STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 24- -PET

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	

PREFILED TESTIMONY OF WITNESS
RYAN JOHNSON
ON BEHALF OF VELCO

December 20, 2024

Ryan Johnson's testimony introduces the other witnesses offering testimony in support of the K24-5 structure replacement Project, provides an overview of the proposed Project, estimated cost and construction schedule, and explains how this Project addresses a subset of the § 248 criteria.

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PREFILED TESTIMONY OF RYAN JOHNSON
ON BEHALF OF VERMONT ELECTRIC POWER COMPANY, INC. AND VT TRANSCO LLC

Introduction

Q1. Please state your name, occupation, and business address.

A1. My name is Ryan C. Johnson. I am employed by Vermont Electric Power Company, Inc. (together with VT Transco LLC referred to as "VELCO") to provide Project Management services for the Transmission Line Refurbishment Program and other projects. I am employed by Burns & McDonnell, 9400 Ward Parkway, Kansas City, Missouri, 64114 and work out of their local office at 110 Merchants Row, Suite 312, Rutland, Vermont 05701.

Q2. Please describe your education and employment background.

A2. I hold a Bachelor of Science Degree in Civil Engineering from Wentworth Institute of Technology. Before my current position, I was employed at Green Mountain Power (GMP) and Central Vermont Public Service (CVPS) for ten years combined as the Manager of Transmission and Substation Civil Engineering. Before that, I was employed by VELCO for eleven years in the roles of Manager of Transmission Engineering, Construction, and Real Estate as well as Civil/Substation Design Engineer. My educational and employment background are set forth in more detail in my résumé, which is attached as **Exhibit Petitioner RCJ-1** (Résumé of Ryan C. Johnson).

Q3. Have you previously provided testimony before the Vermont Public Utility Commission (the "Commission" or "PUC")?

A3. Yes, I have provided testimony in numerous PUC Dockets. A few select Dockets with GMP were 8322 (White River Transmission and Substation Upgrade), 8205 (Georgia Interconnect), 8099 (Taftsville to Hartford Reconductor), and with VELCO, Dockets 7032 (Lamoille County Project) and 6860 (Northwest Reliability Project).

Q4. What is the purpose of your testimony?

A4. My testimony supports the Petition filed by VELCO requesting a Certificate of Public Good ("CPG") pursuant to 30 V.S.A. § 248 for the replacement of Structure LCP-020 and removal of temporary Structure LCP-021 on the VELCO K24-5 Duxbury Tap-Stowe Line in Waterbury, Vermont (the "Project"). My testimony begins with an introduction of the other VELCO witnesses that address specific Section 248 criteria and describe the engineering design. I provide an overview and description of the Project and the anticipated schedule and costs, and I also address specific Section 248 criteria, (b)(1), (b)(2), (b)(3), (b)(4), portions of (b)(5), (b)(6), (b)(7), and (b)(10).

Q5. Please identify each of the other VELCO witnesses that will submit testimony, as well as the scope of their testimony.

A5. In support of this Petition, VELCO submits the prefiled testimony with exhibits sponsored by the following witnesses:

Witness	Subject
William McNamara	Describes the engineering design of the Project

Jason Smith	Provides an assessment of the Project's potential impacts on above-ground and below-ground historic sites, as well as presents the Natural Resource Assessment Report for this Project

I. Project Overview

Q6. Please generally describe the K24-5 structure replacement Project.

A6. This Project involves the permanent replacement of Structure LCP-020 on the VELCO K24-5 Duxbury Tap-Stowe Line in Waterbury, Vermont, and the removal of temporary Structures LCP-020 and LCP-021. These two temporary structures were installed in July and August 2024 in accordance with the Order Granting Waiver Pursuant to 30 V.S.A. § 248(k) (the "Waiver Order") issued by the Commission on July 24, 2024, in Case No. 24-2234-PET.

Q7. Why is Structure LCP-020 being replaced?

A7. As detailed more in the Waiver Order, the original laminate pole Structure LCP-020 was deemed unsafe after core testing was performed in mid-July 2024. It was removed and temporary structures LCP-020 and LCP-021 were installed. Although temporary structures LCP-020 and LCP-021 are sound from an engineering and structural standpoint, parties to the emergency proceeding last summer raised aesthetic and other concerns with the location of LCP-021, which led VELCO to agree to come back to the Commission for approval of a permanent structure in the location of the original structure. The Commission's Order in Case No. 24-2234-PET specifically requires that, "VELCO must file a petition for a CPG under 30 V.S.A. § 248 to install a permanent replacement of Structure LCP-020 with a steel pole and the removal of Structure LCP-021." In accordance with the Commission's Order, VELCO is proposing a permanent replacement for Structure LCP-020.

