



Joslyn Wilschek
Admitted in VT and NH
joslyn@ilovt.net
Tel: 802-249-7663

35 Elm St., Suite 200 | Montpelier, VT 05602

October 15, 2024

Re: Case No. 24-3084-PET: Re: 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(j) authorizing upgrades to VELCO’s existing Newport Substation, in Newport, Vermont

Dear State Statutory Entity, Local Statutory Entity, or Landowner:

On October 7, 2024, Vermont Electric Power Company Inc. (VELCO or Petitioners) filed a petition, prefiled testimony, exhibits, and a proposed certificate of public good requesting a certificate of public good from the Vermont Public Utility Commission (Commission), the formal regulatory approval authorizing VELCO to begin construction in accordance with 30 V.S.A. § 248(j) and Commission Rule 5.400 to replace an existing transformer at VELCO’s existing substation located at 917 Clyde Street, in Newport, Vermont (Project). A copy of the Petition is enclosed which provides a Project description.

You are receiving this letter because your property may directly adjoin (or is only separated by a river, stream, railroad line, or public highway) the proposed Project site, or you are an entity identified in the Public Utility Commission Rule 5.402. VELCO is providing notice to all landowners of record adjoining the Project parcel, as required by Public Utility Commission rules.

On October 14, 2024, the Commission issued Notice of Complete Petition (Completion Determination), determined that the petition is administratively complete, and opened the case: the Case No. is 24-3084-PET. The Commission explained that comments must be submitted by November 15, 2024, on whether the petition raises a significant issue with respect to the substantive criteria of 30 V.S.A. Section 248.

With the exception of those state agencies that will receive notice of and access to the petition via ePUC, the Completion Determination requires the Petitioners to provide a copy of the petition pursuant to 30 V.S.A. § 248(a)(4)(C) and (j)(2) to all entities and persons entitled to receive such

copies (Statutory Entities) within two business days of the Completion Determination. Additionally, to the extent that the Petitioners have not provided notice of the filing of the petition to all persons and entities entitled to receive such notice pursuant to Commission Rule 5.402(A) (such as Adjoining Landowners), the Completion Determination requires the Petitioners to provide such notice along with information on how the public may participate in this case.

On October 15, 2024, the Petitioners provided a copy of the petition, testimony, exhibits, and associated administrative documents to the entities identified in Rule 5.402(A) via email or ePUC as permitted by Commission rules. On October 15, the Petitioners mailed a copy of the petition along with this letter to the Adjoining Landowners.

For information on the Commission, please refer to <http://puc.vermont.gov/document/citizen-guide-public-utility-commission>.

For additional information regarding the Commission's processes, including your right to participate in the proceeding, please refer to a Commission document titled, "Public Participation and Intervention in Proceedings Before the Public Utility Commission," found on the Commission's website at <http://puc.vermont.gov/document/public-participation-and-intervention-proceedings-public-utility-commission>.

As VELCO has filed the petition under Section 248(j), the Commission's Section 248(j) procedures document can be found on the Commission's website at <http://puc.vermont.gov/document/section-248j-procedures>.

For access to all documents in this case, please use the above case number at <http://epuc.vermont.gov/>, or visit the Project website www.velco.com/newport to view the petition under the "Permitting Documents" tab.

If you are unable to download the complete set of electronic documents or prefer to obtain them in hard copy, you can contact the Petitioners to obtain a hard copy of the complete Project plans by mail. Please contact Gunner Tuttle, VELCO Project Manager at 802-779-5486, or at gtuttle@velco.com.

The documents that accompany this letter have been electronically filed using ePUC.

