

**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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**SECOND 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 Second 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, July 15, 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. “Department,” as used herein, means the Vermont Department of Public Service.

18. “SAIDI,” as used herein, means system average interruption duration index.

19. “SAIFI,” as used herein, means system average interruption frequency index.

20. “CAIDI,” as used herein, means customer average interruption duration index.

INTERROGATORIES AND REQUESTS TO PRODUCE

Q.DPS.GMP.2-1. Per A.DPS:GMP.1-7.c, “Cost components associated with the temporary substation are included in the Georgia Substation Rebuild line item...” Please provide the costs associated with the temporary substation as broken out from the overarching Georgia Substation Rebuild line item.

Q.DPS.GMP.2-2. Mr. Hassan’s testimony explains that the project design is such that the Georgia substation will be looped into the line presently connecting the GMP Ballard Road and Nason Street substations, rather than being radially tapped from that line, as it is today.

- a. Did GMP contemplate the use of a radial tap design for this project?
- b. If possible, please give an approximate estimate of the relative cost of a rebuild project utilizing a radial tap design instead of a looped transmission bus design.

Q.DPS.GMP.2-3. Mr. Hassan's testimony states that a reliability benefit of the project design is that the line presently connecting the GMP Ballard Road and Nason Street substations will be sectionalized.

- a. Approximately how many line miles from the Ballard Road and Nason Street substations, respectively, is the Georgia substation?
- b. With the Georgia substation looped into the TL 127, will there be any benefits to GMP operations or maintenance, such as in fault detection and isolation, equipment repair, or otherwise? Please describe if so.
- c. Is it expected that customers served from the Ballard Road or Nason Street substations will experience an increase in reliability from the project as measured by CAIDI, SAIFI, and SAIDI, or otherwise? Why or why not?

Q.DPS.GMP.2-4. In A.DPS:GMP.1-4, Mr. Hassan provides reliability metrics for customers fed from the Georgia substation and for the TL 127 34.5 kV subtransmission line.

- a. Did the 11 faults referenced in A.DPS:GMP.1-4 contribute negatively to the CAIDI, SAIFI, and SAIDI figures provided for the period of 2015 to 2025?
- b. If the faults contributed negatively to reliability figures at the Georgia substation — if possible - please estimate what the CAIDI, SAIFI, and SAIDI figures would have been for customers served from the Georgia substation had it been looped into the TL 127 during the 11 faults.
- c. Is a rate of 11 faults over a span of 7 miles and a period of 10 years typical for GMP's 34.5 kV subtransmission lines? Please explain.
- d. To what degree does subtransmission line reliability have bearing on GMP's substation design choices – weighing their costs and reliability benefits – such as for this project? Please explain.

Q.DPS.GMP.2-5. Please estimate the difference in cost between the use of 438 amp regulators compared to the 328 amp regulators referred to in Mr. Hassan's and Mr. Fiske's testimonies.

[Signature on the following page.]

Dated at Montpelier, Vermont this 1st day of July 2026.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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