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September 3, 2021

Holly Anderson, Clerk
Vermont Public Utility Commission
ePUC

All documents have been filed via ePUC, other than confidential documents

Re: Petition of Vermont Transco LLC, and Vermont Electric Power Company, Inc. (collectively, "VELCO"), for a Certificate of Public Good pursuant to 30 V.S.A. § 248 authorizing upgrades to VELCO's existing Florence Substation, located in Pittsford, Vermont

Dear Clerk Anderson:

Enclosed for filing is an original copy of the Petition, prefiled testimony and supporting exhibits, together with our notice of appearance and certificate of service relating to Vermont Electric Power Company Inc. and Vermont Transco LLCs (collectively "VELCO" or "Petitioners") request to the Public Utility Commission (the "PUC") to issue a Certificate of Public Good ("CPG") pursuant to 30 V.S.A. § 248, authorizing Petitioners to construct the so-called Florence Project in Pittsford, Vermont (the "Project"), in accordance with 30 V.S.A. § 248 and PUC Rule 5.400. VELCO refers to the substation as the "Florence Substation" because the substation is in Florence, which is an unincorporated community in the Town of Pittsford. The Florence Project includes upgrades to VELCO's existing substation located at 8040 Whipple Hollow Road, in Pittsford, Vermont.

With respect to Critical Energy Infrastructure Information (CEII) and other Confidential Information, VELCO expects to enter into a Protective Agreement with the Department of Public Service so that it can provide the one confidential exhibit to the Department. Once the agreement is executed, VELCO will file it with the PUC along with the Motion for Approval of Protective Agreement and the Procedural Order regarding Protective Agreement. Today, we have enclosed the following:

1. Motion for Confidential Treatment of Selected Prefiled Exhibit;
2. Procedural Order;
3. Averment Log.

Thank you for your attention to this matter. If you have any questions or require any further information, please do not hesitate to contact me.

*Admitted in Vermont and New Hampshire
**Admitted in Vermont and Massachusetts

Sincerely,

Joslyn Wilschek, esq.

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. _____

Petition of Vermont Transco LLC, and Vermont Electric Power Company, Inc. (collectively, "VELCO"), for a Certificate of Public Good pursuant to 30 V.S.A. § 248 authorizing upgrades to VELCO's existing Florence Substation, located in Pittsford, Vermont

PETITION

This document and associated testimony and exhibits have been filed ePUC

NOW COME the Vermont Electric Power Company, Inc. and Vermont Transco LLC (collectively referred to herein as "VELCO", "the Company", or "Petitioners"), in accordance with 30 V.S.A. § 248 and Vermont Public Utility Commission ("PUC" or "Commission") Rule 5.400, and petition the PUC for a Certificate of Public Good ("CPG") for the Florence Substation project in Pittsford, Vermont which consists of upgrading VELCO's existing substation located at 8040 Whipple Hollow Road, in Pittsford, Vermont (the "Project"). VELCO refers to the substation as the "Florence Substation" because the substation is in Florence, which is an unincorporated community in the Town of Pittsford. In support of this petition, VELCO states as follows:

1. VELCO is a company as defined by 30 V.S.A. § 201 and is subject to PUC jurisdiction pursuant to 30 V.S.A.§ 203.
2. VELCO's office is located at 366 Pinnacle Ridge Road in Rutland, Vermont.
3. VELCO owns, operates, and plans for Vermont's high voltage electric transmission system.
4. VELCO operates Vermont's high voltage electric transmission system to assure the integrity of the portion of the regional bulk power system for which it is responsible, and to assure adequate and reliable transmission of electricity to the electric distribution utilities that it serves in Vermont.

5. The Florence substation is connected to the VELCO 115 kV electric transmission network in Rutland County, Vermont and connects to Green Mountain Power's (GMP) 46 kV system in the Florence area.

