



*Protecting and restoring the lands and waters of the Virginia Piedmont,
while building stronger, more sustainable communities*

November 18, 2024

Fauquier County Planning Commission; John Meadows, Chair

c/o Fauquier County Community Development Department, 10 Hotel Street, Warrenton, VA
20186

Re: Comprehensive Plan Compliance Review COMR-24-023132 and Special Exception
SPEX-24-023131, Summersweet Energy Center

Dear Planning Commission,

Because the subject property is located on the sole industrial parcel within the Morrisville Village Plan, we do not believe this proposal is in conflict with the Comprehensive Plan's goals and objectives. Although we hope that the Comprehensive Plan eventually addresses battery storage as a land use more specifically, we are encouraged that the County is incorporating battery storage as a separate use category in its zoning ordinance.

We believe that battery storage is a critical component of a modern, renewable electrical grid by storing intermittent renewable energy and making it available when needed. The deployment of more battery storage at scale could also reduce the need for the deployment of new transmission lines as well as new generation sources.¹ For instance, around 10 similar battery storage sites rated at 150 megawatts would be enough to offset the need for the 1,000 megawatt natural gas plant planned in Chesterfield County.² A reduction in utilities' transmission build out would also support an associated reduction in ratepayer burden.

There have been changes in battery technology and housing infrastructure that mitigate fire risk, and the project will be held to existing standards that ensure fires don't spread between battery

¹ "Study Shows Only Select Types of New Wind+Battery or Solar+Battery Power Plants Reduce Local Transmission Congestion | Energy Markets & Policy." 2023. Lbl.gov. 2023.
<https://emp.lbl.gov/news/study-shows-only-select-types-new#:~:text=In%20the%20United%20States%20development,sheds%20light%20on%20these%20questions.>

² Hines-Acosta, Lauren. 2024. "Residents Rally against Gas Plant in Chesterfield, VA." Bay Journal. August 23, 2024.
https://www.bayjournal.com/news/energy/residents-rally-against-gas-plant-in-chesterfield-va/article_e1c545de-6150-11ef-a486-1ba5bedd01aa.html

enclosures.³ However, there is still a fire risk with any battery storage project and the County must ensure that a robust emergency response plan is in place in the event a fire were to occur. We particularly have concerns about the project's impacts on adjacent Mary Water Elementary School. Battery fires emit fumes containing harmful chemicals that could drift towards the school property.⁴ We believe the Applicant must incorporate an emergency response / evacuation plan specifically to protect students at Mary Walter Elementary School.

Before the Board decision, we will be providing the Applicant feedback on their proposed conditions informed by Best Practices [informed by NYSERDA \(New York State Energy Research and Development Authority\)](#).⁵ Beyond the commitments made in the conditions, the County must ensure that the emergency response plans completed at the time of building permit are adequate and that the County Fire Department has the capacity and training to implement them. To that end, PEC will continue to monitor the application after any approvals are granted.

We would be happy to discuss any of these issues further.

Sincerely,

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Fauquier County Field Representative
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³“Energy Storage in Local Zoning Ordinances.” 2023. PNNL. November 4, 2023.

<https://www.pnnl.gov/publications/energy-storage-local-zoning-ordinances>

⁴ Larsson, Fredrik, Petra Andersson, Per Blomqvist, and Bengt-Erik Mellander. 2017. “Toxic Fluoride Gas Emissions from Lithium-Ion Battery Fires.” *Scientific Reports* 7 (August). <https://doi.org/10.1038/s41598-017-09784-z>.

⁵“New York State Battery Energy Storage System Guidebook - NYSERDA.” 2023. NYSERDA. 2023.

<https://www.nyserda.ny.gov/All-Programs/Clean-Energy-Siting-Resources/Battery-Energy-Storage-Guidebook>.