

**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	
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**SECOND SET OF INFORMATION REQUESTS
SERVED UPON GREEN MOUNTAIN POWER CORPORATION
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service (“Department” or “DPS”), by its counsel, Ben Civiletti, hereby serve this Second Set of Information Requests on Green Mountain Power Corporation (“GMP”), in accordance with Vermont Public Utility Commission (“Commission” or “PUC”) Rule 2.214 and 2.230, in the above-referenced matter. The Department requests that GMP answer the requests herein, conforming to Commission Rule 2.230, and deliver its answers and all requested documents and materials to the Department’s offices in Montpelier no later than July 21, 2025. Please provide GMP’s answers in electronic format (i.e. word document or other standard file form readable by the Department) and please provide any spreadsheets in an electronic format.

INSTRUCTIONS

1. Reproduce the request being answered above your response thereto, pursuant to Commission Rule 2.230(M).
2. Responses to any and all Department requests, either contained herein or filed subsequently, should be submitted to the Department as soon as GMP is able to provide an answer or production. In other words, GMP should not withhold a response to any requests for which it has responsive data, documents, etc. until GMP is able to fully answer all pending requests when a reply is forthcoming for some questions.
3. Commission Rule 2.230(M)(3) requires that the response to each request is to be made under oath by a person competent to testify concerning the response, as well as all documents and exhibits produced as part of said response. When responding to each request please state: (1)

the name(s) and title(s) of the person(s) responsible for preparing the response; (2) the administrative unit which maintains the records being produced or the data from which an answer was derived; and (3) the date upon which the question was answered.

4. Where requested information is unavailable in the exact format requested in the question, or is not available for the entire range (e.g. a span of time, such as years, or other periods and classifications) requested in a series, please provide all available information that is responsive to the subject matter of the question.

5. These requests shall be considered continuing and shall be supplemented and updated as provided for in Commission Rule 2.230(D). GMP must supplement, update, correct, and change its answers to be consistent with all relevant information as it becomes available to GMP. For example, actual data must be substituted for estimated data. Responses to requests for information regarding a period of time not entirely in the past (or for which complete actual data is yet to be available) should include all actual data available when requested and be supplemented with the remaining actual data as it becomes obtainable.

6. Whenever and wherever responses include estimated information please include an explanation, or reference to a previous explanation, of the methodology and calculations used to derive the estimates.

7. Some of the Department's requests may reference a particular portion of GMP's filing. Notwithstanding the specific citation, all such requests should be understood to seek all available information that is responsive to the question.

8. With respect to each document produced by GMP, please identify the person who prepared the document and the date on which it was prepared.

9. If any interrogatory or request necessitates a response that GMP believes is totally or partially privileged, please state the complete legal and factual basis for the claim of privilege as described in Commission Rule 2.230(A)(6) and respond to all parts of the interrogatory or request of which no claim of privilege is asserted.

10. If any interrogatory or request is objected to in whole or in part, please describe the complete legal and factual basis for the objection and respond to all parts of the interrogatory or request to the extent to which it is not objected. If an objection is made regarding any requested document(s), please identify the document by author, title, date, recipient(s), and generally describe the nature and subject matter of the document(s) in addition to providing the complete legal and factual basis for the objection.

11. To expedite the discovery process and the resolution of this case, if GMP wishes to have clarification on any of these information requests it should contact the Department as soon as possible and before the deadline for response indicated above.

12. The Department reserves the right to submit additional information requests to GMP.

DEFINITIONS

13. “Identify,” when used in reference to natural person(s) or legal entities shall be interpreted to request the full name and current business address of said person(s) or entities.

14. “GMP,” as used herein, shall refer to Green Mountain Power Corporation.

15. “Document,” as used herein, shall be construed as broadly as possible to encompass any and all means and media by which information can be recorded, transmitted, stored, retrieved, or memorialized in any form. “Document” shall also include all drafts, copies, or versions which differ in any respect from the original. All spreadsheets submitted must have all formulae accessible and intact.

16. “Petition” shall mean GMP’s Petition and associated attachments, including prefiled testimony and exhibits, filed in the above captioned docket with the Vermont Public Utility Commission, unless context indicates otherwise.

17. “Commission” or “PUC” means the Vermont Public Utility Commission.

18. “FY” means Fiscal Year..

19. “ZOI” means GMP’s Zero Outages Initiative.

20. “MYRP” means GMP’s Multi-Year Regulation Plan.

21. “IRP” means an Integrated Resource Plans under 30 V.S.A. § 218c.

22. “ESS” means Energy Storage Systems.

23. “O&M” means Operations and Maintenance.

24. “T&D” means Transmission and Distribution.

25. “A&G” means Administrative and General.

26. “DER” means Distributed Energy Resources.

27. “VSPC” means Vermont System Planning Committee.

INTERROGATORIES AND REQUESTS TO PRODUCE

Q.DPS.GMP.2-1. Question DPS.GMP.1-1 requested quantification of “the cost of each peak-shaving resource (\$/kW-month) on an average annual and long-term levelized basis.” GMP’s response describes “the range of peak shaving *value* for current energy storage service agreements (ESSAs)” (emphasis added) and of residential value. Please provide the cost of each peak shaving resource.

- a. More specifically, please provide the gross cost and the net cost (net of quantifiable value streams to ratepayers) for all GMP owned and contracted energy storage resources. Please provide in the same format as the gross levelized costs as described in Exhibit GMP-JC-3 and GMP’s response to DPS.GMP.1-2.

