

Appendix 1: Vermont System Planning Committee Comments

REF #	COMMENTS ON LONG-RANGE TRANSMISSION PLAN— VSPC REVIEW DRAFT (LRTP) ³	SOURCE OF COMMENT ⁴	DISPOSITION OF COMMENT
1	Cross reference from LRTP to technical analysis.	2/23/09 VSPC meeting	Relevant content moved into LRTP
2	Generic one-line drawings or skeletal drawing of Vermont system.	2/23/09 VSPC meeting	Not adopted. LRTP edits have sought to make report more readable to a general audience.
3	Single glossary across the LRTP and technical analysis.	2/23/09 VSPC meeting	Completed.
4	Request that VELCO show the draft of the report to the DUs before public release.	2/23/09 VSPC meeting	Completed.
5	Footnote on the relationship between year of need and load to further emphasize that load level is the driver.	2/23/09 VSPC meeting	Text added to clarify this point in Sections 2 and 3.
6	Summary is too long and doesn't get to the substance (the reliability deficiencies) until page 31. Sections 3, 4 & 5 are too long. Condense or make appendices.	2/23/09 VSPC meeting	Report reorganized to address this point.
7	Page 2 and 31 maps should show the transmission lines as lines, not dots.	2/23/09 VSPC meeting	Completed.
8	The report feels like it was written in 2007. Needs further updating to current conditions, such as slowed load growth, economy.	2/23/09 VSPC meeting	Discussion added concerning how current economic trends relate to the planning process and the Plan.
9	More focus on Vermont, less on region.	2/23/09 VSPC meeting	Completed.
10	Strengthen the idea of non-reliability transmission. Consider specific reference to proposed NU line.	2/23/09 VSPC meeting	Expanded discussion of non-reliability added to Plan. No reference to any particular line.
11	On map of New England, unify Massachusetts so it doesn't look like three states.	2/23/09 VSPC meeting	Completed.

³ Page number in comments refer to pagination in original VSPC review draft.

⁴ Complete text of all comments are posted on the VSPC website at <http://www.vermontspc.com/VSPC%20Meetings/Forms/By%20Meeting.aspx> under the section for the February 21, 2009, meeting

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12	Mention Non-Transmission Alternatives (NTAs) in the transmission planning section.	2/23/09 VSPC meeting	Completed.
13	PTF: mention in the box on page 20 (the funding explanation).	2/23/09 VSPC meeting	The box no longer exists
14	Acknowledge in 4.2 that the 10 cents for transmission may (is likely to) change.	2/23/09 VSPC meeting	Completed.
15	Be consistent about whether you call it a “plan” or something else.	2/23/09 VSPC meeting	Completed.
16	Much of the document appears to be arguing for and defending transmission. While it is important to present information about where and when transmission may be needed, an equally important message is VELCO’s intent to use the best and most current information in its analyses and to respond to changing demand and new technologies in a collaborative way that considers various options. [Full comment includes specific examples.]	Jenny Cole	Significant edits made that emphasize the Plan as the first step in the larger planning process of Docket 7081.
17	Pages 21-22: The amount of detail on funding may be more than needed. It has been pointed out that the shared funding favors transmission project construction.	Jenny Cole	Detail on funding significantly reduced and moved to Section 4 (background).
18	Page 25-26: Consider adding a bullet describing VSPC’s “open door policy.”	Jenny Cole	Topic added to the fourth bullet.
19	Page 32, Figure 6-1 explanation: “Loss” may need further definition. Consider adding “Loss refers to ____”	Jenny Cole	Added to glossary
20	Page 34: “Project 3B is a proposed new transmission line that is needed before 2018. This 115-kV line would run from Georgia to St. Albans at a distance of fewer than 10 miles. Project 18 is a 230-kV line that would run from Plattsburg to Essex at a distance of fewer than 30 miles.”The use of terms or phrases such as “fewer than” or “rebuilding existing lines” (which occurs earlier in the same paragraph) can give the impression that proposed projects are insignificant or have minimal impact, which may or not be the case.	Jenny Cole	Draft has been edited to remove subjective qualifiers wherever possible.
21	Public summary is a good idea. The summary is very readable.	CVPS	No action required.
22	Comment 1. Use of the word “project” implies we have chosen a solution and won’t fully consider NTAs. Consider “reliability deficiencies” or “issues in need of final solutions.”	CVPS	Substantial edits took this point into consideration throughout.
23	Comment 2. P 2. Subtransmission alleged criteria violations. Remove subtransmission system issue discussion or redraft to explain that VELCO and the distribution utilities are coordinating their planning efforts, but do not declare that a subsystem problem exists based on bulk transmission system study criteria.	CVPS	Did not use bulk transmission system criteria for analysis of subsystem issues.

