

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Petition of Green Mountain Power for investment in )  
its customer-driven Energy Storage System Program )  
pursuant the Tariffed New Initiative provision of the ) Case No. 25-\_\_\_\_-PET  
Multi-Year Regulation Plan (MYRP). )

**PETITION FOR INVESTMENT IN GREEN MOUNTAIN POWER’S  
CUSTOMER-DRIVEN ENERGY STORAGE SYSTEM TARIFF UNDER  
MULTI-YEAR REGULATION PLAN**

Green Mountain Power Corporation (“GMP”) petitions the Public Utility Commission (“Commission”) pursuant to 30 V.S.A. § 218d, Section IV(A)(iv) of GMP’s Current Multi-Year Regulation Plan (“MYRP” or the “Plan”), and the Commission’s Order in Case No. 24-1715-PET (“2024 ESS Order”) for approval of additional capital investments up to \$32 million in support of GMP’s Energy Storage System Tariff (“ESS program”) under the Tariffed New Initiatives provision of the MYRP. This Petition is made in order to meet strong customer demand, and to report and account for this additional customer-driven investment as set forth herein. In support of this Petition, GMP states as follows:

1. GMP is a Vermont corporation engaged in the generation, transmission, distribution, and sale of electricity directly to the public. Its principal office is located at 163 Acorn Lane, Colchester, Vermont 05446.
2. As an integrated electric utility, GMP is subject to the Commission’s regulatory authority over its electric rates and service. *See* 30 V.S.A. §§ 203, 209, 218, 218d, 219, 225, 226, and 227.
3. GMP is currently under a four-year MYRP, through September 30, 2026, which was approved by the Commission under 30 V.S.A § 218d in Case No. 21-3707-PET.
4. As set forth in the supporting testimony and exhibits, GMP seeks approval for continued investment in our customer-driven ESS program pursuant to 30 V.S.A. § 218d and Section

IV(A)(iv) of GMP's MYRP, and consistent with the Commission's 2024 ESS Order, so that GMP can continue to meet strong customer demand and deliver overall program benefits for all customers.

5. Specifically, GMP is requesting the Commission approve that GMP invest capital up to an additional \$32 million in the ESS program over the remainder of the MYRP and the ESS tariff authorization. GMP requests to invest up to that amount based on actual completed installations and to use the regulatory accounting and rate treatment previously approved, as described below and in the accompanying prefiled testimony and exhibits of Madeline Murray-Clasen.

6. The ESS program was approved by the Commission in Case No. 19-3167-TF and extended in Case No. 21-5254-TF. It is authorized through September 30, 2026.

7. The ESS program is a unique customer-driven program based on voluntary signups, where each additional ESS installation provides net benefits to all GMP customers through avoided power supply costs and other value streams that more than cover the system cost.

8. By 2023, customer interest greatly exceeded the initial ESS program installation cap of 5 MW and 500 customers annually. Recognizing the customer demand and benefits for customers, the Commission removed the installation cap by Order dated August 17, 2023, in Case No. 23-1335-TF ("Lift the Cap Order").

9. Following the Lift the Cap Order, GMP subsequently petitioned the Commission to treat the ESS program as a Tariffed New Initiative under Section IV(A)(iv) of GMP's MYRP and requested authorization for \$15 million in additional investments to meet continuing customer demand for the program. The Commission approved GMP's request in the 2024 ESS Order and also established a process for any further capital requests to support the ESS program.

10. Customer demand for the program has remained strong since the 2024 ESS Order.

Between September 2024 and March 2025, customer signups and completed installations have averaged about 85 per month. GMP expects this steady pace to continue over the remainder of the MYRP and the ESS tariff authorization, resulting in about 1,400 additional installations in that period.

11. As a result, GMP is requesting up to \$32 million in additional capital investment subject to the Tariffed New Initiative provisions of MYRP Section IV(A)(iv).

12. Consistent with Section IV(A)(iv) of the MYRP and the 2024 ESS Order, GMP would incorporate costs associated with ESS program projects in base rates after they are closed to plant in subsequent rate filings as follows:

- ESS amounts associated with this additional \$32 million investment request closed through September 30, 2025, will be incorporated into GMP's traditional FY27 rate case, to be filed on or around January 15, 2026.
- ESS amounts closed to plant after September 30, 2025, will be incorporated annually into future annual base rate filings under any future regulation plan as set forth in the review of that plan.

13. The prefiled testimony and exhibits accompanying this Petition demonstrate that the additional ESS program investment, along with the proposed reporting and accounting, continue to meet the requirements of the MYRP and deliver net benefits to all GMP customers, even without accounting for the resilience they provide for those who lease them.

14. Accompanying this request is an updated financial analysis narrative testimony that demonstrates the ESS program will continue to provide net positive benefits for all customers and addresses the Commission's requirement in the 2024 ESS Order that any future capital

request include detailed analysis that “(1) incorporates the actual results from any peak reduction, forward capacity market, regional network service, or other revenue-generating or cost-avoiding opportunities; (2) describes any changes to future assumptions about those revenue-generating or cost-avoiding opportunities; and (3) explains how uncertainty in the future of those revenue-generating or cost-avoiding effects is addressed.” 2024 ESS Order at 8.

15. For the reasons stated above, GMP respectfully requests the Commission approve its request for additional investments to meet customer demand in this Tariffed New Initiative Program under Section IV(A)(iv) of the MYRP, and to continue reporting and accounting requirements for these investments consistent with the 2024 ESS Order, as proposed herein and in the material accompanying this Petition.

WHEREFORE, GMP respectfully requests that the Commission:

1. Approve GMP’s request for additional investment under Section IV(A)(iv) of GMP’s MYRP, authorizing GMP to report for review and approval, as set forth above, capital investments up to \$32 million above the currently approved New Initiatives capital budget in subsequent rate filings;
2. Schedule promptly a prehearing conference on the Petition and issue an order establishing procedural requirements, including scheduling technical hearings, if needed, and as the Commission deems appropriate, for its review of the Petition;
3. Continue all previously-ordered energy storage reporting requirements;
4. Make findings of fact and conclusions of law with respect to the matters set forth in this Petition; and
  - (a) Take any other actions the Commission deems necessary or advisable in connection with this Petition.

Dated at Burlington, Vermont this 12<sup>th</sup> day of May, 2025.

GREEN MOUNTAIN POWER CORPORATION

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