

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 23-3734-PET

Petition of Vermont Transco LLC and Vermont Electric Power Company, Inc. (collectively, “VELCO”), for a Certificate of Public Good pursuant to 30 V.S.A. § 248 authorizing construction of the “Franklin County Line Upgrade Project” consisting of upgrades to VELCO’s existing K42 transmission line in Georgia, St. Albans, Swanton, and Highgate, Vermont	
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SUPPLEMENTAL TESTIMONY OF SCOTT S. MALLORY
ON BEHALF OF VERMONT ELECTRIC POWER COMPANY, INC.
AND VERMONT TRANSCO LLC

February 23, 2024

Mr. Mallory describes structure and height adjustments that have been made to the proposed Project design since the Petition was filed in October 2023, and he also discusses the new, proposed laydown yard for the Project.

EXHIBITS

Exhibit Petitioner SSM-15

Aesthetic Review Update Memorandum

Exhibit Petitioner SSM-16

Map of Proposed Laydown Yard

SUPPLEMENTAL TESTIMONY OF SCOTT S. MALLORY
ON BEHALF OF VERMONT ELECTRIC POWER COMPANY, INC.
AND VT TRANSCO LLC

1 **Q1. Did you previously testify in this matter, Case No. 23-3734-PET, the petition**
2 **of Vermont Electric Power Company, Inc. and Vermont Transco LLC (collectively**
3 **“VELCO”), for a certificate of public good, pursuant to 30 V.S.A. § 248, authorizing**
4 **upgrades to the K42 transmission line in Georgia, St. Albans, Swanton, and Highgate,**
5 **Vermont (the “Project”)?**

6 **A1. Yes, I did.**

7

8 **Q2. What is the purpose of this Supplemental Testimony?**

9 **A2. I discuss changes to structure locations, as well as height adjustments, that have**
10 **been made in the Project design since the Petition filing was submitted on October 26, 2023, as**
11 **well, I discuss the new, proposed laydown yard to be used for Project construction.**

12

13 **Q3. In general, what are the changes that VELCO is proposing to the K42 line**
14 **design since the initial Petition filing?**

15 **A3. As line engineering and collateral permit applications have progressed since the**
16 **initial Petition filing on October 26, 2023, 38 structures have location changes and 51 structures**
17 **have height changes. Please see revised sheet 1 of **Exhibit Petitioner WFM-2 (Revised)****
18 **(revised Plan and Profile) for a list of the location changes and **Petitioner WFM-3 (Revised)****
19 **(revised K42 Line Structure Information Table) for a list of the above ground height changes.**
20 **As discussed below, many of the structure and height changes are minor adjustments.**

1 **Q4. Why are these structure movements and height changes being made?**

2 **A4.** Since we filed the initial Project design, the engineering on the line design has
3 been enhanced to include soil boring and rock coring analysis and the resultant structural loading
4 analysis to determine embedment/foundation design to support the loads on each structure. In
5 addition, location changes have been made for constructability, the ability to remove one
6 structure as unnecessary, and movements away from a river corridor and away from a population
7 of Rare, Threatened, or Endangered (“RTE”) plant species.

8 The structural loading analysis determined pole embedment depth, anchoring, and
9 foundational requirements. These details along with a constructability review led to some
10 structure movements to avoid two pole dead ends in poor soil areas, avoid new guy wires that
11 would be in conflict with existing guy wires or conductor spacing, avoid conductor swinging that
12 could cause a fault, or add concrete foundations. As the structures were moved or changed, the
13 above ground heights also changed, which led to additional small changes in adjacent structures
14 as they are all connected and under tension.

15

16 **Q5. Please describe the changes to structure locations and heights in more detail.**

17 **A5.** 32 of the structure location changes are very minor, involving one removal and
18 changes of less than ten feet. Attachment 2 of Exhibit Petitioner AM-7 contains a table detailing
19 the six other changes in location that are ten feet or more. These are structures 210Y, 261, 264,
20 360, 378, and 387.

