

DOCKETED

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Energy Developer Refuse to Adapt

Please accept these comments regarding the Prairie Song Reliability Project and the numerous impacts this BESS will impose on the community of Acton and its residents.

Additional submitted attachment is included below.

Energy developers refuse to adapt to safe alternative technologies

It baffles the mind how energy developers continue to propose projects that are not suitable for their chosen locations. There are many totally safe and non-toxic technologies that can be utilized for battery energy storage, but developers continue to lead with their wallets.

Lithium-ion batteries have a favorable density and price tag, and Lithium Iron Phosphate have dropped even lower in price than their Lithium-ion predecessor, but while LFP may show slightly more stability when overheated, they still are capable of overheating. They react, burn, go into thermal runaway, are more prone to deflagration and are highly toxic when they burn with a higher percentage of hydrogen-based gases. There are more safe alternatives such as Sodium Ion, Iron Air, Iron Flow or Redox Flow and others which are suitable for grid scale applications and do not pose the safety or health risks to communities. But developers are putting their profit-driven choices above public safety.

There are technologies which do not utilize batteries at all, such as A-CAES (Advanced Compressed Air Energy Storage), and if the CEC would deny dangerous lithium-based battery storage projects that are sited near communities, such as many local AHJs have done due to community safety concerns, then these alternative technologies would be incentivized and developers would bring forth projects that are going to safely help us achieve our green energy goals.

These Lithium-based battery storage projects are seeking locations in close proximity to substations for easy connectivity. The shorter the distance to interconnect, the less money they need to spend on their gen-tie line. Their project could be sited many miles away, could easily tap in and interconnect and have very little additional energy loss over the high transmission voltages. Losses can be mitigated by storing energy during the optimal off-peak hours when renewables are generating and there is less congestion on transmission lines. The practice of energy arbitrage can maximize their profits. Most of the energy loss in the storage process is due to transforming and inverting the energy, not the journey over high transmission voltages.

If siting in remote areas were not possible, then the largest BESS in the nation, the 821 MW Edwards-Sanborn would not exist in the Mojave Desert.

The CEC must not deny the toxicity associated with Lithium-ion battery chemistries, including the Lithium Iron Phosphate batteries. While some risks with BESS can be mitigated, the toxic gases expelled from Lithium Iron Phosphate batteries cannot be mitigated, especially under the adopted "let it burn" fire suppression protocols stated by Fire Risk Alliance and applied to the Prairie Song Reliability Project. When a "let it burn" strategy is imposed, the batteries are left to burn and consume themselves while protection is provided with water applied to adjacent containers/exposures only. Allowing the battery container to burn also allows the unimpeded release of hydrogen fluoride, hydrogen chloride, hydrogen cyanide and other toxic contaminants into the air, and ultimately creates an exposure risk to residents in proximity. There is no way to mitigate the release of these gases during a thermal runaway and fire incident.

The application of water to neighboring containers helps to keep them from overheating, and this concept is likely effective in only optimal weather conditions. But in Acton--especially

east Acton where the PSRP is proposed--- winds tend to exceed the 12mph speed at which UL9540a testing is performed. In east Acton, the winds are actually funneled to greater speeds than in Acton itself due to the fact this is a narrow corridor between the Sierra Pelona and San Gabriel Mountains. During a fire incident the jetted flames that are produced by Lithium Iron Phosphate hydrogen gases can be substantial in length and therefore high winds could drive them horizontally, increasing the probability of additional containers catching fire.

This was proven during the July 30, 2021 fire at the Victorian Big Battery in Australia where a second Megapack container ignited because wind speeds were 20-30 knots (23-34mph) that day, exceeding the 12mph test threshold of UL9540a. These two Megapacks burned themselves out after 6 hours, and according to the energy industry, “failed safely”.
<https://victorianbigbattery.com.au/wp-content/uploads/2023/10/VBB-Fire-Independent-Report-of-Technical-Findings.pdf>

But how “safe” can batteries fail if they are sited in close proximity to residents and their animals? “Failing safe”, according to the industry means there was no explosion or deflagration and there were no injuries during the incident. *This would certainly have not been the case if this same scenario occurred with the PSRP in its proposed location.* There would likely be significant inhalation exposures by residents trying to load and trailer their multiple horses and livestock to evacuate, most of which would be via dirt roads.

BESS that utilize lithium-ion batteries must be given more strict scrutiny than BESS utilizing competitive, safe, alternative batteries or non-battery technologies. Developers who insist on risky technology should have to site responsibly away from communities.

Lithium-ion + proximity to communities = opposition/delay/litigation

Will the CEC do right by the people of Acton and all of CA who say they do not want fire-prone, toxic battery storage in their communities? Do not allow these risky projects to be sited where the developers needs come before residents health & safety. Encourage the safe alternative technologies in those locations. Otherwise these Lithium-ion and LFP BESS will continue to be opposed, denied and challenged in court---ultimately delaying our state’s clean energy goals.