

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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THE VERMONT DEPARTMENT OF PUBLIC SERVICE
COMMENTS ON THE 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

On April 26, 2026, the Green Mountain Power Corporation (“GMP”) filed a petition (“Petition”) with the Vermont Public Utility Commission (“Commission”) for a certificate of public good (“CPG”), 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 (the “Project”). GMP’s filings include a request that the Vermont Department of Public Service (“Department”) make a determination pursuant to 30 V.S.A. § 202(f) that the Project is consistent with the Vermont Electric Plan.

The Department reviewed GMP’s filings, including direct and supplemental prefiled testimony and exhibits, including technical schematics, site plans, and financial summaries, as well as two rounds of discovery responses provided to the Department by GMP. The Department also reviewed discovery and the August 11, 2026, memorandum of understanding (“MOU”) between GMP and the Vermont Agency of Natural Resources (“ANR”) filed as Exhibit GMP-ANR-1 and discovery between GMP and the Vermont Agency of Agriculture, Food, and Markets (“AAFM”). Based on its review, the Department recommends that the Commission issue an order granting the requested CPG without further hearings or investigation. The Department will file a 30 V.S.A. § 202(f) determination separately.

GMP proposes the approximately \$6,695,781 Project to rebuild and upgrade the Georgia Substation to replace equipment at the end of its useful life and to improve the substation's safety and reliability.¹ The Project includes the reconfiguration of the 34.5 kV Transmission Line 127 feeding the substation and proposes modifications to the 12.47 kV distribution circuits which it supplies. The Project also includes an upgraded 10/14 MVA transformer to replace the existing 52 year old transformer sized to provide feeder backup capacity for the West Milton G91 feeder circuit.² The Project would include upgrades to the substation's distribution circuit breakers to improve asset management and control and the installation of 34.5 kV circuit breakers to enable the substation bus to be reconfigured from a radial to looped supply design to improve reliability.³ Finally, the Project would upgrade three (3) 328-amp G71 circuit regulators to 438-amp regulators to provide full feeder backup capability for the West Milton G91 circuit.⁴ GMP proposes to construct and connect a temporary transmission line to a temporary portable substation to avoid an outage of the Georgia Substation during the Project's construction.⁵

The Project involves the replacement and installation of numerous components. Installation of an approximately 27' x 123' gravel access road and 18' x 20' vehicle turn around area, to provide access to the location of the proposed temporary substation and transmission right of way.⁶ Installation of a 9' new National Electric Safety Code ("NESC") compliant fence containing an area measuring approximately 110' x 135'.⁷ Installation of yard lighting and

1 Prefiled Direct Testimony of Kamran Hassan, 4-5.

2 *Id.* at 4-5, 12.

3 *Id.* at 5-7.

4 *Id.* at 6.

5 Prefiled Direct Testimony of John R. Fiske, 10-14.

6 Fiske pf. at 5.

7 *Id.*

security cameras on 18' steel poles within the fenced area with additional lighting on the fence.⁸

Installation of equipment foundations, ground grid, and below grade trench and conduits.⁹

Installation of two (2) 34.5 kV live vacuum circuit breakers ("VCB"), two (2) 34.5 kV phase to phase line potential transformers, and three (3) 34.5 kV phase to ground bus potential

transformers with associated structures, cabling, and other equipment. Replacement of the 10/14

MVA, 34.5/12.5 kV power transformer with an in kind replacement, upsized sufficiently to

provide feeder backup to the West Milton feeder, with associated equipment.¹⁰ Installation of

two (2) 12.47 kV VCBs with associated structure and equipment.¹¹ Installation of six (6) 438

Amp voltage regulators.¹² Installation of an approximately 18' x 28' x 15' control building

containing protection and control switchgear, communications equipment, a DC battery system,

AC and DC distribution panels, Supervisory Control and Data Acquisition ("SCADA")

equipment, and other control equipment.¹³ Installation of an oil containment system with a

perimeter berm with filter drains with at least 10% excess capacity for oil containment including

five (5) inches of freeboard rain.¹⁴ The Project's transmission line modifications include

retirement of various equipment and the installation of two (2) 55' poles, six (6) 50' poles, and

one (1) 45' pole, approximately 709' of three phase line, and one (1) SCADA controlled Motor

Operated Load Breaker ("MOLB") switch.¹⁵ Distribution side modifications include various

retirements and installation of three (3) 50' poles, one to accommodate an alternate service

⁸ *Id.*

⁹ *Id.* at 6.

¹⁰ Hassan pf. at 4-5.

¹¹ Fiske pf. at 7.

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.* at 8.

