

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 23-3501-PET

Petition of Green Mountain Power for approval)
of its Zero Outages Initiative as a Strategic)
Opportunity pursuant to 30 V.S.A. § 218d and)
GMP’s Multi-Year Regulation Plan)

**Green Mountain Power’s Supplemental Responses to the
Second Set of Discovery Requests Served by the Department of Public Service**

Green Mountain Power (“GMP” or “Petitioner”), by and through the undersigned counsel, hereby supplements its responses to the second set of discovery requests served by the Department of Public Service (“DPS,” “PSD,” or “Department”) on January 19, 2024. Unless otherwise stated all responses refer specifically to the first phase of the Zero Outage Initiative.

General Objections

GMP restates and incorporates by reference its General Objections from its previous Responses to the Second Set of Discovery Requests Served by the Department of Public Service.

INTERROGATORIES AND REQUESTS TO PRODUCE

Q.DPS.GMP.2-106. As a follow-up to GMP’s response to Q.DPS.GMP.1-67:

- a. Please provide documentation to support the cost of \$300,000 to rebuild overhead single-phase lines.**
- b. Provide documentation to support the cost of \$700,000 per mile to rebuild a 3-phase overhead line.**

Supplemental Response to Q.DPS.GMP.2-106:

- a. GMP restates and incorporates by reference its previous response to Q.DPS.GMP.2-106a. By means of an illustrative example, please also refer to Attachments GMP.DPS2.Q106a, 106d, and 106e.
- b. GMP restates and incorporates by reference its previous response to Q.DPS.GMP.2-106b.

Person/s Responsible for Response: Mike Burke, Eric Lemery
Title of Person/s: VP, Field Operations; Director, Field Technology
Operations Date: January 29, 2024 and February 2, 2024

Dated at Burlington, Vermont this 2nd day of February, 2024.

As to Objections:



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Attorneys for Green Mountain Power

Dated at Colchester, Vermont this 2 day of February, 2024.

Respondent Signature

By: 

Eric Lemery
Green Mountain Power

Dated at Cockchester, Vermont this 2nd day of February, 2024.

Respondent Signature

By: Michael Burke
Michael Burke
Green Mountain Power