

**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 located at 2066 Ballard Road in the Town of Georgia, Vermont	
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Order entered:

ORDER GRANTING CERTIFICATE OF PUBLIC GOOD

In this Order, the Vermont Public Utility Commission (“Commission”) adopts the following proposal for decision.

PROPOSAL FOR DECISION

I. INTRODUCTION

This case involves a petition filed by Green Mountain Power (“GMP” or “Petitioner”) requesting a Certificate of Public Good (“CPG”), pursuant to 30 V.S.A. § 248, for approval to rebuild the Georgia Substation located at 2066 Ballard Road in the Town of Georgia, Vermont (the “Project”).

In today’s proposal for decision, I recommend that the Commission conclude that, subject to the conditions contained herein, the Project does not raise a significant issue with respect to the substantive criteria of 30 V.S.A. § 248 and that the Project will promote the general good of the State. Therefore, I recommend the Commission issue a CPG, subject to the conditions set forth in this proposal for decision.

II. PROCEDURAL HISTORY

On April 8, 2026, GMP filed a petition with supporting testimony and exhibits of GMP witnesses Kamran Hassan, Adam Crary, and John Fiske.

On April 21, 2026, the Commission issued a Notice of Complete Petition and opened the case.

On April 21, 2026, the Commission also issued a Notice of Scheduling Conference and Memorandum to Adjoining Landowners regarding the Project. The Scheduling Conference was scheduled for April 30, 2026.

On April 21, 2026, Matthew Bakerpoole, Esq. filed a Notice of Appearance on behalf of the Vermont Department of Public Service (“Department” or “DPS”).

On April 22, 2026, GMP provided notices of and service of the Petition filing as required by Commission rules.

On April 23, 2026, Donald Einhorn, Esq., filed a Notice of Appearance on behalf of the Vermont Agency of Natural Resources (“ANR”).

On April 30, 2026, the Scheduling Conference was held, and an Order Establishing Schedule was issued on May 8, 2026.

On May 12, 2026 a Notice of Intervention was filed by the Agency of Agriculture, Food & Markets (“AAFM”), and Willy Jane Patry, Esq., entered her appearance for AAFM.

On May 15, 2026, the Vermont Division for Historic Preservation (“VHDP”) submitted its Comments on the Project. VHDP stated that based on its review and considerations detailed in the letter, “VDHP concludes that the GMP Georgia Substation Rebuild Project will have No Effect on any historic sites that are listed in or eligible for inclusion in the State Register of Historic Places.”

On July 17, 2026, GMP submitted supplemental testimony of witness, John Fiske which included a revised site plan to be admitted into evidence as Exhibit GMP JRF-3 (Revised).

On August 11, 2026, GMP filed a Memorandum of Understanding Between Green Mountain Power and the Vermont Agency of Natural Resources (“GMP-ANR MOU”), to be admitted into the evidence as Exhibit GMP-ANR-1.

On August 12, 2026, the DPS filed 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. In its Comments, the DPS states that, based on its review, “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.”

On August 13, 2026, the DPS filed its Determination under 30 V.S.A. § 202(f). In that filing, the Department states that, “[b]ased upon the statements contained in the petition,

testimony, and exhibits, the Department has determined that the petition is consistent with the Vermont Electric Plan, provided that the actions of Green Mountain Power are consistent with the evidence filed in the above-captioned proceeding.”

On September 15, 2026, GMP filed a Stipulation Between Green Mountain Power and the Vermont Agency of Agriculture, Food and Markets (“GMP-AAFM MOU”).

On October 1, 2026, GMP filed Proposed Findings, together with a draft CPG for the Commission’s consideration.

III. FINDINGS

Based on the Petition and the accompanying record in this proceeding, I have determined that this matter is ready for decision. Based on the evidence of record, I report the following findings to the Commission in accordance with 30 V.S.A. § 8(c).

Description of the Project

1. GMP is a duly organized public service corporation with a principal place of business at 163 Acorn Lane, Colchester, Vermont. It is subject to the Commission’s jurisdiction pursuant to 30 V.S.A. § 203. Petition at 1.

2. Construction of the Project requires a CPG pursuant to 30 V.S.A. § 248. Petition at 1.

3. This Project involves the rebuild of the GMP Georgia Substation, reconfiguration of the 34.5 kV transmission line 127, along with proposed modifications of the 12.47 kV distribution circuits. Prefiled Testimony of John Fiske (“Fiske pf.”) at 3.

4. The upgrades to the Georgia Substation replace equipment at the end of its useful life to improve substation safety and reliability for Georgia and West Milton. Prefiled Testimony of Kamran Hassan (“Hassan pf.”) at 4.

5. The existing GMP Georgia Substation consists of: a driveway mostly covered with grass except for an approximate 13’ wide x 45’ long gravel area intersecting with Ballard Road, and a fenced-in yard (approximately 69’ x 78’ in size); one (1) 34.5 kV steel structure; one (1) Gang Operated Air Break (GOAB) disconnect (354); three (3) 34.5 kV power fuses for transformer protection (PF-T1); three (3) 34.5 kV station class lightning arresters, one (1) 1974 vintage 10/14 MVA 34.5/12.47 kV power transformer (T1); three (3) 12.47kV station class lightning arresters, one (1) 12.47 kV wooden structure; one (1) 12.47 kV steel structure, three (3) bus voltage instrument transformers (VT2) with associated fuses (PF-VT2), one (1) 25 kVA

station service transformer (SS1) with associated fusing (PF-SS1); two (2) 12.47 kV Line breakers (70 & 71); six (6) sets of three 12.47 kV single blade line breaker disconnect switches (719, 718, 709, 708); three (3) 438 amp regulators, three (3) 328 amp regulators; and six (6) 12.47 kV intermediate class lightning arresters. Fiske pf. at 4; Exh. GMP JRF-1.

The Proposed Substation Upgrades

6. The proposed rebuilt GMP Georgia Substation will include the following:
 - (1) Installation of a new driveway, vehicle turn around, and access to the transmission line 127. The new proposed gravel driveway is approximately 27' wide x 123' long and the associated vehicle turn around is approximately 18' wide x 20' long. The new proposed 12' wide transmission line access road will extend from the eastern end of the substation driveway approximately 272' feet east where it will intersect with an existing farm road providing access to the transmission line. Upgrades to the existing farm road are not proposed. The new substation driveway and transmission access road is the proposed route to access the temporary substation.
 - (2) Installation of a new fence with foundations to create a polygon shaped fenced in yard (approximately 110' x 135' in area, 9' high). The new fence will meet National Electrical Safety Code (NESC) requirements and facilitate access to construction and maintenance vehicles. Substation yard lighting and security cameras will be installed on steel poles inside the substation fence to accommodate maintenance, emergency, and surveillance activities. The steel poles will be approximately 18 feet in height. Additional yard lighting will be installed on the fence. The yard lighting will be operated from a switch located within an enclosure mounted to the substation steel tower leg.
 - (3) Installation of new equipment foundations, ground grid, and below grade trench and conduit systems.
 - (4) Installation of two (2) new 34.5 kV line vacuum circuit breakers (VCB) (B-34 & B-35), two bays of 34.5 kV steel structure (each 18 feet wide, 26 feet 2 inches tall, and 16 feet deep) with associated 16 foot lightning rods, 34.5 kV bus work and insulators, two (2) sets of three 34.5 kV single blade disconnect switches (349, 348, 359, 358), two (2) gang operated load break (GOLB) switches (X999, 355), two (2) 34.5 kV phase to phase line potential transformers (VT34 & VT35) with associated fusing (PF-VT34 & PF-VT35), three (3) 34.5 kV phase to ground bus potential transformers (VT1) with associated fusing (PF-VT1), and six (6) 34.5 kV intermediate class lightning arresters.
 - (5) The existing 10/14 MVA, 34.5/12.5 kV power transformer (T1) will be replaced with an in kind replacement, along with three (3) single blade disconnect switches (929), three (3) 34.5 kV station class lightning arresters, three (3) 12.5 kV station class lightning arresters and one (1)

