



Franklin County Line Upgrade Project

VIA CERTIFIED MAIL AND EMAIL

June 16, 2023

Cheryl Letourneau, Town Administrator
Town of Georgia
47 Town Common Road No.
St. Albans, VT 05478
administrator@townofgeorgia.com



Re: Franklin County Line Upgrade Project
Certificate of Public Good – Section 248 Permit Process
45-Day Notice of Project Filing

Dear Town/Regional/State Official:

This letter and enclosed information describe the Vermont Electric Power Company, Inc. and Vermont Transco LLC (collectively “VELCO”) proposed Franklin County Line Upgrade Project (the Project), which is to replace and upgrade VELCO’s existing transmission line that runs through Georgia, St. Albans, Swanton, and Highgate, Vermont.

We anticipate filing our formal petition with the Vermont Public Utility Commission (Commission) on July 31, 2023, requesting a Certificate of Public Good to construct the Project. The state permitting process requires VELCO to provide notice to the Commission and involved Towns at least 45 days prior to a formal filing with the Commission.¹ For your information, we have attached a Project overview and Franklin County Line Upgrade overview map to this letter.

VELCO held a series of public meetings in November, 2022 to share information, to collect feedback and address concerns from affected communities including Georgia, St. Albans, Swanton, and Highgate. Before the Project is filed with the Commission, VELCO will hold in-person meetings on June 21, 22, 27, and 28 in these same communities to share information, collect feedback, and address concerns from affected community members. More information on these meetings can be found at www.velco.com/fclu. You will also receive notice when our petition is filed with the Commission.

¹ The process is governed by Commission Rule 5.400, which can be viewed on the Commission's website at <http://puc.vermont.gov/>.

Please note that Planning Commissions may make recommendations to VELCO within 40 days of the submission of this 45-day notice – July 26, 2023 in this case. Planning Commissions also have the right to make revised recommendations within 45 days after the date the Petition is filed with the Commission, if the Petition contains new or more detailed information that was not previously included in the plans. While Section 248(f) and Commission Rule 5.402(A) focus on the Planning Commission comment process, VELCO welcomes feedback from the affected municipal bodies and state agencies. So that VELCO has sufficient time to incorporate your feedback prior to the July 31, 2023 anticipated filing date, VELCO is requesting that all comments be submitted by July 26, 2023.

For additional information regarding the Commission processes, including your right to participate in the proceeding, please refer to the Commission document titled "Public Participation and Intervention in Proceedings Before the Public Utility Commission," found at the Commission's website at <https://puc.vermont.gov/document/public-participation-and-intervention-proceedings-public-utility-commission>. Further information is provided in "A Citizen's Guide to the Public Utility Commission," found at the Commission's website at: https://puc.vermont.gov/sites/psbnew/files/doc_library/citizens-guide.pdf.

The Commission's website also includes a Section 248 procedures document found at: <https://puc.vermont.gov/document/section-248-procedures>.

As the Project is still in the design phase, we will continue discussions and expect to receive feedback on this Project from various stakeholders. If you are interested in a presentation on this Project, have comments, or want further information, please contact Scott Mallory, Project Manager, at 802-770-6319 or smallory@velco.com. So that we may better address any questions or concerns you may have, please contact us before July 26, 2023.

Sincerely,



Scott Mallory, Project Manager
Vermont Electric Power Company, Inc.

cc: Ms. Holly Anderson, Clerk, Vermont Public Utility Commission (via ePUC)

Enclosures:

Attachment A – Project Overview
Attachment B – Proposed FCLU Overview Map
Attachment C – Proposed Aesthetic Mitigation Plan

Vermont Electric Power Company, Inc.
366 Pinnacle Ridge Rd, Rutland VT 05701



Franklin County Line Upgrade Project Overview

Introduction

Vermont Electric Power Company Inc. (VELCO) was formed when local distribution utilities joined together to create the nation's first statewide "transmission only" company in order to provide access to clean hydro power and build and maintain the state's high-voltage electric transmission* grid. VELCO constructs, owns and operates most of this in-state, high-voltage transmission grid (essentially 115 kV and above), that connects Vermont to the regional and national electric power supply system. VELCO's network also provides the electric supply to Franklin County's local distribution utilities, Vermont Electric Cooperative (VEC), Green Mountain Power (GMP), and the Village of Swanton Electric Department (Swanton).

The Franklin County Line Upgrade Project (the Project) is driven by the need to improve the condition of VELCO's existing 16.6-mile transmission line that runs through Georgia, St. Albans, Swanton, and Highgate. Along with replacing aged and deteriorated structures, the Project is being upgraded to add a second electrical conductor to save Vermont and New England power costs and to increase the existing limit of generation that may be sited and/or allowed to operate within northern Vermont within the Sheffield Highgate Export Interface limit. As is explained in this overview, we expect to file a request on July 31, 2023 with the Vermont Public Utility Commission (Commission) for permission to undertake this Project and, assuming the Commission and other approvals are granted, currently plan for it to be constructed during 2024 through 2025, with the Right of Way clean up work completed by spring of 2026.

This proposed Project overview describes the following:

- Transmission system deficiencies that drive Project need
- Alternatives evaluated for this Project
- The Project's description
- The Project's impact
- The anticipated Project filing date with the Commission
- Local and Regional Planning Commissions' rights to comment on Project plans

Description of the VELCO Franklin County Line transmission system deficiencies

Electric energy remains a cornerstone of our local and state economies, our quality of life, and our communities. Households, businesses and public services like schools and hospitals all rely on electricity for communication, lighting, heating, ventilation, and the operation of appliances and equipment. If transmission facilities fail, large geographic areas can lose their electric service. Transmission utilities such

* Transmission refers to the part of the electric system that operates at high voltage and carries large amounts of electricity from generation plants to the lower-voltage distribution system, which supplies electricity to local areas.

as VELCO are required to design, operate, and maintain a transmission network according to national and regional reliability standards. In addition, VELCO continuously assesses the adequacy of its system to ensure Vermont's transmission network meets national and regional reliability criteria.