Q8. Please describe the new proposed Structure LCP-020.

A8. The original Structure LCP-020 was a self-supported laminate pole angle structure, meaning it did not use guy wires for support. VELCO is proposing to install a self-supported steel pole angle structure supported by a drilled pier concrete foundation for the permanent Structure LCP-020.

VELCO is also proposing to run new conductor between existing structure LCP-019 and permanent Structure LCP-020 to avoid having mid-span splices in this section of conductor. When temporary Structures LCP-020 and LCP-021 were installed, short sections of conductor had to be spliced in to make up the dead-end assembly connections on Structure LCP-020. Further modifications of the existing conductor would be required to transfer it over to permanent Structure LCP-020, and running new conductor is the preferable option.

Further details regarding the engineering design are provided in the prefiled testimony of William F. McNamara.

Q9. What site preparation work will be needed for installation of the new Structure LCP-020?

A9. The site preparation will include reestablishing the access routes used to construct temporary Structures LCP-020 and LCP-021. These access routes are shown on **Exhibit Petitioner RCJ-2** (Access Construction Plan). A work pad will be constructed at the new Structure LCP-020 suitable to support heavy equipment necessary to drill the foundation, set the replacement pole, and frame the structure. A work pad will also be reconstructed at the temporary LCP-021 location to facilitate the removal of that structure. A small, matted pad will

be installed adjacent to Kimberly Lane, near structure LCP-019, to allow equipment to be set up for terminating the new span of conductor.

Q10. What is VELCO's proposal with regard to temporary Structures LCP-020 and LCP-021?

A10. VELCO is proposing to remove temporary Structures LCP-020 and LCP-021 and associated guy anchors. The areas where the two structures were installed will be graded and restored to a similar condition that existed before the temporary installation. Vegetation plantings will be installed in areas where removal of vegetation was required for the installation of the temporary structures. Details of the proposed plantings are described further below in the aesthetics review section.

Q11. Is tree removal or other vegetation clearing required for the Project?

A11. No, VELCO does not anticipate additional vegetation clearing beyond what was previously cleared (approximately 5400 sq. ft.) for the temporary installation of Structures LCP-020 and LCP-021. If for some unexpected reason additional clearing is required, that vegetation would be replaced after construction is complete as previously mentioned.

Q12. Will a laydown area be needed for the Project?

A12. No, a designated laydown area will not be required for the Project. VELCO is planning to use the existing right-of-way around Structures LCP-020 and LCP-021 for staging equipment and material.

Q13. Will the Project require the installation of any permanent sound producing equipment?

A13. No.

Q14. Is an outage necessary for the replacement of new Structure LCP-020 and/or removal of temporary Structure LCP-021? If so, please describe it.

A14. Yes, VELCO is planning two line outages for the Project. The first outage will be necessary for drilling and installing the concrete pier foundation. The height of the drilling equipment will need to be located closer to the K24-5 line conductor than minimum approach distance allows. The second outage will be required for the installation of new Structure LCP-020, transfer and installation of conductors, transfer of optical ground wire, and the removal of temporary Structures LCP-020 and LCP-021.

The first outage will need to occur at least 30 days before the second outage to allow for the required cure time of the concrete. The outages are planned to occur late summer to early fall 2025 and are not expected to last longer than a week at a time. During the outage window it is expected that sub-transmission sources in the area will be capable of serving the load requirements of the Stowe Substation. Construction is planned to occur and must occur before the annual increase of load requirements normally served by the Stowe area due to winter snowmaking, which generally starts in the beginning of November.

The K24-5 outages will be coordinated with the interconnecting distribution utilities to assure there are no overlapping outages with the local sub-transmission system that could impact the ability to support load served in the area.

Q15. Will the Project require any blasting?

A15. No.

Q16. Please describe the approach and process for developing the Project's cost estimate.

