

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 24A-2002

2024 Vermont Long-Range Transmission Plan	
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Case No. 24-3351-INV

Investigation into the potential need for transmission system improvements identified in the 2024 Vermont Long-Range Transmission Plan	
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Order entered: 11/05/2024

**ORDER ADDRESSING 2024 VERMONT LONG RANGE TRANSMISSION PLAN
AND OPENING AN INVESTIGATION**

I. INTRODUCTION

This matter concerns the 2024 Vermont long-range transmission plan filed by Vermont Electric Power Company (“VELCO”). Under the requirements of 30 V.S.A. §218c(d) and Docket 7081, VELCO is required to file, at least every three years, a 20-year long-range transmission plan with the Vermont Public Utility Commission (“Commission”).¹ Pursuant to Section 218c(d)(1), the objective of the plan is to identify the potential need for transmission system improvements as early as possible to allow sufficient time to plan and implement more cost-effective non-transmission alternatives to meet reliability needs, wherever feasible.²

On June 28, 2024, in Case No. 24A-2002, VELCO filed a 20-year long-range transmission plan (the “Plan”).³

On September 25, 2024, the Commission conducted a workshop to discuss the Plan. VELCO made a presentation at the workshop and responded to questions.

The Plan identifies potential transmission needs to address peak demand that is forecasted to grow due to the electrification of heating and transportation, with the earliest reliability need anticipated by 2029. The Plan identifies one statewide and four regional areas of concern on the

¹ 30 V.S.A. § 218c(d)(1); *Investigation into Least-Cost Integrated Resource Planning for Vermont Electric Power Company, Inc.’s Transmission System*, Docket 7081, Orders of 6/20/2007, 8/1/2012, and 1/20/2013.

² 30 V.S.A. § 218c(d)(1).

³ 2024 Vermont Long-Range Transmission Plan, Case No. 24A-2002, filed on 6/28/2024.

bulk or predominantly bulk transmission system. For each area of reliability concern, the Plan provides an estimated transmission improvement and a preliminary non-transmission alternative analysis. The preliminary analysis identifies the amount and location of load management that may address the reliability concerns.⁴

The Plan also includes a solar photovoltaic forecast that provides an analysis of the transmission system's ability to host distributed generation. Assuming the historical pattern continues, the Plan identifies that distributed generation growth will exceed the capacity of the existing transmission system. However, by optimizing the location of additional installations, the Plan states that the transmission system can accommodate much more distributed generation before needing to resolve transmission or sub-transmission constraints.⁵

Pursuant to 30 V.S.A. §218c and Docket 7081, a process has been established for the full, fair, and timely consideration of cost-effective non-transmission alternatives. The process is binding on all Vermont utilities.⁶ Pursuant to Section 218c(d)(6), the retail electricity providers in affected areas must incorporate the Plan into their individual least-cost integrated planning processes and must cooperate as necessary to develop and implement joint least-cost solutions to address the reliability deficiencies identified in the Plan.⁷

II. DISCUSSION AND CONCLUSION

The Commission appreciates the work that VELCO, the distribution utilities, the energy efficiency utilities, and the Vermont System Planning Committee members ("VSPC") have taken to develop the long-range transmission plan. The Plan identifies several transmission reliability areas of concern that affect all Vermont utilities. The preliminary non-transmission alternative analysis in the Plan shows the amount of load reduction needed to address all or some of the reliability deficiency identified in each area of concern.

Under the requirements of 30 V.S.A. §218c and Docket 7081, a detailed non-transmission alternative analysis for each reliability deficiency will be conducted over the next year by the Vermont utilities⁸, with a lead utility identified for ensuring that each analysis is

⁴ Plan at 40-51.

⁵ Plan at 56-71.

⁶ Docket 7081, Orders of 6/20/2007, 8/1/2012, and 1/20/2013.

⁷ 30 V.S.A. § 218c(d)(6).

