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Comment Received From: Perry Goldberg
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Scoping Comment Groundwater Protection & Financial Liability for Prairie Song

Dear Commissioners and CEC Staff,

As a resident living of Acton, I am submitting this formal scoping comment regarding the environmental review of the Prairie Song Reliability Project (Docket 25-OPT-02). My property and my community sit directly in the ecological and hydrological impact zone of this proposed 1,150 MW / 9,200 MWh facility.

I am writing to request that the forthcoming Draft Environmental Impact Report (DEIR) and the ultimate Conditions of Certification include strict mandates regarding secondary water containment and financial liability.

1. Mandate a Seamless Polyurea Liner for Groundwater Protection

The developer claims the metal battery containers themselves act as secondary containment. However, in a thermal runaway fire exceeding 1,800 degrees, those containers will warp, melt, and blow open. The floor of an exploding metal box is not environmental protection. During a thermal runaway event, LFP batteries can produce massive amounts of Hydrogen Fluoride (HF) gas. When suppression water mixes with this gas, it creates highly toxic, corrosive hydrofluoric acid. Any failure in containment guarantees that this and other toxins will follow the natural drainage and irreversibly contaminate our local aquifer. At a minimum, High-Density Polyethylene (HDPE) liners should be required for all BESS projects. For this particular project, however, the limitations of an HDPE liner pose too high of a risk. An HDPE liner must be cut and thermally welded around hundreds of concrete pads, electrical conduits, and grounding rods. In the extreme thermal fluctuations of the Acton high desert, HDPE will expand, contract, and inevitably stress-fracture at these welded seams. To protect Acton's groundwater, the CEC must mandate the use of a seamless, chemical-resistant, liquid-applied Polyurea liner for the entire power block footprint. Polyurea bonds directly to penetrations and flexes with ground movement, eliminating the leak pathways inherent to HDPE. This is expected to cost less than 1% of the total budget of the project, which is undeniably financially feasible under CEQA and is a small price to pay to protect our precious water supply.

2. Complete Financial Indemnification by Blackstone and Coval Infrastructure

The Draft EIR should address the devastating financial impact a catastrophic fire, toxic plume, or groundwater contamination event would have on Acton residents, the County of Los Angeles, and the State of California. If this project is permitted under the state's AB 205 Opt-In process, the State of California should ensure that the costs of any future

disaster involving the project are borne by those who profit from the project, not the victims who were forced to live next to it. At a minimum, the developer must have in place a standalone Environmental Impairment Liability insurance policy for an amount that is expected to match the size of the damage that a disaster at the project site would cause. Based on cleanup costs relating to Exide Technologies in Vernon and PG&E in Hinkley, anything less than \$750 million in coverage would be insufficient. If the risks truly are as small as the project sponsor claims, the premiums should not be prohibitively expensive.

In addition, because insurance policies have limits and corporate loopholes, the developer's corporate parent(s) should sign a legally binding guarantee to cover any and all cleanup and community compensation costs that exceed that policy limit. The applicant on record is "Prairie Song Reliability Project, LLC," a legally shielded shell entity designed to limit liability. My understanding is that the actual developer is Coval Infrastructure, which I further understand is a portfolio company operating under the multi-billion-dollar umbrella of Blackstone Energy Transition Partners. Regardless of the details, the well-heeled entities behind this project should be the ones with ultimate financial responsibility if insurance coverage proves to be inadequate.

I urge for these specific mitigation measures—polyurea containment and true financial protection—to be thoroughly analyzed and included in the upcoming Draft EIR. Protect our water, guarantee our financial safety, or reject this project entirely. Thank you.

Sincerely,
Perry Goldberg