



# K24-5 LCP-020 Replacement Project

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## VIA First Class Mail or ePUC

October 29, 2024

Re: Petition of Vermont Transco LLC and Vermont Electric Power Company, Inc. for a certificate of public good, pursuant to 30 V.S.A. § 248, for the replacement and removal of structures on the VELCO K24-5 Line in Waterbury, Vermont

### **45-Day Advance Notice Package**

Dear Neighbors and Government Entities Entitled to Advance Notice of the Project,

This letter is to provide you with advance notice that Vermont Transco LLC and Vermont Electric Power Company, Inc. (together “VELCO”) are preparing to file a petition with the Vermont Public Utility Commission (“Commission”), pursuant to 30 V.S.A. § 248, for approval to replace one structure and remove one structure on the VELCO K24-5 transmission line in Waterbury, Vermont (the “Project”).

VELCO anticipates filing the petition with the Commission around December 13, 2024, and we are providing the following Project overview and related information in this 45-day advance notice package in accordance with Commission Rule 5.402 and 30 V.S.A. § 248 (“Section 248”).<sup>1</sup>

This letter is organized to provide you with the following information: (1) an overall description of the Project, (2) an explanation of the need for the Project, including an assessment of alternatives considered, (3) an initial overview of the impact of the Project, and (4) information on the Commission review process, including participation by municipal and regional planning commissions, as well as links to guidance on the Commission’s review process.

#### **I. Project Description:**

The Project consists of reconstructing a small segment of the VELCO K24-5, 115 kV transmission line that runs from Duxbury, Vermont to Stowe, Vermont. The line was originally constructed in 2009. In early 2024, VELCO discovered that the laminate poles used on parts of this line were deteriorating prematurely. One pole with significant interior deterioration was structure

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<sup>1</sup> While we anticipate filing the formal petition around December 13, 2024, the formal notice of the petition may not go out until a few days later, as the Commission must first determine whether the petition is complete. The Section 248 process is governed by Public Utility Commission Rule 5.400, which can be viewed on the Commission’s website at: <https://puc.vermont.gov/document/commission-rule-5400-requirements-construct-electric-gas-facilities-pursuant-30-vsa-248>.

LCP-020, adjacent to Kimberly Lane in Waterbury, Vermont. This was a self-supported, single-pole angle structure that extended approximately 88 feet above ground level.

This pole could not be replaced with a like “in kind” replacement because it needed immediate replacement for safety and reliability reasons, and a steel or laminate single-pole structure would take many months to obtain. Thus, after receiving an emergency waiver pursuant to 30 V.S.A. § 248(k) from the Commission in Case 24-2234-PET, VELCO replaced the original structure LCP-020 with a new single-pole structure, LCP-020, and a nearby three-pole structure, LCP-021, using standard wooden poles that VELCO carries in its inventory.

This Project proposes the reconstruction of the current arrangement by removing structure LCP-021 and replacing structure LCP-020 with a self-supported, single-pole steel structure. The steel pole will have a base plate that will attach to a newly installed concrete pier foundation. VELCO is progressing with final design of the steel pole and foundation. Preliminarily, the location of the steel pole and foundation are proposed to shift slightly north, approximately 20-25 feet, of the original laminate pole location. This is necessary to provide more stable ground, away from the retaining wall, that can support the foundation. The final pole top elevation and mid-span conductor elevations will be similar to the original laminate pole structure. The shift of the steel pole slightly to the north will move the base of the pole up the bank and away from the retaining wall, likely resulting in an overall visible pole length that is shorter than the original laminate pole.

An aerial photograph of the Project site is provided with this letter as Attachment 1. A draft site plan for the Project construction showing the current and proposed configurations is provided in Attachment 2.

## **II. Project Need:**

This Project is a requirement of the July 24, 2024 Commission Order in Case No. 24-2234-PET. Per the Order, VELCO needs to install a permanent replacement of structure LCP-020 with a steel pole and remove structure LCP-021.