A16. The first step in VELCO's process is to identify the resources required to plan, design, and construct the Project. VELCO developed the cost estimate using seven categories to establish the total cost for each Project element. The seven resource categories are as follows (1) Materials, (2) Labor, (3) Specialized Equipment, (4) Indirects, (5) Escalation, (6) Capital Interest, and (7) Contingency.

VELCO developed the Direct Costs (i.e., Material, Labor, and Specialized Equipment) using cost data from projects VELCO recently completed or which are in progress. Specifically, VELCO used cost data from ongoing structure replacement projects, including other laminate structure replacements on the K24-5 line.

VELCO used actual costs for the temporary installation of Structures LCP-020 and LCP-021, along with estimated labor and equipment costs for the proposed detailed design of permanent LCP-020. The detailed line items for each Project element were estimated into sub-categories following the Federal Energy Regulatory Commission ("FERC") system of accounts. Developing the cost estimates by FERC account enhances VELCO's ability to track costs in a manner consistent with the reporting format of actual costs as required by FERC. Also, escalation costs can be more accurately calculated by applying the Handy-Whitman cost index to the estimated costs by FERC account.

The Project team also developed the estimated costs for Indirects, Escalation, Capital Interest, and Contingency.

VELCO estimated the Indirect Costs based on the resources required to support the Project completion by resource category. Resource categories included in the Indirect estimated costs include: Engineering and Design; Operations; Planning; Communications; Environmental Engineering; Field Surveys; Impact Mitigation; Aesthetic Impact; Legal Expenses; Regulatory Permitting and Filings; Administrative Overhead; Mobilization and Demobilization; Project Management; Construction Supervision; and Project Administration.

The Indirect estimated Project costs support services are based on the number of people/hours (Level of Effort) required to support the particular function, as well as outsourced consulting services for each resource category (e.g. engineering and surveying).

VELCO Project Controls developed escalation costs by using an anticipated 2024-2028 spending plan and projected Handy-Whitman cost index and consumer price index.

VELCO applied Capital Interest (interest cost during construction) and also followed the Project spending plan as applied to the escalation cost calculation. The Capital Interest rate is typically based on the company's credit rating and is subject to change based on the financial market conditions.

Finally, the Project cost estimate also accounts for a contingency of twenty percent (20%), applied to the permanent LCP-020 installation portion of the estimate, due to the preliminary detailed designs and the uncertainty and risk associated with the current level of Project definition.

Q17. What is the total cost estimate for the Project?

A17. The total cost of the Project is estimated at $1,211,146 with contingency. **Exhibit Petitioner RCJ-3** (Project Cost Estimate) details the cost estimate.

Q18. What risk elements did VELCO consider when developing the cost estimate and how were the risks addressed in the cost estimate?

A18. Risk elements considered are the Project duration, level of certainty regarding ground condition for below-grade work, required aesthetic and environmental mitigation measures, volatility regarding escalation rates, temporary configurations necessary to support construction, and potential resource constraints at the anticipated time of construction. Per standard project management practices widely recognized by organizations such as the Project Management Institute, VELCO applied a contingency of twenty percent (20%) for the permanent installation of Structure LCP-020 to the estimate to account for these risks based on the current level of Project definition.

Q19. Are any portions of the Project expected to be eligible for Pool Transmission Facilities ("PTF") regionalized cost recovery?

A19. No, since the K24-5 Duxbury Tap-Stowe Line is a radial feed to the Stowe Substation and only serves local load, it is not a Pool Transmission Facility.

Q20. What is the Project schedule and planned construction hours?

A20. We propose to begin Project construction as soon as possible upon receiving the required permits, approvals, and materials. Since this is a unique steel pole structure and not a

standard type of pole that is regularly and more commonly used on other parts of the VELCO system, material procurement will not occur until after the required CPG is received. We estimate that once Structure LCP-020 is ordered, it will take approximately 5 months for the pole to be delivered to VELCO. Currently, the estimated construction schedule is planned from August through October 2025, which assumes receipt of a CPG by April 2025.

As discussed in testimony above, VELCO is planning to complete construction before the end of October to avoid impact to local load requirements which typically increase significantly around the beginning of November. If construction cannot be completed before the end of October 2025, we would push construction out to start in the spring of 2026, after the local load requirements reduce.