The VELCO Franklin County Line is connected to VELCO's electric transmission network in Franklin County Vermont. This 115 kV transmission line forms a tie between substations/switching stations in Georgia, St. Albans, and Highgate. GMP, VEC, and Swanton's distribution systems are fed from the sub-transmission system and in turn serve their customers.

This transmission line was originally built in 1958 with various modifications and equipment replacements over the last sixty-five years of service. VELCO conducted a condition assessment of the line and identified the need to replace the majority of the structures due to condition and age.

To replace these deficient structures, and keep the existing line energized during this work to minimize the risk of widespread customer outages, VELCO proposes to build a replacement line adjacent to the existing one. Once the replacement transmission line is completed the existing one will be removed leaving only the new line within the boundary of the existing 150-foot wide easement.

Alternatives evaluated

An analysis of the Project demonstrates that replacing and upgrading this Franklin County transmission line is the most efficient way to address the condition-related deficiencies. This line, and its replacement, is vital to remain in service as it is one of the necessary five feeds supporting the greater Chittenden county load center. This line allows in-state generation in northern Vermont and from Hydro Quebec to flow to the rest of Vermont and New England. This line also critically supports northern Vermont load. There is no direct alternative to this line and upgrading its deteriorated and aged condition is needed and more efficient than replacing it with a new line in a new Right of Way (ROW) that would need to be acquired and cleared.

During development of the replacement line, VELCO considered different sizes and configurations of conductors to see if the energy dissipated by the conductor during the transfer of power (also known as line losses) could be improved upon. The proposed solution, a double bundled 1272 ACSR conductor, proved to be the most efficient at reducing line losses and improving reactive power performance (e.g., supporting a healthy voltage profile during times of high electrical demand or grid disturbances). The reduction in line losses will create savings for Vermont and New England, and the improved reactive power performance will benefit the grid for New England. As well, this will allow the system operator of the New England grid (ISO-NE) to increase the existing limit of generation that may be sited and/or allowed to operate in northern Vermont within the Sheffield Highgate Export Interface limit by approximately 20 MW.

VELCO screened the Project for its potential to be resolved through non-transmission alternatives (e.g., energy efficiency or new generation) using the tool developed by the Vermont System Planning Committee (VSPC). The screening determined that the Project was not a candidate for a non-transmission solution because the proposed replacement is being driven by the condition of the transmission equipment. Thus, non-transmission alternatives could not resolve the present problems on this Franklin County transmission

line. The screening conclusion was reviewed by the VSPC Geographic Targeting Subcommittee on June 1, 2022.

Project description

The Project is to rebuild approximately 16.6 miles of VELCO’s existing 115 kV transmission line from VELCO’s Georgia substation to VELCO’s Highgate substation, known as the K42 line, to remedy asset age and condition deficiencies. A VELCO transmission line includes many subcomponents such as: structures (poles & arms), insulators, switches, conductor/spacers, ground wire, fiber optic cable, guy wires, grounding wire. After construction of the new line, VELCO will remove the existing line and restore the lands that were impacted by the work.

To stay within the existing 150-foot Right of Way easement boundaries, the new structures will need to be taller as the three phases of conductors shift from a horizontal to a vertical configuration. Two of the three phases will be opposing each other horizontally to reduce the overall structure heights, reduce Electric and Magnetic Fields, and benefit the reactive power performance.

VELCO will also need to perform vegetation clearing of the full width of the ROW to accommodate construction equipment. Assuming regulatory approval, construction is expected to start in the summer of 2024 with a targeted completion in the spring of 2026. Although the engineering for the Project is not yet complete, Attachment B depicts a preliminary overview map for the K42 line. A more detailed draft Project map is available at https://www.velco.com/assets/documents/20230206_K-42%20Project%20Map_Landowner_PR_Watermark.pdf.

Project’s Impacts

Aesthetics

Both the Vermont Natural Resources Board and the Commission utilize the so-called Quechee Lakes standard [set forth in the decision Quechee Lakes Corporation, #3EW0411-EB and #3O439- EB (1986)] to guide their aesthetics analysis. According to the Quechee Lakes standard, regulators must first determine whether a project will have an adverse impact on aesthetics and scenic and natural beauty. A project has an adverse impact if it is out of character with its surroundings. Specific factors that regulators use to make this evaluation includes the nature of the project surroundings, the compatibility of the project design with those surroundings, the suitability of the project colors and materials with the immediate environment, the visibility of the project, and the impact of the project on open space. If regulators conclude that a project will have an adverse effect, the next step in the two-part test is to determine whether the adverse effect of the project is “undue.” The adverse effect is considered undue when regulators find that any one of the following questions is answered yes: (1) Does the project violate a clear, written community standard intended to preserve the aesthetics or scenic beauty of the area? (2) Have the applicants failed to take generally available mitigating steps which a reasonable person would take to improve the harmony of the project with its surroundings? (3) Does the project offend the sensibilities of the average person? Is it offensive or shocking because it is out of character with its surroundings or significantly diminishes the scenic qualities of the area? For transmission upgrades, the Commission’s aesthetic analysis, however,

does not end with the results of the Quechee test. In addition, the Commission’s aesthetic assessment is “significantly informed by overall societal benefits of the project.” Public Service Board[†] Docket No. 6860, Order of 1/28/05 (footnotes omitted).

