



LEGAL COUNSELORS & ADVOCATES PLC
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Leslie A. Cadwell
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802-342-3114

September 8, 2015

Susan M. Hudson, Clerk
Vermont Public Service Board
112 State Street
Montpelier, VT 05602-2701

Re: Vermont Transco LLC & Vermont Electric Power Company, Inc.
PV20 Cable Replacement Project Section 248 Petition

Dear Mrs. Hudson:

On behalf of Vermont Transco LLC and Vermont Electric Power Company, Inc., (together referred to as "VELCO"), enclosed for filing with the Public Service Board please find an original and six (6) copies of the following documents:

1. VELCO's Petition for a Certificate of Public Good, Pursuant to 30 V.S.A. § 248, Authorizing the Construction of the PV20 Cable Replacement Project;
2. Prefiled Testimony and Exhibits addressing the Section 248(b) criteria in support of the Petition by Scott S. Mallory, Timothy Follensbee II, Hantz Pr sum  and Edward McGann;
3. An Index of Evidence per Rule 5.402(C)(1)(e);
4. Motion for Confidential Treatment to protect Critical Energy Infrastructure Information (CEII) from public disclosure and a Proposed Protective Order, along with two exhibits containing CEII submitted to the Board under seal (Exhibits Petitioner SSM-4 and EM-5);
5. A 45-Day Notice and Adjoining Landowner List;
6. Notices of Appearance for VELCO by Leslie A. Cadwell and Bridgette Remington;

7. A transmittal letter to the State Treasurer and check in the amount of \$56,684.51 payable to the State Treasury to satisfy the filing fee required by Section 17 of Act No. 57, to be codified at 30 V.S.A. § 248b; and
8. A DVD containing a word-searchable, electronic copy of the enclosed documents, except the two exhibits containing CEII.

The existing PV20 transmission line connects the New York Power Authority (“NYPA”) Beekmantown, New York substation to the VELCO Sandbar substation in Milton, Vermont. VELCO and NYPA are jointly planning to remove and replace a portion of the line that runs from Plattsburgh, New York to Grand Isle, Vermont to maintain an important connection that has served Vermont since the late 1950s. In the enclosed Petition and supporting evidence, VELCO requests a Certificate of Public Good (“CPG”) authorizing the replacement of the VELCO-owned segment of the PV20 circuit from the New York border, located underwater within Lake Champlain, to the overhead point of interconnection, located in Grand Isle, Vermont, including the construction of a new termination station and the installation of two new overhead transmission line structures to reroute the line. The project is known as the “PV20 Cable Replacement Project.”

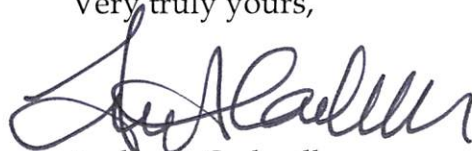
The Project schedule anticipates that the Public Service Board will be able to review the Project and issue a CPG by September 2016. To help meet that schedule, and to take advantage of better weather in the fall, we would appreciate the Board convening a prehearing conference and scheduling a site visit and public hearing as soon as reasonably possible.

For the Board’s information, today VELCO also requested a determination from the Vermont Department of Public Service that the Project is consistent with the Vermont Electric Plan as required by 30 V.S.A. § 202(f). We will file the Department’s determination with the Board after we receive it from the Department.

Please contact me should you have any questions or concerns about this filing. Thank you for your assistance.



Very truly yours,



Leslie A. Cadwell

Cc: Section 248 Petition Service List (attached)
S. Mark Sciarrotta, VELCO



STATE OF VERMONT
PUBLIC SERVICE BOARD

Docket No.

