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## **Comprehensive Site Selection Study Required for Prairie Song Reliability Project**

I am a member of the Citizens for Battery Transparency and Citizens for Safe Energy Storage and opposed to the inappropriate siting of mega scale BESS in California. The CFBT group has been very involved opposing two large BESS facilities in Sonoma County. One of these projects has been withdrawn while the other has been paused. Public concerns and opposition to this relatively new technology at this size and scale have focused on the sites selected by project developers. This has been exacerbated because of accidents and incidents associated with fires at lithium-ion BESS facilities worldwide. The Moss Landing disaster in January of 2025 should give pause to all state regulators particularly the CEC and CPUC.

The California Environmental Quality Act (CEQA), Section 15126.6(a), requires an Environmental Impact Report (EIR) to “describe a reasonable range of alternatives to a project, or to the location of a project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.”

How do energy experts determine where to site a new energy facility? In the past, site selection studies were performed as part of the utility generation planning process. It was also a prerequisite required by state public utility commissions before approving or denying an application to build a new energy facility. I have conducted a number of site selection studies for large energy facilities during my 40 year career in the energy and environmental consulting business.

Important siting criteria should, at a minimum, include the following:

1. Proximity to residential areas, schools, hospitals and businesses
2. Proximity to important cultural resources and historic sites
3. Proximity to sensitive ecological habitat and important natural resources
4. Proximity to faults
5. Proximity to wildfire zones

Today, it appears that the most important criterion is to maximize profit for project developers by taking a less rigorous approach to expedite the site selection process and thereby increasing public health and safety risks. In most cases, proximity to substations becomes the most important criterion for project developers. GenTies are important but not a significant part of the cost of BESS projects. Also, high voltage transmission costs typically are very low 2 % or so. Substation proximity needs to be carefully evaluated along with the above criteria.

Interestingly, the state of California has no site selection requirements for BESS. According to a DOE Pacific Northwest National Lab study entitled “State Siting Authority of Energy Facilities”:

“Energy storage systems” are explicitly included under the CEC’s regulatory jurisdiction in the California Code of Regulations, but specific siting requirements for energy storage systems are not outlined in the text of those regulations.”

In summary, the Commission is required under CEQA to conduct a comprehensive evaluation of alternatives, particularly alternative sites. If this is done for the Prairie Song Reliability Project using the aforementioned siting criteria, I am certain that the Commission will be able to identify a more appropriate site for this gigantic BESS facility that will not adversely impact important people, places and things in Acton. These facilities belong in remote areas and should be integrated with solar facilities.

I appreciate the Commission’s attention to this matter.

Joseph Petrillo

Citizens for Battery Transparency  
Citizens for Safe Energy Storage