

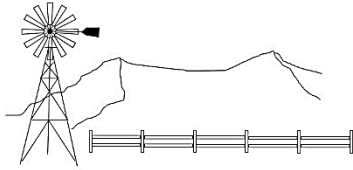
**DOCKETED**

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<b>Project Title:</b>	Prairie Song Reliability Project
<b>TN #:</b>	270986
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*Comment Received From: Save Our Rural Town  
Submitted On: 6/24/2026  
Docket Number: 25-OPT-02*

**Supplemental comment letter from Save Our Rural Town**

*Additional submitted attachment is included below.*



# SAVE OUR RURAL TOWN

June 24, 2026

Lisa Worrall, Project Manager  
California Energy Commission  
715 P Street, MS-40  
Sacramento, CA 95814  
Electronic filing of a 7 page Letter.

**Subject:** Supplemental Comments by Save Our Rural Town (SORT).

**Reference:** AB 205 Application Submitted for a Proposed Battery Energy Storage Project in Acton, CA.  
Docket Number 25-OPT-02.

Dear Ms. Worrall;

Save Our Rural Town (SORT) respectfully files the following supplemental comments pertaining to the referenced Licensing Application (Application) submitted by Coval Infrastructure (developer or applicant) to the California Energy Commission (Commission) for the referenced Battery Energy Storage System Project (BESS Project). These supplemental comments are prompted by documents that were recently filed in the referenced Docket, and SORT respectfully requests that they be factored into any decisions that the Commission makes pursuant to the referenced project.

## **The Developer's Request for a 60 day Extension of the Project Schedule.**

On June 19, 2026, the developer filed a letter in the referenced docket pursuant to California Public Resources Code Section 25545.4(e)(2)(F) that requested a 60 day extension to the project schedule to "allow additional time to complete and incorporate certain technical analyses relevant to the preparation of the Draft Environmental Impact Report". SORT notes that the referenced project has now been in process for more than a year and that the developer has already put thousands of pages of "technical analyses" in the docket; furthermore, an extension will put additional and substantial strains on SORT's already limited resources. Therefore, we oppose the extension request.

SORT has carefully reviewed the language added to the California Public Resources Code in 2025 by the adoption of SB 254 which allows the developer to request an extension to the schedule for processing an AB 205 application, and we note that the

statute does not compel the Commission to grant the request or extend the schedule by the timeframe requested by the developer (in this case, 60 days)<sup>1</sup>. In fact, SB 254 establishes that Executive Director Bohan *may* establish a new schedule to complete the referenced project by a period “attributable to” (i.e. caused by) the applicant’s request<sup>2</sup> but only in circumstances where the applicant has demonstrated “a reasonable need” for the extension. This plain and unambiguous language clearly establishes that the Commission can choose to deny an extension request. Moreover, the applicant has failed to meet its burden to demonstrate there is a “reasonable need” for the extension:

- The applicant states that the extension will allow time for the preparation of “technical analyses”, but does not describe these analyses, identify what they will achieve, or explain how they are relevant. Because the applicant has does not demonstrated that there is a “reasonable need” for any additional “technical analyses”, it has not shown that there is a “reasonable need” for an extension to prepare them.
- Insofar as SORT is aware, Commission staff have not identified a need for any additional “technical analyses” or directed the applicant to prepare any additional “technical analyses”; accordingly, Commission actions do not demonstrate there is a “reasonable need” for an extension to provide additional “technical analyses”.
- Because the responsibility for preparing the DEIR rests with the Commission, it is the Commission and *only* the Commission that is the arbiter of whether additional “technical analyses” are needed or relevant to the preparation of the DEIR. Accordingly, the applicant’s claim that additional “technical analyses” will be “relevant to the preparation of the Draft Environmental Impact Report” is not dispositive and cannot be accorded any weight.

As these facts demonstrate, the applicant has not met the burden imposed by California Public Resources Code Section 25545.4(e)(2)(F) to demonstrate that there is a “reasonable need” for the requested extension. Accordingly, the Commission is precluded from granting the requested extension.

