



Community is at the **Heart** of VPPSA.

Vermont Public Power Supply Authority

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Ms. Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street, 4th Floor
Montpelier, VT 05620-2071

VPPSA Response to PUC Order Addressing Schedule and Process in Case No. 24-3351-INV

The Vermont Public Power Supply Authority ("VPPSA") and its member utilities¹ appreciate the opportunity to provide comments in response to the Vermont Public Utility Commission's ("PUC" or "Commission") request for comments regarding 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.

On December 27, 2024, the Commission requested comments and recommendations with respect to the Plan's conclusion that more statewide

¹ VPPSA Member Utilities include Barton Village; Village of Enosburg Falls; Hardwick Electric Department; Village of Jacksonville; Village of Johnson; Ludlow Electric Light Department; Lyndon Electric Department; Morrisville Water & Light; Northfield Electric Department; Village of Orleans; and Swanton Village.

coordination and planning are needed and address how distributed generation growth can be optimally managed and coordinated .

VPPSA supports the concept of planning and coordinating the growth of distributed generation and guiding the development of DG assets to locations across the State that contribute to avoidance of transmission constraints and unnecessary transmission investments. That said, VPPSA firmly believes any mechanism relying on active control of DER assets needs to occur at the distribution utility level to ensure that actions taken for statewide benefit do not lead to offsetting localized problems or cause cost shifting among stakeholders.

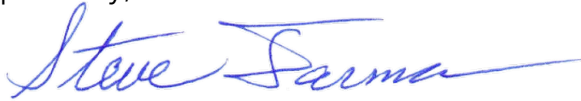
In addition to locational coordination of distributed generation, the VELCO Long Range Transmission Plan discusses the desire to make use of transmission focused NTA's and coordinate them, in their myriad forms, with DG siting considerations. VPPSA notes that the reliance on active control of NTA's raises a different and more complicated set of policy requirements and potential outcomes than those associated with simply ensuring proper location of DERs. VPPSA is concerned that mechanisms employed to implement active management of NTA's have the potential to negatively impact distribution level reliability, as loads are shifted locally or in time, and may result in significant cost shifting across stakeholders.

VPPSA urges the Commission to provide for sufficient process in this proceeding to explore in detail both the potential pitfalls, costs and benefits that

accompany active management of DER's and NTA's with an eye toward avoiding shifting of costs or reliability problems across stakeholders. VPPSA notes that working through the issues at hand may require more than can be accomplished in a round or two of written comments and recommends the Commission consider multiple workshops, as eventual detailed discussion requires.

VPPSA appreciates the opportunity to provide comments regarding the potential need for coordination of distributed generation growth and non-transmission solutions to avoid transmission, sub-transmission and distribution constraints. If you have any additional questions or seek further clarification, please do not hesitate to contact VPPSA.

Respectfully,



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