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October 30, 2023

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 St. Johnsbury Substation, located in St. Johnsbury, Vermont

Dear Clerk Anderson:

Vermont Electric Power Company Inc. and Vermont Transco LLCs (collectively VELCO) this day has filed in accordance with 30 V.S.A. § 248 and Vermont Public Utility Commission (Commission) Rule 5.400, the Petition, prefiled testimony and supporting exhibits, together with other required documents relating to VELCO’s request for a Certificate of Public Good authorizing VELCO to upgrade its existing St. Johnsbury substation at 397 Higgins Hill Road, in St. Johnsbury, Vermont.

With respect to Critical Energy Infrastructure Information (CEII) and other Confidential Information, 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,

Joslyn Wilschek, esq.

*Admitted in Vermont and New Hampshire

**Admitted in Vermont and Massachusetts

**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 St. Johnsbury Substation, located in St. Johnsbury, Vermont

PETITION

This document and associated testimony and exhibits have been filed in ePUC

The Vermont Electric Power Company, Inc. and Vermont Transco LLC (collectively referred to as VELCO, the Company, or Petitioners), in accordance with 30 V.S.A. § 248 and Vermont Public Utility Commission (Commission) Rule 5.400, petition the Commission for a Certificate of Public Good (CPG) for upgrades to the existing St. Johnsbury Substation at 397 Higgins Hill Road, St. Johnsbury, Vermont (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 Commission 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 St. Johnsbury substation is connected to VELCO’s 115 kV electric transmission network, Eversource’s 115 kV transmission network in the St. Johnsbury

area, and the Green Mountain Power (GMP) sub-transmission system in the St. Johnsbury area.

Notice Requirements

6. As required by Commission Rule 5.402, on September 8, 2023, VELCO notified the St. Johnsbury Selectboard, the Northeastern Vermont Development Association, and the St. Johnsbury Planning Commission of the Project. Contemporaneously with this filing, VELCO sent notice of the Project to the adjoining landowners, the Department of Public Service, the Agency of Natural Resources, and the Vermont Division for Historic Preservation. In accordance with Commission Rule 5.402(B)(3), VELCO identified the adjoining landowners using a certified copy of the St. Johnsbury grand list as it existed no more than 60 days before this filing.

Project Need

7. The VELCO St. Johnsbury substation was built in 1972, with various modifications and improvements occurring over the subsequent 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. VELCO proposes to address most of the substation concerns by replacing the existing control building with a larger control building, replacing the existing 220 circuit switcher with a new K220 SF₆ gas circuit breaker, replacing the existing 34.5 kV breakers with new vacuum 34.5 kV breakers, replacing the protection and control panels with the construction of a new control building, and replacing the substation fence with an

expanded fence. VELCO also plans to reconstruct and widen the existing driveway as well as establish a location along the driveway to provide power during Project construction. These Project components will require tree and vegetation removal. VELCO will address other elements of the substation by in-kind replacement and modifications of the existing equipment.

Project Components

10. The Project consists of the following primary components:

- Replace the existing 25' x 31' VELCO control building with a new, approximately 32' x 70' control building that will accommodate the protection and control system, redundant AC & DC station services, communication equipment, and security systems. The new control building will be located on the southern side of the substation.
- Replace the existing 220 circuit switcher with a new K220 SF6 gas circuit breaker that meets VELCO's design standards.
- Expand the fence to accommodate the new control building, and to improve access to equipment for maintenance. The substation fence expansion will be approximately 15 feet to the north, 15 feet to the west, and 55 feet to the south.
- Reconstruct and widen the driveway to 20 feet with turn-around.
- Improve site drainage.
- Perform tree clearing to accommodate the temporary infrastructure, temporary substation/construction area support area, expanded substation yard, and driveway improvements.

- Install landscape mitigation.
 - Install a temporary substation and associated temporary driveway, poles and conductors, to maintain electrical transmission for the Project's duration.
11. The Project will require VELCO to install a temporary configuration to maintain service to the GMP sub-transmission system. The temporary configuration includes a temporary substation with temporary 115 kV poles and lines, driveway; and for GMP to install temporary and permanent electric line components.

Project Cost

12. VELCO estimates that the Project will cost \$18,437,234.

Project Schedule

13. VELCO proposes to begin Project construction as soon as possible after receiving the required permits and approvals. Currently, the estimated construction schedule would begin in August 2024 with a targeted completion date of December 2025. This assumes receipt of a CPG by end of July 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 would 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 given that the

holiday is not widely granted as a paid day off for many of the workers likely to be working on the Project.

14. 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, or (2) work that VELCO must perform related to filling the power transformer with oil.
15. VELCO also requests permission to begin construction without having first obtained the required Wastewater System and Potable Water Supply Permit and the Division of Fire Safety Permit (if applicable). VELCO seeks exemption from the standard condition that requires acquisition of all state and federal permits before the start of construction. Although VELCO anticipates the receipt of any applicable Wastewater System and Potable Water Supply Permit and Division of Fire Safety Permit before the start of construction, the acquisition of these two permits might not occur before 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: yard expansion, vegetation clearing, site grading, and the building and installation of temporary equipment.

Alternatives Considered

16. 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))

17. The Project satisfies the statutory criteria contained in Section 248(b) as demonstrated by the prefiled testimony and exhibits filed with this Petition.
18. In support of this Petition, the Petitioners submit prefiled testimony and exhibits sponsored by the following witnesses:

Witnesses

Subject

John Fiske

Provides 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, educational and municipal services, development affecting public investments); (b)(6)-(7), and (b)(10).

Andrew McMillan

Provides an assessment of the Project’s potential impacts upon above-ground and below-ground historic sites as well as presenting the report entitled: “Natural Resource Assessment Report” prepared by Arrowwood Environmental, LLC which addresses all the Section 248(b)(5) environmental criteria, primary agricultural soils and VELCO’s waste disposal practices.

Ed McGann

Describes VELCO’s proposed substation upgrade design and transmission structure plans associated with the Project and addresses, Section 248(b)(2)(need) and (b)(5) (public health and safety).

Mike Buscher

Discusses the Project’s compliance with the aesthetic criterion and Commission Rule 5.800.

Request for Relief

WHEREFORE, the Petitioner respectfully requests that the Commission:

- 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 Commission determines is necessary, just, and proper.

Dated at Montpelier, Vermont this 30th day of October, 2023.

VERMONT ELECTRIC POWER COMPANY, INC.
AND VERMONT TRANSCO LLC



By: _____

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