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<sup>1</sup> SB 254 added Subsection (F) to 25545.4 (e)(2) to allow for an extension of the schedule to certify the EIR for an OPT-IN project if the “applicant files into the docket a written request that demonstrates a reasonable need for extending the time to certify the environmental impact report or issue a certificate for the site and related facilities pursuant to this chapter”. SB 254 also added Subsection (3) to Section 25545.4(e) which states “Following the occurrence of any circumstance described in paragraph (2), the executive director may establish a new schedule for staff to complete its review of the application that extends the 270-day period in paragraph (1) by a period attributable to the employment of paragraph (2).

<sup>2</sup> Ibid.

Nevertheless, if the Commission decides to extend the project schedule, SORT requests that the revised schedule ensure that the public has sufficient time to respond to any new “technical analyses” that the developer enters into the record; it must also provide Commission staff with sufficient time to review such public comments well in advance of the deadline for issuing the Staff Assessment and the DEIR. This ensures that the public’s response to the developer’s new “technical analyses” will be fully considered by the Commission and factored into the Staff Assessment and the DEIR. Thus, if the Commission *does* adjust the schedule, then the adjustment must offer a robust public review and comment opportunity prior to issuance of the Staff Assessment and the DEIR because that is the only way to ensure meaningful stakeholder participation. To achieve this SORT recommends that the adjusted schedule

- provide the public with at least 30 days to respond to new “technical analyses” submitted by the developer; and
- provide Commission staff with at least 30 days to fully consider the public’s response before finalizing the Staff Assessment and DEIR.

### **The Developer’s Response to Supplemental Data Requests Set 1.**

SORT has reviewed the Supplemental Data Request Set 1 that was entered into the referenced Docket on April 30, 2026, and we appreciate both the Commission’s and the developer’s effort to introduce native species to the project site. In response to this supplemental information, SORT respectfully requests that no species of fiddleneck (plants in the genus *Amsinckia*) be included in any plant palette established for the project. We ask this because we anticipate that, if the BESS project is approved, the developer will provide a trail around the project to replace the trails that currently exist along and over the project site and which will be eliminated by the project<sup>3</sup>.

This expectation is driven by the fact that elimination of existing trails constitutes a potentially significant environmental impact that must be mitigated pursuant to the California Environmental Quality Act (CEQA). Fortunately, this significant impact can be easily and feasibly mitigated by directing the developer to 1) grant a public trail easement in favor of Los Angeles County around the project site, 2) construct the trail, and 3) maintain the trail throughout the life of the project. Because this trail will be used by both pedestrians and equestrians, and because fiddleneck is particularly toxic to horses, no fiddleneck species should be established anywhere on the project site.

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<sup>3</sup> The trails and driving routes around and through the project site have been identified in the record. See for example page 4 of the Scoping Comments submitted by the Acton Town Council on March 4, 2026.

## The Developer’s Response to a Recent Commission Inquiry Warrants Clarification.

SORT is concerned that the information reflected in the Commission’s Report of Conversation (ROC) that was filed in the referenced Docket on June 10, 2026 does not fully reflect the actual number of BESS units that will be replaced throughout the life of the proposed project. Specifically, in response to the Commission’s inquiry regarding the “maximum number of batteries added *or replaced* throughout the life of the project” (emphasis added), the developer states that the project would be augmented by 578 batteries<sup>4</sup>. However, this response does not reflect the total number of batteries that will actually be replaced throughout the project life; rather, it merely describes battery additions that will be made over time to ensure the project meets its commitment to deliver 1,150 MW of power in accordance with the Large Generator Interconnection Agreement<sup>5</sup>. These additions are needed because BESS unit storage capacities decline over time, and to offset this decline, new units are added. Specifically, because each PowerTitan 2.0 is capable of delivering 1,260 kW for four hours<sup>6</sup>, at least 950 BESS units will be initially required to deliver 1,150 MW over 4 hours with 96% reliability:

$$\frac{1,150 \text{ MW}}{0.96} \times \frac{1 \text{ BESS Unit}}{1,260 \text{ kW}} \times \frac{1000 \text{ kW}}{1 \text{ MW}} = 950.73$$

