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July 14, 2008

Susan M. Hudson, Clerk
Vermont Public Service Board
112 State Street
Montpelier, VT 05620-2701

Re: Docket 7032 – Final Lamoille County Project Line Design Plans

Dear Sue:

On March 16, 2006, the Public Service Board (“Board” or “PSB”) issued a Final Order and Certificate of Public Good approving the construction of the so-called Lamoille County Project (“LCP”). As set forth below in detail, at various times, and through various orders, the Board approved final design of the LCP as filed by Vermont Electric Power Company, Inc. and Vermont Transco LLC (together as “VELCO”). Given the stages in which the Board approved the design for the LCP, VELCO has never filed a unified set of plans. Included with this letter please find a complete set of transmission line plans for the entire LCP.¹ As described in this letter, these plans contain certain improvements to the project design that are based on a final engineering review of the approved design. Please find attached:

- Plan and Profile: Duxbury to Stowe 115kV Line REV. F, Duxbury to Stowe 34.5kV Line REV. F (Attachment A)
- Drawings of the 115 kV and 34.5 kV structure types used in the improved design (Attachment B);
- Updated aesthetic mitigation plans that reflect the improvements to the design (Attachment C);
- Memorandum from T.J. Boyle and Associates explaining the changes to the mitigation plans (Attachment D);

¹ Please note that when the parallel 34.5 kV lines are not located on the same structures as the 115 kV line they are shown on separate sheets indicated by “LV” (lower voltage).

- Memorandum regarding the environmental impacts of the improvements (Attachment E);
- Chart identifying, on a structure-by-structure basis, noteworthy differences between the approved design and the improved design (Attachment F);
- Addendum to Hugh Henry's Above-Ground Historic Resources Report (Attachment G);
- Memorandum from Hope Luhman and Niels Rinehart discussing the impacts of the improvements on archeological resources (Attachment H); and
- Letter to landowners giving them notice of the new design plans (Attachment I).

Filings and Approvals

On August 25, 2006, VELCO filed final design plans and aesthetic mitigation plans for the 115 kV and 34.5 kV lines, with replacement aesthetic mitigation plans filed on September 21, 2006. VELCO filed a letter with the Board on December 6, 2006, stating that there were five areas of the transmission line design that were still unresolved. On February 5, 2007, VELCO filed line design plans that resolved three of the five outstanding areas (the Waterbury Reservoir crossing, pole heights, and the Little River crossing).

The Board approved the final design plans and aesthetic mitigation plans for the 115 kV and 34.5 kV lines (with the exception of the northern half of the Gregg Hill route) in a March 9, 2007, order. In the same order, the Board resolved the fourth outstanding area by approving VELCO's August 25, 2006, design for the Harvey property. On April 2, 2007, VELCO filed line design plans for the fifth outstanding area, the northern half of the Gregg Hill route, and the Board approved those plans on May 16, 2007. Given the intermittent timing of the filing of the plans, VELCO has never filed one set of final plans. One of the main purposes of today's filing is to provide the Board with a complete set of final transmission line plans for the 115 kV and 34.5 kV lines.

Project Improvements

The other purpose of today's filing is to call the Board's attention to improvements made to the 115 kV and 34.5 kV line designs. These are improvements to the design as approved by the Board on March 9, 2007, and May 16, 2007. They are a result of a final engineering review of the design approved by the Board. Along with the engineering improvements, these plans reflect aesthetic mitigation changes resulting from discussions with landowners. The final engineering review (with subsequent design improvements) insured that all structural and electrical clearance requirements will be met. In addition,

the review looked at ways to reduce overall physical and visual impacts, and the cost of materials and construction.

As detailed below, none of these improvements will be a “substantial change” to the approved design because there will not be any “significant impacts” to the Section 248(b) criteria. See PSB Rule 5.408. In fact, the improvements will reduce the impacts on the Section 248(b) criteria, and for this reason the Board should approve the design plans enclosed herein.

