

DOCKETED	
Docket Number:	25-OPT-02
Project Title:	Prairie Song Reliability Project
TN #:	270096
Document Title:	Letter to CPUC ESRB regarding Unreported Failure events at Edwards Sanborn
Description:	N/A
Filer:	System
Organization:	Ruthie Brock
Submitter Role:	Public
Submission Date:	5/19/2026 9:11:05 AM
Docketed Date:	5/19/2026

*Comment Received From: Ruthie Brock
Submitted On: 5/19/2026
Docket Number: 25-OPT-02*

**Letter to CPUC ESRB regarding Unreported Failure events at
Edwards Sanborn**

Additional submitted attachment is included below.

May 18, 2026

CPUC staff and ESRB,

I wish to bring BESS failure incident information to your attention, should you not already be aware.

After finding that your April 2025 audit of the Edwards Sanborn Solar/BESS facility owned by Terra Gen revealed no mention of BESS fire incidents, it occurred to me that perhaps the CPUC and ESRB were not aware of several fire incidents which occurred at this facility the year prior in 2024.

I do realize these fire events were prior to the March 2025 mandate under amended GO-167C. Prior State legislation such as SB 38 (Laird-2023) does implement safety improvements through required Emergency Response Plans and the more recent SB 283 (Laird-2025) requires advance engagement with local fire authorities, but until the March 2025 amendment of GO-167 C, there appeared to be no requirement to report BESS failures and certainly no enforcement mechanism for any of the aforementioned requirements.

Thank you CPUC for implementing this extremely important mandate through your amended General Order.

While BESS developers continue to claim that fire incidents have rapidly declined over the past two years, omissions such as these at the Edwards Sanborn can help prove otherwise.

EPRI has been collecting data in their BESS Failure Incident Database since 2011, however it is focused on only failure events which pose a wider potential health and safety risk to the public, and do not include incidents which have occurred but are only reporting as operational failures. This is stated on EPRI's webpage for their BESS Failure Incidents data base. Because EPRI appears to be the only public database tracking failure incidents for commercial and utility scale BESS, the Energy Storage industry is leaning upon this incomplete data to tout recent "greatly improved safety" and a "significant drop in fire events".

This is misleading information being provided to the public to whitewash the real risks of these lithium-ion Battery Energy Storage System facilities.

Communities that are being threatened by BESS utilizing lithium-ion chemistries are not convinced by the mere reported numbers in the EPRI database. Lithium iron Phosphate (LFP) technology is "more safe" than previously favored Nickel Manganese Cobalt (NMC) batteries, but is far from "safe". Even one LFP battery container burning is a threat to residents in proximity due to expelled toxic gases and potential for wildfire.

BESS projects are being opposed up and down our state, including the enormous 1,150MW (LFP) Prairie Song Reliability Project BESS in my community of Acton which is being proposed within <200 ft from sensitive

receptors and in a VHFHSZ. As long as BESS developers are allowed to propose siting their projects in proximity to sensitive receptors and in designated high fire risk areas, these projects will be and *are* being opposed, delayed, challenged in court —and potentially denied—up and down our state and across our nation.

And CA may not succeed in meeting our clean energy goals.

BESS siting guidance for projects utilizing Lithium-ion technology could perhaps be provided by the CEC with a focus on public safety first and foremost. Local governments are struggling to develop ordinances to address BESS project siting and many lack the adequate and accurate risk information to do so.

Instead, developers insist on choosing their site locations focusing first on interconnection convenience and short gen-tie lines —*never* public safety.

For example, the proposed 1,150MW Prairie Song has no municipal water source and is in a VHFHSZ less than 200 ft from sensitive receptors. The 864MW Edwards Sanborn also has no municipal water source and is in a remote location in the Mojave desert region, miles from sensitive receptors. Which of these two projects is properly sited based on public safety? It's obvious the properly sited project is the Edwards Sanborn.

**The following note is provided only for CEC Prairie Song docket submission and was not included in the CPUC ESRB communication:

There were 4 incident reports concerning fire events at the Edwards Sanborn BESS facility which were received through a Public Records Act request from Kern County Fire Dept for the following dates; 2/22/24, 2/29/24, 7/14/24 and 9/18/24. Because these incident reports are not “searchable”, they are not allowable to be submitted to docket.

There had been no prior media coverage of these 4 fire events, likely due to the very remote (and *appropriate*) siting of the Edwards Sanborn facility.

These incident reports were submitted TWICE to EPRI and yet they have not been included in the BESS Failure Data Base as EPRI considers them instead to be “operational failures.”

Isn't any fire at a BESS considered an “operational failure”? Project siting is evidently what stands between what EPRI considers a data base-worthy “BESS Failure” (presenting health and safety risk to the public) or merely an “operational failure”.

Is this not considered skewing the data?

Thank you,
Ruthie Brock
Acton CA