

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. _____

Petition of Vermont Transco LLC and Vermont Electric Power Company, Inc. (collectively, "VELCO"), for a Certificate of Public Good pursuant to 30 V.S.A. § 248(j) authorizing upgrades to VELCO's existing Irasburg Substation, located in Irasburg, Vermont	
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**PETITION OF VERMONT ELECTRIC POWER COMPANY, INC. AND VERMONT
TRANSCO LLC FOR A CERTIFICATE OF PUBLIC GOOD
PURSUANT TO 30 V.S.A. § 248(j)**

By this Petition, Vermont Electric Power Company, Inc. and Vermont Transco LLC (collectively "VELCO" or "Petitioner") request that the Vermont Public Utility Commission ("Commission") issue a Certificate of Public Good ("CPG") pursuant to 30 V.S.A. § 248(j), authorizing an upgrade to VELCO's existing Irasburg Substation, located in Irasburg, Vermont (the "Project"). In support of this Petition, VELCO states the following:

I. DESCRIPTION OF THE PETITIONER

1. VELCO's office is located at 366 Pinnacle Ridge Road in Rutland, Vermont. VELCO is a company as defined by 30 V.S.A. § 201, and as such is subject to the Commission's jurisdiction pursuant to 30 V.S.A. § 203.

2. Construction of the Project requires a CPG pursuant to 30 V.S.A. § 248.

II. DESCRIPTION OF THE PROJECT

3. The Project will upgrade VELCO's existing Irasburg Substation located at 1364 Route 14, Irasburg, Vermont.

4. VELCO's Irasburg Substation was built in 1973 and it interconnects VELCO 115kV substations (Newport, Jay and Highgate) located in northern Vermont to other VELCO substations to the south (Sheffield, Lyndonville and St. Johnsbury).

5. The Irasburg Substation also feeds the sub-transmission 46kV system connecting to: Green Mountain Power (GMP) Lowell station, Vermont Electric Coop (VEC) Irasburg station, Washington Electric Coop (WEC) Coventry Landfill station, Barton Village Electric, and the Orleans Electric Department.

6. VELCO developed an evaluation criterion that it used to conduct a condition assessment of the Irasburg Substation (the “Assessment”). The Assessment identified the need to replace the 115 kV, SF6, 390 circuit switcher with a 115 kV SF6 breaker. While the Project is being constructed, VELCO will make further use of the scheduled bus and line outages necessary to perform the circuit switcher work, by performing maintenance at the Substation during those outages.

7. The VELCO Irasburg Substation’s condition is the driver of the need for the proposed Project. Energy efficiency and load management actions could not resolve the problems identified in the Assessment.

8. The upgrade to the Irasburg Substation will occur in previously disturbed land, and the work will occur within the existing substation footprint.

9. The Project consists of the following major components:

- Replace the existing 390, 115 kV circuit switcher with a new 115 kV, SF6 breaker;
- Add a new concrete foundation for the new 115kV breaker;
- Add a new 115 kV disconnect switch; and
- Install (if needed) a temporary 5400KVar capacitor bank on the 46kV system to support voltage while the 390 circuit switcher is upgraded.

III. PROJECT SCHEDULE AND COST

10. The projected schedule for construction of the Project extends from May 2021 with a targeted completion date of November 2021, subject to Commission approval. Construction would take place between the hours of 7:00 A.M. and 7:00 P.M. Monday through Friday, and between 8:00 A.M. and 5:00 P.M. on Saturdays. No construction will take place on Sundays, or state or federal holidays, except that VELCO requests to be permitted to perform construction on Bennington Battle Day in August. VELCO requests that the above construction time restrictions do not apply to construction activities that VELCO must perform during any required outages that may be needed to maintain system reliability.

11. The estimated cost of the Project is \$703,111, which includes a 15% contingency.

IV. NOTICE REQUIREMENTS

12. Pursuant to 30 V.S.A. § 248(f) and Rule 5.402(A), on September 28, 2020, VELCO issued a 45-day advance notice describing the Project to the Town of Irasburg Selectboard, Town of Irasburg Planning Commission, and the Northeastern Vermont Development Association. VELCO also provided courtesy copies of the 45-day notice to adjoining landowners and the Irasburg Town Clerk.

13. Service of copies of this filing will be made on the parties specified in 30 V.S.A. § 248(a)(4)(C) by the Commission through ePUC, and by VELCO via email to the Town officials and Regional Planning Commission. Pursuant to Rule 5.402(F)(3), VELCO has identified each adjoining landowner based on the certified grand list for the Town of Irasburg as it existed no more than 60 days prior to the date of the Petition filing. The list of names and addresses of all adjoining landowners has been provided to the Commission with the Petition filing.

14. VELCO has complied with the public outreach requirements established in the Memorandum of Understanding approved in Docket 7081.

V. PROCEDURES UNDER § 248(j)

15. The Project is limited in size and scope, it raises no significant issues with respect to the substantive criteria of Section 248, and the public interest is satisfied by the procedures authorized under Section 248(j).

16. VELCO will perform the Irasburg Substation upgrades within previously disturbed lands, and the work will occur within the existing substation footprint, and thus, there are no impacts on the Section 248 environmental and land use criteria as established by the testimony and exhibits submitted with this Petition.

17. The Project does not raise a significant issue with respect to the other criteria given the Project's limited scope to replace equipment that is at the end of its useful life and/or in unsuitable condition.

VI. COMPLIANCE WITH SECTION 248 CRITERIA

18. As demonstrated by the testimony and exhibits submitted with this Petition, the Project meets all applicable Section 248 criteria:

<u>Witness</u>	<u>Subject</u>
Daniel A. Poulin	Daniel A. Poulin provides an overview of the proposed Project, the Project's scope, cost and schedule, and explains how the Project complies with Section 248(b)(1), (b)(2), (b)(3), (b)(4), (b)(5) (aesthetics, public health and safety, air pollution (noise), transportation, education and municipal services, development affecting public investments), (b)(6), (b)(7), and (b)(10). Mr. Poulin also explains why the Section 248(j) procedures should apply to the Project.
Edward J. McGann	Discusses the engineering and design details for the substation replacements.

Andrew McMillan Provides an assessment of the environmental and historic sites criteria ((b)(5) and (b)(8)) for the Project and VELCO's disposal methods for Project waste materials.

VII. REQUEST FOR RELIEF

WHEREFORE, VELCO respectfully requests that the Commission:

- (1) Authorize this filing to be considered under the procedures set out in 30 V.S.A. § 248(j);
- (2) Waive notice and hearing in accordance with Section 248(j);
- (3) Issue findings consistent with this Petition and prefiled testimony and exhibits as required by 30 V.S.A. § 248(j);
- (4) Find that the proposed Project will promote the general good of the State of Vermont, and authorize VELCO to undertake the actions as described herein and, in its testimony, and exhibits;
- (5) Issue a Certificate of Public Good to that effect; and
- (6) Issue any further relief as the Commission deems just and proper.

DATED at Burlington, Vermont this 18th day of November 2020.

RESPECTFULLY SUBMITTED,

VERMONT ELECTRIC POWER COMPANY,
INC. and VERMONT TRANSCO LLC

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