⁸ Vermont utilities include VELCO and the electric distribution utilities.

completed in a timely manner. Within two years from the publication of the Plan, the affected utilities must select a solution and an implementation strategy to address each reliability deficiency and determine a cost allocation.⁹ During the two-year process, the lead utility will regularly report to the VSPC on the status of the analysis. In addition, the lead utility will conduct one or more public engagement processes to involve affected persons and the public generally in the analysis of alternatives and the selection of a solution.¹⁰

The Commission has statutory authority to facilitate the resolution of the reliability deficiencies identified in the Plan. Pursuant to Section 218c(d)(5), based on information contained in a transmission system plan, the Commission and the Vermont Department of Public Service (“Department”) must use their powers under 30 V.S.A. § 218c “to encourage and facilitate the resolution of reliability deficiencies through nontransmission alternatives, where those alternatives would better serve the public good.”¹¹ The Commission, upon notice and hearings, “may enter such orders as it deems necessary to encourage, facilitate, or require the resolution of reliability deficiencies in a manner that it determines will best promote the public good.”¹²

Accordingly, we are opening an investigation for the review of the potential need for transmission improvements identified in the Plan and to facilitate the resolution of reliability deficiencies through the implementation of more cost-effective non-transmission alternatives. The proceeding will be a fact-finding investigation to encourage and facilitate the implementation of non-transmission solutions. The investigation will include regular reporting by the lead utility consistent with the Docket 7081 process, possible additional information requests by the Commission, and the holding of workshops. The proceeding will be conducted as a non-contested case with participation from the Vermont utilities, the Department, and the public. A hearing officer will conduct the proceeding.

We recognize that Docket 7081 establishes a process for the consideration of non-transmission alternatives to address the reliability deficiencies identified in Plan. The investigation will not duplicate that process. Instead, the investigation allows the Commission to

⁹ *Order Approving Amended MOU*, Docket 7081, Order of 1/20/2013, Amended MOU at Paragraphs 33-49.

¹⁰ Docket 7081, Order of 1/20/2013, Amended MOU at Paragraphs 50-59.

¹¹ 30 V.S.A. § 218c(d)(5).

¹² 30 V.S.A. § 218c(d)(5).

remain informed, provide feedback, and exercise our Section 218c(d)(6) authority during the two-year process established under Docket 7081, rather than wait until the end of process.¹³ The investigation also allows for the coordination of overlapping efforts under the flexible load management working group in Case No. 23-2345-PET and the implementation of the Environmental Justice Act.¹⁴

Finally, the Plan identifies that distributed generation growth may exceed existing transmission system hosting capacity and that optimizing the location of distributed generation may avoid the need to resolve transmission or sub-transmission constraints. The Commission agrees with the Plan's conclusion that more statewide coordination and planning are needed. Accordingly, the proceeding will include a fact-finding investigation of how distributed generation growth can be managed and coordinated to avoid transmission, sub-transmission, and distribution constraints and how this management will be coordinated with the implementation of non-transmission solutions that address the reliability deficiencies.

III. ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED by the Public Utility Commission ("Commission") of the State of Vermont that:

1. Pursuant to 30 V.S.A. § 218c(d)(5), an investigation is opened in Case No. 24-3351-INV for the review of the potential need for transmission improvements identified in the 2024 Vermont long-range transmission plan and to facilitate the resolution of reliability deficiencies through the implementation of more cost-effective non-transmission alternatives.

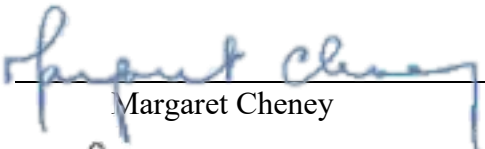
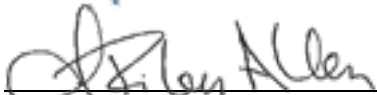
2. Pursuant to 30 V.S.A. § 8, Mary Jo Krolewski, Utilities Analyst, is appointed to serve as Hearing Officer in the proceeding in Case No. 24-3351-INV. The Commission will establish a service list for this proceeding, which is not a contested case. Anyone interested in participating should contact the Clerk of the Commission.

3. Case No. 24A-2002 will be closed.

¹³ For example, the lead utility will regularly report to the VSPC on the status of the analysis; these reports should also be filed with the Commission.

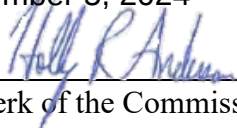
¹⁴ Public Act No. 154, (2022 Vt., Adj. Sess.).

Dated at Montpelier, Vermont, this 5th day of November, 2024.

	)	
Edward McNamara	)	PUBLIC UTILITY
	)	
	)	
Margaret Cheney	)	COMMISSION
	)	
	)	
J. Riley Allen	)	OF VERMONT

OFFICE OF THE CLERK

Filed: November 5, 2024

Attest: 
Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Commission within 30 days. Appeal will not stay the effect of this Order, absent further order by this Commission or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Commission within 28 days of the date of this decision and Order.

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