

DOCKETED

Docket Number:	25-OPT-02
Project Title:	Prairie Song Reliability Project
TN #:	270566
Document Title:	Ruthie Brock Comments - Supplemental to TN 270562 Part 1
Description:	N/A
Filer:	System
Organization:	Ruthie Brock
Submitter Role:	Public
Submission Date:	6/11/2026 3:14:06 PM
Docketed Date:	6/11/2026

*Comment Received From: Ruthie Brock
Submitted On: 6/11/2026
Docket Number: 25-OPT-02*

Supplemental to TN 270562 Part 1

Additional submitted attachment is included below.

The Suffolk County Water Authority has filed a lawsuit against the East Hampton Energy Storage Center LLC, LG Energy Solutions LTD and LG Chem LTD, citing that runoff from a 2023 fire in their 5 MW East Hampton facility has leached PFAS into their public drinking water wells. The BESS facility is approximately 2,500 feet from these wells.

Though fire suppression protocols have evolved since this 2023 incident where more than 2.2 million gallons of water may have been released over about 30 hours in efforts to suppress this fire, significant water is still used to protect adjacent BESS containers while letting the burning container consume itself. Therefore there is a risk that these efforts to keep neighboring battery containers from overheating and becoming involved in the fire, can potentially carry airborne contaminants and particulate into the ground from the burning container and their expelled gases. These gases appear in the form of a white vapor cloud. This is white "smoke" is the electrolyte from within the burning battery cells decomposing and vaporizing. The electrolyte in LFP batteries contain conductive salts of Lithium Hexafluorophosphate (LiPF₆) which release highly toxic Hydrogen Fluoride gas when burning and in the presence of water becomes Hydrofluoric Acid.

The Prairie Song BESS is located at the headwaters of the Santa Clara River which flows through Acton, into Santa Clarita and all the way to the Pacific Ocean, recharging the groundwater and drinking water supply along the way. Many residents in Acton depend solely upon wells for their water source, especially in the east Acton area where the PSRP is proposed.

Since there is no current requirement that battery facilities must be designed to contain their runoff during a fire event, the potential for soil and groundwater contamination is real. Battery containers are mounted on foundations such as concrete slabs, but the space between the containers is normally permeable and covered in surface material such as gravel. This allows water to drain through and potentially carry contaminants into the soil during a battery fire incident.

Now this potential has been brought to light with the filing of this Suffolk County Water Authority lawsuit. This raises the question as to whether BESS projects should be sited in proximity to water resources without the ability to completely capture and contain all water runoff from fire suppression within the facility.

The proposed Prairie Song project will cover approximately 70 acres in Lithium Iron Phosphate batteries and has not been designed for water runoff containment. While there are multiple layers of battery management and system monitoring, these systems can only signal the developing issue and cannot successfully mitigate or eliminate the ensuing fire event nor its potential to contaminate the air and soil.

For these reasons and several others, the Prairie Song Reliability Project should not be approved in the proposed location.

Thank you,
Ruthie Brock