¹⁵ *Id.* at 9.

transformer and a secondary line from G70 to the Georgia Substation, one to accommodate the temporary substation connection to the existing distribution line and fiber cable, and one to equip G70 with a Gang Operated Load Break switch for future maintenance.¹⁶

The Department did not identify any significant issues under applicable 30 V.S.A. § 248(b) criteria subject to the Department's review. Specifically, the Department reviewed the Project under § 248(b)(1) orderly development of the region, § 248(b)(2) need for present and future demand for service, § 248(b)(3) system stability and reliability, § 248(b)(4) economic benefit to the State, § 248(b)(5) aesthetics and public health and safety, § 248(b)(6) consistency with GMP's least-cost integrated plan (Integrated Resource Plan ("IRP")), § 248(b)(7) consistency with the Vermont Energy plan, and § 248(b)(10) existing or planned transmission facilities.

GMP makes the following assertions in support of the Project. The Project will not unduly interfere with the orderly development of the region and is consistent with intent or purpose of the Town of Georgia, Vermont 2024 Town Plan and the Northwest Regional Energy Plan.¹⁷ The Project would further the goals of the plans by replacing aging infrastructure, enhancing the stability, reliability, and load carrying capacity of the Georgia Substation, and ensuring the substations' continued operation as additional distributed renewable generation and additional electrified loads interconnect in support of State and regional policy goals.¹⁸ The Project, intended to replace equipment at the end of its useful life, is necessary to meet the need for present and future demand for service which could not otherwise be provided in a more cost-

¹⁶ *Id.*

¹⁷ Prefiled Direct Testimony of Adam Crary, 4-5.

¹⁸ *Id.* at 5.

effective manner, and will improve system stability and reliability.¹⁹ GMP considered lower cost alternatives including rebuilding the substation in the current radial tap configuration, installing a small 7.5/10.5 MVA transformer, and installing smaller 328 amp regulators, but determined these alternatives would not sufficiently support system stability and reliability.²⁰ The Project will provide economic benefit for the State and its residents by increasing electric system operating flexibility, providing feeder backup, reducing the risk of lost load, and maintaining future load serving capability.²¹ In improving system stability and reliability and complying with the NESC standards the Project will enhance public health and safety.²² The Project is consistent the least-cost and other planning principles within GMP's IRP including reliability and safety and the Vermont Electric plan's least-cost, reliability, and renewable energy strategies.²³ The Project can be served economically by existing or planned transmission facilities.²⁴

GMP filed an Aesthetics Analysis for the Project performed by T.J. Boyle Associates.²⁵ The analysis concluded that the Project would have an adverse impact on the aesthetics of the area, but that the impact would not be undue.²⁶ The analysis concludes that the Project would not violate a clear written community standard intended the preserve the aesthetics or scenic beauty of the area, includes reasonable mitigating steps in the use of an existing substation site and right of way and proposed vegetative screening to offset needed vegetative removal, and will not be shocking or offensive.²⁷

¹⁹ Hassan pf. at 3-5, 7-10.

²⁰ *Id.* at 7-8.

²¹ *Id.* at 10.

²² *Id.* at 11.

²³ *Id.* at 10-11.

²⁴ *Id.* at 12.

²⁵ Exhibit GMP-AC-5 (filed as two parts).

²⁶ *Id.* at 12-13.

²⁷ *Id.* at 2-3, 6, 12-13.

At the time of this filing, the Department was not aware of comments on the Petition or its advanced notice by the Town of Georgia, the Northwest Regional Planning Commission, or members of the public.

Based on its review, the Department concludes that the Petition does not raise a significant issue with respect to the 30 V.S.A. § 248(b) criteria subject to the Department's review. The Project will not unduly interfere with the orderly development of the area. The Project is needed and cannot be avoided by use of non-transmission alternatives, will benefit system stability and reliability, and is consistent with the Vermont Electric Plan, the Northwest Regional Plan, and the Georgia Town Plan. In replacing end of life infrastructure to improve system stability and reliability and hiring Vermont workers the Project will provide economic benefits to the State and its residents. In making use of an existing substation site and associated right of way and including additional vegetative screening, the Project will not have an undue adverse impact on the aesthetics of the area. In improving system stability and reliability while complying with the NESC the project will improve public health and safety. GMP demonstrated the Project's consistency with the least-cost principals of its IRP in its consideration and exclusion of lower cost alternatives. Finally, the Project can be served economically by existing or planned transmission facilities without undue adverse impact effect on Vermont utilities or customers.

Based on the foregoing, subject to the MOU between GMP and ANR and absent a negative determination by AAFM, the Department respectfully recommends that the Commission issue an order granting the requested CPG without further hearings or investigation.

[Signature on the following page.]

Dated at Montpelier, Vermont this 12th day of August 2026.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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