Efficiency Vermont

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January 31, 2025

Holly Anderson, PUC Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 24-3351-INV | Investigation into the potential need for transmission and system improvements identified in the 2024 Vermont Long Range Plan

Dear Ms. Anderson,

On November 5, 2024 the Vermont Public Utility Commission ("PUC" or "Commission") opened an investigation in the above-referenced proceeding for the purpose of reviewing the "potential need for transmission improvements identified in the 2024 Vermont long-range transmission plan ("the Plan") and to facilitate the potential resolution of reliability deficiencies through the implementation of cost-effective non-transmission alternatives ("NTAs"). In its Scheduling Order dated December 27, 2024, the Commission seeks feedback from stakeholders "with respect to the Plan's conclusion that more statewide coordination and planning are needed and address how distributed generation growth can be optimally managed and coordinated. Participants' filings should address further process, including the need for additional filings or the scheduling of workshops." Efficiency Vermont is pleased to provide these comments that are responsive to the Commission's request.

Efficiency Vermont is an active participant in the Vermont System Planning Committee ("VSPC"), and has participated in multiple reviews of the Plan, and provided comments to VELCO prior to its completion in 2024. As a general matter, Efficiency Vermont praises VELCO's comprehensive and transparent review of the transmission system, and the ability to have forthright discussion over the impacts of electrification and renewables on the electric system. In the past, Efficiency Vermont has been utilized by VELCO and the VSPC for delivery of "geo-targeted" programs that serve as a least-cost NTAs.

It is within this context that Efficiency Vermont provides several suggestions for the Commission to consider in this proceeding that may further provide actionable details from the VELCO Plan:

- What are the time, duration, and frequency of transformer overloads under N-1-1 conditions?

- What are the parameters and sensitivities to electrification and load growth in the state? What assumptions about growth and load profiles are being utilized in the Plan's forecast that might be instructive to a potential solution? What metrics should be tracked to determine if this forecast is likely to materialize?

- Similar to questions surrounding load growth, what attributes of the growth of distributed generation and time of generation throughout the state should be understood?

- How can the use of flexible load resources serve as a potential mitigating solution to overload conditions and/or absorption of excess renewables?

- What are the avoided costs that should be used as a basis for deciding whether NTA investments are cost-effective?

- How should stakeholders identify the time for planning, implementation, and measuring results? Working backward from when known transmission needs are documented in the Plan, there should be a clear timeline for exploring a variety of solution sets, designing NTA programs, and still leave enough time to implement solutions in advance of modeled deficiencies.

Efficiency Vermont supports the direction of this proceeding, and will be pleased to support the Commission's investigation in whatever capacity it deems would be helpful.

Please do not hesitate to contact me if you have any questions regarding these comments.

Best Regards,

David C. Westman

Director, Regulatory & State Agency Affairs

Efficiency Vermont