- pedestal mounted GOLB switch (928).
- (6) Installation of two (2) new 12.47 kV VCBs (70 & 71), two (2) bays of steel structures (each 18 feet wide, 26 feet 2 inches tall, and 5 feet deep) with associated 16 foot lightning rods, 12.47 kV bus work and insulators, five (5) sets of three 12.47 kV single blade line disconnect switches (719, 718, 709, 708, X888), three (3) 12.47 kV phase to ground bus potential transformers (VT2) with associated fusing (PF-VT2), two (2) 12.47 kV phase to ground line potential transformers (VT70 & VT71) with associated fusing (PF-VT70 & PF-VT71), six (6) 12.47 kV intermediate class lightning arresters, and a station service transformer (SS1) with associated fusing (PF-SS1).
 - (7) Installation of six (6) new 438 Amp voltage regulators with associated regulator controls.
 - (8) Installation of a new control building (approximately 18 feet wide, 28 feet long, 15 feet tall with a peaked roof). The control building will house the protection and control switchgear, the communications equipment, the DC battery system, the AC and DC distribution panels, the Supervisory Control and Data Acquisition (SCADA) equipment, and other various control equipment. The substation will utilize fiber optic cable for SCADA communications between the GMP Control Center and the Remote Terminal Unit (RTU) in the substation, voice-grade communications, and engineering access for retrieval of fault records from the microprocessor relays. The fault records are utilized to estimate fault locations and analyze power system events for restoration efforts. The SCADA system will provide control and monitoring of the two (2) 34.5 kV VCBs (B-34 & B-35), the two (2) 12.47 kV VCBs (70 & 71), and the regulator controls for the two 12.47 kV distribution circuits. A GPS receiver antenna and a "Gatekeeper" antenna (each approximately 12" in height) will be mounted on the side of the control building. The GPS antenna will provide accurate time stamp for the SCADA system and microprocessor relay event records. The "Gatekeeper" antenna is to collect data from Smart Meters.
 - (9) Installation of a new security system. The security system will be housed in the new control building.
 - (10) Installation of a new oil containment system with a perimeter berm including filter drains to allow rainwater to escape. The proposed oil containment system has a volume of no less than 110% of the proposed power transformer's oil capacity plus 5 inches of freeboard rain.

Fiske pf. at 4-8; Exhs. GMP JRF-2 through GMP JRF-9.

7. The rebuilt Georgia Substation will improve equipment layout and clearances for operational activities and improves system reliability and stability. Fiske pf. at 8.

8. GMP expects that the construction of the substation upgrades will be performed without an outage of the Georgia Substation. Fiske pf. at 14.

9. Laydown areas will not be utilized during construction. Fiske pf. at 14.

The Proposed Modifications to Transmission Line 127

10. The existing Transmission Line 127 (TL127) is a 7.57 mile 34.5 kV networked line that serves three distribution substations. The line serves the Georgia distribution substation with a 0.06-mile-long radial tap off from TL127 P105X. There are no automatic sectionalized devices on the TL127 between Nason Street and Ballard Road substations. The two other distribution stations served off from TL127 are radial taps and have SCADA controlled Motor Operated Load Breaker (MOLB) switches on each side of the radial taps for sectionalizing. Fiske pf. at 8-9.

11. The proposed TL127 modifications include the installation of two (2) 55' poles (P105 & PX106), six (6) 50' poles (P104X, P105-1, P105-2, P105-3, P105-4, & P106) and one (1) 45' pole (P105-2-1), approximately 709' of three phase overhead transmission line, one (1) SCADA controlled MOLB switch (457) to create a loop feed into the Georgia Substation. The line modifications also include the retirement of approximately 382' of three phase overhead transmission line, one (1) 45' 1955 vintage pole, one (1) 45' 1986 vintage pole, one (1) 45' 1988 vintage pole and one (1) 65' 1978 vintage pole. Fiske pf. at 9.

12. The proposed SCADA controlled MOLB switch (457) and associated lightning arresters will be installed on P105-2-1 to facilitate a bypass of the rebuilt Georgia Substation for future maintenance efforts. This bypass switch is located between the new P105-2 and the new P105-3 on TL127. Fiske pf. at 9.

13. Two sets of three (3) in-line disconnect switches are proposed for working clearance during construction of the proposed rebuilt Georgia Substation and for future maintenance efforts, one set (356) between new P105-2 and new P105-2-1 with the second set (346) between new P105-2-1 and new P105-3. Fiske pf. at 9.

The Proposed Distribution Line Modifications

14. There are two (2) existing 12.47 kV three phase overhead distribution circuits (70 & 71) emanating from the Georgia substation. The proposed substation will retain the existing distribution line right of way for both the 70 and 71 circuits. Fiske pf. at 10; Exh. GMP JRF-2; Exh. GMP JRF-3 (Revised).

15. On the 70 circuit, the existing 40' 1986 vintage G70 P1 pole will be replaced with a 50' pole to accommodate the installation of an alternate station service transformer and the installation of secondary cable from G70 P1 to the Georgia Substation. Fiske pf. at 10; Exh. GMP JRF-2; Exh. GMP JRF-3 (Revised).

16. On the 71 circuit, the existing 45' 1977 vintage G71 P1 pole will be replaced with a 50' pole to accommodate the temporary substation connection to the existing distribution line and fiber cable. Fiske pf. at 10; Exh. GMP JRF-2; Exh. GMP JRF-3 (Revised).

17. The existing in-line single blade disconnects on the 70 circuit (632) and 71 circuit (442) will be retired and two sets of pole mounted single blade disconnects will be installed, one on G70 P1(704) and the other on G71 P1 (714). Fiske pf. at 10; Exh. GMP JRF-2; Exh. GMP JRF-3 (Revised).

18. A new 50' pole will be installed at G70 P3 equipped with a permanent Gang Operated Load Break switch (7017) to provide a circuit tie for future maintenance needs. Fiske pf. at 10; Exh. GMP JRF-2; Exh. GMP JRF-3 (Revised).

The Proposed Temporary Substation

19. The construction of the rebuilt Georgia Substation will require the use of a temporary substation to serve customers during construction. The proposed rebuilt Georgia substation has been designed to accommodate the installation of a portable substation for future needs. Fiske pf. at 10.

20. The temporary substation will be supplied from the Transmission Line 127 Temporary Pole TP3. The plans for the proposed temporary Georgia Substation construction consist of:

- (1) Installation of a temporary fence to create a fenced in yard (approximately 44' x 80' in area, 8' high). The temporary fence will meet NESC requirements and facilitate access to construction and maintenance vehicles.
- (2) Installation of a temporary 45' pole (TP4) equipped with a set of three single blade disconnects (T999).
- (3) Installation of a mobile substation complete with one (1) 34.5 kV GOAB switch (X919), three (3) 34.5 kV power fuses (PF-T1), and three (3) 34.5 kV station class lightning arresters, one (1) 15 MVA Power Transformer, three (3) 12.47 kV station class lightning arresters, one (1) 12.47 kV distribution breaker, three (3) 668-amp bus regulators, one (1) single phase station service transformer (SS1) with associated fuses (TPF-SS1), one (1) three phase station service (SS2), three (3) – 668 amp regulators, and a new 45' pole

- (TP5) equipped with a set of three single blade disconnects (T888).
- (4) The temporary substation will be constructed with oil containment with a volume of no less than 110% of the proposed power transformer's oil capacity plus 5 inches of freeboard rain. The oil containment will be constructed with a perimeter berm and include filter drains to allow rainwater to escape.
 - (5) Installation of temporary relay and communication equipment cabinets.

Fiske pf. at 11-12; Exh. GMP JRF-3 (Revised); Exh. GMP JRF-10.

21. The fence, oil containment berm and filters, poles and all equipment associated with the temporary substation will be removed after the project is complete. The gravel and ground grid will be removed, and the area will be topsoiled, seeded and mulched after construction. Fiske pf. at 12.