VELCO’s aesthetic consultant, T. J. Boyle Associates, LLC (TJB), a landscape architecture and planning firm, has reviewed the initial design plans and performed a preliminary visual analysis of the areas of the proposed Project. TJB’s preliminary analysis indicates that Project upgrades will not result in an undue adverse impact on aesthetics and scenic or natural beauty of the area. The Project will result in a limited increase in visibility of the electrical transmission infrastructure from surrounding public vantage points. The proposed upgrades will replace existing transmission line structures, one for one, but for them being 30 feet taller on average, made of self-weathering steel (i.e., rusted brown) and in most cases having one pole instead of two. The Project will result in vegetation clearing within the ROW, some of which currently helps to screen and soften views toward the structures. While most of this vegetation will grow back, new landscape mitigation will be proposed either in or adjacent to the ROW to help soften public viewing areas post construction. Attachment C shows the preliminary proposed aesthetic mitigation plan for public viewing areas. VELCO is continuing to review this preliminary plan with landowners and towns. VELCO’s Petition to be filed shall address any comments received on the proposed plan and will include a full analysis of potential aesthetic impacts and proposed landscaping mitigation measures. TJB will work with landowners, VELCO, the towns, and other interested parties to finalize a mitigation plan that includes locations and specifications of proposed plantings.

Noise

No noise generating equipment is planned to be replaced or added as part of this project. Therefore, no adverse impacts are expected at nearby residences.

Transport of Equipment and Materials

The Project poses no long-term traffic impacts to the towns of Georgia, St. Albans, Swanton, or Highgate. During the Project’s construction period, expected to be from Summer 2024 to Summer 2026, truck traffic will increase. This is due to the mobilization and demobilization of large construction equipment and material deliveries to the job sites. Such deliveries will use existing roads that intersect with the VELCO Right of Way, as shown on the Proposed FCLU overview map (Attachment B), with vehicles that are commonly used on public roads. During delivery of any large equipment, VELCO will employ the services of traffic control personnel to manage traffic flow to include the ability of emergency response vehicles to get to and from where they need to go. The increased traffic will be most noticeable in the proximity of the transmission line access points and the substation sites.

[†] The Public Utility Commission was formerly called the Public Service Board.

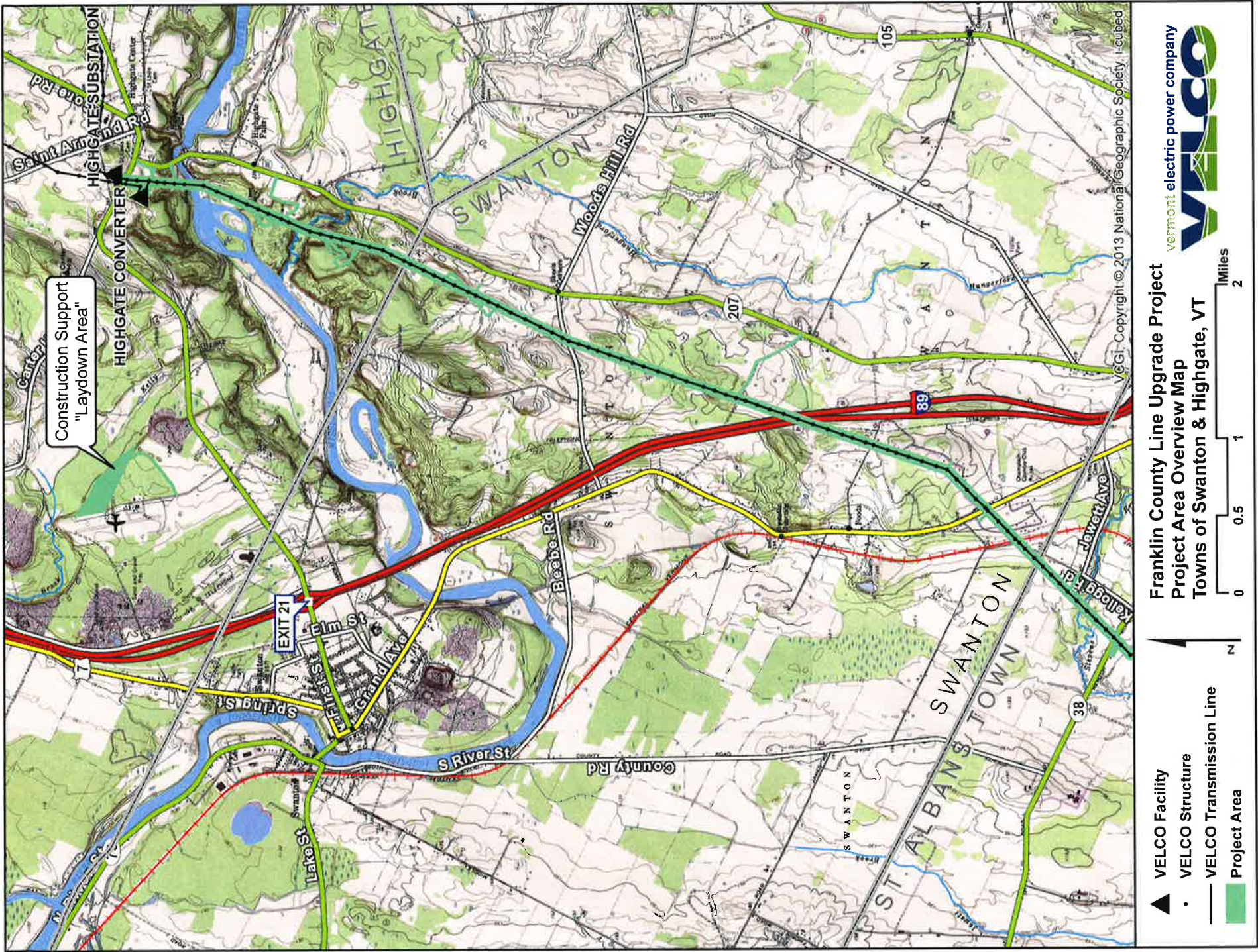
Right of the Local and Regional Planning Commissions to Comment on the Project Plans