Duxbury Switch

The Duxbury switch is now mounted on a single pole steel self-supported structure on a concrete foundation. The previous switch design required three (3) two-pole steel structures, and one (1) single pole steel structure, for a total of seven (7) steel poles, each requiring a concrete foundation. Six (6) of these steel poles and foundations will be eliminated in the improved design, which now requires only one single pole steel structure (LCP-1), and one single pole guyed wood structure (232.6).

Two (2) three-pole guyed wood H-frame angle structures (232.3 and 232.7) were previously required in the lines leading to the Duxbury switch, from the existing VELCO K24 line, resulting in six (6) wood poles and eighteen guy wires. The realignment of the K24 tap will eliminate this line angle, allowing these two structures to be designed as single unguyed wood poles, for a reduction at this point alone of four (4) wood poles and all of the guying.

The switch location is being relocated to an area providing reliability benefits (from a long term maintenance and initial construction perspective), fewer environmental issues, and less aesthetic concerns.

Elimination of 115 kV Wood Structures

Three (3) 115kV wood structures will be eliminated from the 115kV single circuit section (LCP-4, -21, and -120).

Elimination of 115 kV Steel Structures

Four (4) steel structures (some multi-pole) in the 115kV single circuit line section will be converted to wood or laminated wood, resulting in the elimination of nine (9) concrete foundations (LCP-2, 6, 8, and 18). The conversion from steel structures to wood or laminated wood structures will reduce the Project’s impact on aesthetics as well as its construction cost, while maintaining VELCO’s reliability standards for its transmission lines. This is true for all of the other locations where structures are changing from steel

to wood (see Gregg Hill and Black Bear Run, below) and for all the other changes that are part of the improved final line design plans.

Gregg Hill Improvements

The two (2) large single pole multi-arm side-by-side style double circuit steel towers at the south end of the Gregg Hill reroute in the original design will be replaced; one by a guyed laminated wood double circuit structure with underbuild (LCP-59), matching the underbuild cross-arm style as approved for use south of the Waterbury Reservoir, and one by a pair of guyed single wood poles (LCP-61/GMP-74).

Black Bear Run/ Little River Area Improvements

Nine (9) large single pole multi-arm side-by-side style double circuit steel towers in the Black Bear Run/Little River area will be replaced with either wood or laminated wood structures, still of the single pole double circuit style, again matching the underbuild cross-arm style as approved for use south of the Waterbury Reservoir. (Structures LCP-94, 97, 98, 103, 104, 108, 112, 113, and 114). One of these steel towers at the west edge of the Little River is being eliminated altogether (LCP-111).

Double Circuit 34.5 kV Structures

Ten (10) steel poles and associated concrete foundations in the double circuit 34.5kV line section between Stowe's River Road and the future Stowe Substation will be replaced with laminated wood poles. (GMP-1, 2, 5, 6, 10, 11, 13, 14, 18, and 20). Some of these poles are guyed; some of them are unguyed depending on the location.

In addition to the improvements discussed above, VELCO has made other minor changes to the approved plans that improve the overall design of the LCP. To the degree that these changes involve the relocation of structures, the shift is depicted on the new plan and profile with a small open circle indicating an earlier structure location if different from what is proposed. If the changes involve pole heights or structure framing types, they are listed on Attachment F, a chart comparing structure types in both the approved plan and the improved plan.

Conclusion

The improvements to the design described above do not result in a "substantial change" to the approved design of the LCP. Prior to filing with the Board, VELCO has been conducting a communications effort to share these improvements with state agencies, municipalities and landowners. Coincident with this filing, VELCO has notified all adjacent landowners that the final design for the LCP has been improved and that the new

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plans are available for viewing at their municipal offices or on VELCO's web site. Because VELCO's communication efforts have been significant and these improvements are changes that make the LCP a better project, it requests that the Board give a two week period for comments on the improvements and then approve the final design plans and aesthetic mitigation plans as filed with this letter.

We thank you for your thoughtful and thorough review. Please contact me if you have any questions or concerns.

Yours truly,

A handwritten signature in black ink, appearing to read "Bill Piper", with a long horizontal flourish extending to the right.

William B. Piper

Enclosure

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