

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 26A-1277

Green Mountain Power Corporation reliability plan for the northern and northwest reliability areas	
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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: 08/05/2026

**ORDER REQUESTING COMMENTS ON RELIABILITY PLAN AND
RESPONSES TO INFORMATION REQUESTS**

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

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, led the working group to conduct non-transmission alternative (“NTA”) analyses for the identified concerns. This proceeding included a fact-finding investigation that allows the Vermont Public Utility Commission (“Commission”) to remain informed and provide feedback during the NTA process.

The NTA working group has completed its analyses and filed a final reliability plan for the northern and northwest area.²

Information Requests

The Commission directs GMP to respond to the following information requests concerning the reliability plan. The deadline for responses is August 21, 2026.

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

² See Northern and Northwest Area Reliability Plan, dated June 26, 2026, filed in Case No. 26A-1277.

- The reliability plan states that the updated forecast shows a significantly lower projection of electric vehicle (“EV”) adoption across the state pending the removal of federal incentives. Please describe in more detail the uncertainty associated with the updated EV load forecast, including: differences between the updated EV load forecast to the 2024 Plan’s EV load forecast; the assumptions about the number of registered EVs in the state in 2026 and 2033, separated by all-electric vehicles and plug-in-hybrid electric vehicles; the basis or dataset used for forecasting the number of EVs; and the assumptions about coincident peak EV load reductions.
- Please describe the load forecast assumptions addressing hourly EV charging, including the assumptions for: customers enrolled in EV charging management program; new EV drivers enroll in charging management program; opt-out rates of management events for customers enrolled in a charging management program; plug-in-hybrid electric vehicle participation in charging management programs; amount of home charging versus public charging; customers not on any EV rate; allocation of EV loads across each affected distribution utilities; the amount of charging under an EV management rate program that is moved off the peak; charging patterns for EVs in charging programs versus EVs not enrolled in programs.³
- Please describe how EV forecast assumption values were determined, including how data from existing charging programs informed assumptions, the use of any data sets, online tools, and studies, and any realization rates for EV charging programs that measure the ratio of evaluated or actual grid/energy impacts compared to original ex-ante engineering estimates.
- Page 15 of the reliability plan describes potential changes to time-of-use programs to allow “multiple staggered time-of-use (“TOU”) windows (with on peak hours of 3pm-12am, 4pm-1am, 5pm-2am, for example) to more evenly distribute the impact of many EVs coming online during the off-peak hours. Please explain whether any utility has demonstrated the effectiveness of such an approach. Please explain the intermediate

³ I note that some of these assumptions may be identified in documents presented to the VSPC geographic targeting subcommittee and load forecasting subcommittee. For clarity, GMP is requested to summarize all the assumptions in its response.

steps that would need to be taken to develop and implement “multiple staggered TOU windows” that would be sufficiently robust to defer a transmission need.

Comments on Reliability Plan

The reliability plan considers an updated load forecast and states that the need to build a transmission solution has been deferred beyond the 10-year study horizon by considering existing peak-shifting storage programs, flexible load management, and event-based electric vehicle programs. Thus, the plan represents that there are no constraints to resolve and there is no need to consider the use of non-transmission alternatives. Consistent with the process established for reliability plan review and before the Commission makes its determination regarding the reliability plan, participants may file comments on the plan’s methodology and the recommendation that a transmission solution be deferred.⁴

The deadline for comments on the reliability plan is September 4, 2026.

SO ORDERED.

Dated at Montpelier, Vermont, this 5th day of August, 2026.

Mary Jo Krolewski

Mary Jo Krolewski
Hearing Officer

OFFICE OF THE CLERK

Filed: August 5, 2026

Attest: *Pamela Lenahan*
Deputy Clerk of the Commission

⁴ See *Programmatic changes to the standard-offer program*, Dockets 7873 and 7874, Order of 3/25/13 at Attachment II; *Investigation into least-cost integrated resource planning for the Vermont transmission system*, Docket 7081, Order of 6/20/07.

PUC Case No. 26A-1277, 24-3351-INV – JOINT SERVICE LIST

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