22. Temporary transmission line construction is required to connect the temporary substation. Fiske pf. at 12.

23. A temporary 34.5 kV line bypass is proposed to maintain continuity of TL127 during construction of the proposed lines into the Georgia Substation. The bypass consists of replacing TL127 P104X with a new 50' pole, addition of two (2) temporary 50' poles (TP1 & TP2) and associated guying, and approximately 225' of three phase 34.5 kV conductor. The proposed temporary GOLB switch (T820) on P106, the set of three in-line disconnects (T643) between PX106 and TP3, the set of three in-line disconnects (T666) between P104X and TP1, and the set of three in-line disconnects (T653) between P104X and P105 will be installed as sectionalizing points to facilitate the installation of a temporary substation and construction of the loop feed into the Georgia Substation without a customer outage. Fiske pf. at 12.

24. Temporary distribution line construction is also required to connect the temporary substation to the existing distribution circuits. Fiske pf. at 13.

25. A temporary three phase overhead 12.47kV distribution line will extend from the temporary substation pole TP5 to G71 P1, approximately 425 feet via two (2) 50' poles (TP6 & TP7). At G71 P1, the temporary overhead line will connect to the existing 71 circuit. Fiske pf. at 13.

26. The existing pole at G71 P2 will be replaced with a new 50' pole to accommodate the installation of a temporary recloser (TPG71) equipped with six (6) intermediate class lightning arresters and associated bypass fuses (TP-F71). Fiske pf. at 13.

27. The existing pole at G70 P2 will be replaced with a new 50' pole to accommodate the installation of a temporary recloser (TPG71) equipped with six (6) intermediate class lightning arresters and associated bypass fuses (TP-F72). Fiske pf. at 13.

28. Temporary overhead fiber optic cable will be installed from the temporary substation to each of the temporary reclosers at G70 P2 and G71 P2. This temporary fiber will be installed on the temporary distribution line to G71 P1 where it will then follow the existing distribution line to G71 P2 providing communications to the temporary recloser on this pole. The fiber optic cable will then extend from G71 P2 to G70 P2 via G70 P3 to provide communications to the recloser on G70 P3. These reclosers are being installed to maintain reliability of the 70 and 71 circuits while in the temporary configuration and will be removed after the proposed Georgia substation is commissioned. Fiske pf. at 13.

Proposed Construction Schedule and Estimated Cost

29. Subject to Commission approval, GMP is proposing to commence construction for this Project in March 2027 and conclude by September 2027. Fiske pf. at 14.

30. Construction is planned to take place between the hours of 7:00 A.M. and 7:00 P.M. Monday through Friday, and between 8:00 A.M. and 5:00 P.M. on Saturdays. No construction will take place on Sundays, federal holidays, and state holidays except where construction activities must be performed during required outages needed to maintain system reliability. Fiske pf. at 14-15.

31. GMP estimates that the capital costs of the Project will be approximately \$6,695,781 which includes a 20% contingency. Hassan pf. at 12; Exhibit GMP-KAH-1.

REVIEW OF THE PROJECT UNDER THE SECTION 248 CRITERIA

Orderly Development of the Region

[30 V.S.A. § 248(b)(1)]

32. The Project will not unduly interfere with the orderly development of the region, with due consideration having been given to the recommendation of the municipal and regional planning commissions, the recommendations of the municipal legislative bodies, and the land conservation measures contained in the plan of any affected municipality. This finding is supported by the additional findings below.

33. The Project involves substation equipment upgrades needed to improve system reliability and safety of electricity service provided for customers in the towns of Georgia and Milton. Prefiled Testimony of Adam Crary (“Crary pf.”) at 4.

34. The substation is in Georgia, and the Town of Georgia, Vermont 2024 Town Plan (“Town Plan”) suggests that public utilities should be enhanced to improve economic development and quality of life without jeopardizing public health, the environment, or scenic resources. It further suggests that utilities should be located in appropriate areas respecting the integrity of residential areas, aesthetic concerns, and natural resources issues. Crary pf. at 4.

35. GMP hired VHB to perform an inventory of natural resource features in the Project area, and assess the Project as designed for potential impacts. VHB also assessed potential noise-related impacts of the facility, and T.J. Boyle Associates (“TJBA”) assessed potential aesthetic impacts from the substation upgrades; each assessment resulted in findings that the Project as proposed will not have undue adverse impacts. GMP also hired Northeast Archaeological Research Center (“NEARC”) to assess potential impacts on below-ground historic cultural resources, and VHB has reviewed above-ground historic sites. Crary pf. at 4-5.

36. GMP designed the Project to avoid and minimize impacts to natural and cultural resources. Accordingly, the Project meets the intent of the Town Plan, and the siting of the Project raises no issues or conflict with the Town Plan’s three criteria for utilities. Crary pf. at 5; Exhibit GMP-AC-5 (TJBA Aesthetics Report), Appendix E.

37. Although the Northwest Regional Planning Commission’s (“NRPC”) 2024 regional energy plan does not specifically mention substation rebuilds, the purpose of that plan is to lay out goals that support progress toward Vermont’s statewide energy goals. The purpose of this Project, specifically the rebuild and modernization of the existing substation in its current footprint, meets that intent by improving the electric infrastructure in this region of Vermont. Crary pf. at 5; Exhibit GMP-AC-5, Appendix E.

38. GMP provided advance notice of the Project as required. No written comments were submitted by the Town of Georgia or the NRPC in response to the 45-day notice. A GMP representative did attend the NRPC’s March 11, 2026 meeting where the Project was discussed. Crary pf. at 5-6; Hassan pf. at 13.

Need for Present and Future Demand for Service

[30 V.S.A. § 248(b)(2)]

39. The Project is required to meet the need for present and future demand for service that could not otherwise be provided in a more cost-effective manner through energy conservation programs and measures and energy-efficiency and load management measures, including those developed pursuant to the provisions of subsection 209(d), section 218c, and subsection 218(b) of Title 30. This finding is supported by the additional findings below.

40. The upgrades to the Georgia Substation replace equipment at the end of its useful life to improve substation safety and reliability for Georgia and West Milton. Hassan pf. at 4.

41. The existing Georgia Substation provides service to approximately 1,630 customers by serving two circuits (G70 and G71), at a voltage of 12.47 kV. The existing 10/14 MVA transformer is 52 years old and will be replaced with a 10/14 MVA unit. This unit is sufficiently sized to allow for improved backup capacity for the West Milton G91 feeder. The existing 12.47 kV circuit breakers will be replaced with two new 12.47 kV circuit breakers to address asset management and accommodate the transition from 48VDC control to 125VDC. Two 34.5 kV circuit breakers will be installed to accommodate the reconfiguration of the substation's 34.5 kV bus from a radial supplied station to looped transmission bus design, which will improve reliability by sectionalizing an approximately 7-mile transmission line between the GMP Ballard Road and GMP Nason Street Substations in the Towns of Georgia and Saint Albans. Hassan pf. at 4-5.

42. The current circuit regulators have limited capacity to backup other area substations (referred to as feeder backup) during an outage situation. The Georgia Substation has a circuit tie with the West Milton G91 feeder. In addition to replacing the existing transformer, the three 328-amp G71 circuit regulators will be changed to 438-amp regulators to enhance feeder backup capability for customers. The increased capacity of the regulators will also provide additional capability for distributed energy resource interconnections and increased electrification. These upgrades will provide greater operating flexibility thereby improving reliability to the customers fed from the Georgia Substation. Hassan pf. at 5.

43. The Project has asset management benefits. The project replaces one 1974 vintage 10/14 MVA transformer, two 12.47 kV circuit breakers, a 2009 vintage battery charging infrastructure and battery bank, as well as lighting, insulators, switches, potential transformers,

foundations, and supports ranging from the substation's initial construction in 1974 to 2023. Therefore, there are asset management benefits with the replacement of aging and deteriorated plant. These replacements provide reliability and resiliency improvements. Hassan pf. at 5-6.

44. The existing Georgia Substation serves 1,630 customers in the Town of Georgia. The 2024-2026 year-to-date peak load at the Georgia Substation was 7,003 kW and occurred on April 22, 2025. There are 8,086 kW of DER connected and 0 kW of DER proposed for interconnection on this substation. Hassan pf. at 6.

45. This Project supports feeder backup. The Georgia Substation has existing circuit ties with the West Milton G91 feeder. The non-coincident peak load of the combined Georgia and West Milton G91 feeder is 3.312 MVA. The transformer for the Georgia Substation was sized to ensure that the substation would have the capacity to provide full feeder backup to the West Milton G91 feeder under both present loads and loads that could be realized with future electrification. The circuit regulators were sized to 438 amps for the same reasons. Hassan pf. at 6.

