



January 31, 2025

Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, Drawer 20
Montpelier, VT 05620

Re: Case 24 - 3351 – Vermont’s Long Range Transmission Plan

Dear Ms. Anderson,

This letter filing is responsive to the Public Utility Commission’s (“Commission”) Order of December 27, 2024, requesting comments and recommendations in the above captioned proceeding.

Case 24 – 3351 was opened for the purpose of reviewing the “potential need for transmission improvements identified in [Vermont Electric Power Company’s (“VELCO”)] 2024 Long Range Transmission plan (“the Plan”) and to facilitate the potential resolution of reliability deficiencies through the implementation of cost-effective non-transmission alternatives (“NTA”)”¹. The City of Burlington Electric Department (“BED”) is an active member of the Vermont System Planning Committee (VSPC) and has reviewed the Plan. Based on our review and participation in VSPC meetings, BED believes that the Plan could benefit from additional analyses and discussion relative to the following potential issues:

- Duration, frequency, and load profile of transformer overloads under N-1-1 conditions;
- Rate of increase in the deployment of distributed generation (“DG”) and other distributed energy resources (“DER”);
- Rate of increase in the deployment of electric vehicles and advanced heat pumps;
- Rate of increase in the deployment of energy storage in key areas of the state;
- Whether existing rate structures, such as EV rates, could alleviate forecasted overload conditions, and;

¹ Order of December 27, 2025, at pg. 1



- Whether future dynamic rate structures could alleviate forecasted overload conditions.

BED agrees with VELCO that statewide coordination and planning is needed to develop a range of potential cost-effective solutions designed to maximize transmission, sub-transmission, and distribution reliability. In addition to ensuring reliability, any proposed solution should be predicated on local distribution utility control over DERs, particularly when such assets are deployed by a distribution utility. Local utility control is important to make sure these assets are available to alleviate distribution level constraints before being utilized to relieve transmission level constraints. Absent local DER control, transmission level constraints could unexpectedly cause distribution system constraints and undermine local reliability. Additionally, any proposed solution to a transmission constraint should not shift transmission level costs to a local distribution utility affected by the proposed solution unless there is a clear net benefit to the affected local distribution utility. BED recommends that additional workshops focused on VELCO's Plan, and its findings be held, along with discussion on GMP's proposed NTAs. BED also recommends that GMP and/or VELCO submit regular status updates with the Commission, as well as a 2025 year-end progress report.

Thank you for the opportunity to submit these comments and recommendations. BED looks forward to working through the VSPC to fully evaluate VELCO's Long range transmission plan. Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Thomas Lyle