

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 25-0719-TF

Tariff filing of Green Mountain Power Corporation for a proposed Zone 4 Energy Storage tariff to be effective with bills rendered on or after May 30, 2025

**RECOMMENDATION OF THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

On April 15, 2025, Green Mountain Power Corporation (“GMP”) filed a proposed Zone 4 Energy Storage Tariff (“Tariff”) with the Vermont Public Utility Commission (“Commission”) pursuant to 30 V.S.A. § 225. The Tariff seeks approval of up to \$30 million to deploy residential battery energy storage systems as part of GMP’s broader Zero Outages Initiative (“ZOI”), first proposed in Case No. 23-3501-PET (“ZOI Petition”). The Commission’s October 18, 2024 order in that case (“ZOI Order”) approved \$150 million of initial resilience investments for grid upgrades and hardening “focused on GMP’s EJ-G7 and 56G1 circuits and the circuits included on GMP’s ‘20 least reliable circuits’ list.”<sup>1</sup> While the ZOI Petition also sought approval of \$30 million for storage, the Commission had several specific concerns about the proposal and deferred further review until GMP filed a separate tariff for approval.<sup>2</sup> The Tariff proposed here follows directly from the ZOI Order, and GMP has included supporting testimony.<sup>3</sup>

GMP proposes to offer whole-home battery energy storage installations for approximately 1,200 “Zone 4” customers on the EJ-G7 (Brattleboro), 56G1 (Wilmington), CH-G11 (Chester), and DM-G6 (Dummerston) circuits.<sup>4</sup> “Zone 4” is the classification GMP has given to the most

---

<sup>1</sup> *Petition of Green Mountain Power*, Case No. 23-3501-PET, Order of 10/18/24 at 24.

<sup>2</sup> *See id.* at 28.

<sup>3</sup> *See id.* at 28-29 (directing GMP to address several issues); Josh Castonguay, Green Mountain Power Corp. (“Castonguay”), pf. at 3, filed 4/15/25.

<sup>4</sup> Castonguay pf. at 18–19.

remote portions of its circuits, “consisting of single-phase lines feeding the fewest customers per mile.”<sup>5</sup> Participation would be voluntary and, as noted in the ZOI Order, the battery systems would be leased to eligible customers for no cost.<sup>6</sup> The Department has conducted a preliminary review of GMP’s filings, including multiple productive discussions with GMP, and finds that an investigation is warranted to fully assess the details and potential impacts of the proposal.<sup>7</sup>

The Commission has emphasized that early ZOI investments will “serve as a baseline for the development of a more comprehensive approach to the ZOI and grid resilience,” and therefore should be “narrowly directed at gathering meaningful experience and data.”<sup>8</sup> GMP’s proposal includes the two circuits already slated for complete transmission and distribution upgrades – EG-G7 (Brattleboro) and 56G1 (Wilmington) – and two additional circuits in close proximity.<sup>9</sup> An investigation will facilitate a more thorough evaluation of this approach to ensure that storage deployment is targeted strategically and effectively, and that the overall project design yields meaningful insights for future investments.<sup>10</sup> Appropriate metrics and tracking will be essential to capturing those insights, and while GMP proposes to use the metrics adopted in the ZOI Order, an investigation should explore metrics specifically designed to consider impacts of this storage tariff and how it fits as part of the aforementioned “comprehensive approach to the ZOI.”<sup>11</sup>

---

<sup>5</sup> *Id.* at 17–18.

<sup>6</sup> *See Petition of Green Mountain Power*, Case No. 23-3501-PET, Order of 10/18/25 at 28; *see also* Castonguay pf. at 24.

<sup>7</sup> In addition to the issues described below, the Department finds that several of the questions reflected in the Commission’s ZOI Order and the Information Request issued in this case on May 6, 2025, warrant further evaluation.

<sup>8</sup> *See Petition of Green Mountain Power*, Case No. 23-3501-PET, Order of 10/18/25 at 3-4.

<sup>9</sup> *See* Castonguay pf. at 18–19.

<sup>10</sup> *See, e.g., Petition of Green Mountain Power*, Case No. 23-3501-PET, Order of 10/18/25 at 23 (discussing the benefits of working in geographically diverse areas of the state).

<sup>11</sup> *See id.* at 3, 27 (requiring GMP to report on the metrics in Attachment 1 of its Brief); Castonguay pf. at 21–22.

With respect to customer impacts, GMP's proposal contemplates a relatively long payback period relying almost entirely on peak shaving and other power supply value streams.<sup>12</sup> The capture of these values are contingent on GMP's ability to accurately predict both the timing of peaks and their future prices over the next decade, presenting financial risk further into the forecast period. It is important to explore risk mitigation options to ensure that ratepayers are adequately protected, and to further examine the categories and values of proposed benefits and costs to ensure least-cost planning principles are followed. The proposal also relies on voluntary customer adoption, and there is a need to better understand the potential impacts for non-participants on the same circuits.

Although this \$30 million investment represents only one component of the unfolding ZOI, it is a foundational element that should be carefully vetted. \$30 million is also a significant expenditure on its own, particularly in the context of consistent upward rate pressures and the broader affordability crisis facing Vermonters. GMP's proposal is timely and could have broader beneficial applications, but it is appropriate to undertake a thorough review that provides for closer scrutiny of what is a significant spending proposal with direct rate implications. This will secure greater assurances of the value to customers and the grid that the proposal represents.

For the foregoing reasons and pursuant to 30 V.S.A. § 225(b), the Department respectfully recommends that the Commission open an investigation into GMP's proposed Zone 4 Energy Storage Tariff to ensure that the proposal is just and reasonable. The Department further recommends that the Commission (1) suspend GMP's proposed Tariff and (2) set a date for a scheduling conference.

---

<sup>12</sup> See Exhibit GMP-JC-3 (Financial Analysis).

Dated at Montpelier, Vermont this 15<sup>th</sup> day of May 2025.

VERMONT DEPARTMENT OF PUBLIC SERVICE

Respectfully submitted,

By: /s/ Ben Civiletti  
Ben Civiletti, Special Counsel  
112 State Street  
Montpelier VT 05620  
802-622-4388  
[benjamin.civiletti@vermont.gov](mailto:benjamin.civiletti@vermont.gov)

cc: Service List (via ePUC)