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October 5, 2022

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(j) authorizing upgrades to VELCO’s existing Highgate Substation, located in Highgate, Vermont

Dear Clerk Anderson:

Vermont Electric Power Company Inc. and Vermont Transco LLCs (collectively “VELCO” or “Petitioners”) this day has filed ePUC the Petition, prefiled testimony and supporting exhibits, together with my notice of appearance and other required documents relating to VELCO’s request to the Public Utility Commission (the “PUC”) to issue a Certificate of Public Good (“CPG”) pursuant to 30 V.S.A. § 248(j), authorizing Petitioners to construct the so-called Highgate Project in the town of Highgate, Vermont (the “Project”), in accordance with 30 V.S.A. § 248(j) and PUC Rule 5.400. The Highgate Project includes upgrades to VELCO’s existing substation located at 2731 Route 78, in Highgate, Vermont.

With respect to Critical Energy Infrastructure Information (CEII), VELCO expects to enter into a Protective Agreement with the Department of Public Service so that it can provide a CEII 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.

Sincerely,

\*Admitted in Vermont and New Hampshire

\*\*Admitted in Vermont and Massachusetts

*Joslyn Wilschek*

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(j) authorizing upgrades to VELCO’s existing Highgate Substation, located in Highgate, 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(j) and Vermont Public Utility Commission (“PUC” or “Commission”) Rule 5.400, and petition the PUC for a Certificate of Public Good (“CPG”) for the Highgate Substation project in Highgate, Vermont which consists of making minor upgrades to VELCO’s existing substation located at 2731 Route 78, in Highgate, Vermont (the “Project”). 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. VELCO's Highgate substation is connected to VELCO's 115 kV electric transmission network in the Highgate area. The substation is connected to Vermont Electric Cooperative, Inc.'s sub-transmission systems in the Highgate area. VEC's distribution systems are fed from the sub-transmission system and in turn serve VEC's customers.

#### **Notice Requirements**

6. As required by PUC Rule 5.402, on July 18, 2022, VELCO notified the Highgate Selectboard, the Northwest Regional Planning Commission, and the Highgate 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 Highgate grand list as it existed no more than 60 days before this filing.

#### **Project Need**

7. VELCO purchased the 46 kV equipment in the Highgate Substation in 2003 from Citizens Utility. VELCO rebuilt the 115 kV equipment in 2005 as part of the Northern Loop project.

8. VELCO identified the primary deficiency as the control building. The existing 24' x 61' light gauge metal control building suffers from several deficiencies, which cumulatively, requires its replacement. The control building's physical size does not adequately house the protection and control equipment, station service, DC battery systems, communication equipment, and security systems while maintaining safe working clearances as further detailed in the Assessment. The existing shell provides no ballistic protection and requires greater insulation. The

existing roof includes no fire protection and is not adequately insulated as icing at the eaves indicates heat loss through the roof. The building's wall and door systems include no fire protection, some doors have rust, and daylight can be seen around both door systems. The exterior insulation of the building's foundation is exposed and deteriorating due to UV rays. The existing battery rooms require increased working space.

9. To address these deficiencies, VELCO proposes to construct a new building of approximately 32' x 80'. VELCO would install the control building adjacent to the existing control building inside the substation fence.

10. To accommodate the new control building, VELCO will need to expand a 90-foot portion of the existing fence on the fence's eastern side and relocate the existing gate. VELCO proposes to expand the fence approximately 5 feet to the east with the same materials as the existing fence: chain link fence that meets the National Electric Safety Code (NESC) and is at least seven feet in height. The fence expansion in this area will also prevent snow from falling off the control building's roof and onto the fence.

11. VEC will have to remove its existing 46 kV conductors and one pole and relocate these just outside the fence on the east side of the substation approximately 30 feet to allow clearance to the new control building.

12. To accommodate the new gate, VELCO will need to regrade, widen, and shorten the existing driveway.

13. VELCO will use the existing substation parcel, VELCO right-of-way easements, and a VELCO-owned parcel across Route 78 from the substation to stage any material needed during construction.

14. The Commission can process this petition using Section 248(j) procedures. The Project is limited in size and scope, it raises no significant issues with respect to the substantive criteria of Section 248, and VELCO believes that the public interest is satisfied by the procedures authorized under Section 248(j). VELCO will perform the Section 248 upgrades within previously disturbed lands, and most of the work will occur within the existing substation fence other than the minor fence expansion and associated driveway improvements, and the relocation of a VEC pole. No Project components will require tree clearing. Temporary construction impacts will impact a Class II wetland buffer, but such impacts will be limited and VELCO proposes to implement best management practices to ensure no undue adverse impacts. Thus, the Project does not raise a significant issue with respect to the Section 248 criteria given the Project's limited scope and clear need to replace the control building.

#### **Project Components**

15. The Project consists of the following primary components:
- Replace the existing 24 foot by 61-foot VELCO control building with a new, approximately 32 foot by 80-foot control building that will accommodate a new protection and control system, station service, DC battery systems communication equipment, and security systems, and bathroom. The new control building will be located inside the existing the Substation.
  - Expand a 90-foot portion of fence on the fence's eastern side to accommodate the new control building. VELCO proposes to expand the fence approximately 5 feet to the east.

- Relocate the entry gate approximately 40 feet to the south, and adjust the existing driveway by regrading, widening, and shortening the driveway to accommodate the new entry gate.
- Remove existing substation, including all above and below grade components.
- Relocate VEC's existing 46 kV wires and pole just outside the east side of the fence to accommodate the new control building.
- Relocate communication fiber cables to connect to new control building.

#### **Project Cost**

16. VELCO estimates that the Project will cost \$12,513,480.

#### **Project Schedule**

17. VELCO proposes to begin Project construction as soon as possible after receiving the required permits and approvals. Currently, the estimated construction schedule is from April 2023 with a targeted completion date of March 2024. 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.

18. VELCO requests that these construction restrictions do not apply to construction activities that VELCO must perform during any required outages that may be needed to maintain system reliability.

19. 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, site grading, reroute of fiber-optic cable and installation of temporary equipment.

#### **Alternatives Considered**

20. 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))**

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

22. 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, aesthetics) (PUC Rule 5.800), development affecting public investments); (b)(6)-(7); and (b)(10).

Andrew McMillan

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 VHB 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, Section 248(b)(5).

**Request for Relief**

WHEREFORE, the Petitioner respectfully requests that the PUC:

- a. 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(j);
- b. Issue a Certificate of Public Good for the Project consistent with this Petition and prefiled testimony and exhibits; and
- c. Grant such further relief as the PUC determines is necessary, just, and proper.

Dated at Montpelier, Vermont this 5th day of October, 2022.

VERMONT ELECTRIC POWER COMPANY, INC.  
AND VERMONT TRANSCO LLC



By: \_\_\_\_\_

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