In connection with planning this Project, VELCO considered the following alternatives:

- Leaving the current configuration in place. This option is not allowed under the Commission Order in Case No. 24-2234-PET.
- Installing a self-supported, three-pole steel structure near the location of the proposed single-pole structure. VELCO considered this alternative when neighbors of the Project asked whether the three conductors could be horizontal, rather than vertical. However, the three-pole structure would require additional vegetation clearing, need to be located further north than the location of the proposed single-pole structure and would cost more than the proposed self-supporting single pole configuration. In addition, such a proposal is not allowed under the Commission Order in Case No. 24-2234-PET.

### **III. Project Impact:**

VELCO has engaged an environmental consultant (VHB, Inc.) to perform a natural resource assessment of the Project area and to review project activities as they relate to impacts to Section 248 criteria. Although this assessment is still underway, given the existing data and knowledge of this area, it is anticipated that the proposed Project will have limited impacts on Section 248 criteria. In addition, VELCO will consult with the applicable Vermont Agency of Natural Resources departments or staff to address options for avoidance, minimization or mitigation of any potential impacts.

In terms of visual impact, the Project consists of removing the two emergency structures (LCP-020 and LCP-021) installed as a temporary replacement of the original un-guyed laminated structure LCP-020 that extended approximately 88' above ground, and installing a new LCP-020 pole. The proposed permanent LCP-020 replacement pole will be an approximately 77-foot-tall, un-guyed weathering steel pole proposed in a location approximately 20-25 feet north of the original laminated structure. The permanent replacement will be installed at a slightly higher ground elevation, which will result in a comparable overall pole-top height to the original laminated structure.

T.J. Boyle and Associates conducted a preliminary review of aesthetic impacts and determined that utilizing weathering steel rather than galvanized steel will reduce the industrial character of the new pole and be consistent with several other weathering steel structures found elsewhere along the K24-5 (Duxbury-Stowe) line. Additionally, a landscape plan has been prepared to help reduce the visual impact of the proposed steel structure from the immediately surrounding area. The landscape plan also provides for the replacement of several lilac shrubs and other plants that were removed during the construction of the two temporary emergency structures. See Attachment 3. Proposed plantings will help screen the base of the new permanent pole while avoiding the use of species that will interfere with the necessary wire clearances.

VELCO will file a more detailed aesthetic analysis and final mitigation measures with the complete petition.

The Project will not result in any long-term traffic impacts to Waterbury. Construction equipment and materials will be delivered on existing roads using common vehicles that are regularly used on public roads. Any traffic impacts will be minor and limited almost entirely to the period of Project construction.

#### **IV. Information Regarding the Project Review Process:**

As noted above, VELCO has enclosed an aerial photo and site plan with this letter, showing the location and proposed design of the Project. The information contained in this package is intended to provide a general understanding of the Project and could change based on further analysis and the requirements of applicable permits.

Before beginning work on the Project, VELCO must obtain a Certificate of Public Good (“CPG”) from the Commission under 30 V.S.A. Section 248. Before issuing a CPG, the Commission must find, among other things, that the Project will not unduly interfere with the orderly development of the region with due consideration having been given to the recommendations of the municipal and regional planning commissions, the recommendations of the municipal legislative bodies, and the land conservation measures contained in the plan of any affected municipality.

Section 248(f) of Title 30 provides information regarding participation of municipal and regional planning commissions in Section 248 proceedings. Per 30 V.S.A. § 248(f)(1)(A), each municipal and regional planning commission may convene a public hearing on the proposed petition. Pursuant to section 248(f)(1)(C), each planning commission may submit recommendations to the petitioner within 40 days of the petitioner’s submittal to the planning commissions, which is December 8, 2024, for this Project.

The petitioner’s application to the Commission must address any written comments provided to the petitioner in response to the 45-day advance submission that are related to the Section 248(b) criteria and any oral comments related to those criteria made at any public hearing conducted pursuant to 30 V.S.A. § 248(f)(1)(A). Section 248(f)(1)(D) provides that once the petition is filed with the Commission, each planning commission may make recommendations to the Commission after the petition is filed. While Section 248(f) focuses only on the Planning Commission comment process, VELCO welcomes feedback from the affected municipal bodies, state agencies, and adjoining landowners. So that VELCO has sufficient time to incorporate your feedback before the December 13, 2024, anticipated filing date, VELCO is requesting that comments be submitted by December 5, 2024.