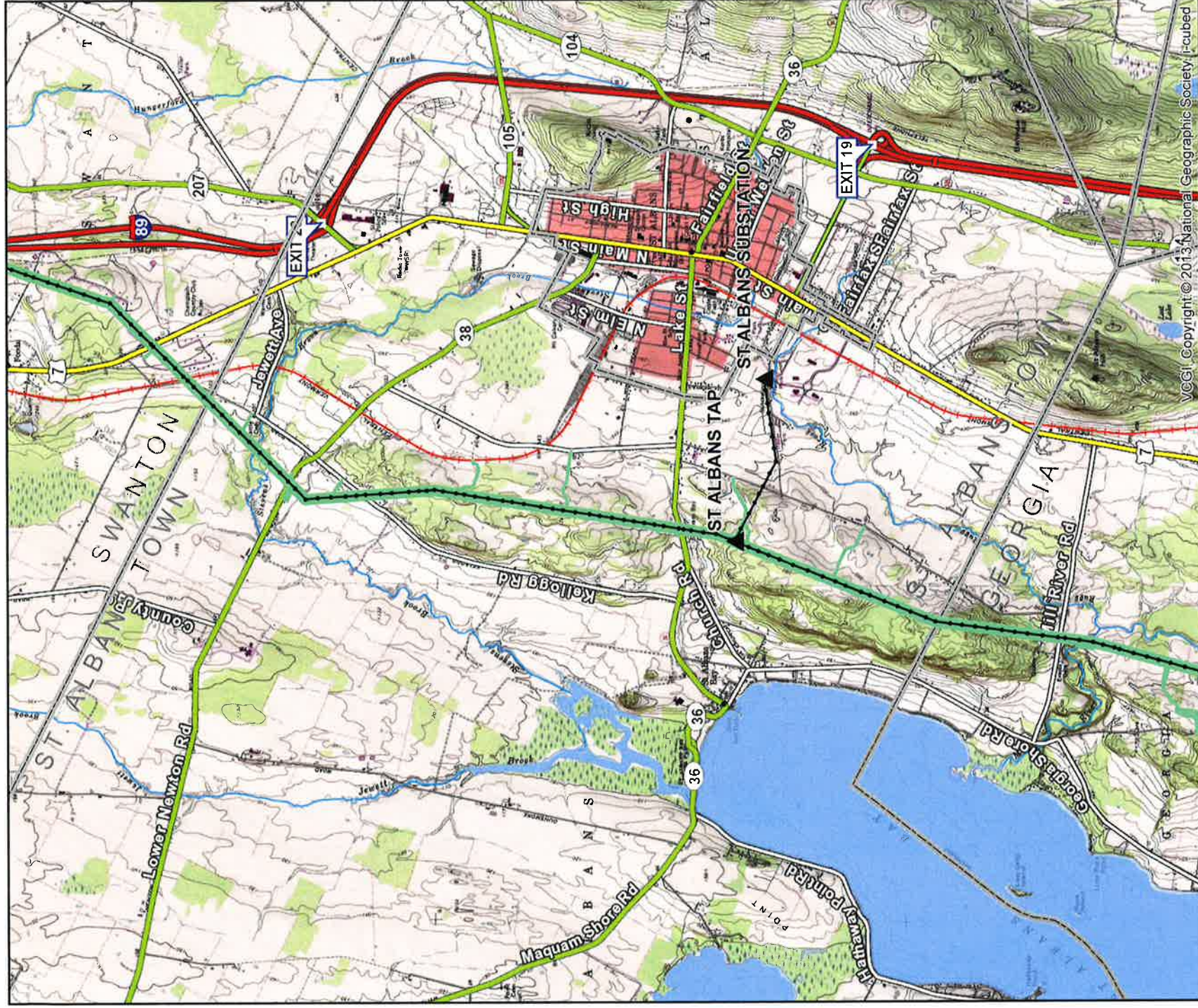
Section 248(f) of Title 30 of the Vermont Statutes Annotated provides that municipal and regional Planning Commissions are entitled to receive notice of projects proposed under Section 248, and it provides information on how these entities can participate in Section 248 proceedings, including making recommendations to the Commission and to the petitioner. More specifically, municipal, and regional Planning Commissions may make recommendations regarding the Project as follows. First, 30 V.S.A. § 248(f)(1)(C), states local and regional Planning Commissions may, “Make recommendations to the petitioner [VELCO] within 40 days of the petitioner’s submittal to the planning commission under this subsection.” Forty days from the date the letter and this Attachment were sent to municipal and regional Planning Commissions is July 26, 2023. Second, Section 248(f)(1)(D) states that, once the petition is filed with the Commission, such local and regional Planning Commissions may make recommendations to the Commission “by the deadline for submitting comments or testimony set forth in the applicable provision of this section, Commission rule, or scheduling order issued by the Commission.” Commission Rule 5.402(A)(2) states that local and regional Planning Commissions also have the opportunity to “provide revised recommendations within 45 days of the date on which petitioner has filed a petition with the Commission if the petition contains new or more detailed information that was not previously included in the petitioner’s filing with the municipal and Regional Planning commissions.” Recommendations made to the Commission under Section 248(f), or the lack of such recommendations, do not preclude municipal and regional Planning Commissions from presenting evidence during evidentiary hearings if they exercise their right to appear as a party.

For additional information regarding the Commission’s processes, including your right to participate in the proceeding, please refer to a Commission document titled, “Public Participation and Intervention in Proceedings Before the Public Utility Commission,” found on the Commission’s website at <https://puc.vermont.gov/document/public-participation-and-intervention-proceedings-public-utility-commission>.

The Commission’s website also includes a Section 248 procedures document found on the Commission’s website at <https://puc.vermont.gov/document/section-248-procedures>.

As the Project is still in the design phase, we will continue discussions and expect to receive feedback on this Project from various stakeholders. Please note that the Commission Petition and filing anticipated for July 31, 2023 as well as other pertinent Project updates, will be posted on VELCO’s website at: <http://www.velco.com/FCLU>. Those interested in a presentation on this Project, have comments or request further information, please contact Scott Mallory, Project Manager, at 802-770-6319 or smallory@velco.com.



