

**This document filed to the ePUC**

May 15, 2026

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

**Re: Petition of Green Mountain Power (GMP) for a Certificate of Public Good pursuant to 30 V.S.A § 248 authorizing the rebuild of the Georgia Substation located at 2066 Ballard Road in the Town of Georgia, Vermont. Public Utility Commission Case No. 26-0651-PET.**

Dear Ms. Anderson:

Thank you for the opportunity to comment on the above-referenced project. The Division for Historic Preservation (VDHP) is reviewing this undertaking for purposes of 30 V.S.A., Section 248. Project review consists of identifying the project's potential impacts to historic buildings, structures, districts, landscapes, and settings, and known or potential archeological resources. The purpose of VDHP's comments is to provide the Public Utility Commission (PUC) with the necessary information for their Section 248 review.

The proposed project consists of a rebuild and expansion of the existing GMP Georgia Substation with a 1.47-acre parcel of land located at 2066 Ballard Road in Georgia, Vermont. The major rebuild components consist of complete replacement of the existing substation structures and equipment, installation of a new substation fence, security and lighting systems, replacement of the existing transformer, an oil containment system, and a new control building. A new driveway, vehicle turnaround, and access road to transmission line (TL) 127 and a temporary substation pad will also be constructed. The project includes modifications to the associated TL 127 and distribution lines 70 and 71, consisting of pole replacements and retirements, as well as temporary and permanent line reconfigurations to connect to the rebuilt substation.

VDHP has reviewed the August 25, 2025, *Archaeological Phase I Survey of the Green Mountain Power Georgia Substation Upgrade Project, Georgia, Franklin County, Vermont End-of-Field Letter Report* prepared by Northeast Archaeology Research Center, Inc. (NE ARC) and presented in Exhibit GMP AC-3. No evidence of significant cultural activity was documented in the project area and NE ARC recommended that the project would not have an adverse effect on any archaeological sites. VDHP concurred with NE ARC's report on October 9, 2025. In January 2026, VDHP was also



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contacted by NE ARC regarding a change in the project plans which shifted the location of the temporary substation pad to the north away from the area previously tested. VDHP agreed that this change would not alter the original NE ARC recommendations regarding archaeological sites.

In addition to our archaeological review, the VDHP has considered the effects of the project on above-ground historic structures, districts, and landscapes. There is one historic site in the immediate vicinity, roughly one-thousand feet to the northwest of the project area, the Whitney Farm (VDHP Survey #0608-25), listed on the State Register of Historic Places (SRHP) on November 22, 1993. Due to the topography of the area and intervening vegetation, it is the opinion of VDHP there will be no effect on any above-ground historic resources.

Based on the above considerations, VDHP concludes that the GMP Georgia Substation Rebuild Project will have **No Effect** on any historic sites that are listed in or eligible for inclusion in the State Register of Historic Places.

Thank you for your cooperation in protecting Vermont's irreplaceable historic and archeological heritage. R. Scott Dillon and Greg Socinski reviewed this project and prepared this letter. I concur with the findings and conclusions described above.

Sincerely:

VERMONT DIVISION FOR HISTORIC PRESERVATION

Signed by:  
  
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For

Laura V. Trieschmann  
State Historic Preservation Officer

