

DOCKETED

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Developers Elimination Of Sensitive Receptors Who Are At Riskâ€”CORRECTED

Additional submitted attachment is included below.

Developer's Elimination of Sensitive Receptors Who Are At Risk

When Coval requested a 60 day extension from the CEC to “allow additional time to complete and incorporate certain technical analyses relevant to the preparation of the Draft Environmental Impact Report”, we were disappointed that it was granted by the CEC.

How do we believe they are using their 60 day extension?

To feverishly pursue new purchase option agreements from residents who are within 1,000 ft of the project.

Why the sudden interest in residents within 1,000 ft of the project?

Because Save Our Rural Town had recently submitted TN270152 on 5/51/26 which is an analysis of the developer's risk assessment and AERMOD plume study. In this analysis, using realistic yet still conservative percentages of fluorine combustion, SORT calculates much higher HF concentrations which are produced by the burning electrolyte within the battery cells of a burning Sungrow Power Titan 2.0 battery container. This analysis clearly proves that HF concentrations far exceed safe AEGL levels even at a distance of 1,000 ft.

So suddenly the developer has an interest in securing purchase option agreements for sensitive receptors within this expanded area of 1,000 ft.

And what happens when an owner of one of these sensitive receptor properties rejects a purchase option offer with “No thank you, I want to stay in my home”?

The pressure intensifies with more phone calls and scheduled meetings to “further discuss things”. The purchase offer price is increased, far above fair market value.

The property owner is then faced with the difficult decision of uprooting their lives to protect their investment and gain a potential financial windfall --or-- stay in their home and potentially put themselves and their family in harms way during a fire incident, in a devalued home that is now unsellable, across from a monstrous lithium ion battery energy storage system industrial facility.

The developer is attempting to make his project appear to be “safely sited” by systematically eliminating the sensitive receptors in the area. That's what I equate to bulldozing your way into a community to get what you want at all costs.

What happens if a property owner in proximity to PSRP still says “no” to their purchase option offer? What if the project is approved and then built, and then the property owner realizes that they cannot live beside this project? Will the developer be willing to buy out this property owner *after* the project has been approved and/or built? Or are property owners expected to just capitulate right up front to the developer's offer in the form of a “now or never” ultimatum?

Will the CEC allow this developer to basically apply mob tactics to the sensitive receptor property owners in order to clear the way for their project? Because this is how it appears to the residents of Acton. And if, after this 60 day extension, the only substantial “technical data” the developer has to show for this delay is another successfully executed property purchase option agreement (or two), then my assumptions and accusations of the developer's intent will have been proven correct.

Alternative Site

The CEC must not enable Coval Infrastructure as they attempt to shoehorn their enormous, risky BESS project into Acton. We are a small, rural, high desert, equestrian community in a VHFHSZ. Any BESS which utilizes lithium-ion technology definitely does not belong here.

Please instruct Coval Infrastructure to find a more suitable and *safe* location for this project. They have failed to provide even one truly feasible site alternative with their 6 mile radius limiting factor. They must cast a wider net and look for a *safe* site location.

There is no reason why this project must be within 1.8 miles or even 6 miles of the Vincent Substation. The CEC has approved much longer transmission lines than this. The developer cannot cite energy loss as a reason for proximity to a substation because energy/friction loss over high transmission voltages is only about 2%. The process of stepping down and transforming voltage from transmission voltage (500kV) to distribution voltage (34.5kV) and then inverting energy from AC to DC suitable for storing in batteries, results in a considerable amount of energy loss. The whole process is reversed when returning energy to the grid. Overall, it is reported this can result in up to a 25% energy loss, far more significant than the 2% energy loss through transmission.

Calculating Risk

If this huge Prairie Song BESS is really important to the grid, then you must find away to build it where it is *truly safe*. Recent CEC staff comments have been made in the Corby Staff Assessment (7/15/26, Section 5.1-25 Air Quality) that a BESS facility is only estimated to have a failure every 11 to 67 years. Respectfully, that is absurd.

Calculating BESS failure rates using skewed data such as from the EPRI BESS Failures Database--- which they themselves openly admit to only including incidents that they deem to be a “threat to public health and safety”, not simply “operational failures”--- falls far short of being accurate. The EPRI documented incidents are proven using mostly media driven sources such as news articles and videos.

Every BESS failure should be recorded in the database, even “operational failures”. Why? Because these incidents may very well have resulted in threats to public health and safety if the siting of the BESS were in proximity to sensitive receptors. Are we not trying to calculate the total number of failures so we can then accurately calculate probability of occurrence which then can accurately ascertain the risk to a community from a project? Cherry picking which events are counted in the database only skews the data.

For instance, the 821MW Edwards Sanborn in Mojave CA had 4 fire incidents in 2024 which were substantiated through Kern County Fire Dept incident reports. Yet, when these failure incidents were submitted to the EPRI BESS Failure Database along with the Kern County Incident reports, they were rejected by EPRI and still have not been added to the database. This is because they consider these 4 incidents to be “operational failures” because there was no evacuation, no sheltering in place, no road closures, business closures, school closures etc--no risk to public health and safety. And this is because the Edwards Sanborn Facility is *properly, safely and remotely sited* away from sensitive receptors. But there were still 4 fire incidents and these still qualify as failures.

Up until the CPUC GO-167C was amended and adopted in March 2025, there was no mandatory requirement to report BESS failures. Why would a developer want to document a failure when public outcry and organized opposition to BESS was growing? Opposition = delays, denials and litigation.

Also, BESS failure rates cannot be ascertained when BESS failure incident reporting compliance cannot be guaranteed. Therefore, estimated failure rates based on flawed data should not be considered in a project's risk calculations.

In Closing....

Please deny the Prairie Song Reliability Project in Acton based on fire, health and safety risks and do not allow this developer to eliminate sensitive receptors with strong-armed property purchase offers.

Thank you,
Ruthie Brock
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