

This public comment is being filed in response to the 45-day advance submission of Vergennes VT BESS 1 LLC for a certificate of public good, pursuant to 30 V.S.A. § 248, to file a petition for a 4.9 MW battery storage facility in Vergennes, Vermont

Case Number: 25-3076-AN

To the Vermont Public Utility Commission,

I am submitting this comment in opposition to the proposed lithium-ion Battery Energy Storage System (BESS) facility planned approximately 150 feet from a residential zone in the City of Vergennes.

The primary concern is the planned site location. Utility-scale lithium-ion energy storage systems present documented risks, including thermal runaway events, fire propagation and the release of hazardous gases such as hydrogen fluoride and other combustion byproducts. National standards such as NFPA 855 and UL 9540A testing protocols exist precisely because these risks are real and require rigorous mitigation. Even with compliance, setbacks and buffering are critical components of risk management. **A separation distance of roughly 150 feet from residential dwellings does not provide a substantial margin of safety in the event of a fire, prolonged burn event, or toxic plume.**

Emergency response capacity must also be evaluated realistically. Vergennes and surrounding communities rely heavily on volunteer fire and ambulatory services. Lithium-ion battery fires can require extended suppression efforts, large volumes of water, specialized training, and coordination with hazardous materials teams. Containment of contaminated runoff water is another concern with the close proximity to Otter Creek which flows directly into Lake Champlain. The application should be scrutinized for detailed fire modeling, plume dispersion analysis, stormwater containment design, and groundwater protection measures.

From a land use standpoint, introducing an industrial-scale energy storage installation into close proximity with established residential properties is inconsistent with traditional zoning principles intended to separate incompatible uses. Industrial facilities are typically buffered from homes through distance, vegetation, topography, or siting within designated industrial districts. The proposed location does not appear to provide meaningful physical or visual buffering.

Additional considerations include long-term maintenance obligations, decommissioning plans, and financial assurance. The Commission should require a clearly defined decommissioning bond sufficient to cover removal, site remediation, and potential

environmental cleanup at end of life or in the event of system failure. Without robust financial safeguards, risk is effectively transferred to City of Vergennes residents.

This project may serve broader grid objectives, but those objectives do not override the obligation to ensure prudent siting and public safety. A location with greater setback from residential zones and more appropriate industrial context would better align with established risk mitigation principles. Also, the fact that this is not being brought to a vote by City of Vergennes residents is concerning.

For these reasons, **I respectfully request that the Commission deny approval of this project as currently sited** or require relocation to a site with substantially greater separation from residential properties.

Thank you for your consideration.

Jonathan Sullivan, Addison County, Vermont Resident