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January 17, 2023

Holly Anderson, Clerk
Vermont Public Utility Commission
ePUC

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

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 Middlebury Substation, located in Middlebury, 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 Middlebury Project in Middlebury, Vermont (the “Project”), in accordance with 30 V.S.A. § 248 and PUC Rule 5.400. The Middlebury Project includes upgrades to VELCO’s existing substation located at 522 Quarry Road, in Middlebury, 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,

A handwritten signature in cursive script, appearing to read "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 authorizing upgrades to VELCO’s existing Middlebury Substation, located in Middlebury, 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 Middlebury Substation project in Middlebury, Vermont which consists of upgrading VELCO’s existing substation located at 522 Quarry Road, Middlebury, 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. The Middlebury substation is connected to the VELCO 115 kV electric transmission network in Addison County, Vermont and connects to Green Mountain Power's (GMP) 46 kV system in the Middlebury area.

Notice Requirements

6. As required by PUC Rule 5.402, on November 11, 2022, VELCO notified the Middlebury Selectboard, the Addison County Regional Planning Commission, and the Middlebury 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 Middlebury grand list as it existed no more than 60 days before this filing.

Project Need

7. VELCO purchased the Middlebury substation from CVPS in 1958. VELCO's 115/46 kV Middlebury substation was constructed in 1970 with various modifications and improvements over the nearly fifty years of service.
8. VELCO developed an evaluation tool that it used to conduct a condition assessment of the substation (Assessment). The Assessment identified the need to replace some of the equipment primarily due to condition, but design standards and operating practices were also taken into consideration.
9. The primary deficiency is the control building. To correct this deficiency, VELCO proposes to replace the existing control building with a larger control building, and

replace and expand a portion of the existing fence to accommodate the new control building on the northeast side of the existing facility. This work will require VELCO to expand the fence by approximately 30 feet on the east side, and approximately 72 feet on the north side to accommodate the new control building. In addition, there is currently a stream that runs through a culvert beneath the substation and VELCO will take this opportunity to relocate the stream through a culvert located beneath the ground along the southern fence line. VELCO will also be shortening its existing access road to accommodate the expanded fence area and will install a turnout area to allow vehicles to safely turnaround without having to enter the fenced substation. VELCO also plans to replace the existing circuit switcher located on the high voltage side of the transformer with a circuit breaker.

10. To maintain electrical transmission while executing corrective actions with minimal necessary outages, VELCO proposes to use a temporary substation, which consists of mostly mobile components located on trailers. The proposed location of the temporary substation will be to the southwest of the existing substation.
11. The proposed temporary substation will require VELCO to install temporary 115 kV and 46 kV structures and conductors.

Project Components

12. The Project consists of the following primary components:
 - Replace the existing control building with a larger control building that can accommodate a new protection and control system, redundant AC & DC station services, communication equipment, security systems and new bathroom facilities;

- Replace the existing perimeter fence and expand the northeast substation yard area to accommodate new control building;
- Replace water supply & wastewater systems for control building facilities;
- Install a temporary substation and associated temporary access road, poles and conductors, and temporary fenced-in yard to maintain electrical transmission for the Project's duration (all components of the temporary substation will be removed and the area returned to existing conditions within 9 months of commissioning the permanent substation);
- Reroute an existing stream that presently runs through the middle of the substation in an underground culvert so it runs along the southern fence line in an underground culvert;
- Shorten and revise existing access road;
- Replace the oil containment system for the transformer (typically maintenance work that does not require any regulatory procedures but is included as a component of this Project).

Project Cost

13. VELCO estimates that the Project will cost \$17,357,013.

Project Schedule

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

15. 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.
16. 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, and installation of temporary equipment.

Alternatives Considered

17. 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))

18. The Project will satisfy the statutory criteria contained in § 248(b) as demonstrated by the prefiled testimony and exhibits filed with this Petition.
19. 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 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 associated with the Project and addresses public health and safety 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 17th day of January, 2023.

VERMONT ELECTRIC POWER COMPANY, INC.
AND VERMONT TRANSCO LLC



By: _____

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