



Petition for Certificate of Public Good, 30 V.S.A. § 248

Submitted: November 15, 2019



New Haven Operations Facility
760 Main Street

19629005.1

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Vermont Transco LLC and Vermont)
 Electric Power Company, Inc. (collectively,)
 “VELCO”), for a certificate of public good,) Case No. 19-____-PET
 pursuant to 30 V.S.A. § 248, authorizing the)
 construction of the New Haven Operations)
 Facility in New Haven, Vermont)

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**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Vermont Transco LLC and)
Vermont Electric Power Company, Inc.)
(collectively, “VELCO”), for a certificate of) Case No. 19- ____-PET
public good, pursuant to 30 V.S.A. § 248,)
authorizing the construction of the New Haven)
Operations Facility in New Haven, Vermont)

**PETITION FOR CERTIFICATE OF PUBLIC GOOD
PURSUANT TO 30 V.S.A § 248**

NOW COME Vermont Transco LLC and Vermont Electric Power Company, Inc. (collectively, “VELCO”), in accordance with 30 V.S.A. § 248, and petition the Vermont Public Utility Commission (“Commission”) for a certificate of public good (“CPG”) authorizing the construction of the New Haven Operations Facility located at 760 Main Street (Route 17) in the Town of New Haven, Vermont (the “Project”).

In support of this request, VELCO represents as follows:

1. VELCO is a company as defined by 30 V.S.A. § 201 and is subject to the Commission’s jurisdiction pursuant to 30 V.S.A. § 203.
2. VELCO’s primary office is located at 366 Pinnacle Ridge Road in Rutland, Vermont. VELCO refers to this as the Pinnacle Ridge Campus.
3. VELCO owns, operates, and plans for 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 ensure adequate and reliable transmission of electricity to the electric distribution utilities that it serves in Vermont. Most of the day-to-day administration of VELCO’s assets are conducted by personnel at the operations facility and primary data center at the Pinnacle Ridge Campus.

Project Description

4. The Project will generally consist of an 18,000 square foot, two-story building (the “Main Building”) located on five acres of VELCO’s 100-acre property, setback on the south

side of Main Street/Route 17 in New Haven, Vermont. The Project is also situated adjacent to VELCO's existing New Haven substation.

5. The main purpose of the Project is to serve as VELCO's Backup Control Center ("BCC") for operating the transmission system in the event that for reasons of man-made or natural disasters the Pinnacle Ridge Campus must be partially or totally evacuated, or otherwise cannot or should not be used for operations. In addition, the Project will include a Secondary Data Center to safely collect, store, and access transmission-related data, as well as a system operator training facility and an emergency response center. The Main Building also contains secondary office and conference space to be used with the BCC, Secondary Data Center, and emergency response center.

6. The Main Building has been designed to resemble a traditional Vermont barn with dark red matte finish in order to blend in with the rural surroundings of the site. Consistent with VELCO's vision of a sustainable Vermont, the building design will incorporate energy efficiency and environmental sustainability principles to the greatest extent economically feasible.

7. Other exterior Project components include:

- (i) A separate back-up generator building with two independent and redundant generators located to the immediate east of the Main Building;
- (ii) Mechanical equipment surrounded by a retaining wall located on the western side of the Main Building;
- (iii) Two separate fiber-optic cable connections from the New Haven Substation site to the Main Building;
- (iv) Solar panels installed on the roof of the Main Building to be used exclusively for onsite generation and consumption;
- (v) An eight-foot tall, chain link security fence surrounding the Main Building, the generators, and the mechanical equipment;
- (vi) Site access provided from Route 17 via an existing driveway extending to a new parking area; and
- (vii) Two redundant and independent, three-phase electric distribution services with power transformers supplied from Green Mountain Power Corporation (the "Distribution Improvements").

Project Need

8. Transmission utilities such as VELCO are required to design, operate, and maintain a transmission network according to national and regional reliability standards. Under these standards, VELCO is required to have primary and backup operational functionality, with facilities that can be operated independently. The backup facility must be capable of being fully operational within two hours after loss of the primary operations center.

9. VELCO's main control center is located at its Pinnacle Ridge Campus in Rutland, and its current backup control center is housed in the basement of its West Rutland Substation. VELCO's current backup control center is inadequate both in terms of its location and functionality. For example, the proximity between VELCO's main control center and the West Rutland Substation introduces a high risk that a significant weather event or other disaster could impact both facilities.

10. The Project will address critical needs set forth in VELCO's Emergency Response Plan, which is intended to be used when potential or actual events jeopardize VELCO's bulk transmission and associated communication systems. The Project is also consistent with VELCO's Business Continuity Plan, which is designed to support business processes following a disruption that prevents the execution of normal business processes at the Pinnacle Ridge Campus. The new BCC will allow for VELCO personnel to operate the transmission system by essentially replicating the existing main control center at the Pinnacle Ridge Campus.

11. The Project was designed with critical input on transmission operations control center planning obtained through the North American Transmission Forum, all to factor in experiences of other utilities addressing national electric transmission reliability requirements.

