quality of life is so negatively affected and will require a buy out.

The LA County General Plan and Antelope Valley Area Plan specify guidelines to protect the rural communities in Unincorporated areas such as Acton. The PSRP does not comply with these local guidelines and the Plans intent to limit agriculture zoned areas to only residential and animal-based uses. Residents who purchased property in these agricultural zoned areas in Acton had no future warning they would be asked to co-exist with an enormous industrial BESS project that is proposed to utilize toxic and risky LFP batteries.

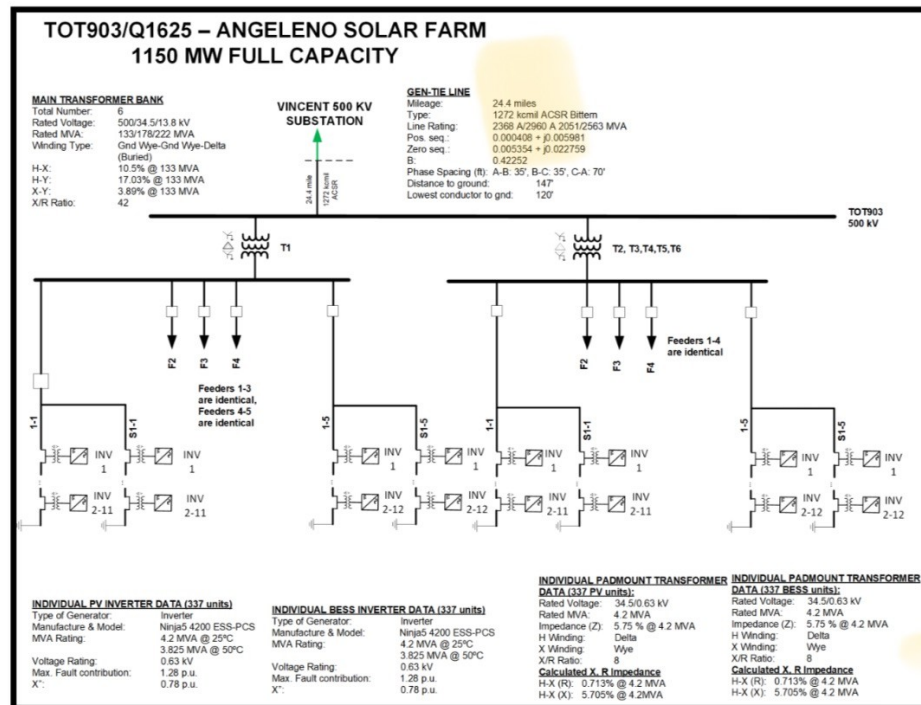
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LARGE GENERATOR INTERCONNECTION AGREEMENT



The Interconnection Customer has requested, and this LGIA provides for, a total net output capacity of 1,155.25 MW as measured at the high-side of the main step-up transformer(s) and 1,150.00 MW at the Point of Interconnection. The Parties acknowledge that the Large Generating Facility has a total net capability that exceeds these values. Accordingly, the Interconnection Customer agrees to install, own, operate and maintain a control limiting device or, alternatively, by means of configuring the Large Generating Facility's control system to ensure the Large Generating Facility does not exceed the total net output capacity provided under the LGIA at the high-side of the main step-up transformer(s) and Point of Interconnection, subject to the following:

- (a) The Interconnection Customer shall provide documentation to the Participating TO and CAISO prior to the Initial Synchronization Date which demonstrates the ability of the control limiting device or configuration of the control system to ensure the Large Generating Facility does not exceed the total net output capacity provided under the LGIA at the high-side of the main step-up transformer(s) and Point of Interconnection.