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24	Comment 3. Industry Dynamics. P 6. Section should be revised to better explain how industry dynamics affect Vermont decisions. E.g., SPEED vs. RPS; vertically integrated utilities vs. load-serving entities; supply mix low in GHG emissions. Better tailoring to Vermont will reduce misperception that LRTP serves interests of New England at expense of Vermont.	CVPS	Significant edits to this section sought to increase Vermont focus and decrease regional focus.
25	Comment 4. Power supply planning. P 9. How is this discussion relevant to the LRTP. DUs are responsible for power supply. Omit or explain the role of the DUs in power supply decisions.	CVPS	Power supply arises as a topic in discussion of transmission planning relative to the impacts of losing current supply from Vermont Yankee and Hydro Quebec. New England’s supply mix remains a part of “Industry Dynamics, now Section 4, to provide context, but this section has been significantly shortened.
26	Comment 5. Role of EEU. P 9. Correct implication that DUs, rather than Energy Efficiency Utility, are responsible for Energy Efficiency in Vermont.	CVPS	Completed.
27	Comment 6. Renewables. P 10. Discussion of RPS requirements not relevant to Vermont. Redraft to better reflect Vermont situation rather than presenting regional focus where renewable don’t plan as great a role in current supply.	CVPS	Substantial edits took this point into consideration.
28	Comment 7. Conventional generation. P 11. Draft focuses on region not on Vermont. Redraft to focus on Vermont supply resource to avoid creating confusion in minds of Vermont consumers.	CVPS	Substantial edits took this point into consideration.
29	Comment 8. Identifying subtransmission deficiencies. P 24. Correct the draft to accurately reflect the respective roles of DU and VELCO under the 7081 MOU with respect to identifying reliability deficiencies in the subsystem.	CVPS	Substantial edits took this point into consideration throughout.
30	Comment 9. P 30. Revise the table to reflect prior comments regarding treatment of subsystem issues.	CVPS	Significant edits made to address concerns raised.
31	Comment 9. P 30. Continued. Rename Section 6 “reliability issues and solutions”	CVPS	Completed

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32	Comment 9. P 30. Continued. Revise intro to state: “Figure 6-1 summarizes <u>potential</u> the transmission reliability issues identified as part of the 2009 planning process. These areas represent locations that <u>may</u> require future transmission related upgrades or alternatives such as local generation or energy efficiency to meet the reliability standards. The following table provides a brief description of each <u>issue based on the VELCO’s application of the bulk system N-1-1 study criteria deficiency.</u> ”	CVPS	This specific language was not incorporated, however, significant changes were made to emphasize that the plan is based on criteria VELCO is required to apply to the bulk system. Further changes were incorporated to clarify where the current plan fits into the larger process of determining solutions.
33	Comment 9. P 30. Continued. Label the table “reliability issue number” not “deficiency number” and “reliability issues” not “deficiency causes.”	CVPS	This suggested change has not been made. The Docket 7081 MOU requires VELCO to identify “reliability deficiencies.” While this language has been significantly edited out of the report, in the context of what is now Figure 3-1, it is an accurate description of the data.
34	Comment 9. P 30. Continued. Expand the explanation for item 9.	CVPS	Completed.
35	Comment 9. P 30. Continued. Clarify the name for item 17.	CVPS	The name “loop flow” has been retained but more descriptive information has been added.
36	While the draft overview that subtransmission issues can be resolved by transmission fixes, the opposite is also true. This should be reflected in the draft.	CVPS	Completed.
37	Delete the phrase “although the Vermont subtransmission system is designated as transmission with regards to FERC.”	CVPS	Substantial edits addressed this point.
38	Comment 10. NTAs. P 36. Challenges accuracy of text regarding technical infeasibility of NTAs in projects 3A, 4, 5 and 6, and objects to use of 2009 loads in screening due to concerns with VELCO forecasts. More opportunity for consideration of NTAs than the report implies for these projects. Should be corrected in text.	CVPS	Edited to remove reference to these projects in illustrating technical infeasibility.
39	I think this has been very well done. I am delighted. Suggestion: glossary, angle: Don't we owe a bit of reference to alternating voltage/current? Everybody knows AC. How about: “Angle is used to measure the synchronism between different alternating quantities, such as voltage or current. It is often an important performance measure; it is measured in degrees.”	Richard Suitor	Completed.