

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 26-0651-PET

Petition of Green Mountain Power for a certificate of public good, pursuant to 30 V.S.A. § 248, authorizing the rebuild of the Georgia substation in Georgia, Vermont	
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**FIRST SET OF INFORMATION REQUESTS
SERVED UPON GREEN MOUNTAIN POWER
BY THE VERMONT DEPARTMENT OF PUBLIC SERVICE**

The Vermont Department of Public Service (“Department” or “DPS”), by its counsel, Matthew Bakerpoole, hereby serves this First Set of Information Requests upon Green Mountain Power (“GMP”), in accordance with Vermont Public Utility Commission (“Commission”) Rule 2.214, in the above-referenced matter. The Department requests that GMP answer the requests herein, conforming to Commission Rule 2.214 and 2.230, and deliver its answers and all requested documents and materials to the Department no later than **Wednesday, June 3, 2026**. 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 the response to each request 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 the 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 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, means Green Mountain Power.
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,” as used herein, means 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. “FY,” as used herein, means Fiscal Year.
18. “Department,” as used herein, means the Vermont Department of Public Service.

INTERROGATORIES AND REQUESTS TO PRODUCE

Q.DPS.GMP.1-1. Please estimate the expected differential in cost between the 438 amp regulators included in the project design and the 328 amp regulators referred to in Mr. Hassan's and Mr. Fiske's testimonies.

Q.DPS.GMP.1-2 Are any other upgrades needed after completion of this project to enable feeder back up as discussed in Mr. Hassan’s testimony? Please explain.

Q.DPS.GMP.1-3 Mr. Hassan's testimony on pages 4-8 states the reasons a 10/14 MVA transformer was selected over a 7.5/10.5 MVA transformer.

- a. Please provide the forecasted peak load and other relevant data points of long-term electrification forecasts for the Georgia substation that contributed to the selection of a 10/14 MVA transformer.
- b. Is the forecasted contribution of flexible load management commensurate with the assumptions made in the 2024 Long-Range Transmission Plan Non-Transmission Alternatives analysis built into these figures?

Q.DPS.GMP.1-4 Please provide outage statistics for the Georgia substation, and for the 34.5 kV line off of which the substation is tapped, over a ten-year period, or some other length of time if more illustrative of present and expected system conditions.

Q.DPS.GMP.1-5 Did GMP contemplate the addition, as part of the project or in the future, of Level 2 or Level 3 EV chargers as included in the recent Fair Haven substation upgrade (Case No. 25-0593)? Why or why not?

Q.DPS.GMP.1-6 Exhibit GMP-KAH-1 shows the cost estimate for the project, with contingency of 20% applied.

- a. Is it GMP's standard practice to use 20% for the stage of design at which permit filing takes place?
- b. At what stage of project development does GMP typically reduce the contingency in a project budget, if at all?

Q.DPS.GMP.1-7 Mr. Fiske's testimony at page 10 states that the substation design, as rebuilt, will be able to accommodate a GMP portable substation.

- a. Is the present substation able to make use of a GMP portable substation to alleviate outage conditions?
- b. If possible, please roughly estimate the component of the project's cost in designing the rebuilt substation with the capability to accommodate a portable substation.
- c. Does the total cost listed for "Georgia TL Bypass" in Exhibit GMP-KAH-1 comprise all of the costs of constructing the temporary substation? If not, please provide any additional costs of its construction.

Dated at Montpelier, Vermont this 20th day of May 2026.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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