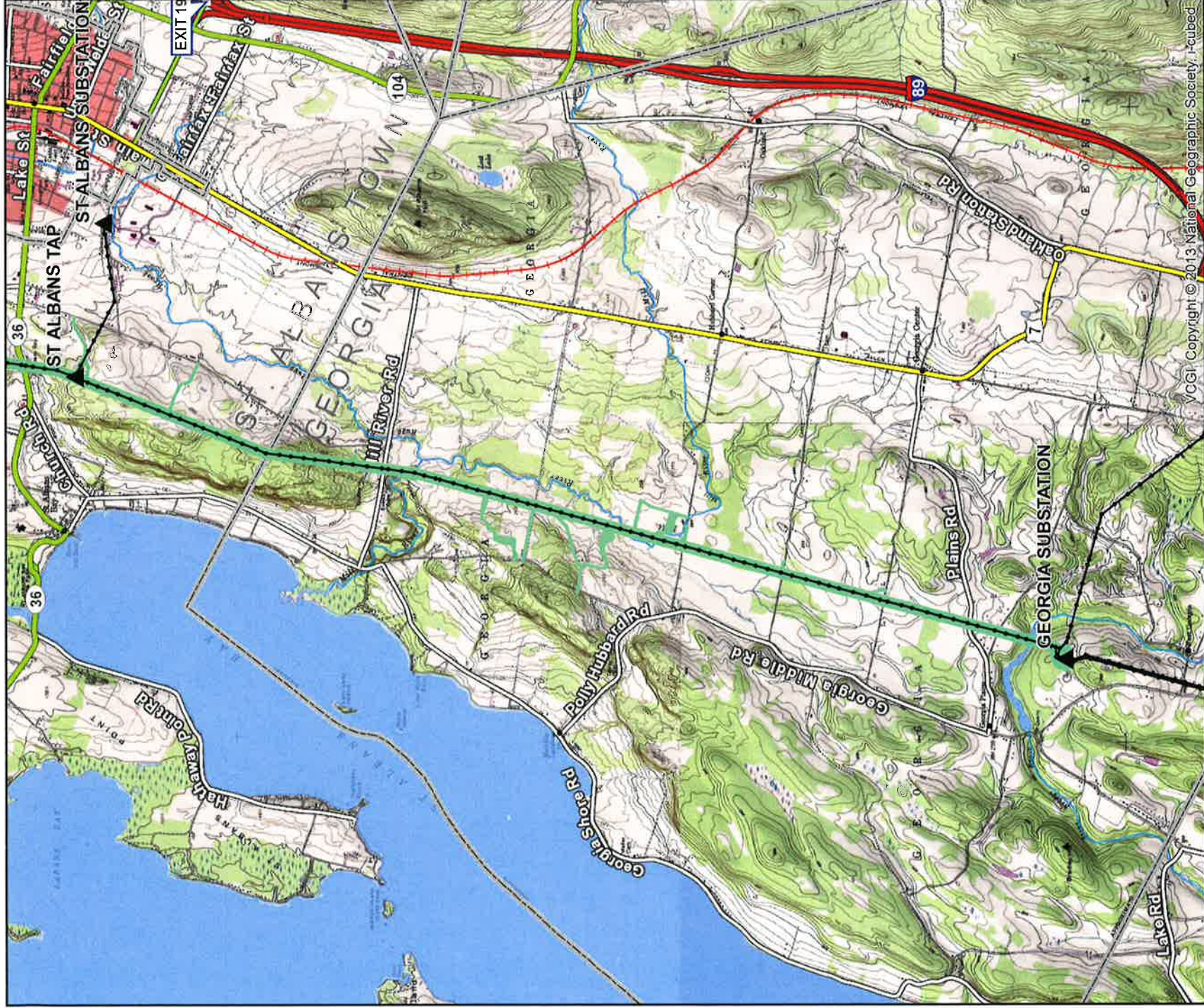


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- ▲ VELCO Facility
- VELCO Structure
- VELCO Transmission Line
- Project Area

Franklin County Line Upgrade Project
Project Area Overview Map
St Albans Town, VT

