GREEN MOUNTAIN POWER
Generating Possibilities Together

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Via ePUC

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: Case No. 24-3351-INV – Investigation into the potential need for transmission system improvements identified in the 2024 Vermont Long-Range Transmission Plan – *GMP Response to Information Requests*

Dear Ms. Anderson,

We appreciate the opportunity to provide answers to the Hearing Officer's information requests of July 6, 2026, in the above-referenced proceeding regarding VELCO's 2024 Vermont Long-Range Transmission Plan (Plan). GMP responds to the three information requests below.

Please provide any comments on the recommendations.

Green Mountain Power (GMP) filed the Reliability Plan on June 26, 2026, the culmination of two years of collaboration to evaluate non-transmission alternatives to meet forecasted load growth. The Reliability Plan demonstrates that the transmission findings raised in VELCO's 2024 Long-Range Transmission Plan can be addressed using today's flexible load resource management programs, including managed EV charging and residential and grid-scale storage, and also establishes a framework that can be used for future analyses. We agree with the Commission that no changes to the NTA analysis process established under Docket 7081 are needed.

The Vermont System Planning Committee's (VSPC) Geotargeting Subcommittee (GTSC) was a helpful forum to discuss analysis, validate assumptions, and evaluate conclusions prior to presentation to the full VSPC. We agree with the Commission that no change is needed to the GTSC's processes or responsibilities established under Docket 7081 and we agree that any future changes requiring Commission approval would need a separate petition.

We remain engaged in discussions at the Load Forecast Subcommittee to incorporate lessons learned from the NTA study process into the next plan and we agree with the Commission that no changes to the long-range planning process are needed. The DUs Integrated Resource Plans (IRP) are useful in developing plans to optimize hosting capacity, and we agree that the

Commission and Department should continue using the IRP process to track and monitor utility progress in managing generation growth.

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.

We understand that the pace of proposed net-metering registrations in recent years has been moderate, and that the VDUs, whose service territory is within the interface, are projecting this moderate interconnection rate to continue in the coming years. Because our service territory does not reside within the export interface, we defer to the VDUs whose service territories are within the SHEI to provide a detailed listing of registrations.

SHEI congestion has been greatly reduced in recent years, most notably due to reduced import volumes into Vermont over the Highgate Converter. GMP expects this trend to continue. This indicates that renewable generation growth in the export interface is not causing curtailment of substantial potential output from other existing renewable generators.

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

Given recent SHEI adjustments, limited net-metering registrations, and that the export limit has increased to account for the recent Lowell-to-Morrisville upgrade and the VELCO K42 upgrade, neither a SHEI adjustor fee for net-metering registrations nor a proceeding into the need for an adjustor fee is necessary at this time.

The SHEI region will continue to be monitored, and large-scale renewable generators should be evaluated on a case-by-case basis.

Thank you for the opportunity to submit these comments. Please reach out with any questions.

Respectfully submitted,

K.H

Kamran Hassan
Director of Substation Operations

cc: Service List *(via ePUC)*