46. There are loss benefits associated with the Project. The new 10/14 MVA transformer for this Project will be purchased utilizing a transformer purchase formula called for under GMP's Integrated Resource Plan to maximize efficiency for least cost. Hassan pf. at 6.

47. There are other benefits associated with this Project. Installation of the new 34.5 kV vacuum circuit breakers improves reliability and power quality to the transmission supply for the Georgia Substation. These breakers provide automatic selective fault isolation eliminating the need for momentary outages. The Georgia Substation is in between the Nason Street substation and the Ballard Road substation making it the optimum location for sectionalization. After the addition of the new breakers, if a contingency occurred between the Ballard Road substation and the Georgia Substation, the Georgia Substation's 1,630 customers as well as customers fed from the Wyeth substation would remain energized. Similarly, if a contingency occurred between the Georgia Substation and the Nason Street substation, customers fed from the Ben & Jerry's substation, and the Georgia Substation would also remain energized. These breaker additions also eliminate miles of exposure on given protective devices, thereby shortening the miles of line to be patrolled following faults and reducing repair times. Hassan pf. at 7.

48. GMP considered various alternatives for this project. These alternatives include the following:

- 1) Feeding the substation with the existing radial tap rather than updating it to an in-and-out configuration,
- 2) Installing a smaller (7.5/10.5MVA) transformer, and
- 3) Installing 328 amp regulators rather than the proposed 438 amp regulators.

Hassan pf. at 7.

49. GMP did not propose the alternatives listed above for these reasons. First, GMP chose to reconfigure the substation to an in-and-out design in order to improve the reliability of the customers fed from this substation by adding equipment to decrease outage duration times. Second, GMP chose a 10/14 MVA transformer over a 7.5/10.5 MVA transformer because under present-day feeder backup conditions, the 7.5/10.5 MVA transformer could not allow for full feeder backup between the Georgia and West Milton substations while maintaining capacity for future electrification from cold climate heat pumps and electric vehicles. Third, while installing 328 amp feeder regulators, rather than the proposed 438 amp regulators, would result in Project cost savings, under present-day feeder backup conditions, the 328 regulators would be overloaded to 115% of their rating. Similarly, 328 amp regulators limit the ability to utilize the 10/14 MVA transformer's full capacity. For these reasons, GMP proposes installing 438 amp regulators. Hassan pf. at 8.

50. This Project is not being completed to accommodate growth in load or growth in Distributed Energy Resources (DER). Per the findings above, this Project has been proposed by GMP to address aging assets and improve reliability. An ancillary benefit is the enhancement of feeder backup to the West Milton G91 feeder loads. Hassan pf. at 8.

51. The introduction of demand side management (DSM) or distributed generation (DG) would not alleviate the need for the Project. These measures cannot address the issues related to aged infrastructure or improved feeder backup. DSM and DG cannot address the reliability exposure that is mitigated with the proposed 34.5kV vacuum circuit breakers. Hassan pf. at 9.

52. The Project is the most cost-effective option to meet present and projected future demand for service within the affected area. Application of DSM and DER's cannot cost effectively address asset conditions or deliver reliability improvements. Hassan pf. at 9.

Impact on System Stability and Reliability

[30 V.S.A. § 248(b)(3)]

53. The Project will not have an adverse effect on system stability and reliability. This finding is supported by the additional finding below.

54. As detailed in the findings above, the Project will improve system reliability by replacing aged equipment and enhancing transmission fault isolation. Hassan pf. at 10.

Economic Benefit to the State

[30 V.S.A. § 248(b)(4)]

55. The Project will result in an economic benefit to the State and its residents. This finding is supported by the additional finding below.

56. The improved reliability from this Project is a benefit to the State and its residents. The Project will allow GMP's electric system to provide increased operating flexibility and feeder backup capabilities to the Georgia area loads in the event of planned and emergency outages. The Project will reduce the likelihood of lost load due to equipment failure and maintain future load serving capability, which will provide economic benefit to the State and Franklin County residents. Hassan pf. at 10.

Aesthetics, Historic Sites, Air and Water Purity, the Natural Environment, the Use of Natural Resources, and Public Health and Safety

[30 V.S.A. § 248(b)(5)]

57. Subject to the conditions described below, the Project will not have an undue adverse effect on aesthetics, historic sites, air and water purity, the natural environment, the use of natural resources, or the public health and safety, with due consideration having been given to the criteria specified in 10 V.S.A. §§ 1424a(d) and 6086(a)(1) through (8) and (9)K, impacts to primary agricultural soils as defined in 10 V.S.A. § 6001, and greenhouse gas impacts. This finding is supported by the additional findings below.

58. GMP hired VHB to perform an inventory of natural resource features in the Project area, and assess the Project as designed for potential impacts. VHB also assessed potential noise-related impacts of the facility and TJBA assessed potential aesthetic impacts from the substation upgrades. GMP hired NEARC to assess potential impacts on below ground historic cultural resources, and VHB has reviewed the Project for impacts on above-ground historic sites. The Project as designed will avoid and minimize impacts to environmental and

cultural resources as detailed in the findings below. Crary pf. at 6; Exhibits GMP-AC-2, GMP-AC-3, GMP-AC-4, and GMP-AC-5.

59. GMP entered into a Memorandum of Understanding with ANR, Exhibit GMP-ANR-1, which requires a number of conditions be included in any CPG issued by the Commission in this Case. Pursuant to the GMP-ANR MOU, subject to compliance with the conditions listed in the MOU, “the Project will avoid an undue adverse effect on the natural environment and the use of natural resources under section 248(b)(5), with due consideration having been given to the criteria specified in 10 V.S.A. §§ 1424a(d) and 6086(a)(1) through (8) and greenhouse gas impacts.” Exhibit GMP-ANR-1, ¶ III.

60. GMP entered into a Stipulation Between GMP and AAFM, which requires a number of conditions be included in any CPG issued by the Commission in this proceeding. The Parties to the GMP-AAFM MOU agreed that, subject to compliance with the GMP-AAFM MOU conditions, the Project, as described in the plans and specifications submitted with the Petition, shall not have an undue adverse effect on primary agricultural soils (PAS) under 30 V.S.A. § 248(b)(5). GMP-AAFM MOU, ¶ 4.

Air Pollution, including Noise

[30 V.S.A. § 248(b)(5); 10 V.S.A. § 6086(a)(1)]

61. The Project will not result in undue air pollution. This finding is supported by the additional findings below.

62. With respect to air pollution, any dust from construction activities will be suppressed in accordance with the Vermont Department of Environmental Conservation (“DEC”) Standards and Specifications for Erosion Prevention and Sediment Control. The Project does not involve any burning. Crary pf. at 6-7.

63. GMP hired VHB to assess potential noise impacts from the upgraded facility. VHB’s modeling concludes that the maximum predicted sound levels of the proposed Project will be approximately 15.9 dBA at the closest residential building, which is a contribution less than the sound level limit of 40 dBA used as the sound level limit for the Project. The Project sound levels are greater than 10 dBA below the ambient sound levels at the closest residence, and therefore, the Project as proposed will not result in undue noise. Crary pf. at 8; Exhibit GMP-AC-4.

Water Pollution

[10 V.S.A. § 6086(a)(1)]

64. The Project will not result in undue water pollution or undue adverse impacts on water purity. This finding is supported by the additional findings below and the findings under the criteria of headwaters through erosion, below.

65. As described in the water-related criteria findings below, the Project has been designed to avoid or minimize impacts to soils and water resources and runoff that could cause water pollution. Crary pf. at 8.