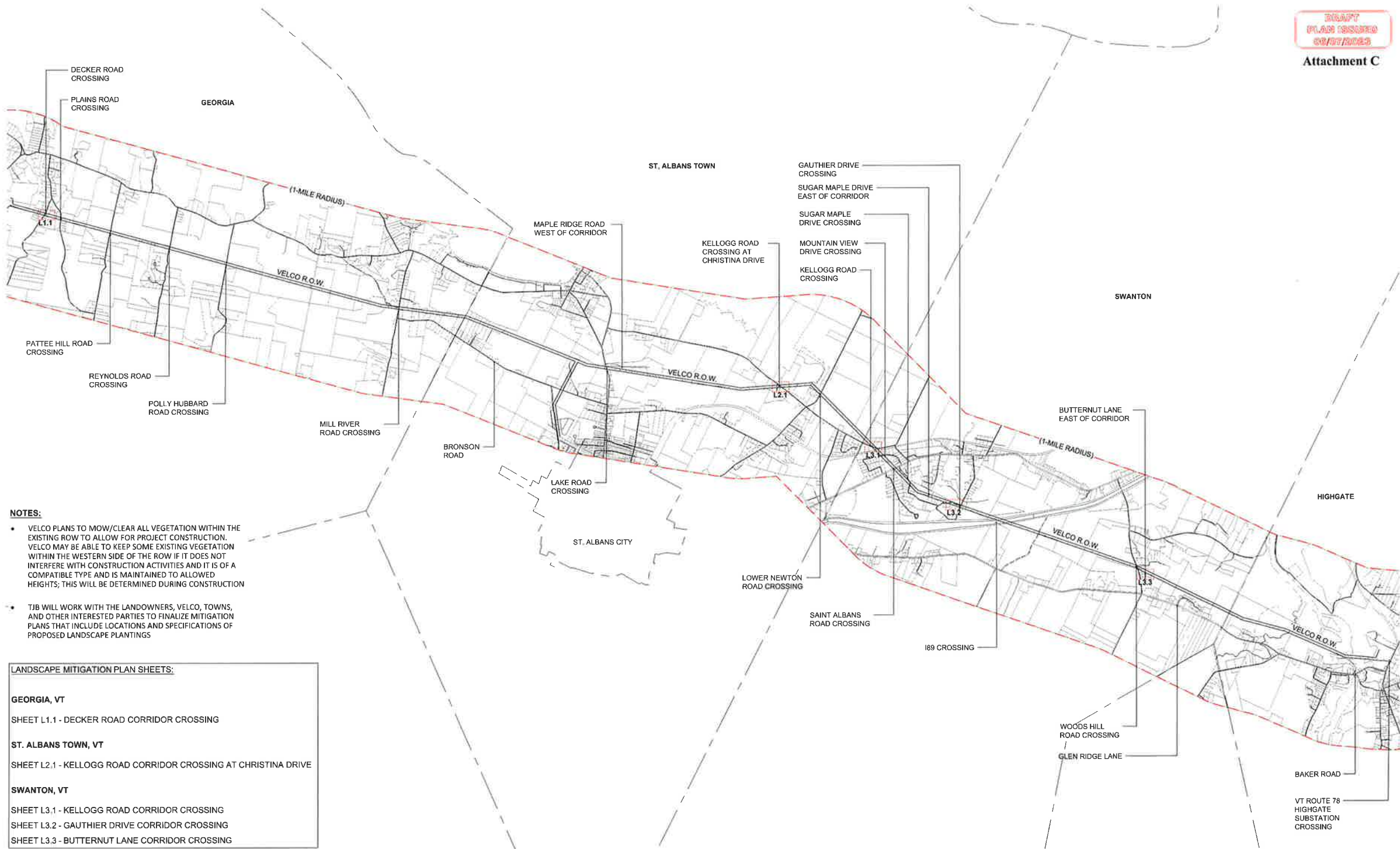




- ▲ VELCO Facility
- VELCO Structure
- VELCO Transmission Line
- Project Area

Franklin County Line Upgrade Project
Project Area Overview Map
Town of Georgia, VT