For additional information regarding the Commission’s review process, please reference the Commission’s document labeled, “Public Participation and Intervention in Proceedings Before the Public Utility Commission,” which can be found on the Commission’s website at: <https://puc.vermont.gov/document/public-participation-and-intervention-proceedings-public-utility-commission>. Specific information about Section 248 procedures can be found on the Commission website at: <https://puc.vermont.gov/document/section-248-procedures>.

If you have any questions or feedback about the Project, please reach out and I will be happy to speak with you. My email address is [rjohnson@velco.com](mailto:rjohnson@velco.com). If you would like to contact me my phone number is (802) 349-8726.

Sincerely,

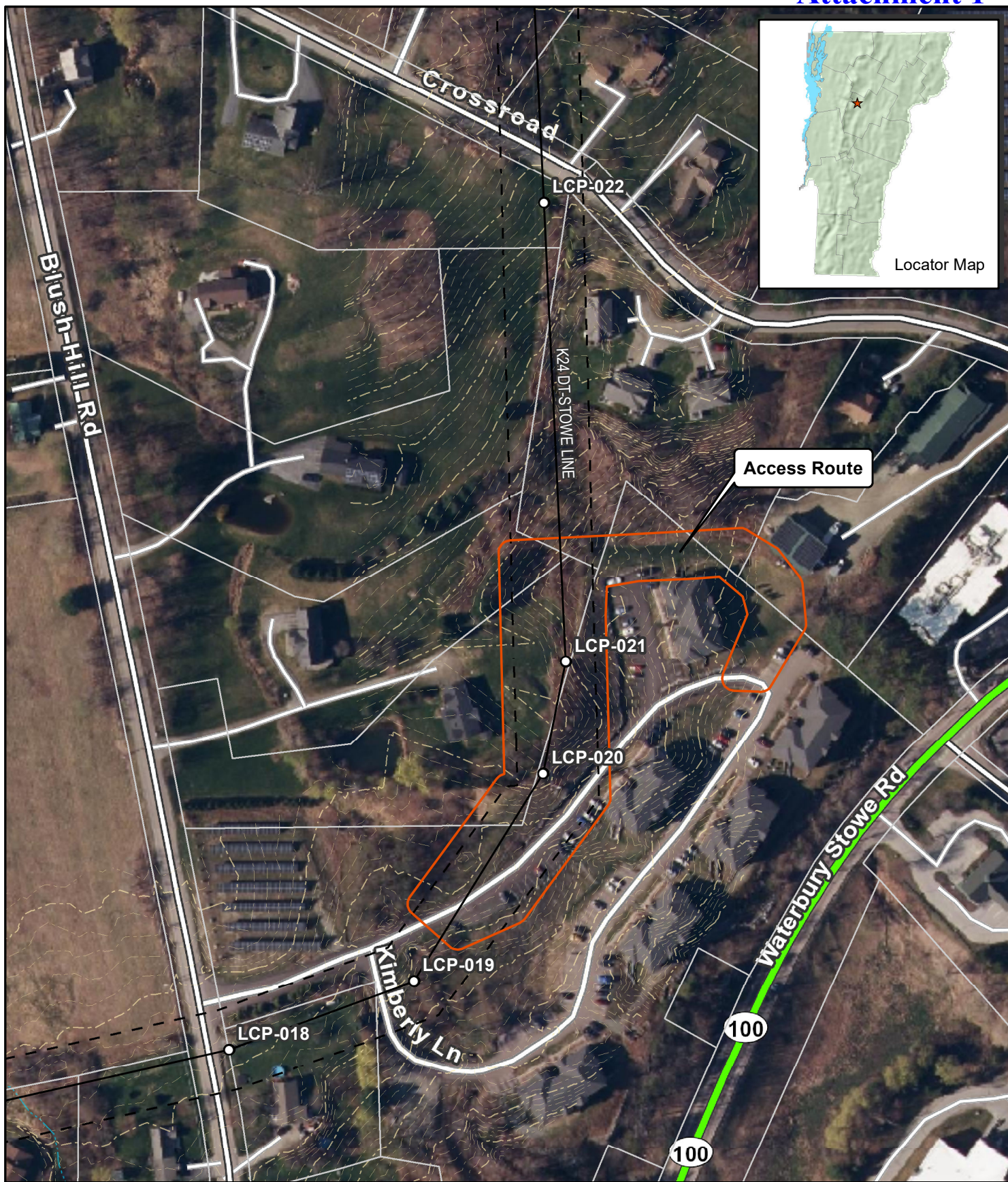
A handwritten signature in black ink, appearing to read 'R. Johnson', with a stylized flourish at the end.