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 will take place on Sundays, federal holidays, and state holidays with the exception of Bennington Battle Day in August. VELCO requests, however, that these restrictions do not apply to construction activities that VELCO must perform during any required transmission outages that may be needed to maintain system reliability. VELCO also respectfully requests that it be allowed to perform construction activities on Bennington Battle Day given (i) the short summer construction season, and (ii) that the holiday is not widely granted as a paid day off for the workers on this Project.

II. Public Outreach [Docket No. 7081]

Q21. Has the Project development been consistent with the public outreach contemplated in Docket No. 7081 Memorandum of Understanding ("MOU")?

A21. Yes. I describe our public outreach efforts below.

Q22. Please describe VELCO's public outreach efforts related to this Project, including coordination with parties that participated in the 248(k) proceeding.

A22. VELCO began its outreach on this Project with the landowners that obtained party status during the emergency hearings of July 19 and 22, 2024, immediately after the July 24, 2024 PUC Order granting a waiver for the emergency installation of temporary Structures LCP-020 and LCP-021. At that time, communications were provided on the plans for the installation of the temporary structures and the progress of construction. Since completion of construction in August, regular communications have been provided to the landowners on the progress towards filing this Petition and of the Project design, including sharing an example photo of a structure similar to the proposed permanent Structure LCP-020.

On December 3, 2024, a site visit was conducted with the landowners to review and discuss the design of the Project and planned aesthetic mitigation plantings.

The 45-day pre-CPG advance notice with a Project description was sent out on October 29, 2024, to the Town of Waterbury select board and planning commission, along with the regional planning commission, adjoining landowners (which include those landowners that intervened in the Section 248(k) proceeding), the Department of Public Service, the Agency of Natural Resources, and other state agencies pursuant to Commission rules on service of advance notices. **Exhibit Petitioner RCJ-4** (45-day Advance Notice Package).

Q23. How did VELCO address the comments and input that were received from its public outreach efforts?

A23. VELCO received and promptly answered questions from the landowners with party status throughout the communication process.

III. Orderly Development [30 V.S.A. § 248(b)(1)]

Q24. Will the Project unduly interfere with the orderly development of the region giving due consideration to recommendations from municipal and regional planning commissions and municipal legislative bodies, and land conservation measures included in the municipal plan?

A24. No. I have reviewed the Town of Waterbury's 2018 Municipal Plan and the Central Vermont Regional Planning Commission's 2016 Regional Plan (Amended Effective November 17, 2020). The Project is consistent with the plans as they do not have any policies regarding energy or land use that would specifically pertain to or contradict the Project. The Energy section of both plans discusses "Key Challenges and Trends," which describe the need to have adequate three-phase grid infrastructure to support renewable energy development for the foreseeable future. See **Exhibit Petitioner RCJ-5** (referenced sections of town and regional plans). The K24-5 line is a key component in providing adequate three-phase infrastructure to the area. The Project helps support the reliability of the K24-5 line. Further discussion on the consistency of this Project with the Town and Regional Plan is provided in **Exhibit Petitioner RCJ-6** (Aesthetics Review Memorandum).

Q25. Has VELCO received any substantive comments from the municipal or regional commissions related to the criteria of 30 V.S.A. § 248(b)? And if so, how has VELCO addressed them?

A25. VELCO did not receive any comments from the municipal or regional planning commissions in response to the 45-day notice letter.

IV. Need for Present and Future Demand for Service [30 V.S.A. § 248(b)(2)]

Q26. Is the Project required to meet the need for present and future demand for service which could not otherwise be provided in a more cost-effective manner through energy conservation programs and measures and energy-efficiency and load management measures, including those developed pursuant to the provisions of subsection 209(d), section 218c, and subsection 218(b) of V.S.A. Title 30?

A26. Yes. When the laminate pole structure was failing last summer, an immediate replacement was needed to address the deficient transmission line assets that support loads in the Lamoille County Area. The K24-5 line was approved for construction in Docket 7032 and found to be required to meet the present and future demand of service which could not otherwise be provided in a more cost effective manner through energy conservation programs and measures and energy efficiency and load management measures.

Q27. Can the same benefits be achieved by transmission alternatives?

A27. No. Although VELCO would normally present a proposed Project to the Vermont System Planning Committee (VSPC) Geographic Targeting Subcommittee for a non-transmission alternatives analysis, the emergency nature of this matter did not allow for that screening before VELCO had to seek (and was granted) a waiver to install temporary structures. Further, the waiver that was granted to VELCO explicitly required that VELCO file this Petition for a permanent replacement for Structure LCP-020.