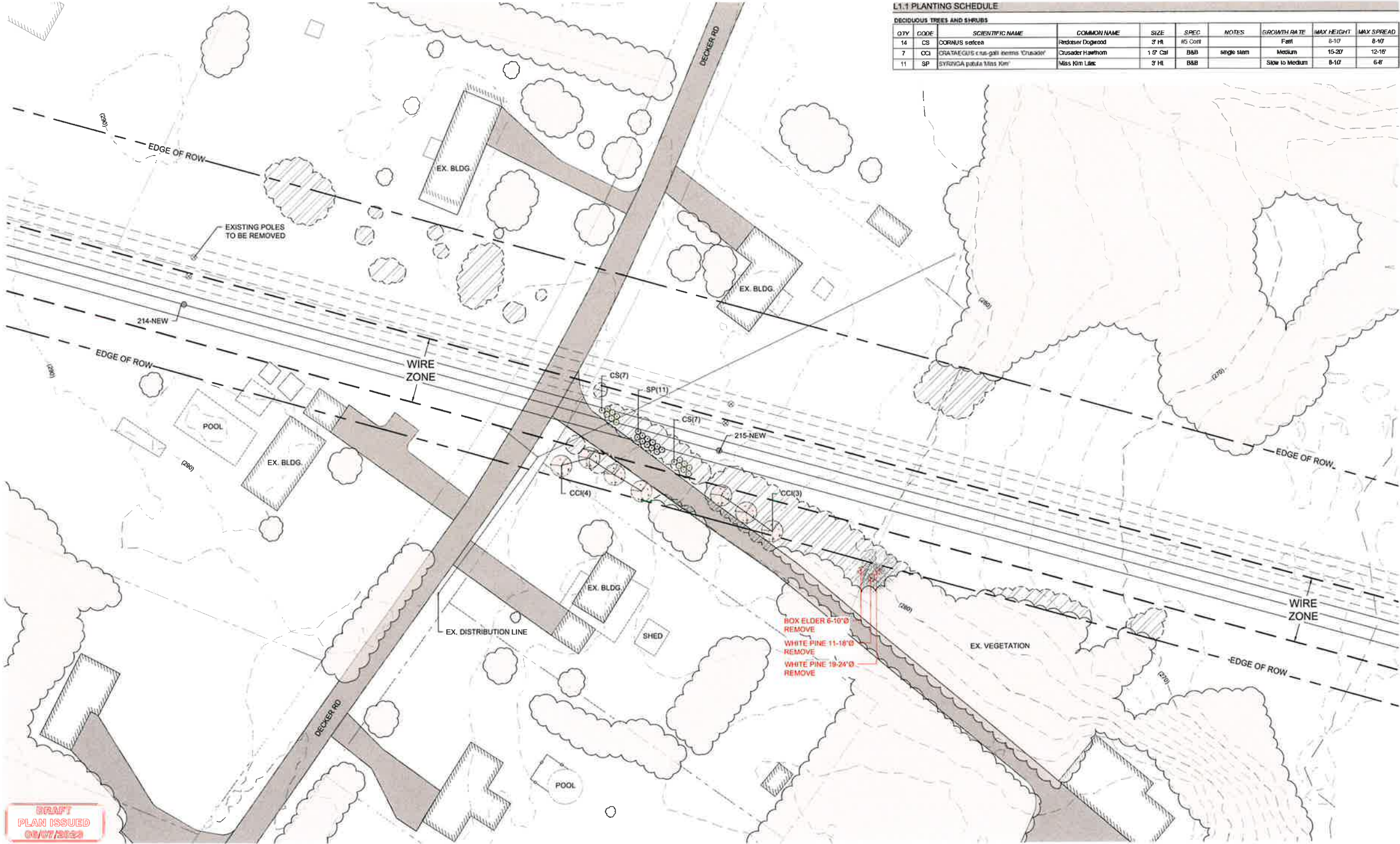




- NOTES:**
- VELCO PLANS TO MOW/CLEAR ALL VEGETATION WITHIN THE EXISTING ROW TO ALLOW FOR PROJECT CONSTRUCTION. VELCO MAY BE ABLE TO KEEP SOME EXISTING VEGETATION WITHIN THE WESTERN SIDE OF THE ROW IF IT DOES NOT INTERFERE WITH CONSTRUCTION ACTIVITIES AND IT IS OF A COMPATIBLE TYPE AND IS MAINTAINED TO ALLOWED HEIGHTS; THIS WILL BE DETERMINED DURING CONSTRUCTION
 - TJB WILL WORK WITH THE LANDOWNERS, VELCO, TOWNS, AND OTHER INTERESTED PARTIES TO FINALIZE MITIGATION PLANS THAT INCLUDE LOCATIONS AND SPECIFICATIONS OF PROPOSED LANDSCAPE PLANTINGS

LANDSCAPE MITIGATION PLAN SHEETS:	
GEORGIA, VT	
SHEET L1.1 - DECKER ROAD CORRIDOR CROSSING	
ST. ALBANS TOWN, VT	
SHEET L2.1 - KELLOGG ROAD CORRIDOR CROSSING AT CHRISTINA DRIVE	
SWANTON, VT	
SHEET L3.1 - KELLOGG ROAD CORRIDOR CROSSING	
SHEET L3.2 - GAUTHIER DRIVE CORRIDOR CROSSING	
SHEET L3.3 - BUTTERNUT LANE CORRIDOR CROSSING	

L1.1 PLANTING SCHEDULE										
DECIDUOUS TREES AND SHRUBS										
QTY	CODE	SCIENTIFIC NAME	COMMON NAME	SIZE	SPEC	NOTES	GROWTH RATE	MAX HEIGHT	MAX SPREAD	
14	CS	CORNUS setacea	Redosier Dogwood	3' Ht.	NS Cont.		Fast	8-10'	8-10'	
7	CCI	CRATAEGUS crus-galli ssp. 'Crusader'	Crusader Hawthorn	1' 0" Cal.	B&B	single stem	Medium	15-20'	12-16'	
11	SP	SYRINGA patula 'Miss Kim'	Miss Kim Lilac	3' Ht.	B&B		Slow to Medium	8-10'	6-8'	