Ryan Johnson

VELCO Project Manager

Enclosures: Attachments 1, 2, and 3

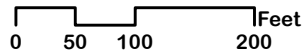
cc: Service List per Certificate of Service



- VELCO Structure
- VELCO Right-of-Way
- VELCO Transmission Line
- ▭ Project Area Boundary
- ▭ Parcel Boundaries



**K24-5 LCP-020 Structure Replacement  
Project Location Map  
Waterbury, Vermont**



Sources: Structures, Lines, Project Area, 2 contours, and LMS Easement from VELCO. Parcels, and basemap from VCGI.



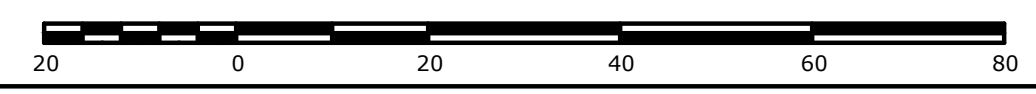


**LEGEND**

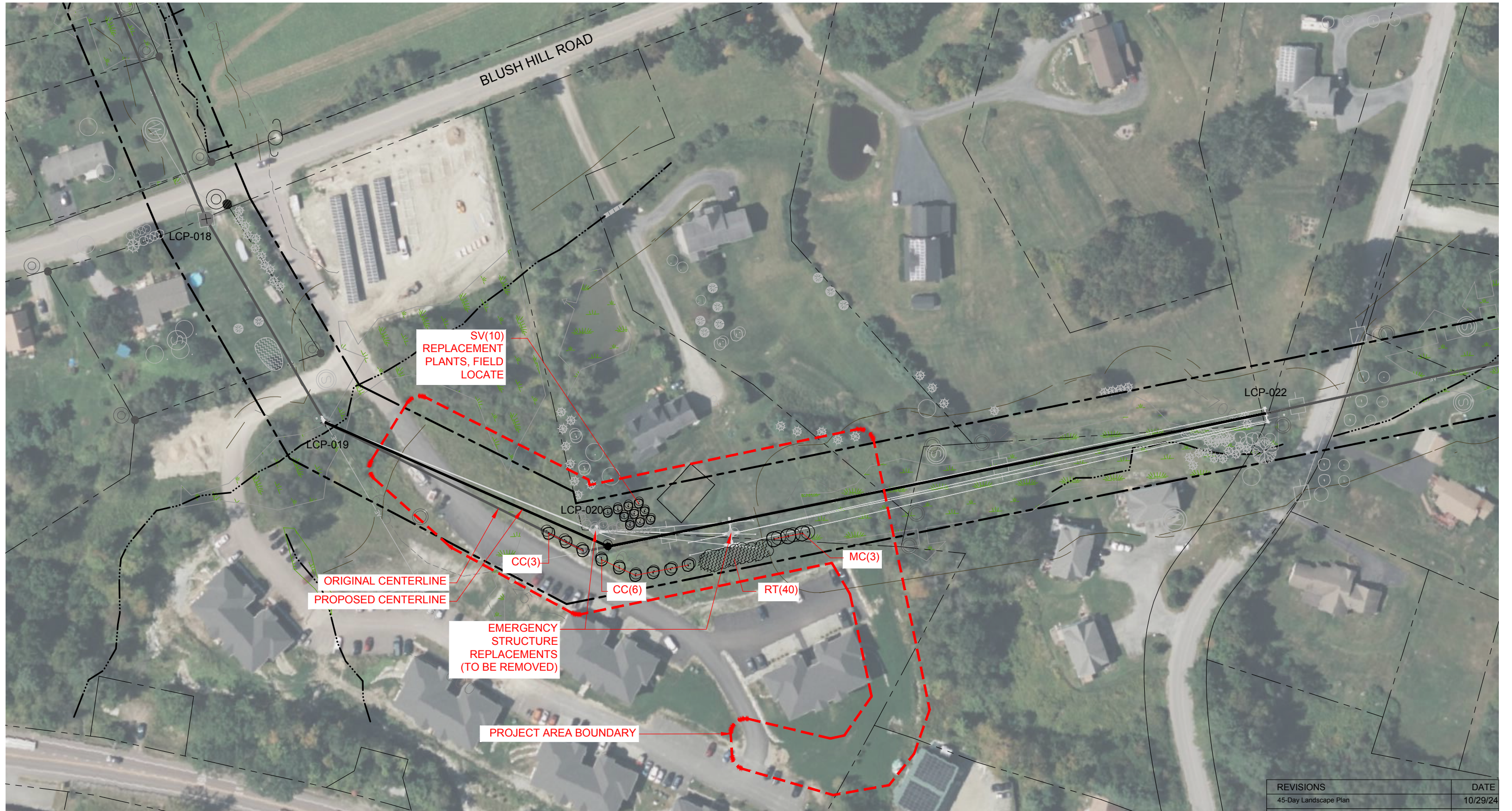
	EXISTING INFRASTRUCTURE
	PROPOSED INFRASTRUCTURE
	INFRASTRUCTURE TO BE REMOVED
	RIGHT-OF-WAY
	BOUNDARY LINE

