

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 24-3351-INV

Investigation into the potential need for transmission system improvements identified in the 2024 Vermont Long-Range Transmission Plan	
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Order entered: 07/06/2026

ORDER REQUESTING COMMENTS ON STAFF RECOMMENDATIONS

This investigation was opened, pursuant to 30 V.S.A. § 218c(d)(5), to review the reliability deficiencies and other concerns identified in the 2024 Vermont long-range transmission plan (“the 2024 Plan”).¹

Under the requirements of 30 V.S.A. §218c(d) and Docket 7081, Vermont Electric Power Company (“VELCO”) is required to file, at least every three years, a 20-year long-range transmission plan with the Vermont Public Utility Commission (“Commission”).² Pursuant to Section 218c(d)(1), the objective of the plan is to identify the potential need for transmission system improvements as early as possible to allow sufficient time to plan and implement more cost-effective non-transmission alternatives (“NTAs”) to meet reliability needs, wherever feasible.³

The 2024 Plan identified potential reliability concerns in Northern and Northwest Vermont in the 10-year planning horizon beginning in 2033. Under the process established in Docket 7081, Green Mountain Power Corporation (“GMP”), as the lead distribution utility, lead the working group to conduct NTA analyses for the identified concerns. This proceeding included a fact-finding investigation that allows the Commission to remain informed and provide feedback during the NTA process.

The 2024 Plan also identified that distributed generation growth may exceed existing transmission system hosting capacity. The fact-finding investigation included an examination of

¹ 30 V.S.A. § 218c(d)(1). 2024 Vermont Long-Range Transmission Plan, Case No. 24A-2002, filed on 6/28/24.

² 30 V.S.A. § 218c(d)(1); *see Investigation into Least-Cost Integrated Resource Planning for Vermont Electric Power Company, Inc.'s Transmission System*, Docket 7081, Orders of 6/20/2007, 8/1/2012, and 1/20/2013.

³ 30 V.S.A. § 218c(d)(1).

the opportunities to optimize the location of distributed generation to avoid the need to resolve transmission, sub-transmission, or distribution constraints.

As an initial step, participants in this proceeding were requested to file comments and recommendations with respect to the 2024 Plan's conclusion that more statewide coordination and planning are needed and address how distributed generation growth can be optimally managed and coordinated. The Commission received filings on January 31, 2025, and July 15, 2025, from the Vermont Department of Public Service ("Department"), the City of Burlington Electric Department ("BED"), GMP, Efficiency Vermont, Stowe Electric Department, Vermont Electric Cooperative, Inc. ("VEC"), Vermont Electric Power Company ("VELCO"), and the Vermont Public Power Supply Authority ("VPPSA").

In addition to the responses to information requests, Commission staff reviewed periodic updates on the efforts of the NTA study group that conducted its work through the Vermont System Planning Committee ("VSPC"), including the geographic targeting subcommittee. Commission staff also conducted a workshop on October 9, 2025, to discuss the participants' filings.

After reviewing multiple information requests, reviewing the updates on NTA analyses, conducting a workshop, and reviewing the draft reliability plan, I recommend no further actions in this proceeding. My specific recommendations are summarized below by topic area.

NTA Study Process

The NTA working group completed its analyses and filed a final reliability plan for the northern and northwest area. The reliability plan considers an updated load forecast and confirms that the need to build a transmission solution has been deferred beyond the 10-year study horizon by considering existing peak-shifting storage program, flexible load management, and event-based electric vehicle programs.⁴ If load growth happens at the rate studied in the 2024 Plan, the reliability plan identified additional actions that will need to be taken by the distribution utilities, including a refinement of electric vehicle charging management programs and the tracking of metrics related to peak management.

⁴ See Northern and Northwest Area Reliability Plan, dated June 26, 2026, filed in Case No. 26A-1277.

It appears that the existing process and procedures established under Docket 7081 enable participants to adequately conduct NTA analysis. I recommend no changes to the NTA analysis process established under Docket 7081 process.

The NTA working group conducted most of its activities through the VSPC's geotargeting subcommittee and provided updates at the quarterly VSPC meetings. The geotargeting subcommittee acts as a forum for consideration of various NTA resources, ensuring coordinated consideration and equal treatment of these resources relative to transmission and distribution infrastructure solutions and one another. I recommend no changes to this process.

Based on discussions at the quarterly VSPC meetings, most participants appear to support no changes to the Docket 7081 process, while some participants may have interest in pursuing some changes to the geotargeting subcommittee process. If participants have interest in changing aspects of the geotargeting subcommittee process or the Docket 7081 process, I recommend that those changes be conducted in separate proceedings. Specifically, I recommend that participants file a separate petition for any changes that may need Commission approval.