66. The substation upgrades include installation of an oil containment berm for all oil-filled equipment at the facility. Along with GMP's existing substation monitoring systems and comprehensive spill reporting/response program, this upgrade will further enhance containment of potential releases of oil from substation equipment into underlying soils and groundwater. Failures of substation equipment that may result in releases of dielectric fluid are immediately detected, investigated, and remediated by GMP, and routine monthly inspections include condition assessments of oil-filled equipment, along with identification and remediation of any small leaks not resulting in detectable equipment failure. The facility has been designed to hold any significant volume of leaked or spilled oil within the fenced yard, with the capacity to contain the entire volume of oil from all on-site equipment. The contours of the bermed yard prevent liquids from flowing out of the facility, and the engineered drainage system includes containment structures that block the flow of petroleum-based liquids while allowing the flow of water out of the yard. Mineral oil dielectric fluid spills are remediated through removal of impacted stone and soil, along with simple soap-and-water washing of impacted solid surfaces. Crary pf. at 7.

67. The Project requires a spill prevention control and countermeasure ("SPCC") plan due to the volume contained in the oil-filled equipment needed to operate the substation. The purpose of the SPCC Plan is to minimize the chances that a spill of oil or hazardous material onsite will occur; and, to prepare for a proper response in case a spill was to occur. GMP will update its SPCC plan with the required site-specific information for the rebuilt Georgia Substation within six months following the commencement of operation. Crary pf. at 7-8.

Headwaters

[10 V.S.A. § 6086(a)(1)(A)]

68. The Project will have no adverse impacts on headwaters. This finding is supported by the additional findings below.

69. The Project is not located in a headwaters area. Though the Project area technically does meet subcategory (ii) of the headwaters criteria with a drainage area of less than twenty square miles, it occurs within the much larger St. Albans Bay-Lake Champlain watershed, and the remaining subcategories of the criterion related to elevation, slope, water protection and ground water recharge are not met. Given the physical characteristics of the Project area as they relate to headwater subcategories, and the Project's location in the Lake Champlain watershed, it is not located in a Headwaters area. Crary pf. at 8-9; Exhibit GMP-AC-2, at 3-4.

70. In addition, the Project will comply with all applicable regulations regarding the protection of ground and surface water. Crary pf. at 9.

Waste Disposal

[10 V.S.A. § 6086(a)(1)(B)]

71. The Project will meet all applicable regulations for the disposal of wastes and not involve injection of waste materials or any harmful or toxic substances into ground water or wells. This finding is supported by the additional findings below.

72. The Project operation will not generate sanitary waste nor create more than one-half acre of impervious surface (about 8,600 square feet or 0.20-acre), or more than three acres in combination with existing impervious surfaces and will not require an operational stormwater permit for operational phase stormwater discharges from the Vermont Department of Environmental Conservation. Crary pf. at 9.

73. Project construction waste will include the equipment from the deconstructed substation and the poles/conductor material removed as part of the transmission and distribution line work. Retired materials and other construction waste, such as existing oil-filled operational equipment, existing substation structures and concrete pads/foundations, removed wooden poles, fiber and electric conductor line material will be disposed of or recycled as appropriate and in accordance with all applicable regulations. Crary pf. at 9.

74. GMP hired VHB to assess the existing substation soils for potential contamination, including collection and analysis of soil samples. Due to accessibility

limitations, concrete supporting the transformer was not sampled, but VHB recommends visual inspections for staining prior to disposal. There are no underlying soils that were found to exceed DEC soil standards. The Project's waste concrete will be visually inspected and disposed of in accordance with DEC's 2019 policy on concrete disposal. The Project will generate waste soil, particularly from access road upgrades and construction, which does not require DEC's Division of Waste Management regulation. GMP will coordinate with VHB regarding the appropriate offsite location for disposal of this waste soil. Crary pf. at 9-10.

75. Woody debris generated from the Project will be disposed by the contractor at an approved disposal facility. Stumps grubbed from the site will be chipped onsite prior to hauling to a landfill or other approved disposal facility, or by a licensed hauler to transport solid waste. Crary pf. at 10.

Water Conservation, Availability, and Supply

[10 V.S.A. §§ 6086(a)(1)(C), (a)(2) and (a)(3)]

76. The Project will not have an undue adverse effect on water conservation because the Project will not utilize water during operation. Crary pf. at 10.

77. GMP's contractor may use an insignificant amount of water for the cleaning of equipment and for potential dust control during construction, if necessary. Crary pf. at 10.

78. There is sufficient water available for the needs of the Project because operation of the substation facility will not involve the use of water. Crary pf. at 13.

79. The Project will not require a permanent water supply, and therefore, it will not cause an unreasonable burden on an existing water supply. Crary pf. at 13.

Floodways

[10 V.S.A. § 6086(a)(1)(D)]

80. The Project will not restrict or divert the flow of floodwaters; cause or contribute to fluvial erosion; or endanger the health, safety, and welfare of the public or of riparian owners during flooding because the Project is not located within a Floodway, Floodway Fringe, or mapped River Corridor. Crary pf. at 10; Exh. GMP-AC-2, Attachment 2.

Streams

[10 V.S.A. § 6086(a)(1)(E)]

81. The Project as designed will maintain the natural condition of streams, and will not endanger the health, safety, or welfare of the public or of adjoining landowners. This finding is supported by the additional further findings below.

82. There are no streams that occur within the VHB natural resources study area, and the Project therefore does not involve any work within streams. Crary pf. at 11; Exh. GMP-AC-2, at 4.

83. There is an intermittent stream system located beyond the Project property to the south, that was delineated by VHB as part of a separate project and is an unnamed tributary to Stone Bridge Brook. This stream, located approximately 250-feet south from the rebuilt substation, is afforded a 50-foot riparian buffer, including from its riparian wetlands, which do occur within the Project property and are shown as wetland buffer on the Project site plans. The Project involves minor grading and tree clearing (approximately 360 square feet) along the outer fringe of the buffer in one location in order to accommodate the expanded substation, which is minimized by utilizing the existing substation footprint and angling the grading on that corner of the yard. The impacts are minor and will not result in a change in riparian buffer condition or function that would impact the natural condition of the offsite stream. Crary pf. at 11.

84. The Project also involves upgrades to a segment of overhead distribution line from Ballard Road to the rebuilt substation. This upgrade will not involve new poles in the riparian buffer nor new tree clearing beyond normal maintenance for the existing overhead line, which is conducted by GMP in accordance with its integrated vegetation management plan. Crary pf. at 11.

85. The Project will involve approximately 1,570 square feet of tree clearing (no stump grubbing) in the riparian buffer for improving access road site visibility between the driveway and the overhead distribution line. This work is on the outer fringe of the buffer, is a minor area, and will not impact the buffer's function to protect the riparian wetland and offsite stream. Crary pf. at 11-12; Exh. GMP JRF-3 (Revised).

Shorelines

[10 V.S.A. § 6086(a)(1)(F)]

86. The Project will not have an undue adverse effect on any shorelines, as no part of the Project is located on a shoreline. Crary pf. at 12; Exh. GMP-AC-2, Attachment 2.

Wetlands

[10 V.S.A. § 6086(a)(1)(G)]

87. The Project is in compliance with the rules of the Secretary of Natural Resources relating to significant wetlands. This finding is supported by further findings below.

88. VHB delineated one Class II wetland area within the Project's natural resources study area, which would have a 50-foot buffer and is regulated under the Secretary's Vermont Wetland Rules ("VWR"). The ANR-DEC wetland program field-reviewed and confirmed a portion of this wetland complex as part of review of the adjacent battery energy storage project in September 2020. VHB's delineation in 2023 for this Project's Study Area is an extension of the complex's delineation, and it is topographically defined wetland. Crary pf. at 12; Exhibit GMP-AC-2, at 4-5.

89. The Project's substation design has been configured to avoid activities within Class II wetlands and buffers with the exception of the minor grading and tree clearing necessary to expand the southwest corner of the substation. Project work in this area will involve approximately 360 square feet of wetland buffer impact, and requirements to be permitted under the VWR. As noted above, there will also be approximately 1,570-sf of tree clearing in wetland buffer and 150-sf in wetland to improve the site access visibility. Access and work required to upgrade the segment of existing overhead distribution line within this wetland and buffer (including some danger tree removals) will be completed in accordance with best management practices pursuant to VWR Allowed Use 6.8, and GMP's integrated vegetation management protocols. The Project will require a permit pursuant to the VWR. Crary pf. at 12-13.

