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November 7, 2024

Holly R. Anderson

Clerk of the Public Utility Commission

112 State Street

Montpelier, VT 05620-2701

Re: Lightshift 16MW/52MWh battery energy storage system on GlobalFoundries Robinson Parkway Campus, Essex Junction

Dear Ms. Anderson,

The City of Essex Junction has received the 45-day notice of the above-named application submitted by Lightshift Energy to develop a 16MW/52MWh battery energy storage system to be located off Robinson Parkway in Essex Junction, VT on a parcel owned by GlobalFoundries, Inc.

The City’s Planning Commission has reviewed this project’s conformance with the Essex Community Enhanced Energy Plan, and with the Essex Junction Comprehensive Plan, both of which were adopted in 2019.

Essex Community Enhanced Energy Plan Renewable Energy Goal

As this project is associated with a solar power generation, the City finds that this project aligns with the intent of the Renewable Energy Generation Goal of the Enhanced Energy Plan, which aims to “generate between 211,386 and 353,629 MWh of renewable energy by 2050”.

Constraints Policies

The Enhanced Energy Plan states that renewable energy facility development should be located to avoid state and local known constraints and to minimize impacts to state and local possible constraints. Our review indicates that the following constraints are located on the property:

State Possible Constraints

* **Agricultural and Hydric Soils.** Primary Agricultural Soils underlie a majority of the site, some of which may be considered previously impacted by the development of the existing parking lots. The City of Essex Junction requests that further impacts to the agricultural soils be minimized in accordance with the recommendations of the Vermont Agency of Agriculture, Food, and Markets.

Local Known Constraints

* **Slopes of 20% and steeper are NOT considered to be Local Known Constraints within the City of Essex Junction**. While the Enhanced Energy Plan generally lists the slopes of 20% and steeper to be a “local known constraint”, the City does not prohibit the siting of solar generation in these areas (unlike the Town of Essex, which does). As such, these areas are not shown within Map 2 of the Plan within the boundaries of the City of Essex Junction.

Siting Policies

Policy 11 of the “Siting Policies” states:

* Where feasible, pair renewable energy generation with electrical energy storage to ensure energy is utilized to the fullest potential, to increase resiliency/reliability of electricity during outages, and to decrease fossil fuel usage during peak periods. Renewable energy generation projects that can accommodate energy storage are strongly encouraged.

Since the proposed energy storage project is located on the same property as the Essex A North Lot and Essex B1 Parking Lot Solar projects, the City finds that the proposed energy storage project is consistent with the aforementioned policy.

This review is based on the information currently available. The City of Essex Junction will review and comment on materials submitted as the Section 248 review process continues.

Thank you for your time and attention.

Sincerely,

Diane Clemens

Essex Junction Planning Commission Vice-Chair

CC: Essex Junction City Council

Chris Yuen, Essex Junction Community Development Director