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*Comment Received From: Heather La Bella, ViceChair€”ACTON FIREWISE Inc.
Submitted On: 9/26/2026
Docket Number: 25-OPT-02*

Strong opposition to the Prairie Song Reliability Project

Additional submitted attachment is included below.

September 26, 2026
Commissioners and CEC Staff
California Energy Commission

Strong opposition to the Prairie Song Reliability Project

Applicant: Prairie Song Reliability Project, LLC
Docket No. 25-OPT-02

Dear Commissioners and CEC Staff:

Acton Firewise Inc. strongly opposes certification of the Prairie Song Reliability Project at its proposed Acton location.

The Commission must confront two connected risks: a fire that threatens the community beyond the facility, and residents who cannot evacuate without help. A safety analysis that addresses the battery equipment but leaves those residents' escape to chance does not adequately protect Acton.

Nearly one in four Acton residents is age 65 or older. The U.S. Census Bureau puts the figure at 22.8%, compared with 18.0% nationwide. It also estimates that 319 veterans live in Acton. Veterans account for about 5.1% of civilian adults here, compared with approximately 5.9% nationally. The number still matters in a town this size. Age or military service alone does not establish a need for help, but our work with local households shows that seniors and veterans have disabilities or limited mobility; some no longer drive or own a car; and some live alone with no family in California who can come for them. A resident will need a ride, accessible lodging, and a safe place to remain if a fire or road closure prevents an immediate return.

For these residents, an evacuation warning is not an evacuation plan. A phone alert cannot provide a car. An instruction to leave early cannot pay for lodging. And a promise that neighbors will help cannot be the foundation of a project's emergency plan when those neighbors may be evacuating their own households.

Acton residents are actively working together to reduce the wildfire risk they already face. By our latest local count, 382 homes are participating in Firewise USA communities or neighborhoods pursuing recognition. Acton Firewise coordinates neighborhood action and risk assessments with Los Angeles County Fire Department personnel. Residents remove hazardous vegetation, improve defensible space, replace combustible materials near homes, strengthen homes against embers, and prepare evacuation plans. Our volunteer organization has directly assisted six households, including seniors who could not complete critical mitigation work alone, and distributed 100 fire extinguishers. This effort is still growing. Residents should not have to offset a new potential fire and evacuation burden as they invest their time and money in protecting Acton.

The proposed facility is in a Very High Fire Hazard Severity Zone. The Commission has acknowledged that its construction and operation could increase wildfire risk and that a battery thermal runaway event could pose a fire risk. Acton Firewise is deeply concerned about a fire escaping the facility into surrounding vegetation and threatening homes or roads needed for evacuation. We are also concerned about an approaching wildfire reaching the facility. Severe winds, smoke, and simultaneous demands on firefighters could turn either event into a community emergency.

That is why evacuation and fire spread must be studied together. Many of Acton's local roads are unpaved, and some stretches are narrow. Residents would be trying to leave while fire engines, ambulances, and vehicles assisting people without cars would be trying to reach them. A blocked route could leave a resident who needs physical help with no practical way out. A facility fire that remains on-site could still force evacuations, close roads, and displace residents. The 2025 Moss Landing battery fire was contained to one building, yet approximately 1,200 residents were evacuated for about 24 hours. Acton cannot assume that containing flames within a fence would eliminate the danger to its residents.

Acton's local emergency response capacity must be examined openly. Los Angeles County Fire Station 80 serves Acton. The Commission should document its current on-duty staffing and apparatus, identify the additional units that would respond to a prolonged incident at Prairie Song, and show where those units would come from and how long they would take to arrive. It must also answer a question of direct importance to every household in Acton: If local crews are committed to the battery facility, what fire and medical protection remains available for residents, especially during a concurrent wildfire or evacuation?

Before considering certification, the Commission must provide a public, independently reviewed analysis that answers these questions:

- 1. Who cannot leave independently?** What has been done to identify residents in the potentially affected area who need transportation, physical assistance, or accessible shelter, including people who have never registered for assistance?
- 2. Who will get them out?** Which agency will send vehicles and personnel, how many will be available, how long will it take to reach residents, and what is the backup plan during a regional wildfire?
- 3. Can the roads handle the response?** Which routes will residents and emergency vehicles use? Have the widths, surfaces, passing areas, and possible closures of local roads been assessed under simultaneous evacuation and incoming response traffic?
- 4. Where will displaced residents go?** What arrangements exist for people without nearby family or the money to pay for lodging, transportation, and meals? What happens if they cannot return for several days?
- 5. How far could the consequences reach?** What credible fire-spread scenarios have been modeled for severe wind conditions, surrounding vegetation, the facility, and its electrical infrastructure? Which homes and evacuation routes could be affected?
- 6. Can responders protect both the facility and Acton?** What water, equipment, staffing, and mutual aid would a prolonged incident require? What protection would remain available to Acton residents if Station 80 and other local resources were committed to Prairie Song?

These are not questions residents should have to answer after approval or during an emergency. Los Angeles County has already requested further analysis of fire and emergency services, transportation, and cumulative impacts. Its Fire Department has identified water supply, apparatus access, and fuel modification matters requiring review. The answers must be available to the public and considered in the certification decision.

We cannot ask an older resident with limited mobility and no car to prepare for a hazard without knowing who will reach them when they need to leave. We cannot ask residents who are making defensible space around their homes to bear a potential new fire hazard without fully examining whether a fire associated with this project could spread through the surrounding landscape.

The burden is on the applicant to demonstrate that this location is safe for the people who live here, including those least able to escape. Acton Firewise does not believe that burden has been met. We

strongly urge the Commission to deny certification of the Prairie Song Reliability Project at the proposed Acton location.

Please place this letter in the public record for Docket No. 25-OPT-02.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. La Bella', with a stylized, cursive flourish.

Heather La Bella
Vice Chair, Board of Directors
Acton Firewise Inc.
info@actonfirewise.org
www.actonfirewise.org