Q28. Did VELCO review this Project with the Vermont distribution utilities?

A28. VELCO reviewed the specifics of this Project with Stowe Electric Department since the K24-5 line directly feeds the Stowe substation. Stowe Electric did not express concerns with the Project. Communication has been provided to distribution utilities with co-existing facilities on other laminate poles on the K24-5 line and other lines in the VELCO system. That communication described the premature deterioration of the laminate poles and the plans for replacement.

Q29. Has VELCO considered and assessed whether the proposed Project represents the least-cost alternative to resolving the deficiencies discussed above?

A29. Yes. Although it would be less costly to leave the temporary structure in place as a permanent structure, that is not an allowed option here. This Project is a requirement of the July 24, 2024 Commission Order in Case No. 24-2234-PET, which requires VELCO to install a permanent replacement of structure LCP-020 with a steel pole and remove structure LCP-021.

Since the laminate wood poles used in the original line design have proven to deteriorate prematurely, the next most cost-effective and proven reliable equivalent alternative to the original Structure LCP-020 design is to use a self-supported tubular steel structure on a concrete foundation.

Another self-supported structure type offered in the industry is lattice steel. This option was not selected because it is more costly due to requiring a larger foundation footprint and the significant amount of labor required to construct.

Q30. Can the introduction of demand side management ("DSM") or distributed generation ("DG") alleviate the need for the Project?

A30. No. As the need for the Project is to replace deficient transmission line assets, DSM or DG cannot provide a direct replacement for this transmission path.

V. System Stability and Reliability [30 V.S.A. § 248(b)(3)]

Q31. What impact will this Project have on system stability and reliability?

A31. The Project will have no adverse impact on system stability and reliability of VELCO's transmission system. The Project is expected to improve system safety and reliability by replacing a deficient laminate wood structure with a steel structure.

VI. Economic Benefit to the State [30 V.S.A. § 248(b)(4)]

Q32. Will the Project result in an economic benefit to the State?

A32. Yes. The Project will create economic and safety benefits for the citizens of Vermont. The Project will increase property tax revenues based on the capital investment required for the upgrades. Additionally, there will be some local economic benefits associated with engaging local businesses and contractors during the Project's construction phase.

VII. Air Pollution (Noise), Public Health and Safety [30 V.S.A. § 248(b)(5)]

Q33. Has VELCO evaluated the Project's sound impacts?

A33. No, the Project does not install any sound producing facilities.

Q34. Will the Project have any adverse effects on the health, safety, or welfare of the public or adjoining landowners?

A34. No. VELCO will design and construct the Project in accordance with National Electric Safety Code requirements. VELCO will adhere to prudent utility construction practices throughout the construction phase to not endanger the public or adjoining landowners.

VIII. Transportation Systems/Traffic [10 V.S.A. § 6086(a)(5)]

Q35. Please describe the Project's potential impacts with respect to use of public roads.

A35. VELCO does not expect long-term traffic impacts from the Project. There are potential, minor short-term traffic impacts due to construction equipment and material deliveries.

Q36. Will the Project require the construction of new access roads?

A36. No. Only temporary access locations into the right-of-way will be utilized.

Q37. Will the Project affect railway, waterway, or air transportation?

A37. No.

IX. Educational & Municipal Service [10 V.S.A. § 6086(a)(6)&(7)]

Q38. What impact will the Project have on educational and municipal services?

A38. The Project is not anticipated to have any impact on educational or municipal services because it will not create the need for any additional educational or municipal services.

X. Aesthetics [30 V.S.A. § 248(b)(5), 10 V.S.A. § 6086(a)(8)]

Q39. Will the Project adversely impact aesthetics?

A39. No. VELCO retained T.J. Boyle & Associates (Boyle) to review and assess the potential aesthetic impact associated with this Project and prepare a report of its findings, which is attached as Exhibit Petitioner RCJ-6 (Aesthetic Analysis Memorandum). The proposed aesthetic mitigation planting plan is contained in Appendix A to Exhibit Petitioner RCJ-6.

