

November 15, 2019

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Via ePUC
Ed McNamara
Director for Regulated Utility Planning
Planning Division, State of Vermont
Department of Public Service
112 State Street
Montpelier, VT 05620-2601

Re: Case No. 19-____-PET
Vermont Transco LLC and Vermont Electric Power Company, Inc. – 30 V.S.A. § 248 Petition
New Haven Operations Facility

Dear Director McNamara:

Pursuant to 30 V.S.A. § 202(f), Vermont Transco LLC, acting by and through Vermont Electric Power Company, Inc., its manager (collectively “Petitioner”), respectfully requests a determination by the Department of Public Service that the proposal to construct and operate the New Haven Operations Facility at 760 Main Street, New Haven, Vermont (the “Project”), is consistent with Vermont’s 2016 Comprehensive Energy Plan (“CEP”).

The Project is described in greater detail in the Petition and accompanying Prefiled Testimonies of Peter W. Lind, David P. Haas, Daniel L. Nelson, Jacob T. Reed, Michael J. Buscher, and Kenneth H. Kaliski, which we are submitting to the Public Utility Commission today for approval under 30 V.S.A. § 248. Enclosed is a copy of the filing for your convenience.

As described more fully in the testimonies, the Project complies with the CEP, which stresses that the State of Vermont must plan and prepare for electric power supply emergencies, noting significant weather events such as Tropical Storm Irene, and with recent ice storms serving as a sobering reminder. The CEP recommends designing resiliency into critical infrastructure, training key personnel to implement energy emergency response plans, and developing plans for coordinated restoration efforts and enhanced situational awareness. The CEP strives for the protection of public safety, preservation of the environment, and least cost planning.

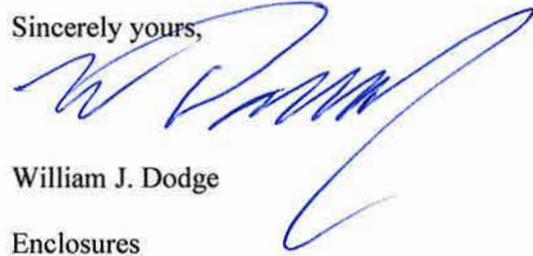
The Project strikes the proper balance between these objectives, and directly advances the emergency planning themes embodied within the CEP. It does so by creating a facility that will allow VELCO to continue to safely and reliably operate the bulk transmission system in the event that a man-made or natural disaster renders unusable VELCO’s headquarters, all by combining backup operations center, a secondary data center, and other critical emergency and training functions in a new, unobtrusive building. The Project will be at a sufficient distance from VELCO headquarters to ensure compliance with applicable reliability standard and continuity of VELCO’s operations during emergency situations.

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Thank you for your consideration of this matter.

Sincerely yours,



William J. Dodge

Enclosures

cc: James Porter, Director, Public Advocacy Division, Vermont Department of Public Service
Peter W. Lind, Senior Project Manager / Engineer, VELCO

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