90. Pursuant to the GMP-ANR MOU, GMP has agreed that, "[b]efore beginning site preparation or construction of the Project, the CPG Holder shall obtain coverage under a Vermont Department of Environmental Conservation Wetland Permit for impacts to Class II wetlands and their buffers. All Project work shall be performed in accordance with the terms and conditions of the Wetland Permit." Exhibit GMP-ANR-1, ¶ II.3.

Soil Erosion

[10 V.S.A. § 6086(a)(4)]

91. The Project will not cause unreasonable soil erosion or reduce the capacity of the land to hold water so that a dangerous or unhealthy condition may result. This finding is supported by the additional further findings below.

92. The Project will involve less than one acre of earth disturbance (approximately 41,900 sf or 0.96-acre) and will therefore not require authorization under DEC's construction stormwater permit 3-9020. Crary pf. at 13.

93. GMP will ensure that Project construction is performed in accordance with DEC's Low Risk Site Handbook for Erosion and Sediment Control in Vermont. The Project is a rebuild on an existing substation site and there will not be any significant change in the landform and runoff characteristics, and the design is in accordance with applicable Vermont construction stormwater discharge regulatory parameters, so there will not be unreasonable erosion or reduction in the land's water holding capacity. Crary pf. at 13-14; see Exhibit GMP-JRF-3 (Revised).

Transportation

[10 V.S.A. § 6086(a)(5)]

94. The Project will not cause unreasonable congestion or unsafe conditions with respect to the use of highways, waterways, railways, airports, airways, or other means of transportation, existing or proposed. This finding is supported by the additional finding below.

95. Access to the Project site from Ballard Road will be unchanged. When construction is complete, trips to the new facility will continue to be infrequent, consisting of routine inspections and planned or necessary maintenance. Crary pf. at 14.

Educational and Municipal Services

[10 V.S.A. § 6086(a)(6) & (7)]

96. The Project is not anticipated to have any impact on educational or municipal services because it will not require any additional educational or municipal services. Crary pf. at 14.

Aesthetics, Historic Sites, and Rare and Irreplaceable Natural Areas

[10 V.S.A. § 6086(a)(8)]

97. The Project will not have an undue adverse impact on aesthetics or on the scenic or natural beauty of the area, nor will the Project have an undue adverse effect on historic sites or rare and irreplaceable natural areas. This finding is supported by the additional findings below.

98. GMP hired TJBA to assess potential impacts of the Project on aesthetics and natural beauty. In its resulting report, Senior Landscape Architect Jeremy Owens concluded that the Project will result in an adverse visual impact, that will not be undue. Mr. Owens concluded that the Project will not violate any clear, written community standards; that GMP has proposed reasonable mitigation including reuse of an existing facility and implementation of a landscape mitigation plan consisting of mainly evergreen plantings; that the Project will not be shocking or offensive; and that any adverse impacts associated with the Project will not be undue. Cray pf. at 15; Exhibit GMP-AC-5.

99. The proposed landscape mitigation plan is Appendix C to Exhibit GMP-AC-5.

100. With respect to above-ground historic sites, from review of available records and the proposed Project by VHB's Director of Cultural Resources, Vermont and senior historian Britta Tonn, there are two state-register listed above-ground historic sites within the indirect Area of Potential Effects ("APE") for the Project: the Ballard Farm (#0608-27) at 1900 Ballard Road adjacent to the south of the Project parcel, and the house at 2382 Ballard Road (#0608-28) located north of the Project parcel. No direct effects to either will occur. Potential indirect effects of the Project on both properties are included in the Project's aesthetic assessment. Cray pf. at 15; see Exhibit GMP-AC-5.

101. Based on TJBA's review of the Projects viewshed and aesthetic impacts, due to the retention of existing vegetation, there will be no potential impacts to the listed historic properties to the south. There would be views of the proposed Project to the listed property to the north due to the proposed vegetation removal north of the substation, which will be mitigated by the replacement evergreen screening. The TJBA report, Exhibit GMP-AC-5, includes more details on Project views and screening, as well as a review of the proposed substation upgrade height, which will not be significantly higher than the existing substation, see the Cross Sections in Appendix D of GMP-AC-5. From this, Britta Tonn reviewed the TJBA aesthetic assessment and concluded that there will be no undue adverse effect on above-ground historic sites within

the APE. As such, the Project will not result in an adverse effect on above-ground historic sites. Crary pf. at 15-16; see Exhibit GMP-AC-5.

102. With respect to below-ground cultural (archaeological) resources, GMP hired NEARC to assess the Project area for potential archaeological resources. NEARC performed an Archaeological Resource Assessment (“ARA”) for the Project Area, which identified areas within the Project that would be considered Archaeologically Sensitive Area (“ASA”) and warrant further study. NEARC then completed a subsequent Phase I investigation of the ASA within the Project area, including a follow up review of the results against a revised site plan version. NEARC’s Phase I study did not find any archaeological sites and concluded that the Project will not have any adverse effect on below-ground historic sites. Crary pf. at 16; Exhibit GMP-AC-3.

103. On May 15, 2026, the Vermont Division for Historic Preservation submitted its Comments on the Project. VHDP stated that based on its review and considerations detailed in the letter, “VDHP concludes that the GMP Georgia Substation Rebuild Project will have No Effect on any historic sites that are listed in or eligible for inclusion in the State Register of Historic Places.”

104. There are no known significant natural communities at the Project site, and VHB confirmed through the natural resources field studies that the Study Area does not contain any areas that could be. Therefore, there are no rare or irreplaceable natural areas associated with the Project. Crary pf. at 17; Exhibit GMP-AC-2, Attachment 2.

Necessary Wildlife Habitat and Endangered Species

[10 V.S.A. § 6086(a)(8)(A)]

105. The Project will not destroy or significantly imperil necessary wildlife habitat or any endangered species. This finding is supported by the additional findings below.

106. Based on database and field review, there are no areas that VHB would consider necessary wildlife habitat within the Study Area. There are also no known threatened or endangered species within the Study Area. Crary pf. at 17.

107. The Project is located within the known range of the federal and state-protected northern long-eared bat and the federal proposed threatened monarch butterfly. There are no documented occurrences of this bat within one mile of the Study Area, and the Project will involve only 0.16-acre of tree clearing due to the Project. Therefore, no additional conservation

measures are required. There are no proposed critical habitats for monarch butterfly, and the Project will not result in any large-scale habitat or land use change that would warrant any further conservation measures. Crary pf. at 17.

108. There is one 30-year old record of a state protected bird (upland sandpiper) mapped nearly 1-mile away from the Project, but given the unsuitable field and edge characteristics at the Project site, the existing infrastructure and activity in the Project vicinity, and the availability of more suitable grassland habitat elsewhere, the Project will not impact this species, even in the unlikely scenario individuals still inhabit the area. Crary pf. at 17-18; Exhibit GMP-AC-2, at 4-5.

109. VHB performed a database review of known rare, threatened or endangered (“RTE”) species from which no plants are known in the Project’s 1-mile vicinity and there are also no unique habitats onsite, suggesting that detailed RTE plant surveys are not warranted. However, VHB did collect a list of plants in the Study Area and no threatened or endangered species, or otherwise rare species were documented. Crary pf. at 18.

Development Affecting Public Investments

[10 V.S.A. § 6086(a)(9)(K)]

110. The Project will not unnecessarily or unreasonably endanger any public or quasi-public investment in any facility, service, or lands, or materially jeopardize or interfere with the function, efficiency, or safety of, or the public’s use or enjoyment of or access to any facility, service, or lands. The access from the town’s Ballard Road will be in the same location. However, it will be widened, including removal of some roadside vegetation, both of which will improve safe access to and from Ballard Road. Crary pf. at 18.

Natural Resources and Greenhouse Gas Impacts

[30 V.S.A. § 248(b)(5)]

111. There will be no significant Project impacts related to the use of natural resources or greenhouse gases. The Project will not utilize natural resources beyond those required as elemental construction materials. The Project does not involve the use of any equipment containing sulfur hexafluoride gas and the substation operation will not emit greenhouse gases. Emissions from construction vehicles will be small in scale and temporary. Crary pf. at 18.

Primary Agricultural Soils

[30 V.S.A. § 248(b)(5)]

112. There will be no undue adverse impacts to primary agricultural soils as defined by 10 V.S.A. § 6001. This finding is supported by the additional findings below.