Notice Requirements

6. As required by PUC Rule 5.402, on May 24, 2021, VELCO notified the Pittsford Selectboard, the Rutland Regional Planning Commission, and the Pittsford Planning Commission of the Project. Contemporaneously with this filing, VELCO sent notice of the Project to the adjoining landowners, Department of Public Service, Agency of Natural Resources, and Vermont Division for Historic Preservation. In accordance with PUC Rule 5.402(B)(3), VELCO identified the adjoining landowners using a certified copy of the Pittsford grand list as it existed no more than 60 days before this filing. The list was last certified in July 2021.

Project Need

7. VELCO originally constructed the substation in 1978 to serve the OMYA Plant, which is located to the east of the substation, and has had various modifications and improvements over the nearly forty-three years of service.

8. VELCO has identified deficiencies in substation equipment such as the protection and controls system, 115 kV circuit switcher, 46 kV breakers, switches, capacitor bank, and control building.

9. VELCO considered addressing the condition-related deficiencies by performing specific equipment refurbishments, replacements, and upgrades to the existing substation in its current, radial bus configuration. While further analyzing this potential solution,

VELCO learned that GMP would require VELCO to install a temporary substation for the duration of construction in the vicinity of the existing substation to provide service to GMP customers while performing the identified improvements. This temporary substation would cost approximately $1 million.

10. Alternatively, VELCO considered constructing a new substation adjacent to the existing substation and then after commissioning the new substation, it would transfer the load to the new substation and remove the existing substation. This alternative obviates the need for the temporary substation and therefore allows VELCO to use monies it would have used for a temporary component (temporary substation), on a long-term substation ring-configuration.

11. A new substation ring bus configuration rather than the existing radial bus configuration improves the substation's reliability and maintainability.

12. Therefore, to correct the identified deficiencies, VELCO is proposing the Project which involves constructing a new substation to the north and adjacent to the existing substation. VELCO proposes to design the new substation in a ring bus configuration as opposed to the existing radial bus configuration.

13. The Project also requires VELCO to work with GMP to support some of the Florence Project construction activities. GMP will perform the 46 kV line work to replace the three existing 46 kV line structures and will provide temporary station service power to the site while the VELCO Florence substation is out of service. GMP will be supporting other aspects of construction that require interface with the GMP 46 kV protection and control systems and temporary workarounds.

Project Components

14. The Project consists of the following primary components:

- Construct a new 115/46 kV ring bus substation with all new components adjacent to the existing substation, including installing:
- A new 115/46 kV, 33.6/44.8/56 MVA transformer.
- Four (4) 46 kV vacuum circuit breakers.
- One (1) 115 kV, SF6 circuit breaker.
- Ten (10) MVAR capacitor bank, and associated reactor/resister filter bank components, and SF6 Breaker.
- A protection and control system.
- A control building that can accommodate the new protection and controls system, redundant AC and DC station services, communication equipment, and security systems.
- One (1) set of 115 kV, and four (4) sets of 46 kV instrument voltage transformers in support of the new protection and controls system.
- Passive secondary oil containment system for the new 115/46 kV transformer.
- A new fence to accommodate the new substation. The substation fence will enclose a 39,500 square foot area to the north of the existing substation fence. For comparison, the existing substation fence encloses an area of 24,900 square feet. In addition, VELCO will install a fence at the top of the hillside for safety purposes.

- Two (2), three pole structures to connect the existing 115 kV transmission line to the new substation.
- Performing tree clearing to accommodate new substation and pole structures; and
- Removing existing substation, including all above and below grade components and restore the area to fit in with the surrounding property.

Project Cost

15. VELCO estimates that the Project will cost $17,681,390.

Project Schedule

16. VELCO proposes to begin Project construction as soon as possible after receiving the required permits and approvals. The area of land to be cleared as part of the clearing plan is located in the summer range of the Indiana bat (Myotis sodalist), which is listed as endangered under 10 V.S.A. Chapter 123 by federal authority. To avoid injuring or killing Indiana Bats, the Vermont Department of Fish and Wildlife has requested that VELCO not clear trees greater than five inches in diameter at breast height between April 1 and October 31 unless VELCO performs further studies or implements mitigation measures. Therefore, VELCO is hoping to receive a CPG by March 1, 2022 to be able to remove any affected trees prior to the April 1, 2022 start of the seasonal clearing restriction period. Currently, the estimated construction schedule is from March 2022 with a targeted completion date of December 2022. A failure to achieve this schedule will likely have adverse impacts on Project execution and overall Project cost. Construction would 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, or state or federal holidays; although VELCO seeks to conduct activities on Bennington Battle Day given the short summer construction season, and the holiday is not widely granted as a paid day off for many of the workers likely to be working on the Project.

