December 16, 2025

TO: Recipients Entitled to Advance Notice under Vermont Public Utility Commission Rule 5.402

RE: Vergennes VT BESS 1 LLC's Proposed Battery Energy Storage Project in Vergennes, VT
- 45-Day Notice of §248(j) Petition to be filed with Vermont Public Utility Commission

Dear Persons and Entities Entitled to Notice:

Pursuant to 30 V.S.A. § 248(f) and Public Utility Commission Rule 5.402, Vergennes VT BESS 1 LLC is pleased to submit the following pre-application notice concerning its proposed 4.99-megawatt, 4-hour battery electric storage project in Vergennes, Vermont.

Introduction

Vergennes VT BESS 1 LLC ("Vergennes VT BESS"), a special purpose entity created by Lightshift Energy, is preparing to file an application for a Certificate of Public Good ("CPG") with the Vermont Public Utility Commission ("PUC" or "Commission"), requesting approval to install and operate a 4.99- megawatt, 4 hour Battery Energy Storage System ("BESS" or "Project"), to be sited on a parcel of land located off Panton Road in Vergennes, Vermont. If approved, services from the Project will be provided to Green Mountain Power ("GMP"), as well as the ISO-NE market.

This 45-day notice letter briefly describes Vergennes VT BESS's plans for the Project, including (1) Project design and plans for construction and operation; (2) preliminary assessment of aesthetic and environmental impacts; (3) the expected date a Section 248(j) petition will be filed with the PUC; and (4) the rights of the local and regional planning commissions to comment on the Project plans in accordance with PUC Rule 5.402(C). The following attachment is included with this letter:

Attachment A – Location Map and Preliminary Site Layout

I. Project Description and Construction Plans

The 4.99 MW (alternating current, or "AC") BESS facility will occupy approximately 0.2 acres (±) of a 1.76 acre (±) parcel of land located at approximately 99 Panton Road in Vergennes, Vermont. The Project site will be located along Panton Road in a vacant lot across the street from Collins Aerospace and directly adjacent to Ushio America, Inc – Vermont. See Attachment A – Location Map and Preliminary Site Layout. The fenced-in Project will be accessed via a new approximately 25 foot-long driveway from Panton Road to the Project area.

The Project equipment will consist of approximately five (5) containerized DC energy storage containers connected to PCS units (inverters) (to convert power between AC and DC), one (1) main transformer, one (1) auxiliary transformer, and some smaller communications and metering equipment cabinets. The Project will likely provide peak shaving services and may also respond to signals from the regional grid from ISO-NE and be dispatched to manage renewable energy generation. The Project will interconnect to GMP's system through the existing overhead three-phase circuit on Panton Road to the north of the proposed Project footprint. The exact configuration of the interconnecting line will be included in the final site plan.

The preliminary Site Layout (Attachment A) illustrates the anticipated location of the Project's components in relation to the surrounding area. Vergennes VT BESS chose the proposed location for this BESS due to its proximity to favorable interconnection infrastructure and its minimal impact on natural resources and the character of the area.

While the attached site layout represents the current preferred layout, the layout that will be contained in the final application may vary somewhat based upon further engineering, environmental, or other siting considerations. The final layout will be within the overall site area where environmental and other impacts have been evaluated for the purposes of this 45-day notice.

The basic parameters of the site layout include the following working assumptions:

- Access to the BESS site will make use of the existing roads within the area, including Panton Road, and a short access drive will be added to connect the Project to Panton Road.
- Construction will be performed in accordance with the Vermont Standards & Specifications for Erosion Prevention and Sediment Control.
- Year-round daily access to the BESS is not required. Therefore, no on-site septic or water supply systems will be constructed. The BESS will be monitored remotely, with technicians dispatched only as required.
- The BESS will be enclosed by a perimeter fence that will meet applicable electric safety code standards.

Site Access and Equipment Delivery

Standardized trucking methods will be used to transport the battery containers and other Project components (e.g., inverters, transformers, and construction materials) to the site. Typical tractor-trailer and box truck vehicles will be used to transport materials to the site for construction. The Project will not require any oversized loads. Panton Road will be used for bringing in all construction-related equipment and machinery. Construction equipment will likely include a light-duty crane or similar equipment to lift the batteries in place, trucks to move equipment around the site, and a small trencher to install underground electric wiring.

BESS and Electrical Interconnection System

The Project layout is shown in Attachment A - Location Map and Preliminary Site Layout. The battery containers will be interconnected by electrical cables in conduit to the inverters, which convert the electricity from AC to DC when charging and DC to AC when discharging. From the inverters, power is delivered to the adjacent medium voltage transformer, which is then connected underground to the switchgear. From the switchgear, the electric interconnect line will connect to the existing GMP overhead three-phase circuit to the north of the Project on Panton Road.