Sincerely,



Joslyn L. Wilschek

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. _____

Petition of Vermont Transco LLC, and Vermont Electric Power Company, Inc. for a certificate of public good, pursuant to 30 V.S.A. § 248(j) authorizing upgrades to VELCO's existing Newport Substation, in Newport, Vermont

PETITION

This document and associated testimony and exhibits have been filed in ePUC

Vermont Electric Power Company, Inc. and Vermont Transco LLC (collectively referred to as VELCO, the Company, or Petitioners), in accordance with 30 V.S.A. § 248(j) and Vermont Public Utility Commission (Commission) Rule 5.400, petition the Commission for a Certificate of Public Good (CPG) to replace an existing transformer at the existing Newport Substation at 917 Clyde Street in Newport, Vermont (Project). In support of this petition, VELCO states as follows:

1. VELCO is a company as defined by 30 V.S.A. § 201 and is subject to Commission jurisdiction pursuant to 30 V.S.A. § 203.
2. VELCO's office is located at 366 Pinnacle Ridge Road in Rutland, Vermont.
3. VELCO owns, operates, and plans for Vermont's high voltage electric transmission system.
4. VELCO operates Vermont's high voltage electric transmission system to assure the integrity of the portion of the regional bulk power system for which it is responsible, and to assure adequate and reliable transmission of electricity to the electric distribution utilities that it serves in Vermont.
5. VELCO's Newport substation provides service to Vermont Electric Cooperative, Inc. (VEC) and facilitates the transfer of Hydro Quebec power into the VEC system.

Notice Requirements

6. VELCO will follow the filings requirements set forth in Commission Rule 5.407, including providing notice to adjoining landowners upon receiving notice of completion.

Project Need

7. This substation currently has an existing 116/43.8 kV (15 with no fans; 20 with fans MVA) “T1” transformer that was built in 1958. This transformer supports the 46 kV ring and VEC local distribution circuits that are radially served. The VELCO asset maintenance team has determined that due to the existing transformer’s age and condition, it is approaching the end of its usable life expectancy and if the transformer is kept in service, it would be risking a potential future outage due to equipment failure. Load increases are not a basis to replace the existing transformer.

8. VELCO proposes to replace the existing transformer with a spare in-stock transformer that VELCO currently stores at the VELCO Newport substation as a backup in the event of a failure occurring, and that VELCO previously used at the VELCO Florence substation. This replacement transformer is rated for 115/46 kV (30 with no fans; 40 with fans; 50-second bank of fans MVA), was built in 1971 by General Electric, and is available for VELCO to use now.

9. The Project all occurs within the existing substation fence.

10. The Commission can process this petition using Section 248(j) procedures. The Project is limited in size and scope, it raises no significant issues with respect to the substantive criteria of Section 248, and the public interest is satisfied by the procedures authorized under Section 248(j). VELCO would perform the Project within previously disturbed lands, all within the existing substation fence. No Project components require tree clearing. For these reasons, as

well as those explained in the accompanying testimony, the Project does not raise a significant issue with respect to the Section 248 criteria. The Project has a limited scope and there is a clear need to replace the old transformer.

Project Components

11. The Project consists of the replacing the existing T1 transformer with a spare replacement transformer rated for 115/46 kV (30/40/50 MVA). VELCO will use the existing oil containment.

Project Cost

12. VELCO estimates that the Project will cost \$451,977.

Project Schedule

13. VELCO proposes to begin Project construction as soon as possible after receiving the required permits and approvals. Currently, the estimated construction schedule would begin in June 2025 with a targeted completion date of September 2025. A failure to achieve this schedule will likely have adverse impacts on Project execution and overall Project cost. Construction would take place between the hours of 7:00 A.M. and 7:00 P.M. Monday through Friday, and between 8:00 A.M. and 5:00 P.M. on Saturdays. No construction would take place on Sundays, or state or federal holidays; although VELCO seeks to conduct activities on Bennington Battle Day given the short summer construction season, and given that the holiday is not widely granted as a paid day off for many of the workers likely to be working on the Project.

14. VELCO requests that these construction restrictions do not apply to (1) construction activities that VELCO must perform during any required outages that may be needed to maintain

system reliability; and (2) work that VELCO must perform related to filling the power transformer with oil.