113. All of the mapped soils underlying the Project site are considered Primary agricultural soil. Crary pf. at 19; Exhibit GMP-AC-2, Attachment 8.

114. The Project's impacts to PAS are considered *de minimis* and do not require compensatory mitigation per AAFM procedure. Crary pf. at 19; Exhibit GMP-AC-2, Attachment 8; GMP-AAFM MOU, ¶ 3.

115. Per the GMP-AAFM MOU, GMP and AAFM agree that the Project's impacts to PAS are *de minimis*, with 0.41 acres of permanent impact and 0.22 acres for temporary impacts. GMP-AAFM MOU, ¶¶ 1, 3.

116. Per the GMP-AAFM MOU, GMP and AAFM agreed that certain conditions to address the Project's temporary PAS impacts should be included in any CPG issued by the Commission. GMP-AAFM MOU, ¶ 2. All of these conditions have been included in the CPG that accompanies this Order.

Public Health and Safety

[30 V.S.A. § 248(b)(5)]

117. The Project will not have any adverse effects on the health, safety, or welfare of the public or adjoining landowners. This finding is supported by the additional finding below.

118. The Project will be designed and constructed in accordance with current National Electrical Safety Code requirements. GMP will use quality materials and adhere to careful construction practices throughout the construction phase. The Project will not unnecessarily or unreasonably endanger the public or adjoining landowners. Fiske pf. at 14.

Consistency with Least Cost Integrated Plan

[30 V.S.A. § 248(b)(6)]

119. The proposed Project is consistent with the principles for resource selection expressed in GMP's most recently approved least-cost integrated plan. This finding is supported by the additional findings below.

120. GMP seeks to serve projected customer loads in a reliable and efficient manner as outlined in its Integrated Resource Plans. The proposed Project is consistent with GMP's

approved Integrated Resource Plan (IRP) because it specifically enhances several of the improvement criteria outlined in the IRP: specifically, service reliability and safety. Hassan pf. at 10-11.

121. The Project will add two 34.5kV transmission line circuit breakers which will enhance service reliability by significantly decreasing reliability exposure for customers fed from the Georgia Substation. The Project will also enhance public safety by ensuring that the substation and transmission line components are designed and built to the current National Electrical Safety Code Standards. Hassan pf. at 11.

Compliance with Twenty-Year Electric Plan

[30 V.S.A. § 248(b)(7)]

122. The Project is consistent with the 2022 Vermont Comprehensive Energy Plan, which also serves as the Vermont Electric Plan. This finding is supported by the additional findings below.

123. The Vermont Electric Plan identifies the basic objectives that must be satisfied in serving the public interest. The 2022 Vermont Comprehensive Energy Plan contains strategies that can facilitate the electric system to meet increased demands in a manner that encourages increased electrification while ensuring that electric bills remain affordable. The Plan states, “The concept of least-cost planning is a central component to the decision making of Vermont electric utilities and regulatory policies.” Utilities are required to serve their customers reliably at least cost while meeting Vermont’s renewable and environmental requirements and goals. The Project will help GMP to manage its electric network to further the objectives outlined in the Vermont Electric Plan by improving the reliability of its transmission and distribution systems in the affected area at least cost. Hassan pf. at 11.

124. On August 13, 2026, the Department filed its Determination under 30 V.S.A. § 202(f). In that filing, the Department states that, “[b]ased upon the statements contained in the petition, testimony, and exhibits, the Department has determined that the petition is consistent with the Vermont Electric Plan, provided that the actions of Green Mountain Power are consistent with the evidence filed in the above-captioned proceeding.”

Outstanding Resource Waters

[30 V.S.A. § 248(b)(8); 10 V.S.A. § 1424a(d)]

125. The Project will not result in an undue adverse effect on any outstanding resource waters. The Project is not located on or near any Outstanding Resource Waters. Crary pf. at 19; Exhibit GMP-AC-2, Attachment 2.

Waste-to-Energy Facility

[30 V.S.A. § 248(b)(9)]

126. The Project does not involve a waste-to-energy facility; therefore, this criterion is not applicable.

Existing or Planned Transmission Facilities

[30 V.S.A. § 248(b)(10)]

127. The Project can be served economically by existing or planned transmission facilities without undue adverse effects on Vermont utilities or customers. The Project will help GMP to improve distribution feeder backup capability and improve reliability for the area's 34.5 kV transmission network thereby benefiting the customers that are served in Franklin County. Hassan pf. at 12.

Woody Biomass Facilities

[30 V.S.A. § 248(b)(11)]

128. The Project does not involve a woody biomass facility; therefore, this criterion is not applicable.

IV. MEMORANDA OF UNDERSTANDING

129. GMP entered into a Memorandum of Understanding Between GMP and ANR, which GMP filed in this Case on August 11, 2026. Exhibit GMP-ANR-1.

130. The parties to the GMP-ANR MOU agree that the conditions in the ANR MOU should be incorporated into any CPG issued by the Commission in this proceeding. Exhibit GMP-ANR-1, ¶ II. The CPG incorporates all of the GMP-ANR MOU conditions.

131. The Parties to the GMP-ANR MOU further agree that, subject to compliance with the GMP-ANR MOU conditions, the Project will avoid an undue adverse effect on the natural environment and the use of natural resources under section 248(b)(5), with due consideration having been given to the criteria specified in 10 V.S.A. §§ 1424a(d) and 6086(a)(1) through (8) and greenhouse gas impacts. Exhibit GMP-ANR-1, ¶ III.

132. GMP entered into a Stipulation Between GMP and AAFM, which GMP filed in this Case on September 15, 2026.

133. The parties to the GMP-AAFM MOU agreed that specific conditions in the GMP-AAFM MOU should be incorporated into any CPG issued by the Commission in this proceeding. GMP-AAFM MOU, ¶ 2. The CPG incorporates all of the GMP-AAFM MOU conditions.

134. The Parties to the GMP-AAFM MOU further agree that, subject to compliance with the GMP-AAFM MOU conditions, the Project, as described in the plans and specifications submitted with the Petition, shall not have an undue adverse effect on PAS under 30 V.S.A. § 248(b)(5). GMP-AAFM MOU, ¶ 4.

V. CONCLUSION

Based upon the evidence in the record, I recommend that the Commission conclude that the Project, subject to the conditions set forth herein:

(a) will not unduly interfere with the orderly development of the region with due consideration having been given to the recommendations of the municipal and regional planning commissions, the recommendations of the municipal legislative bodies, and the land conservation measures included in the municipal plan;

(b) will meet the need for present and future demand for service that could not otherwise be provided in a more cost-effective manner through energy conservation programs and measures and energy-efficiency and load management measures, including those developed pursuant to the provisions of subsection 209(d), section 218c, and subsection 218(b) of Title 30;

(c) will not adversely affect system stability and reliability;

(d) will result in an economic benefit to the State and its residents;

(e) will not have an undue adverse effect on aesthetics, historic sites, air and water purity, the natural environment, the use of natural resources, and public health and safety, with due consideration having been given to the criteria specified in 10 V.S.A. §§ 1424a(d) and 6086(a)(1) through (8) and (9)(K), impacts to primary agricultural soils as defined in 10 V.S.A. § 6001, and greenhouse gas impacts;

(f) is consistent with GMP's most recent Integrated Resource Plan;

(g) is consistent with the 2022 Vermont Comprehensive Energy Plan, which also serves as Vermont's Electric Plan;

(h) does not involve a facility affecting or located on any segment of the waters of the State that has been designated as outstanding resource waters by the Secretary of Natural Resources;

(i) does not involve a waste-to-energy facility;

(j) can be served economically by existing or planned transmission facilities without undue adverse effect on Vermont utilities or customers; and

(k) does not involve an in-state generation facility that produces electric energy using woody biomass.

This proposal for decision has not been circulated to the parties pursuant to 3 V.S.A. § 811 because it is not adverse to any party.

Date: _____

Deidre Morris, Hearing Officer

VI. ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED by the Public Utility Commission (“Commission”) of the State of Vermont that:

1. The findings, conclusions, and recommendations of the Hearing Officer are adopted. All other findings proposed by parties to the extent that they are inconsistent with this order, were considered and not adopted.