**NOTES:**

1. SATELLITE IMAGERY DISPLAYED USING AUTOCAD GEOMAP FEATURE.
2. RIGHT-OF-WAY AND BOUNDARY LINES DERIVED FROM GIS DATA SOURCES, THIS PLAN DOES NOT CONSTITUTE A BOUNDARY SURVEY.



		<b>VELCO</b>		VERMONT ELECTRIC POWER CO., INC. RUTLAND, VERMONT	
		K24 DUXBURY TO STOWE			
		K24-5 LCP-020 STRUCTURE REPLACEMENT SITE PLAN			
		SCALE: AS SHOWN	DRAWN BY: JJO	APPROVED BY:	
		DATE: 10/25/24	CHECKED BY: RCJ	DATE:	
		SHEET NUMBER: K24-5 LCP-020 SITE		REV:	
OA	10/25/24	JJO	RCJ	DRAFT	
REV	DATE	DR	CK	DESCRIPTION	



**L3.3a - Blush Hill Road and Crossroad Waterbury, VT**

Qty.	Code	Scientific Name	Common Name	Size	Spec	Notes	Original Location	Growth Rate	Max. Height
9	CC	CRATAEGUS crugalli inermis 'Crusader'	Crusader Hawthorn	8' Ht., Heavy	B&B	multi-stem, 3-5 stems	NEW	Slow to Medium	15-20'
3	MC	MALUS 'Cortland'	Cortland Apple	1 1/4" cal.	B&B		NEW	Medium	15-20' Ht.
40	RT	RHUS typhina	Staghorn sumac	30" Ht.	#3 Cont.		NEW	Medium	10-12' Ht.
10	SV	SYRINGA vulgaris	Common Lilac	7' Ht.	B&B	multi-stem	REPLANT 10	Medium	12-15'

**45-DAY PLAN**  
**10/29/2024**

(1" = 100' at Sheet Size 11"x17" Only)

REVISIONS	DATE
45-Day Landscape Plan	10/29/24
As-Built Plan	07/01/10
Issued for Bid	12/01/09
Revised per PSD Aug. 12th Mtg. & landowner	08/12/09
Revised per Landowner Mtg., Bravin - TJB, JDS	03/16/09
Revised to include Willow Trees	10/29/08
Revised per Ulteig Line Design	06/20/08
Revised per site visit	04/24/08
Revised per landowners visits	04/18/08
Revised to remove plants from road ROW	01/30/08