Next Long-Range Plan

Under the requirements of 30 V.S.A. §218c(d) and Docket 7081, VELCO is required to file the next long-range transmission plan in 2027. VELCO collaborates with the Vermont distribution utilities, and other participants to finalize the plan and starts the process almost two years in advance of filing the plan. Thus, the process for next plan has already started.

I recommend no changes to the long-range plan planning process or the process for conducting the next plan.

Distributed Generation Growth

The 2024 Plan identified that distributed generation growth may exceed existing transmission system hosting capacity. In participant filings and workshop discussion, this investigation examined the opportunities to optimize the location of distributed generation to avoid the need to resolve transmission, sub-transmission, or distribution constraints.

Participants' filings and workshop discussions did not identify the need to coordinate or plan at the state level to optimize the location of distributed generation. Instead, most participants supported planning and managing renewable generation at the distribution utility

level. Distribution utilities identified various tools and mechanisms to guide generation and limit the scope of grid upgrades needed to integrate new distributed renewable generation. These mechanisms and tools include relying on active control of distributed energy resource assets, limited curtailment of distributed renewable generation, use of distributed storage and flexible load resources, solar plant design choices that can enhance plant capacity factors, and planning process/criteria revisions.

I am persuaded that there is no current need to coordinate at the state level to optimize the location of distributed generation beyond the existing distribution and transmission planning that occurs in the VSPC process. Further, as noted in GMP's filings, a distribution utility can use its integrated resource plan and process to identify an optimized deployment of solar and flexible resources across its system and identify how much generation capacity headroom exists across its system. I recommend that the Commission and the Department use the integrated resource plan process to track and monitor utility progress in managing distributed generation growth.

Locational Adjustor Fees

This proceeding examined the usefulness and limitations of locational adjustor fees to help optimize the location of distributed generation. Some participants' filings and workshop discussions noted drawbacks to implementing an adjustor through a tariff structure. Specifically, participants noted using adjustors to target or optimize the location of distributed generation may be administratively burdensome for individual distribution utilities to implement. Some participants recommended that constraints and adjustor fees be addressed on a case-by-case basis or individual approach through the interconnection process.

Given the availability of other tools and mechanisms discussed above, most participants' filings and workshop discussions indicated that the use of locational adjustor fees is not needed to optimize the location of distributed generation. However, participants supported adjustors being applied in identified constrained areas, like the Sheffield-Highgate Interface Export ("SHEI") area. Participants also noted that adjustors are currently being applied in the issuance

of most certificates of public good (“CPGs”) in the SHEI area, except for net-metering registrations.⁵

I am persuaded that locational adjustors fees may not be the best tool to optimize the location of distributed generation, except in the case of known constraints, like the SHEI. I recommend the Commission continue to apply the SHEI adjustor fees on a case-by-case basis as part of the CPG process. However, I remain concerned that a significant amount of net-metering systems are issued in VEC’s territory as registrations and a SHEI adjustor fee is not applied. Commission Rule 5.136 allows a distribution utility to propose for Commission approval a tariff assessing a locational adjustor fee on new net-metering systems located in constrained or limited-headroom areas of the grid. To date, VEC has not proposed a tariff for the SHEI area. There may be value to a follow-on proceeding to understand whether a tariff is appropriate to address net-metering registrations in the SHEI area. The information requests below further address this issue.

Information Requests

Before presenting its recommendations to the Commission, participants are asked to respond to the following information requests. The deadline for comments or responses is July 24, 2026.

- Please provide any comments on the above recommendations.
- CPGs for net-metering registrations in the SHEI area are issued without the requirement for a SHEI adjustor fee. For the SHEI area, please identify how much generation from net-metering registrations has been added in 2025, added to date in 2026, and what is expected by the end of 2026. Please explain any economic impact of the added generation from net-metering registrations, including whether any of this generation displaces other renewable generation on the system or requires the curtailment of other renewable generation.
- Please address whether a tariff or other mechanism is needed to assign adjustor fees for new net-metering registrations in the SHEI area. Should the Commission open a

⁵ Net-metering registration applies to ground-mounted solar facilities of up to 15 kW in capacity, roof-mounted photovoltaic net-metering systems of any capacity up to 500 kW, and mixed ground- and roof-mounted systems of up to 500 kW where the ground-mounted portion does not exceed 15 kW.

proceeding to investigate the need for adjustor fees for new net-metering registrations in the SHEI area?

SO ORDERED.

Dated at Montpelier, Vermont, this 6th day of July, 2026.

Mary Jo Krolewski

Mary Jo Krolewski
Hearing Officer

OFFICE OF THE CLERK

Filed: July 6, 2026

Attest: *Pamela Lenahan*
Deputy Clerk of the Commission

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