By extension, twice as many BESS units (or at least 1,900) will be initially required to deliver 1,150 MW for 8 hours with 96% reliability. Because this capacity will degrade over time, the developer will “augment” the project by bringing in new BESS units and replacing underperforming BESS units. Based on the developer’s claim that a maximum of 2,035 BESS units will be on the project site<sup>7</sup>, SORT estimates that, among the 578 BESS units incorporated into the project by the 18<sup>th</sup> year via “augmentation”, 443 of them will replace existing BESS<sup>8</sup>; the remaining 135 will be new additions.

Notably, the *actual* number of BESS units that will be replaced during the 40 year project life<sup>9</sup> will be counted in the thousands, not the hundreds. This is because lithium BESS typically operate for less than 20 years; in fact, they often fail in 10 years or less because of high operating temperatures and high cycling rates. Insofar as SORT can

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<sup>4</sup> 95+95+140+120+128 = 578.

<sup>5</sup> Appendix C of the LGIA states the project must deliver 1,150 MW [TN # 265695 in Docket 25-OPT-02].

<sup>6</sup> info-support.sungrowpower.com/application/pdf/2024/02/21/DS\_20230925\_ST5015kWh-2500kW-2h\_1250kW-4h\_V3\_EN.pdf. Note: the https and the // were omitted from this citation to satisfy the Commission Docket Office.

<sup>7</sup> Pages 2-3 and 3.1-26 of the developer’s application.

<sup>8</sup> 1,900 initial batteries + 578 augmented batteries - 2035 final batteries = 443 batteries replaced.

<sup>9</sup> Page 1-2 of the developer’s application states that the project life is 40 years.

determine, the developer has not provided any warranty or life expectancy information pertaining to the PowerTitan 2.0 BESS systems that are proposed for the project; however, SORT has found one source indicating that the “system performance life” of a PowerTitan 2.0 BESS is 20 years.<sup>10</sup> Unfortunately, the source does not define the term “system performance life”. It could mean that Sungrow (the manufacturer) guarantees the BESS will operate uninterrupted and at adequate capacity for 20 years; it could also mean that, within the first 20 years of operation, Sungrow will replace underperforming BESS units when necessary (in which case, BESS units will be replaced more frequently than every 20 years). If it is assumed that each PowerTitan 2.0 BESS unit will last 20 years (which is highly unlikely), then *each* of the 2,035 BESS units on the project site at the end of the 20<sup>th</sup> year of operation will be replaced to ensure that the developer consistently delivers 1,150 MW for 8 hours<sup>11</sup>. This “end of life” replacement schedule is unrelated to the “augmentation” schedule discussed in the ROC, and it explains why the developer’s “augmentation” schedule ends after only 18 years: in the 20<sup>th</sup> year, all the BESS units are replaced and the “augmentation” cycle begins anew. Accordingly, by the end of the 20<sup>th</sup> year, the project will have replaced a total of 2,478 BESS units<sup>12</sup>, and between the year 20 and the end of year 40, another 2,478 BESS units will be removed.

***AERMOD Results Show Hydrogen Fluoride Concentrations Released from a Burning BESS Will Be Much Higher Than What the Developer States.***

As SORT has previously explained, the developer claims that the highest 1-hour  $\chi/Q$  value which establishes the location of the Maximally Exposed Individual Receptor (MEIR) is only 872.11, but the AERMOD output files indicate that the highest offsite 1-hour  $\chi/Q$  value is actually 1,616.06 and not 872.11<sup>13</sup>. However, SORT recently noticed that the developer’s AERMOD analysis reports a 1-hour  $\chi/Q$  value of 2990.99 at UTM coordinates 394894.77 east and 3816459.27 north<sup>14</sup> which corresponds to a location just inside the northern boundary of the project’s BESS yard. Reconciling this 2991  $\chi/Q$  value with the developer’s alleged hydrogen fluoride (HF) emission rate of 0.17 g/s

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<sup>10</sup> [energytoolbase.com/hardwarepartners/sungrow/guide/PowerTitan-2.0-hardware-and-software-guide.pdf](https://energytoolbase.com/hardwarepartners/sungrow/guide/PowerTitan-2.0-hardware-and-software-guide.pdf). Note: the https: and the //www were removed from this citation to satisfy the Commission Docket Office.