The final selection of all equipment and configurations will be made after a CPG is issued and contractors and vendors are selected.

BESS Safety

The Project will be designed, built, and operated in accordance with the latest standards and best practices for energy storage system safety, including guidance and requirements provided by NFPA 855 Standard for the Installation of Stationary Energy Storage Systems. A Hazard Mitigation Analysis will be developed as part of the Project design to assess and show that the Project incorporates adequate safety features and protocols. Engaging with local authorities and first responders will be an integral part of Project implementation, including familiarization with the facility, review of the Hazard Mitigation Analysis and associated Project documentation, training provided by Vergennes VT BESS, and emergency response planning.

II. Preliminary Impact Assessment

Vergennes VT BESS 1 has engaged local environmental and land use consultants, Bowman Consulting, to conduct initial reviews of potential environmental and aesthetic impacts of the Project. Their work has included the use of online databases and a field site visit. The Project's location will not cause undue adverse impacts to environmental resources and will not result in an undue adverse aesthetic impact. More detailed assessments will be provided with the forthcoming petition, which may include design/siting changes, if necessary.

The key elements of the preliminary assessments are as follows:

- A desktop review of the Vermont Agency of Natural Resources environmental database does not list any mapped resources, necessary wildlife habitat, or rare, threatened, or endangered ("RTE") species on the Project parcel.
- The Project has been sited to avoid or minimize activities within wetlands, streams, and buffers. No Class I or II wetlands or streams have been identified on the Project site.
- The Project will require some vegetation clearing for the Project area and the access drive. The site does not contain any rare and irreplaceable natural areas or necessary wildlife habitat.
- The Project will employ stormwater management practices that may be required under the State's stormwater permitting program.
- A preliminary aesthetic assessment determined that visual impacts from the Project will be localized to the immediate area. The Project fence is located approximately 40-ft from Panton Road and about 150-ft from the nearest residence. There is vegetation between the Project and residences to the north, east, and south that will remain and will buffer and filter views of the Project from residences on Panton Road, West Street, and W. Main Street. The battery enclosures and other equipment are sited against the southeastern fence line, and a 7-ft tall fence with privacy slats is proposed to enclose all the project elements. Views from the west and east on the road will be buffered by the Project fence and buildings in the nearby area. The vegetation present in the area that will remain will also serve to screen the Project from many offsite vantage points. Visibility will be sufficiently limited such that there will not be an undue adverse impact on the aesthetics or natural beauty of the area from the Project, and no further visual mitigation plantings are deemed necessary or proposed at this time. A complete visual and aesthetic analysis of the proposed Project will be conducted as part of the Petition materials to confirm this preliminary assessment.

III. Expected Petition Filing Date with the Vermont Public Utility Commission

Vergennes VT BESS intends to file a Section 248 Petition and supporting materials with the PUC soon after the 45-day notice period expires in late January.

IV. Municipal and Regional Planning Commissions' Rights, Comments to the Vermont Public Utility Commission & Additional Information on Section 248 Proceedings

Under V.S.A. § 248(f)(1), municipal and regional planning commissions may make recommendations to Vergennes VT BESS within 40 days of this notice and may convene a public hearing on the proposed Project. In addition, after Vergennes VT BESS files its Section 248 petition with the Commission, the planning commissions may make further recommendations to the Commission, to which the Commission will give due consideration.

Recommendations made to the Commission pursuant to § 248(f)(1), or the lack of such recommendations, shall not preclude municipal and regional planning commissions and municipal legislative bodies from exercising their rights to appear as parties pursuant to § 248(a)(4)(G)-(I). In its Section 248 Petition, Vergennes VT BESS's petition will address any written comments provided to Vergennes VT BESS in response to this letter related to the Section 248(b) criteria and any oral comments related to those criteria made at any public hearing convened by the planning commissions.

For additional information regarding this process, including your right to participate in the Commission proceeding, please refer to the Commission document "Public Participation and Intervention in Proceedings Before the Vermont Public Utility Commission" document, available on the website at: https://puc.vermont.gov/document/public-participation-and-intervention-proceedings-public-utility-commission. Information regarding the Commission's procedures for Section 248(j) proceedings can also be found on the PUC's website at:: https://puc.vermont.gov/document/section-248j-procedures.

Thank you for your interest in this Project. We look forward to progressing through the Section 248 process and welcome your input and suggestions to make this a successful Project.

Sincerely,

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