12. The Secondary Data Center will improve the reliability of VELCO's existing integrated computer systems today, while ensuring that in the event of an event affecting the Pinnacle Ridge Campus that critical data is protected and useful to VELCO's transmission operations.

13. Based on the importance of data in the operation of the transmission system, the siting requirements for the Secondary Data Center aligned with that of the proposed BCC. The

colocation of the facilities achieves design efficiencies, which include allowing the secondary data servers to be supported by the redundant systems also needed for the BCC.

Alternatives Considered

14. VELCO evaluated a number of potential locations and configurations for the Project. The proposed New Haven Project was selected based on multiple positive factors, including distance from the main control center, suitable roadway access, and proximity to reliable and diverse telecommunications and power infrastructure. VELCO's analysis demonstrated that the Project represents the most prudent and least-cost option to address the critical functions that it will serve.

Project Cost

15. VELCO estimates that the Project will cost \$50.7 million. It is expected that 80 % of the costs will be supported on a New England-wide basis, with Vermont to be responsible for 20% of the costs.

Project Schedule

16. VELCO proposes to begin construction as soon as possible after receiving the required permits and approvals, presently assumed to be by mid-July 2020. Currently, the estimated Project construction schedule extends from late summer 2020 through the second quarter of 2022. This schedule assumes receipt of a CPG by July 2020. Failure to achieve this construction schedule will likely have adverse impacts on Project commissioning dates and significant adverse impacts overall Project costs.

Jurisdiction

17. The Commission has jurisdiction over this Project pursuant to 30 V.S.A. §248(a)(2)(A) as a transmission facility proposed for site preparation and construction. Specifically, the BCC and Secondary Data Center qualify as an "other transmission facility not part of a transmission line" for purposes of PUC Rule 5.402(B)(2)(b), given their integral usage with the bulk transmission system. These facilities serve no independent purpose apart from usage with transmission, and are therefore subject to regulation pursuant to 30 V.S.A. § 248. All other elements of the Main Building are to be used principally in conjunction with the BCC and Secondary Data Center, and are thus "improvements, temporary or permanent, that are

reasonably related to facilities for which a certificate of public good is required under 30 V.S.A. §248.” PUC Rule 5.402(D).

18. The Commission’s jurisdiction is ripe based on compliance with the 45-day advance notice requirements as set forth in PUC Rule 5.402(A), and as certified through the Certification of Advance Notice accompanying the Petition. The prefiled testimony and exhibits being provided in connection with the Petition include a discussion of public input received during the advance notice period and incorporated into the design of the Project, consistent with Rule 5.402(A).

Prefiled Testimony and Evidence

19. The Project will satisfy the statutory criteria contained in Section 248(b) as demonstrated by the prefiled testimony and exhibits filed with this Petition.

20. In support of this Petition, VELCO submits prefiled testimony and exhibits sponsored by the following witnesses:

<u>Witness</u>	<u>Subject</u>
Peter W. Lind	Provides an overview of the Project description, 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, and development affecting public investment), (b)(6)-(7), and (b)(10)
David P. Haas	Describes the Project’s BCC and addresses the Project’s compliance with Section 248(b)(2) and (3).
Daniel L. Nelson	Describes the Project’s Secondary Data Center and demonstrates the Project’s compliance with Section 248(b)(2) and (3).
Jacob T. Reed	Assesses the Project’s potential impacts on natural resources and historic sites under Section 248(b)(5) and (b)(8).
Michael J. Buscher	Evaluates the Project’s potential aesthetic impact pursuant to Section 248(b)(5).
Kenneth H. Kaliski	Assesses the sound levels associated with the Project under Section 248(b)(5).

21. A detailed index showing the location of evidence in the prefiled testimony is included with this Petition consistent with PUC Rule 5.402(C)(1)(e), along with a glossary for ease of reference to terminology associated with the Project.

22. The site plans for the Project, included as Exhibit Petitioner PWL-2, satisfy the requirement for a “design level of detail” as set forth in PUC Rule 5.402(C)(1) and (C)(3). Consequently, conceptual approval by the Commission followed by a post-certification review of final designs is not necessary.

Request for Relief

WHEREFORE, VELCO respectfully requests that the Commission:

- A. Render a determination of completeness;
- B. Schedule a prehearing conference in this matter as soon as practicable;
- C. Issue findings consistent with this Petition and the prefiled evidence that the Project will promote the general good of the State of Vermont as required by 30 V.S.A. § 248;
- D. Issue a certificate of public good for the Project consistent with this Petition and the prefiled evidence; and
- E. Take such other actions as may be required for the expeditious review and approval of this Petition.

DATED at Burlington, Vermont, this 15th day of November, 2019.

VERMONT ELECTRIC POWER COMPANY, INC.
AND VERMONT TRANSCO LLC

By their attorneys,

A handwritten signature in blue ink, appearing to be "W. J. Dodge", is written over a horizontal line.

DOWNNS RACHLIN MARTIN PLLC

William J. Dodge

Joshua D. Leckey

199 Main Street

P.O. Box 190

Burlington, VT 05402-0190

(802) 863-2375

wdodge@drm.com

jleckey@drm.com

19560189.5