



Josh Castonguay
VP, Chief Innovation Officer, Generation & Power Supply

(802) 655-8754
Josh.Castonguay@greenmountainpower.com

July 17, 2025

Via ePUC

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 25-1253-INV – Public Utility Commission investigation into the definition of single plant pursuant to Act 38 of 2025 and decommissioning financial assurances

Dear Ms. Anderson,

I am writing with the initial response of Green Mountain Power (GMP) pursuant to the Commission's Order of June 30, 2025, opening an investigation for purposes of providing a recommendation to the Legislature regarding amendment of the definition of "plant" set forth in 30 V.S.A. Section 8002(18) and to consider changes to managing decommissioning funding obligations for electric generation and energy storage facilities that hold Certificates of Public Good (CPG).

GMP does not at this time have specific proposed revisions to Section 8002(18). GMP supports appropriate, efficient siting for solar and other generating facilities. GMP did not oppose the revised definition put forward during the 2025 legislative session, with the understanding that it would not lead to higher costs for customers. GMP would welcome more clarity on whether and when utility-owned distribution line upgrades completed for one project and later used by another should continue to be a part of the review regarding whether two facilities constitute one plant. We look forward to reviewing proposals and will plan to offer any detailed comments on the schedule set by the Commission and at the workshop.

With regard to decommissioning, GMP looks forward to learning more about the straw proposal cleanup fund approach set forth by the Commission compared to current instruments for decommissioning assurance such as Letters of Credit. GMP is interested in what types of facilities and to which ownership structures such a fund would be applied (for example, will it apply to existing facilities already holding CPGs regardless of ownership), along with the methodology that would be applied to set the fee. This will help GMP understand any difference in costs for customers between the current and proposed approaches.

Thank you for this initial opportunity to comment. We look forward to reviewing the submissions of other interested stakeholders, and to attending the workshop scheduled by the Commission.

Sincerely,



Josh Castonguay,
Vice President, Chief Innovation Executive

cc: Service List (*via ePUC*)