

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 24-3351-INV

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| Investigation into the potential need for transmission system improvements identified in the 2024 Vermont Long-Range Transmission Plan |  |
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Order entered: 05/27/2025

**ORDER REQUESTING ADDITIONAL INFORMATION**

This matter concerns an investigation opened, pursuant to 30 V.S.A. § 218c(d)(5), for the review of the potential need for transmission improvements identified in the 2024 Vermont long-range transmission plan (“the Plan”).

As an initial step, participants in this proceeding were requested to file comments and recommendations 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. The Commission received filings from the Vermont Department of Public Service (“Department”), the City of Burlington Electric Department (“BED”), Green Mountain Power Corporation (“GMP”), Efficiency Vermont, Vermont Electric Power Company (“VELCO”), and Vermont Public Power Supply Authority (“VPPSA”).

Based on the filings received, participants are requested to respond to the following information requests. The deadline for responses is Tuesday, July 1, 2025. A workshop will be scheduled in the second or third week of July to discuss the responses and the next steps. The Commission will issue a notice and agenda in advance of the workshop.

**Information Requests**

- In its comments, the Department notes that Commission Rule 5.136 includes a provision allowing distribution utilities to propose tariffs that would implement locational adjustor fees for new net-metering systems, or other new electric generation facilities, that connect within a constrained or limited headroom area of the grid. To date, no such tariff has been filed by utilities. Distribution utilities are requested to address whether they have any plans to propose tariffs. Responses should address what systems or facilities will be covered by the tariff and how the locational adjustor fees would be implemented.

- To understand the barriers to implementing locational adjustor fees, distribution utilities and VELCO are requested to provide an assessment of the drawbacks, barriers, opportunities, and usefulness of locational adjustor fee tariffs. Distribution utilities should address whether the barriers are administrative or technical, or if a determination has been made that such a fee would not help optimize the location of distributed generation. For example, the GMP Solar Map shows significant portions of the distribution system that are served by a substation transformer with less than 10% capacity remaining; GMP should address whether these parts of the grid are candidates for adoption of a locational adjustor fee tariff.
- Participants, including distribution utilities and VELCO, are requested to address whether there are other mechanisms to facilitate and enable a rational distribution of generation resources across the state with respect to distribution and transmission capacity.
- In their comments, BED and VPPSA state that any mechanism relying on active control of distributed energy resource assets needs to occur at the distribution utility level to ensure that actions taken for statewide benefit do not lead to offsetting localized system or reliability problems or cause cost shifting among stakeholders. Participants are requested to address whether active control of distributed energy resource assets needs to occur at the distribution utility level and address the potential benefits, disadvantages, and costs of active control of these assets.
- In its comments, VPPSA notes that the Plan discusses the desire to make use of non-transmission alternatives (“NTAs”) and coordinate them with distributed generation siting and raises concerns about the reliance on active control or management of NTAs, including whether the active management of NTAs have the potential to negatively affect distribution level reliability, as loads are shifted locally or in time, and may result in significant cost shifting across stakeholders. Participants are requested to address the potential benefits, disadvantages, and costs that accompany active management of distributed energy resources and NTAs, including whether and how the shifting of costs or reliability problems across stakeholders can be avoided.
- In its comments, GMP states that its 2024 Integrated Resources Plan (“IRP”) identifies that GMP has identified what an optimized deployment of solar and flexible resources

would look like and how much generation capacity headroom exists across GMP's system. GMP is requested to file that information on optimized deployment and capacity headroom into this proceeding and address its efforts to date and plans for future work with stakeholders to ensure optimal deployment.

- In its comments, GMP states that it will use additional tools to limit the scope of grid upgrades needed to integrate new distributed renewables, including limited curtailment of distributed renewable generation, use of distributed storage and flexible load resources, and solar plant design choices that can enhance plant capacity factors. GMP is requested to provide additional information on how it implements these tools, including how GMP determines the most cost-effective way to integrate additional distributed generation. Responses should address how GMP determines what grid upgrades are the most cost-effective option.
- In its comments, BED states that the Plan could benefit from additional analyses and discussion on the following issues: (1) duration, frequency, and load profile of transformer overloads under N-1-1 conditions; (2) rate of increase in the deployment of distributed generation and other distributed energy resources; (3) rate of increase in the deployment of electric vehicles and advanced heat pumps; (4) rate of increase in the deployment of energy storage in key areas of the state; (5) whether existing rate structures, such as electric vehicle rates, could alleviate forecasted overload conditions; and (6) whether future dynamic rate structures could alleviate forecasted overload conditions. Participants are requested to address how the Plan and state distribution and transmission planning can benefit from analysis of these issues and file any supplemental information, data, or analyses that would aid in the discussion of these issues.
- In its comments, Efficiency Vermont identifies some additional analysis and considerations: (1) 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? (2) What attributes of the growth of distributed generation and time of generation throughout the state should be understood? (3) How can the use of flexible load resources serve as a potential

mitigating solution to overload conditions and/or absorption of excess renewables?

(4) What are the avoided costs that should be used as a basis for deciding whether NTA investments are cost-effective? (5) How should stakeholders identify the time for planning, implementation, and measuring results? Participants are requested to address these issues along with the issues identified by BED.

- As identified in the Department's comments, participants are requested to address the present condition of coordination of statewide distribution and transmission planning work, including strengths and weaknesses, and what steps are needed to ensure that NTAs are given full, fair and timely consideration as envisioned by Docket 7081. Responses should include a step-by-step recitation of how: (1) effective data and information gathering and collaboration will occur; (2) load growth, load controllability, and other key assumptions will be collectively determined; and (3) grid cost and resiliency factors can be better reflected in distributed generation siting and utility infrastructure investment decisions moving forward and incorporated in the next iteration of the Plan. Responses should also address: (1) any recommendations for changes to the Docket 7081 process to ensure NTAs are given full consideration; and (2) any recommendations for which entities are responsible for paying for transmission level upgrades that become necessary because of distributed generation growth, rather than load growth.
- VELCO announced its enhanced Point of Interconnection Heat Map – a publicly accessible, interactive tool designed to improve transparency regarding available capacity on VELCO's transmission system. This tool is intended to assist in the optimized siting of distributed generation resources across the state. Participants are requested to address how this tool can be used in coordination of statewide distribution and transmission planning work.

**SO ORDERED.**

Dated at Montpelier, Vermont, this 27th day of May, 2025.

*Mary Jo Krolewski*

Mary Jo Krolewski  
Hearing Officer

OFFICE OF THE CLERK

Filed: May 27, 2025

Attest: *Pamela Lenahan*  
Deputy Clerk of the Commission

*Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: [puc.clerk@vermont.gov](mailto:puc.clerk@vermont.gov))*

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