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September 10, 2013

Ms. Susan Hudson, Clerk
Vermont Public Service Board
112 State Street
Montpelier, VT 05620-2701

VIA ELECTRONIC MAIL

Re: EEU 2013-01 Demand Resource Plan Proceeding

Dear Mrs. Hudson:

Pursuant to the Board's August 1, 2013 order, Green Mountain Power Corporation ("GMP" or "Green Mountain") provides the following comments on the proposed scenarios, including modeling input assumptions, and Quantifiable Performance Indicators ("QPIs") recommendations for the Demand Resource Plan ("DRP").

The Vermont Department of Public Service ("PSD" or "Department") has proposed three different Scenario Modeling Recommendations; 1) level budget with inflation; 2) sustained growth; and 3) aggressive growth. Because aggressive growth could result in a dramatic increase in charges to our customers, Green Mountain does not support this proposal. That being said, Green Mountain believes that it would be appropriate for all proposals to be fully vetted and reviewed during this proceeding.

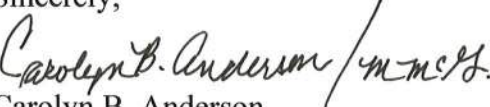
With regard to the QPIs, Green Mountain recommends that the Board consider the inclusion of a QPI aimed at reducing Vermont's average monthly coincident peak. Such a focus has the potential to reduce Vermont's share of the region's electric transmission charges (the Regional Network Service or "RNS" charge).

Finally, Green Mountain understands that during the August 27, 2013 workshop, Vermont Energy Investment Corporation ("VEIC") proposed a workshop to consider the roles load shaping and electrification (even with the potential for increased usage) can play in efficiency. Green Mountain supports the Board holding a workshop to consider these matters.

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Thank you for providing us with the opportunity to comment. In the future, please include Bruce Bentley at bruce.bentley@greenmountainpower.org and me, carolyn.anderson@greenmountainpower.org on the service list in this matter.

Sincerely,


Carolyn B. Anderson

/MMcG
Enclosure