

July 10, 2024

Holly R. Anderson
Clerk of the Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: Essex A North Lot Solar, LLC (GlobalFoundries) Petition for a 3.5 MW Solar Array off Robinson Parkway, Essex Junction (case #24-1898-PET)

Dear Ms. Anderson,

The Chittenden County Regional Planning Commission ("CCRPC") is in receipt of Essex A North Lot Solar, LLC petition submitted by Encore Renewable Energy to develop a 3.5 MW solar array to be located off Robinson Parkway in Essex Junction, VT on a parcel owned by GlobalFoundries, Inc.

CCRPC has reviewed this project's conformance with CCRPC's *2018 Chittenden County ECOS Plan* ("the Plan"), which gained a Determination of Energy Compliance from the Vermont Department of Public Service on August 9, 2018.

ECOS Energy Goal

CCRPC finds that this project meets the intent of the Energy Goal (Goal #17) of the Plan: "Move Chittenden County's energy system toward a cleaner, more efficient and renewable system that benefits health, economic development, and the local/global climate by working towards the State's Comprehensive Energy Plan goals."

Strategy 2, Action 4b of the Plan states "CCRPC supports the generation of new renewable energy in the County to meet the Vermont Comprehensive Energy Plan's goals of using 90% renewable energy by 2050, in a manner that is cost effective and respects the natural environment." Development of this solar facility helps implement this action.

Constraints Policies

The *2018 ECOS Plan* states that renewable energy facility development should be located to avoid state and local known constraints that have been field verified, and to minimize impacts to state and local possible constraints that have been field verified (Strategy 3, Action 1.f and Strategy 4, Action 1.f and Action 2.e). Our review indicates that the following constraint is located on the property:

State Possible Constraints

- **Agricultural Soils.** The petitioner's Primary Agricultural Soils (PAS) memo notes that these underlie a majority of the site. Some of the site may be considered previously impacted by the development of the existing parking lots. While it appears that the project will not create further impacts to PAS, CCRPC requests that any further impacts to the agricultural soils be minimized in accordance with the recommendations of the Vermont Agency of Agriculture, Food, and Markets.

Additionally, the site meets all the 2018 ECOS Plan's suitability standards, which define characteristics of sites where CCRPC encourages the siting of renewable energy generation facilities. These relevant standards for this project are:

1. Strategy 2, Action 4(b)(i): Locate energy generation proximate to existing distribution and transmission infrastructure with adequate capacity and near areas with high electric load: The project is located with direct access to three-phase power and is near both Green Mountain Power distribution lines and VELCO transmission lines without distribution constraints. In addition, the project is located close to Global Foundries which is among the single largest users of electricity in the state. The project is located in an area of highest development density and electric load in Essex Junction.
2. Strategy 2, Action 4(b)(ii): Locate renewable energy generation in areas designated by a municipality: In its 2019 Comprehensive Plan, the City of Essex Junction designated preferred sites to include previously developed land (including parking lots) and locations where 50% of a facility's demand will be used on-site or on an adjacent parcel.
3. Strategy 2, action 4(b)(iii): Locate solar generation (including but not limited to net metering) on previously impacted areas: The project is located primarily on a previously developed parking lot.
4. Strategy 2, action 4(b)(iv): Locate ground-mounted solar larger than 15 kW...outside of state designated village centers: The project is located outside of Essex Junction's designated village center.
5. Strategy 2, action 4(b)(v): Locate ground-mounted solar generation in Chittenden County's areas planned for growth, while allowing for infill development wherever reasonably practical: The project is located in the growth-oriented Enterprise Planning Area and utilizes an existing partially developed site not available for other forms of development, but still allows for expansion of GlobalFoundries' microchip manufacturing facility.

The project meets CCRPC's suitability policies and constraints policies provided the applicant works with the appropriate State agency to mitigate impacts to the above cited constraint.

This review is based on the information currently available. CCRPC will review and comment on materials submitted as the Section 248 review process continues.

Thank you for your time and attention.

Sincerely,



Charlie Baker
Executive Director

CC: CCRPC Board
Chris Yuen, Essex Junction Community Development Director