

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Vermont Transco LLC and Vermont Electric Power Company, Inc., pursuant to 30 V.S.A. § 248(j), to amend the certificate of public good issued in Docket No. 4905, as amended in Docket No. 4905-A	Case No. 25-____-PET
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PETITION TO AMEND CERTIFICATE OF PUBLIC GOOD

Vermont Transco LLC and Vermont Electric Power Company, Inc. (collectively, “VELCO”), through the undersigned counsel, hereby petition the Vermont Public Utility Commission (“Commission”), pursuant to 30 V.S.A. § 248(j), to amend the certificate of public good issued in Docket No. 4905, as amended in Docket No. 4905-A, to authorize increasing the operating capacity of the interconnection-line portion of the Highgate Transmission Facilities from 225 MW to 250 MW. In support of this petition, VELCO represents as follows:

1. VELCO is a company as defined by 30 V.S.A. § 201 and is subject to the Commission’s jurisdiction pursuant to 30 V.S.A. § 203.
2. VELCO operates Vermont’s high-voltage electric transmission system to ensure the integrity of the portion of the regional bulk power system for which it is responsible and to ensure adequate and reliable transmission of electricity to the electric distribution utilities it serves in Vermont.
3. The Highgate Interconnection Facilities, which are owned and operated by VELCO, consist of two principal components: (i) a transmission line, designated as the 1429 Line, which was constructed for 345 kV service but operates at 120 kV, and (ii) a back-to-back converter station (the “Converter Station”). The 1429 Line extends approximately 7.5 miles from the U.S.-Canada border near Franklin, Vermont, to the Converter Station in Highgate, Vermont. The Converter Station converts electricity imported from the Hydro-Québec (“HQ”) electric system to direct current and then back to alternating current, enabling delivery into VELCO’s existing 115 kV transmission.

4. In Docket No. 4905, the Commission issued a certificate of public good (the “CPG”) authorizing construction and operation of the Highgate Transmission Facilities up to an operating capacity of 200 MW.¹

5. In Docket No. 4905-A, the Commission issued an amendment to the CPG to authorize operation of the Highgate Transmission Facilities at an increased capacity of up to 225 MW.²

6. VELCO seeks to increase the maximum operational capacity of the interconnection-line portion of the Highgate Transmission Facilities from 225 MW to 250 MW (the “Capacity Upgrade”).

7. The Capacity Upgrade is administrative in nature and will not involve any construction activities or physical alterations to the Highgate Transmission Facilities.

8. The U.S. Department of Energy approved the proposed capacity increase to 250 MW in Presidential Permits 82-3 and 82-4, which were required due to the electrical connection at the international border with Canada.

9. The Capacity Upgrade will provide important reliability benefits to the electrical system in Northern Vermont. In particular, it will help address power system reliability and energy shortage issues, such as those that can arise during extended periods of extreme cold. Under these circumstances and other regional emergencies, ISO New England (“ISO-NE”) may require that all transmission facility owners, including VELCO, shed electrical load within their respective service territories.

10. Vermont Electric Cooperative, Inc. (“VEC”) has the unique ability to mitigate this load-shedding risk by disconnecting portions of its electrical load in Northern Vermont from ISO-NE’s system and serving that load directly through power scheduled on the 1429 Line from HQ. VEC’s ability to shift this portion of its load can reduce outages for its members and

¹ Docket No. 4905, Order of 08/10/84 at 50-51.

² Docket 4905-A, Order of 01/25/95 at 10.

additional distribution utilities that VEC supplies. This portion of VEC's system is called the Highgate Block Load. The Capacity Upgrade would provide up to 23 MW of backup electrical supply to serve VEC's Highgate Block Load while allowing the Converter Station to operate at its full 225 MW capacity.

11. In addition, the Capacity Upgrade would enable compensation for approximately 2 MW of transmission losses along the 1429 Line between the international border and the Converter Station, thereby allowing the Converter Station to operate at its full 225 MW capacity rather than its current effective limit of 223 MW due to the losses. VELCO does not seek authority to increase the operating capacity of the Converter Station beyond this 225 MW limit.

12. The Capacity Upgrade has been reviewed with all potentially affected distribution utilities. There was additional discussion among those utilities with regard to potential effects the Capacity Upgrade might have on the Sheffield Highgate Export Interface that resulted in an agreement amongst them. After reaching this agreement, affected utilities did not object to the Capacity Upgrade as described in this Petition and the supporting materials.

13. VELCO respectfully submits that the proposed Capacity Upgrade satisfies the applicable requirements for review and approval under 30 V.S.A. § 248(j) as a project of limited size and scope. As demonstrated in the prefiled testimony and supporting exhibits of Jason Pew, the Capacity Upgrade provides important reliability benefits that promote the general good of the state, it does not involve any physical construction or modification to existing facilities, and it satisfies all applicable Section 248 criteria.

14. VELCO respectfully requests that the Commission approve this Petition as soon as practicable so the Capacity Upgrade may be implemented for use during the upcoming winter season—allowing it to support reliable service during periods of winter supply constraint or other emergency operating conditions that may arise.

Request for Relief

WHEREFORE, VELCO respectfully requests that the Commission:

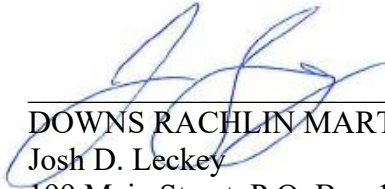
- A. Determine that review under 30 V.S.A. § 248(j) is appropriate;

- B. Issue findings consistent with this Petition and prefiled testimony and exhibits that the Capacity Upgrade will promote the general good of the State of Vermont as required by 30 V.S.A. § 248;
- C. Issue an amended certificate of public good for the Highgate Transmission Facilities authorizing the Capacity Upgrade; and
- D. Take such other measures as may be required for review and approval of this Petition as expeditiously as practicable to enable the Capacity Upgrade to be operational for use during this upcoming winter season.

DATED at Burlington, Vermont, this 21st day of October, 2025.

VERMONT ELECTRIC POWER COMPANY, INC.
AND VERMONT TRANSCO LLC

By their attorneys,



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