2. In accordance with the evidence and plans submitted in this proceeding, the rebuild of the Georgia Substation located at 2066 Ballard Road in the Town of Georgia, Vermont (“the Project”), proposed for construction and operation by Green Mountain Power (“the CPG Holder”), will promote the general good of the State of Vermont pursuant to 30 V.S.A. § 248, and a certificate of public good (“CPG”) to that effect will be issued in this matter.

3. As a condition of this order, the CPG Holder must comply with all terms and conditions set out in the CPG issued in conjunction with this order.

DATED at MONTPELIER, VERMONT, this _____ day of _____, 2026.

_____)	
_____)	PUBLIC UTILITY
_____)	
_____)	COMMISSION
_____)	
_____)	OF VERMONT

OFFICE OF THE CLERK

FILED: _____

ATTEST: _____

CLERK OF THE COMMISSION

NOTICE TO READERS: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by email, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (Email address: puc.clerk@vermont.gov)

Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Commission within 30 days. Appeal will not stay the effect of this Order, absent further order by this Commission or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Commission within 28 days of the date of this decision and Order.

**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 located at 2066 Ballard Road in the Town of Georgia, Vermont	
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Order entered:

**CERTIFICATE OF PUBLIC GOOD ISSUED
PURSUANT TO 30 V.S.A. § 248**

IT IS HEREBY CERTIFIED that the Vermont Public Utility Commission (“Commission”) this day found and adjudged that the rebuild of the Georgia Substation located at 2066 Ballard Road in the Town of Georgia, Vermont (the “Project”) by Green Mountain Power (“GMP” or “CPG Holder”) in accordance with the evidence and plans submitted in this proceeding, will promote the general good of the State of Vermont, subject to the following conditions:

1. Site preparation, construction, operation, and maintenance of the Project must be in accordance with the plans and evidence submitted in this proceeding. Any material deviation from these plans or a substantial change to the Project must be approved by the Commission. Failure to obtain advance approval from the Commission for a material deviation from the approved plans or a substantial change to the Project may result in the assessment of a penalty pursuant to 30 V.S.A. §§ 30 and 247.

2. Before beginning site preparation, construction, operation, or maintenance of the Project, the CPG Holder shall obtain all other necessary permits and approvals. Site preparation, construction, operation, and maintenance of the Project shall be in accordance with such permits and approvals, and with all other applicable regulations, including those of the Vermont Agency of Natural Resources (“ANR” or the “Agency”).

3. The CPG Holder must restrict construction activities and related deliveries to the hours between 7:00 A.M. and 7:00 P.M. Monday through Friday, and between 8:00 A.M. and 5:00 P.M. on Saturdays. No construction activities shall occur on Sundays or state or federal holidays except where construction activities must be performed during required outages needed

to maintain system reliability.

4. Before beginning site preparation, the CPG Holder must file with the Commission, the parties, and the Town of Georgia, Vermont, a letter stating that it has fulfilled all pre-site preparation CPG conditions, and that it intends to begin site preparation for the Project.

5. Before operating the Project, the CPG Holder must file with the Commission, the parties, and the Town of Georgia, Vermont, a letter confirming that it has fulfilled all pre-operation CPG conditions and that it intends to begin operation of the Project.

6. The CPG Holder must fully implement the final aesthetic mitigation plan, identified in the evidentiary record as Exhibit GMP-AC-5, Appendix C, as soon as reasonably possible, and in no case more than 90 days following the completion of construction, unless such timing would require implementation between October 15 and April 15, in which case the plan shall be fully implemented within 30 days of the following April 15.

7. Within 30 days following the full implementation of the final aesthetic mitigation plan, the CPG Holder must submit to the Commission and all parties in this proceeding a certification that all work has been fully implemented in a manner consistent with the approved plan. This certification shall include the completion of construction date as well as the date the upgraded facility was energized and shall be supported by an affidavit and dated photographs of the installed mitigation measures. If construction of the facility components and/or aesthetic mitigation has deviated from the design of the facility as approved, the CPG Holder must also file for Commission review and approval of a revised final mitigation plan. Submission of a revised final mitigation plan shall not relieve the CPG Holder from its obligation to request an amendment to the CPG for a substantial change.

8. For a period of three years, the CPG Holder must conduct an annual inspection of the facility to determine the health, vigor, and continued effectiveness of the mitigation. The CPG Holder must file with the Commission and parties an annual certification documenting the results of the inspection and any corrective actions taken. Certifications required under this paragraph shall be submitted by the dates one, two, and three years following the submission of the certification of completion required by Condition __ above.

9. The CPG Holder must maintain mitigation measures contained in the final aesthetic mitigation plan or revised final aesthetic mitigation plan for the life of the facility as those measures are depicted on the plan.

10. In accordance with Commission Rule 5.805(C), the Commission may conduct further process as needed to ensure compliance with the final aesthetic mitigation plan or revised final aesthetic mitigation plan.

11. The CPG Holder must comply with the Memorandum of Understanding between GMP and ANR entered into the evidentiary record as Exhibit GMP-ANR-1.

12. Before beginning site preparation or construction of the Project, the CPG Holder shall obtain coverage under a Vermont Department of Environmental Conservation Wetland Permit for impacts to Class II wetlands and their buffers. All Project work shall be performed in accordance with the terms and conditions of the Wetland Permit.

13. The parties acknowledge that the Agency may, at its own risk and through its authorized representatives, enter upon and inspect non-energized portions of the Project area upon reasonable notice, in a reasonable manner, and at reasonable times during ordinary business hours to determine compliance with the conditions in the ANR MOU. Should the Agency, through its authorized representatives, require access to any portions of the Project area which contain energized equipment, the Agency shall provide 24-hour notice and must be accompanied by a GMP representative in those areas.

14. The CPG Holder must comply with the Stipulation between Green Mountain Power and the Vermont Agency of Agriculture, Food and Markets.

15. To address the Project's temporary impacts on primary agricultural soils ("PAS") and to restore PAS to its condition prior to construction of the Project to the greatest extent practicable, for the temporary substation, GMP agrees:

- a. GMP will remove 6 inches of topsoil at the location for the temporary substation and move it directly to the temporary stockpile location (just south of the temporary substation) as shown on Exhibit GMP JRF-3 (Revised);
- b. If the 6 inches of soil removed has layers of different soil types, GMP will separate the soils into separate stockpiles for each soil type;
- c. Stockpiled soil shall be placed so that its base is at least three feet away from any part of the site that has a slope of 15% or greater;

- d. The removed soil will be placed on top of fabric to protect the underlying soil, and silt fencing will be placed around this soil;
- e. GMP will also install a gate on the access road to deter theft of the stockpiled soil;
- f. Access to the soil stockpile area will be along the existing farm road and along a delineated access route to the stockpile area; and
- g. Once the temporary substation can be removed at the end of construction (expected to be approximately a year), GMP will 1) perform agricultural subsoiling/tilling of the soils under the temporary substation location, and 2) then return the 6 inches of topsoil to the same location from which it was removed.

16. The Project grading is shown on Exhibit GMP JRF-3 (Revised).

17. To reduce impacts to PAS from soil compaction for 1) installation of the new transmission poles east of the substation (and right of the access drive) and 2) for the temporary substation construction and related soil stockpile, the CPG holder shall use tracked equipment with a gross axle weight of less than or equal to 12,000 lbs. If tracked equipment is not available, timber matting shall be used in conjunction with standard wheeled equipment.

18. This Certificate of Public Good shall not be transferred without prior approval of the Commission.

DATED at MONTPELIER, VERMONT, this _____ day of _____, 2026.

_____	)	
_____	)	PUBLIC UTILITY
_____	)	
_____	)	COMMISSION
_____	)	
_____	)	OF VERMONT

OFFICE OF THE CLERK

FILED: _____

ATTEST: _____

CLERK OF THE COMMISSION

NOTICE TO READERS: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by email, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (Email address: puc.clerk@vermont.gov)

Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Commission within 30 days. Appeal will not stay the effect of this Order, absent further order by this Commission or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Commission within 28 days of the date of this decision and Order.