21 In general, the proposed height changes are minor and typically reduce overall structure
22 height. Three structures have changed by ten feet or greater in above grade height. Structures
23 294 and 400 were reduced in height by approximately 21 feet each as a second pole was added to

1 each for constructability with the existing structure guy wires. Structure 261 was increased by
2 nine feet to accommodate the removal of structure 262. Structure number 382 was increased by
3 ten and one half feet, as the prior two pole dead end at this location was moved and replaced with
4 a single pole.

5

6 **Q6. Has VELCO evaluated whether the structure movements and height changes**
7 **will have the potential to impact any of the Section 248 criteria? If so, what was the**
8 **conclusion of that further evaluation?**

9 **A6.** Yes, VELCO’s Project engineers and consultants have evaluated the potential
10 impacts from these changes, and that further analysis confirms that there is no potential for
11 impact to any Section 248 criteria from these changes.

12 As I explain above, VELCO project engineers have proposed many of the structure
13 movements as Project refinements, which will improve the overall safety and reliability of the
14 rebuilt K42 line.

15 From an aesthetics point of view, T.J. Boyle Associates reviewed these changes and
16 found that they created no undue adverse impacts. Specifically, T.J. Boyle Associates, states in
17 its supplemental review that, “Our analysis concludes that the proposed K42 design revisions
18 will not change our previous conclusion that reconstruction of the K42 transmission line will not
19 result in undue adverse impacts to the aesthetic or scenic or natural beauty of the area.” **Exhibit**
20 **Petitioner SSM-15.**

21 VELCO witness Andrew McMillan provides supplemental testimony discussing the
22 additional review under the Section 248(b)(5) criteria, and the conclusion that there is no
23 potential impact to those criteria from the line design changes.

1 **Q7. Please describe the laydown area that VELCO is now proposing for this**
2 **Project.**

3 **A7.** VELCO is now proposing to use an approximate 4-acre portion of a 13.8 acre
4 property located at 457 Swanton Road in the Town of St. Albans, Vermont, as a laydown area to
5 support Project construction. This approximately 4-acre area has already been improved and
6 consists of gravel parking area and concrete pad, in addition to a few existing buildings,
7 including but not limited to a garage. See **Exhibit Petitioner SSM-16** (Map of Proposed
8 Laydown Yard).

9 VELCO plans to temporarily use the graveled area and buildings for construction
10 meetings, equipment, and materials storage during the construction period. The site will not be
11 altered other than added stone or minor grading to re-establish level travel and storage area,
12 temporary connections for power, telecommunications, water, and septic, and for temporary
13 fencing for security and to keep materials off undisturbed lands. Temporary
14 power/telecommunications may require the setting of a temporary pole in previously disturbed
15 and/or improved areas of the site. Further details regarding the proposed laydown area are
16 discussed in the Supplemental Testimony of witness Andrew McMillan.

17

18 **Q8. Has VELCO evaluated whether using the new, proposed laydown area will**
19 **have the potential to impact any of the Section 248 criteria? If so, what was the conclusion**
20 **of that further evaluation?**

21 **A8.** Yes. In his Supplemental Testimony, witness Andrew McMillan explains that
22 there is no potential for impacts on certain Section 248(b)(5) criteria from the use of the laydown
23 yard. During delivery of any large equipment or materials to the laydown area, VELCO will

1 employ the services of traffic control personnel to manage traffic flow and enable emergency
2 response vehicles to get to and from where they need to go. There are no impacts on any other
3 Section 248 criteria from the temporary use of this already improved approximately 4-acre area
4 for Project construction support.

5

6 **Q9. Has VELCO informed the landowners adjoining the new, proposed laydown**
7 **area of the plan to utilize a portion of the property as a Project construction laydown area?**

8 **A9.** VELCO has sent correspondence to adjoining landowners about the proposed
9 plan to utilize this location as a laydown area to support Project construction.

10


11 **Q10. Does this conclude your testimony at this time?**

12 **A10.** Yes, it does.

DECLARATION OF SCOTT S. MALLORY

I declare that the above statements are true and accurate to the best of my knowledge and belief.
I understand that if the above statements are false, I may be subject to sanctions by the
Commission pursuant to 30 V.S.A. § 30.

02/23/24
Date



Scott S. Mallory