<sup>11</sup> At the end of their life cycle, BESS units operate at less than 80% of initial capacity and therefore deliver less than 1,008 kW for 4 hours (or 80% of the initial 4 hour, 1,260 kW capacity). Thus, the 2,035 PowerTitan 2.0 BESS units onsite will cumulatively deliver <1,025 MW for 8 hours which is substantially less than the 1,150 MW required by the LGIA; accordingly, all BESS units will have to be replaced.

<sup>12</sup> 2,478 represents the sum of the 2,035 BESS units that must be replaced at the end of the 20<sup>th</sup> operating year plus the 443 batteries that were removed over the initial 20 years as part of the “augmentation” program.

<sup>13</sup> See pages 2-5 of SORT’s letter dated April 6, 2026

<sup>14</sup> See pages 1833, 2719, and 2742 of the developer’s 2,761 page response to Data Request #5.

yields an HF concentration of 508.3  $\mu\text{g}/\text{m}^3$  which is more than *double* the REL threshold established for the project. Furthermore, if a more appropriate BESS location had been modeled as the burn site, this 2991  $\chi/\text{Q}$  value and corresponding 508.3  $\mu\text{g}/\text{m}^3$  HF concentration level would have occurred outside the project boundary and in the front yard of a surrounding residence. Figure 1 illustrates this point:

- Had Alternative BESS Burn Location #1 just north of the modeled BESS been selected as the burn site, the resulting 2991  $\chi/\text{Q}$  value and corresponding 508.3  $\mu\text{g}/\text{m}^3$  HF concentration would have occurred in the front yard of the Benitez home;
- Had Alternative BESS Burn Location #2 to the north and west of the modeled BESS been selected as the burn site, the resulting 2991  $\chi/\text{Q}$  value and corresponding 508.3  $\mu\text{g}/\text{m}^3$  HF concentration would have occurred in the front yard of the Bevaro home;
- Had Alternative BESS Burn Location #3 to the west and south of the modeled BESS been selected as the burn site, the resulting 2991  $\chi/\text{Q}$  value and corresponding 508.3  $\mu\text{g}/\text{m}^3$  HF concentration would have occurred in the front yard of the Quevedo home.
- Had Alternative BESS Burn Location #4 at the west end of the BESS yard been selected as the burn site, the resulting 2991  $\chi/\text{Q}$  value and corresponding 508.3  $\mu\text{g}/\text{m}^3$  HF concentration would have occurred found in the front yard of the Ramirez home.