Q.DPS.GMP.2-2. Question DPS.GMP.1-5 requested estimation of the amount of major storm costs that will be avoided by Zone 4 tariff investments. GMP did not provide an estimate in response, instead referring to the Commission order in case No. 23-3501-PET discussing the need to develop more data. Please confirm that GMP has not made a quantitative estimate of the specific amount of storm costs that will be avoided by the proposed Zone 4 Tariff investments.

Q.DPS.GMP.2-3. Question DPS.GMP.1-16 discusses formal least-cost alternatives analysis comparing Zone 4 Energy Storage Tariff to other solutions that could deliver equivalent reliability, resiliency, and grid benefits. GMP responded by citing its previously filed responses to the Commission’s information request of May 6, 2025, specifically its response to PUC Info Request 5 and Attachment PUC-Info Request-5 (filed May 12, 2025, Case No. 25-0719-TF). This narrative compares the cost of energy storage to the cost of single-phase undergrounding with an example for four Zone 4 segments showing that: “(i)n total, undergrounding these four taps was estimated at \$960,500, compared to \$421,200 for the energy storage solution.”

- a. Do other infrastructure investments such as undergrounding provide identical benefits to customers as compared to installing an energy storage solution?
- b. If not, what are the differences – and were those differences considered in the analysis referenced above?
- c. In the event of an outage, will GMP still need to repair or replace storm-damaged infrastructure – including distribution lines – for Zone 4 energy customers? If so, should those costs be included in a comparison of solutions?

Q.DPS.GMP.2-4. In response to question DPS.GMP.1-17, GMP notes that it “considered several other potential methods in connection with Zone 4, including distribution line undergrounding, widening rights-of-way and easements for increased vegetation management, tree trimming acceleration, and centralized storage options” and goes on to explain qualitatively why some of these options are not viable.

- a. Please confirm whether GMP conducted any quantitative analysis to evaluate widening or expanding the rights-of-way in connection with Zone 4, for example: evaluating the cost of expanding the rights-of-way in the proposed Zone 4 areas and the benefits associated with reduced storm damage. If yes, please provide that analysis. If no quantitative analysis was completed, please explain why.
- b. GMP states that “even with tree trimming, the storm damage is from vegetation outside the right of way.” Is GMP asserting that accelerated tree-trimming within the current right-of-way would have zero impact the amount of storm damage? In other words, is all storm damage from vegetation attributable to vegetation outside the right of way?
- c. If the answer to subpart b. above is no, then how much damage is attributable to vegetation from within the current right-of-way, and what is the value of accelerated tree-trimming?

Q.DPS.GMP.2-5. In response to DPS.GMP.1-33, GMP has asserted that its “ability to predict monthly peaks has not decreased.” Even if GMP’s ability to predict monthly peaks has not decreased, has GMP’s ability to activate flexible resources such as storage during monthly peaks decreased, given flatter peaks as described in the response, as well as increased storms where GMP chooses not to activate such resources?

Q.DPS.GMP.2-6: Please confirm that, consistent with its presentation to the Vermont System Planning Committee Geotargeting Subcommittee on July 9, 2025, Green Mountain Power has forecasted no distribution system projects that are driven by load growth.

Q.DPS.GMP.2-7: In response to DPS.GMP.1-28, GMP notes that “critical care or other customers with medical needs and customer on the Energy Assistance Program will be prioritized in deployment.”

- a. Did GMP compare the concentration of customers on the Energy Assistance Program or with medical needs in the chosen circuits to the concentrations in other potential circuits?
- b. Did GMP assess any other indicators of vulnerability other than income?

Q.DPS.GMP.2-8: Referring to GMP’s discovery Attachment DPS.GMP.1-1b, the Grid Transformation (ESS) pilot, which began in 2017 and is now a tariff, is described as “the original energy storage leasing program and the foundational learning for the rest of GMP’s energy storage programs.” Has the ESS pilot/tariff helped GMP avoid any storm response costs?

- a. If yes, please quantify these avoided storm response costs.
- b. If no, please explain why the ESS pilot/tariff has not provided such benefits or the data GMP deems necessary to estimate avoided storm response costs through the deployment of these same storage solutions through the Zone 4 tariff.

Q.DPS.GMP.2-9: Referring to GMP's Attachment DPS.GMP.1-1b, the Grid Transformation (ESS) pilot, which began in 2017 and is now a tariff, notes that “GMP uses these resources for grid benefits, predominantly peak shaving.”

- a. What, if any, quantifiable non peak-shaving grid benefits has the ESS pilot/tariff provided?
- b. Please quantify any such benefits.

Q.DPS.GMP.2-10: Referring to GMP's response to Q.DPS.GMP.1-5, please clarify if the positive forecasted positive NPV includes any assumed reduction in major storm costs. If so, please quantify these avoided costs.

Q.DPS.GMP.2-11: Referring to GMP's response to Q.DPS.GMP.1-5:

- a. Please confirm that providing Zone 4 customers with energy storage solutions delays but does not eliminate the need for GMP to restore power to these customers in the event of an outage.
- b. By how much time will Zone 4 energy storage solutions delay the need for GMP to restore power to these customers?
- c. Please quantify any and all restoration costs GMP avoids with this additional time afforded by Zone 4 energy storage solutions.

Dated at Montpelier, Vermont this 14th Day of July 2025.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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cc: ePUC Service List