Boyle concluded that the proposed self-weathering steel structure will have an adverse effect on the character of the area, particularly to the residential uses in the immediate vicinity of the Project. Specifically, Boyle found that the slight relocation of the new structure #LCP-020, and the change in material from a laminated wood pole to a self-weathering steel pole results in a limited increase in transmission structure visibility and industrial character. However, the incorporation of new and replacement landscape plantings and the use of self-weathering steel rather than galvanized steel will lessen the industrial character of the proposed structure, as well as match materials on other existing structures elsewhere along the K24 transmission corridor. As such, the Project as proposed will not be unduly adverse to the aesthetics and the scenic and natural beauty of the area. Additionally, the proposed Project incorporates line design characteristics and materials permitted and installed for the original Lamoille County 115 kV Project (PUC Docket No. 7032).

XI. Development Affecting Public Investments [10 V.S.A. § 6086(a)(9)(K)]

Q40. What impact will the Project have on public investment in a public resource?

A40. None. The Project will not unnecessarily or unreasonably endanger any public or quasi-public investment in any facility, service, or lands, or materially jeopardize or interfere with the function, efficiency, or safety of, or the public's use or enjoyment of or access to any facility, service, or lands.

XII. Compliance with Integrated Resource Plan [30 V.S.A. § 248(b)(6)]

Q41. Is the Project consistent with VELCO's least cost Integrated Resource Plan?

A41. VELCO does not have an integrated resource plan. As a transmission-only company, VELCO periodically produces transmission studies. Specifically, VELCO issued a 2024 Vermont Long-Range Transmission Plan. The 2024 Plan explains that:

> Sometimes routine or asset condition activities require significant projects, such as the refurbishment of substation equipment and the replacement of a relatively large number of transmission structures to replace aging equipment or maintain acceptable ground clearances. Although Docket 7081 MOU requirements do not apply to these types of projects, VELCO is listing these projects for the sake of information. These projects are needed to maintain the existing system, not to address system issues resulting from load growth, and VELCO routinely shares plans for many of these projects with the VSPC as part of its non-transmission alternatives project screening process.

2024 VELCO Plan, at page 19. The Project complies with the 2024 VELCO Plan because it is a routine refurbishment project as contemplated therein.

XIII. Compliance with Vermont Electric Energy Plan [30 V.S.A. § 248(b)(7)]

Q42. Is the Project consistent with the 2022 Comprehensive Energy Plan?

A42. Yes. Vermont's Comprehensive Energy Plan (CEP) identifies objectives that utilities must meet in serving the public interest, such as serving its customers at the lowest life-cycle costs, including environmental and economic costs, and reducing greenhouse gas emissions. The CEP "balances the principles articulated in 30 V.S.A. § 202a of energy adequacy, reliability, security, and affordability, which are all essential for a vibrant, resilient, and robust economy and for the health and well-being of all Vermonters." CEP executive summary at 1. The CEP also acknowledges that the "grid needs to continue to perform — to reliably deliver the required energy to customers, every hour of the year, to and from resources that are exponentially more distributed, diverse, and variable, under increasing pressure from severe weather events and cyberattacks, while weaning off fossil resources and staying affordable." CEP at ES-24. The CEP states that Vermont's overarching goal for the grid should be "A secure and affordable grid that can efficiently integrate, use, and optimize high penetrations of distributed energy resources to enhance resilience and reduce greenhouse gas emissions." CEP at page 60. The Project strikes the proper balance between these objectives. Specifically, VELCO has proposed a Project that restores and maintains system reliability and safety. Moreover, VELCO's proposal to perform the Project in an area that already hosts other electric infrastructure limits the environmental impact. VELCO has asked the Department for a determination under 30 V.S.A. § 202(f) that the Project is consistent with the 20-Year Plan.

XIV. Impact on Vermont Utilities and Customers [30 V.S.A. §248(b)(10)]

Q43. Can existing or planned transmission facilities serve the Project without creating an undue adverse effect on Vermont utilities, customers, or existing transmission facilities?

A43. Yes. Existing transmission facilities can serve the Project without creating an undue adverse effect on Vermont utilities and customers. The proposed Project is designed to enhance the existing utility system and to improve service to customers by replacing deficient transmission equipment.

Conclusion

Q44. Does this conclude your testimony at this time?

A44. Yes, it does.

DECLARATION OF RYAN JOHNSON

I declare that the testimony and exhibits that I have sponsored are true and accurate to the best of my knowledge and belief and were prepared by me or under my direct supervision. I understand that if the above statement is false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

12/20/24 — Date

/s/ Ryan Johnson — Ryan Johnson