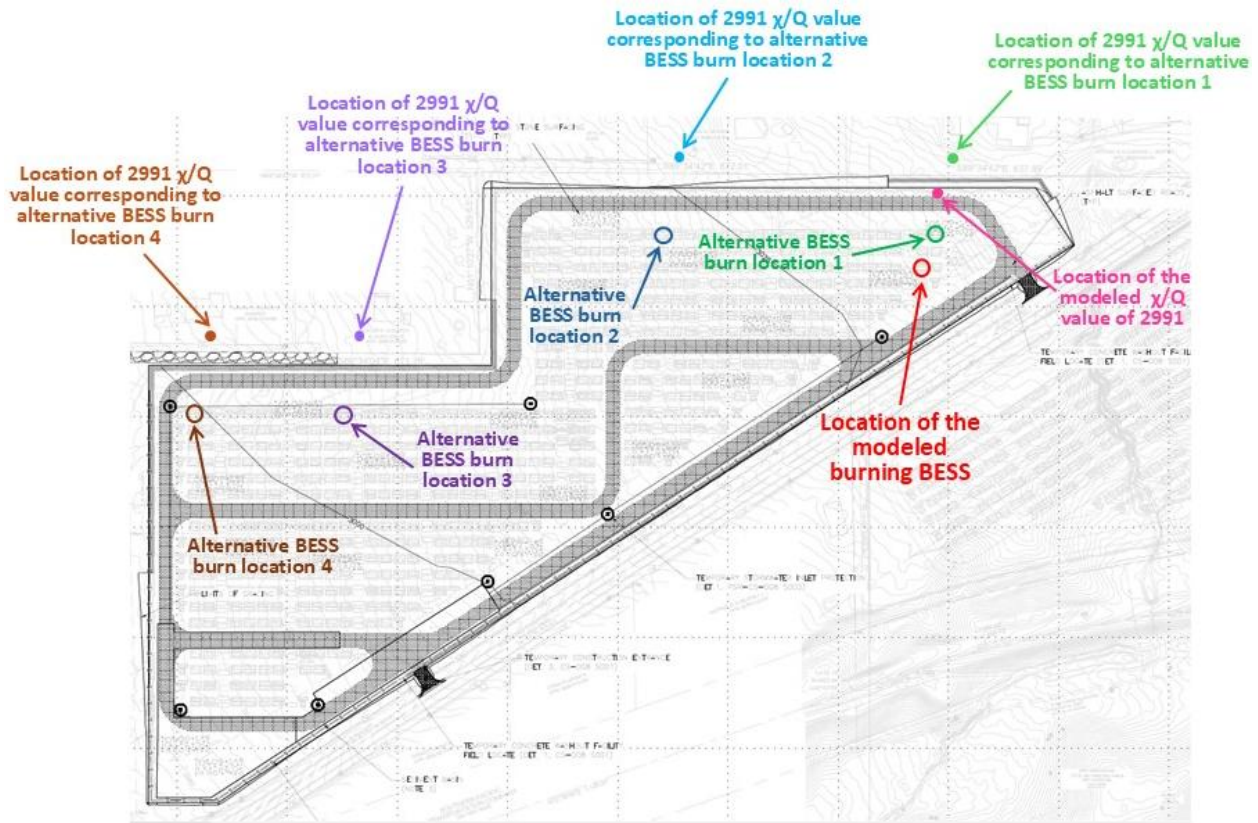
SORT also recently noticed that the developer's AERMOD analysis reports an 8-hour  $\chi/\text{Q}$  value of 1653.19 at UTM coordinates 394894.77 east and 3816459.27 north<sup>15</sup>; this is the same location where the 1-hour  $\chi/\text{Q}$  value is reported to be 2991. Reconciling this 8-hour  $\chi/\text{Q}$  value of 1653 with the developer's alleged 0.17 g/s HF emission rate yields an average 8 hour HF concentration of 281  $\mu\text{g}/\text{m}^3$  which also exceeds the REL established for the project. And, had a more appropriate BESS location been selected for the AERMOD modeling effort, this 8-hour 1653  $\chi/\text{Q}$  value and corresponding 281  $\mu\text{g}/\text{m}^3$  HF concentration level would have occurred outside the project boundary and in the front yard of a surrounding residence.

At the very least, these facts demonstrate that 1) the project will generate HF concentrations on surrounding residential properties which substantially exceed

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<sup>15</sup> See page 2,719 of the developer's 2,761 page response to Data Request #5.

Figure 1. MEIR Locations Corresponding to Different BESS Burn Locations.



The schematic underlying this figure is an excerpt from an updated site plan that was provided in response to Data Request #2

adopted safety thresholds; and 2) that the developer's conclusions regarding 1-hour and 8-hour MEIR exposures are substantially deficient. Moreover, because the developer underestimates the project's HF emission rate by at least an order of magnitude (as SORT has previously explained), actual offsite HF concentrations that will occur when a BESS unit ignites will substantially exceed established safety levels at great distances from the project site.

**Conclusion.**

SORT respectfully requests that the Commission factor the information provided above into any decisions that are made pursuant to the referenced project.

Respectfully submitted;

/S/Jacqueline Ayer  
Jacqueline Ayer, Director  
Save Our Rural Town