Petition of Vermont Transco LLC and Vermont)
Electric Power Company, Inc., requesting a)
certificate of public good, pursuant to 30 V.S.A.)
§ 248, authorizing the construction of the PV20)
Cable Replacement Project)

SECTION 248 PETITION SERVICE LIST

Deborah Markowitz, Secretary
Vermont Agency of Natural Resources
1 National Life Drive, Davis 2
Montpelier, VT 05620-3901

Northwest Vermont Regional Planning
Commission
75 Fairfield Street
St. Albans, VT 05478

Dr. Harry Chen, Commissioner
Vermont Department of Health
108 Cherry Street, Suite 301
Burlington, VT 05401

Susan Minter, Secretary
Vermont Agency of Transportation
National Life Building
Montpelier, VT 05633-5001

William Sorrell, Attorney General
Office of the Attorney General
109 State Street
Montpelier, VT 05609-1001

Laura Trieschmann, Director & SHPO
VT Division for Historic Preservation
One National Life Drive, Davis 6
Montpelier, VT 05620-0501

Geoffrey Commons
Director for Public Advocacy
Vermont Department of Public Service
112 State Street
Montpelier, VT 05620-2601

John LaBarge
Byways Program Manager
Vermont Agency of Transportation
One National Life Drive, Davis Building
Montpelier, VT 05633

Christopher Recchia, Commissioner
Vermont Department of Public Service
112 State Street
Montpelier, VT 05620-2601

Grand Isle Select Board
P.O. Box 49
Grand Isle, VT 05458

Chuck Ross, Secretary
Agency of Agriculture, Food & Markets
116 State Street
Montpelier, VT 05620-2901

Grand Isle Planning Commission
P.O. Box 49
Grand Isle, VT 05458

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 seventeen electric distribution utilities that it serves in Vermont.

Notice Requirements

5. As required by PSB Rule 5.402, on April 10, 2015, VELCO notified the Grand Isle Select Board, the Grand Isle Planning Commission, and the Northwest Vermont Regional Planning Commission of the Project ("45-Day Notice"). Contemporaneously with that filing, VELCO sent notice of the Project to each adjoining landowner ("Adjoining Landowner Notice"). Please see the 45-Day Notice and Adjoining Landowner Notice attached together to this Petition as Attachment 1. The Adjoining Landowner list was obtained from the Town of Grand Isle land records.

6. Notice of this Petition was sent to adjoining landowners on September 8, 2015 as required by PSB Rule 5.402(B).

Project Need

7. The existing PV20 circuit connects the New York Power Authority (NYPA) Plattsburgh substation in Beekmantown, NY to the VELCO-Sand Bar substation in Milton, VT. A portion of this circuit runs underwater (submarine) in Lake Champlain between Plattsburgh, New York and Grand Isle, Vermont. The existing

submarine segment of the circuit consists of four cables installed in 1958, and three cables installed in 1970. The existing cables are damaged, with one being no longer usable, and are at the end of their expected useful service life. Replacing the existing cables and termination stations in Vermont and New York, and rerouting terrestrial and overhead portions of the PV20 line, is necessary to maintain this vital high-voltage circuit.

Project Components

8. The Project seeks to: (a) replace the VELCO-owned segment of the PV20 circuit from the New York border, located underwater within Lake Champlain, to the overhead point of interconnection, located in Grand Isle, Vermont; (b) replace the existing Grand Isle termination station¹ with a new termination station, to be located north of the existing station; (c) reroute the overhead transmission line with the installation of two new transmission structures; (d) remove the existing cables; (e) remove the existing Grand Isle termination station and its associated equipment; and (f) remove two no-longer-required overhead line structures.

Project Cost

9. The total estimated cost of the PV20 removal and replacement in New York and Vermont is \$91.6 million. This cost is comprised of \$83.3million for the installation of new cables, spare cable, and structures, and \$8.3 million for the removal

¹ A termination station contains equipment to terminate the submarine and underground conductors and transition them to an overhead connection to the VELCO transmission network.

of existing cables and structures. The estimated capital cost for VELCO's portion of the installations is \$45.1 million (PTF and non-PTF combined), and the estimated cost for VELCO's portion of the removals is \$4.6 million.