17. VELCO requests that these construction restrictions do not apply to: 1) construction activities that VELCO must perform during any required outages that may be needed to maintain system reliability and 2) work that VELCO must perform related to filling the power transformer with oil.

18. VELCO also requests permission to commence construction without having first obtained the required Wastewater System and Potable Water Supply Permit and the Division of Fire Safety Permit. VELCO seeks exemption from the standard condition that requires acquisition of all state and federal permits prior to the start of construction. Although VELCO anticipates the receipt of the Wastewater System and Potable Water Supply Permit and Division of Fire Safety Permit prior to the start of construction, the acquisition of these two permits may not occur prior to when VELCO is prepared to begin site preparation and construction activities that are not subject to these two permits. Specifically, VELCO would like to begin the following activities upon receipt of a final order and CPG: equipment demolition, vegetation clearing, site grading, reroute of fiber-optic cable and installation of temporary equipment.

Alternatives Considered

19. The proposed Project is the most efficient way to address the condition-related concerns. The substation's condition drives the need for the proposed Project. Energy efficiency

and load management could not resolve these problems. Moreover, VELCO presented the proposed Project to the Vermont System Planning Committee (VSPC). The Project screened out of the VSPC's test for Non-Transmission Alternative (NTA) analysis, due to the need being based upon condition. Thus, VELCO did not perform an NTA analysis.

Prefiled Evidence and Compliance with Statutory Criteria (30 V.S.A. § 248(b))

20. The Project will satisfy the statutory criteria contained in § 248(b) as demonstrated by the prefiled testimony and exhibits filed with this Petition.

21. In support of this Petition, the Petitioners submit prefiled testimony and exhibits sponsored by the following witnesses:

Witnesses	Subject
Dan Poulin	Provide an overview of the proposed Project's scope, cost and schedule, and explains how the Project complies with Section 248(b)(1)-(4), (b)(5) (public health and safety, transportation, education and municipal services, development affecting public investments); (b)(6)-(7); and (b)(10).
Jacob Reed	Provide an assessment of the Project's potential impacts upon above-ground and below-ground historic sites as well as to present the report entitled: "Natural Resource Assessment Report" prepared by TRC which address all the Section 248(b)(5) environmental criteria. Addresses primary agricultural soils and VELCO's waste disposal practices.
Ed McGann	Describe VELCO's proposed substation upgrade design and transmission structure plans associated with the Project and addresses public health and safety and air pollution (sound), Section 248(b)(5).

Mike Buscher	Discuss the Project's compliance with the aesthetic criterion and PUC Rule 5.800.

Request for Relief

WHEREFORE, the Petitioner respectfully requests that the PUC:

a. Schedule a prehearing conference in this matter as soon as practicable;

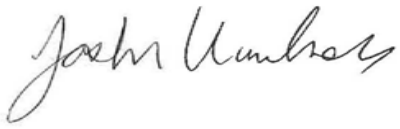
b. Issue findings consistent with this Petition and prefiled testimony and exhibits that the Project will promote the general good of the State of Vermont as required by 30 V.S.A. § 248;

c. Issue a Certificate of Public Good for the Project consistent with this Petition and prefiled testimony and exhibits; and

d. Grant such further relief as the PUC determines is necessary, just, and proper.

Dated at Montpelier, Vermont this 3rd day of September, 2021.

VERMONT ELECTRIC POWER COMPANY, INC.
AND VERMONT TRANSCO LLC



By: _____

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