Alternatives Considered

15. The proposed Project is the most efficient way to address the condition-related concerns. The T1 transformer's condition as discussed above is the main driver of the need for the proposed Project. Energy efficiency and load management could not resolve these problems. Moreover, VELCO presented the proposed Project to the Vermont System Planning Committee (VSPC). The Project screened out of the VSPC's test for Non-Transmission Alternative (NTA) analysis, due to the need being based upon condition. Thus, VELCO did not perform an NTA analysis.

Prefiled Evidence and Compliance with Statutory Criteria (30 V.S.A. § 248(b))

16. The Project satisfies the statutory criteria contained in Section 248(b) as demonstrated by the prefiled testimony and exhibits filed with this Petition.

17. In support of this Petition, the Petitioners submit prefiled testimony and exhibits sponsored by the following witnesses:

Witnesses

Subject

Gunner Tuttle

Provides an overview of the proposed Project's scope, cost and schedule, and explains how the Project complies with Section 248(b)(1)-(4), (b)(5) (public health and safety, transportation, educational and municipal services, aesthetics) (and Commission Rule 5.800), and development affecting public investments); (b)(6)-(7); and (b)(10).

Tegan Brand

Provides an assessment of the Project's potential impacts upon above-ground and below-ground historic sites as well as all the

Section 248(b)(5) environmental criteria, primary agricultural soils and VELCO's waste disposal practices.

Ed McGann

Describes VELCO's proposed substation design details and addresses how the Project complies with Section 248(b)(5) (public health and safety and air pollution-sound levels).

Request for Relief

WHEREFORE, the Petitioners respectfully request that the Commission:

- a. Issue findings consistent with this Petition and prefiled testimony and exhibits that the Project will promote the general good of the State of Vermont as required by 30 V.S.A. § 248(j);
- b. Issue a Certificate of Public Good for the Project consistent with this Petition and prefiled testimony and exhibits; and
- c. Grant such further relief as the Commission determines is necessary, just, and proper.

Dated at Montpelier, Vermont this 7th day of October, 2024.

VERMONT ELECTRIC POWER COMPANY, INC.
AND VERMONT TRANSCO LLC

By:



Joslyn Wilschek, Esq.
Wilschek Iarrapino Law Office, PLLC
joslyn@ilovt.net
35 Elm Street, Suite 200
Montpelier, VT 05602
(802) 249-7663

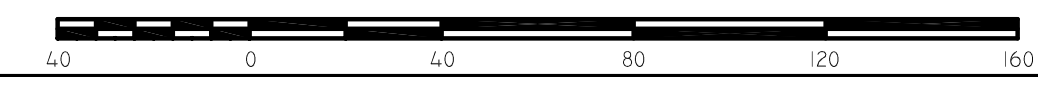


SITE PLAN

- LEGEND**
- APPROXIMATE BOUNDARY LINE
 - - - APPROXIMATE RIGHT-OF-WAY LINE
 - ↑ SUBSTATION FENCE
 - ⊕ UTILITY POLE
- COLOR KEY**
- EXISTING INFRASTRUCTURE TO REMAIN
 - PROPOSED OR RELOCATED INFRASTRUCTURE

NOTE:

1. ORTHOMAGERY OBTAINED FROM VERMONT CENTER FOR GEOGRAPHIC INFORMATION, ACQUIRED IN 2022.
2. RIGHT-OF-WAY AND BOUNDARY LINES DERIVED FROM GIS DATA SOURCES, THIS PLAN DOES NOT CONSTITUTE A BOUNDARY SURVEY.



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| REV | DATE | DR | CK | DESCRIPTION |
| | | | | VERMONT ELECTRIC POWER CO., INC. RUTLAND, VERMONT NEWPORT SUBSTATION |
| SITE PLAN 115/46/12.5KV YARD NEWPORT, VERMONT | | | | |
| SCALE: | AS NOTED | DRAWN BY: | MRS | APPROVED BY: |
| DATE: | 01.09.23 | CHECKED BY: | JWK | DATE: |
| DRAWING NUMBER: | | | | 0 |
| PLOT: | 1=1 | | | REV. |
| 271-EX1 | | | | |

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