Project Schedule

10. VELCO's schedule calls for work on the access road, site grading, and horizontal directional drilling to begin in 2016 and with primary construction commencing in the spring of 2017. The Project is scheduled to be completed by the winter of 2017, and the removal of the existing facilities in 2018. This schedule presumes that a CPG will be issued in July of 2016.

Alternatives Considered

11. Energy efficiency load management measures and energy conservation programs could not resolve the need to restore a redundant supply to the vital area of Northwest Vermont. This project has screened out of the need for a detailed non-transmission alternative ("NTA") analysis as it is maintenance/asset condition related.

Prefiled Evidence and Compliance with Statutory Criteria

12. Accompanying the Petition and in support thereof, Petitioners offer a Rule 5.402 Index along with the Prefiled Testimony and Exhibits of Scott Mallory, Hantz Presume, Tim Follensbee, and Edward McGann. As demonstrated in the prefiled evidence, the Project will satisfy the statutory criteria contained in § 248(b).


Request for Relief

WHEREFORE, VELCO respectfully requests that the PSB:

- a. Docket the Petition and 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 PSB determines is necessary, just, and proper.

Dated at Castleton, Vermont this 8th day of September, 2015.

VERMONT TRANSCO LLC AND
VERMONT ELECTRIC POWER COMPANY, INC.

By: 

Leslie A. Cadwell
Bridgette Remington
Legal Counselors & Advocates, PLC
P.O. Box 827
Castleton, VT 05735
Its Attorneys

STATE OF VERMONT
PUBLIC SERVICE BOARD

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§ 248, authorizing the construction of the PV20)
Cable Replacement Project)

45-DAY NOTICE AND ADJOINING LANDOWNER LIST

Grand Isle Planning Commission
P.O. Box 49
Grand Isle, VT 05458

Grand Isle Select Board
P.O. Box 49
Grand Isle, VT 05458

Northwest Vermont Regional Planning Commission
75 Fairfield Street
St. Albans, VT 05478

Adjoining Landowners

JC & Emma Rancoud Guillon
10 Champlain Landing
Grand Isle, VT 05458

Dr. Donald Majercik
32 Morgan Road
Jericho, VT 05465

William & Joanne Champagne
64 West Shore Road
Grand Isle, VT 05458

Ryan Maynard
PO Box 162
Grand Isle, VT 05458

North Country Federal Credit Union
Attn: Michael Cardinal
69 Swift Street
So. Burlington, VT 05403

Robert Tashjian & Sarah Majercik
5220 East Pioneer Fork Road
Salt Lake City, UT 84108

STATE OF VERMONT
PUBLIC SERVICE BOARD

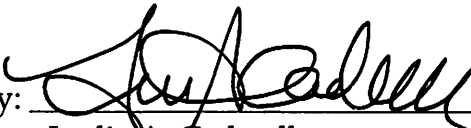
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§ 248, authorizing the construction of the PV20)
Cable Replacement Project)

NOTICE OF APPEARANCE

In accordance with Public Service Board Rule 2.201(A), Leslie A. Cadwell of
Legal Counselors & Advocates, PLC hereby enters her appearance for Vermont Transco
LLC and Vermont Electric Power Company, Inc. in the above-captioned matter.

Dated at Castleton, Vermont this 8th day of September, 2015

By: 

Leslie A. Cadwell
Legal Counselors & Advocates, PLC
P.O. Box 827
lac@lac-lca.com
802-342-3114

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§ 248, authorizing the construction of the PV20)
Cable Replacement Project)

NOTICE OF APPEARANCE

In accordance with Public Service Board Rule 2.201(A), Bridgette Remington of Legal Counselors & Advocates, PLC hereby enters her appearance for Vermont Transco LLC and Vermont Electric Power Company, Inc. in the above-captioned matter.

Dated at Castleton, Vermont this 8^h day of September, 2015


By: _____

Bridgette Remington
Legal Counselors & Advocates, PLC
P.O. Box 827
Castleton, VT 05735
bridgette@lac-lca.com
802-279-7498