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App 1B-E Executive Summary 6-20-2025

On 6/20/25 the applicant submitted App 1B-E Executive Summary
I'd like to address the following section provided by the applicant:

b. Grid Resilience

The Applicant is exploring opportunities to improve access to reliable power in communities historically affected by resource adequacy shortfalls and Public Safety Power Shutoff (PSPS) events. This initiative aims to support established organizations working to expand access to distributed energy resources and backup generation that are critical for residents and essential facilities, including hospitals and emergency response infrastructure.

My comments:

Acton has not ever experienced a brown out or blackout to my knowledge. But CAISO has prematurely cut power in other areas contrary to its own policy which was to not cut power until they have reached a threshold of 3 percent reserves. CAISO cut power on Aug. 5, 2020, causing rolling blackouts with significant reserves still available. In 2019, CAISO called a stage 3 emergency with nearly 9 percent still in reserves. Was this to create the perception that there was an imminent need for battery storage to support renewable generation? At this time there was a plethora of battery storage projects in CAISO Cluster 14 with intentions of developing storage up and down our state. FIVE of these projects had plans to interconnect to the Vincent Substation in Acton via either their 230kV or 500 kV transmission lines. Acton, where the applicant wishes to site their enormous project, is not experiencing resource adequacy shortfalls and Prairie Song will not provide any direct energy benefit to Acton through resource adequacy agreements.

It is also evident by this referenced Executive Summary statement the applicant does not have a clear understanding of Public Safety Power Shutoff, also called PSPS, as they apply to the community of Acton. When Acton experiences a PSPS event it is because we are in a Very High Fire Hazard Severity Zone and high winds and dry conditions necessitate the de-energizing of local distribution lines by SCE to avoid a potential wildfire start, such as what occurred in the case of the 2025 devastating Eaton Fire. The only supporting energy source that can be safely applied during a PSPS event is provided through an independent residential solar battery back up system or a portable or household integrated generator. A facility like Prairie Song would only be able to inject their stored energy to the power grid at the Vincent Substation where it interconnects via an SCE 500kV transmission line. The local distribution lines to and from the Acton 66 kV substation would be de-energized during a PSPS until SCE deems it safe to re-energize them. So while this statement may sound like beneficial supporting service during a PSPS for the Acton community, there is no way they can safely deliver that stored energy.

Such statements made by the applicant regarding the benefits of the Prairie Song, as submitted in the Executive Summary, fall far short of reality for the community of Acton.