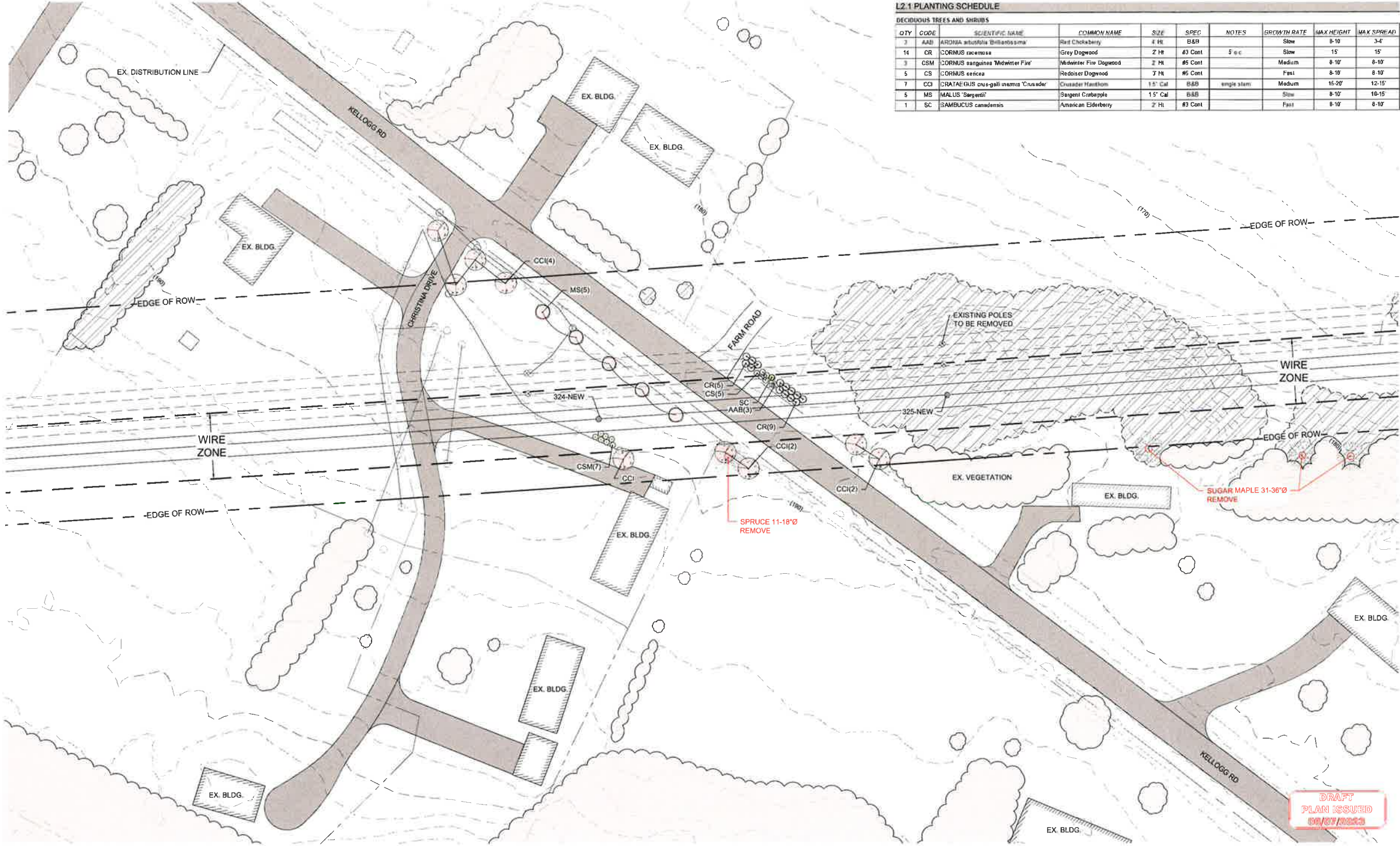


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09/07/2022



L2.1 PLANTING SCHEDULE

DECIDUOUS TREES AND SHRUBS									
QTY	CODE	SCIENTIFIC NAME	COMMON NAME	SIZE	SPEC	NOTES	GROWTH RATE	MAX HEIGHT	MAX SPREAD
3	AAB	ARONIA arbutifolia 'Brilliantissima'	Red Chokeberry	4' Ht.	B&B		Slow	8-10'	3-4'
14	CR	CORNUS racemosa	Gray Dogwood	2' Ht.	#3 Cont.	5 e.c.	Slow	15'	15'
3	CSM	CORNUS sanguinea 'Midwinter Fire'	Midwinter Fire Dogwood	2' Ht.	#5 Cont.		Medium	8-10'	8-10'
5	CS	CORNUS sericea	Redosier Dogwood	3' Ht.	#5 Cont.		Fast	8-10'	8-10'
7	CCI	CRATAEGUS crus-galli inermis 'Crusader'	Crusader Hawthorn	1.5' Cal.	B&B	single stem	Medium	15-20'	12-15'
5	MS	MALUS 'Sargentii'	Sargent Crabapple	1.5' Cal.	B&B		Slow	8-10'	10-15'
1	SC	SAMBUCUS canadensis	American Elderberry	2' Ht.	#3 Cont.		Fast	8-10'	8-10'



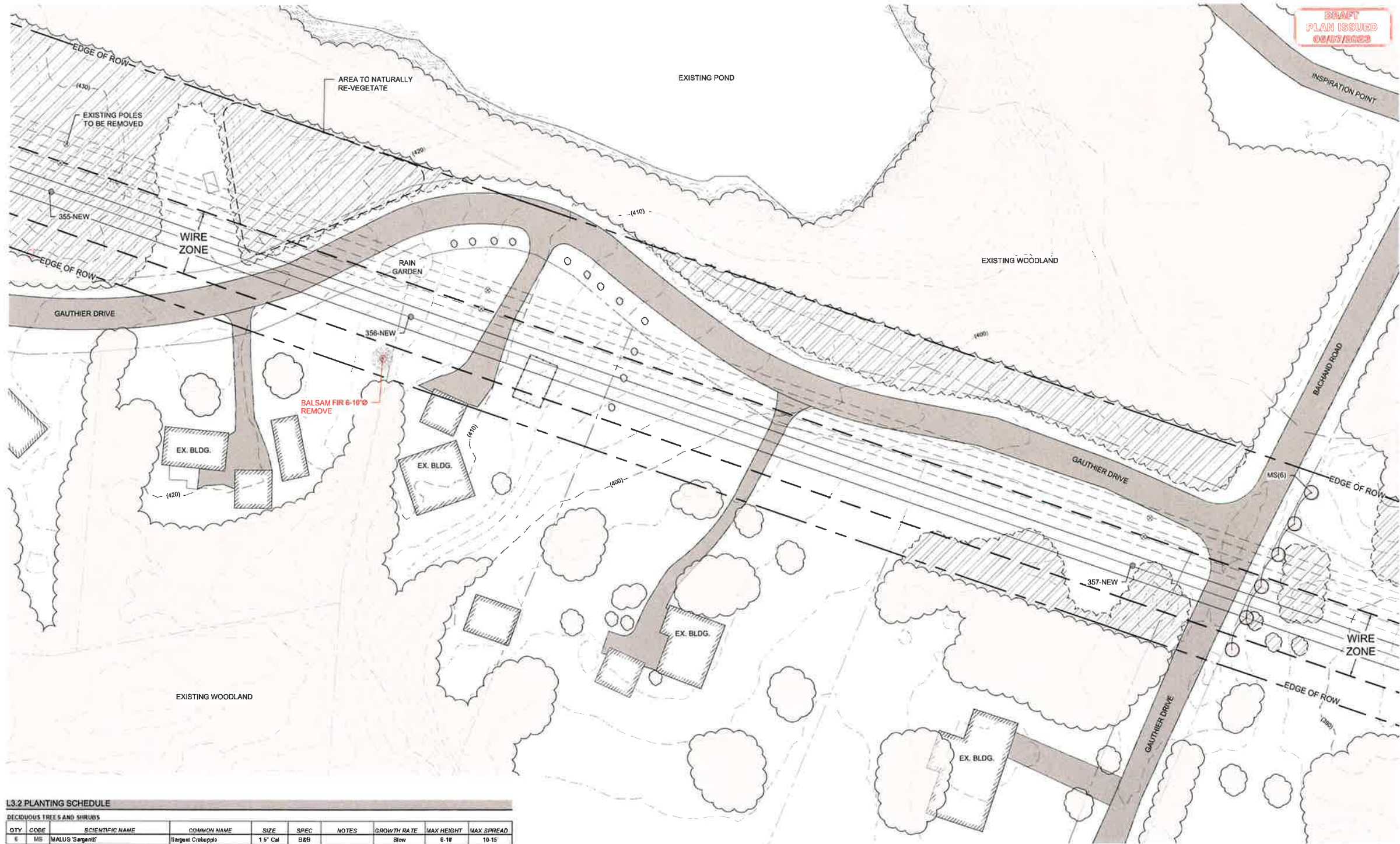
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L3.1 Planting Schedule

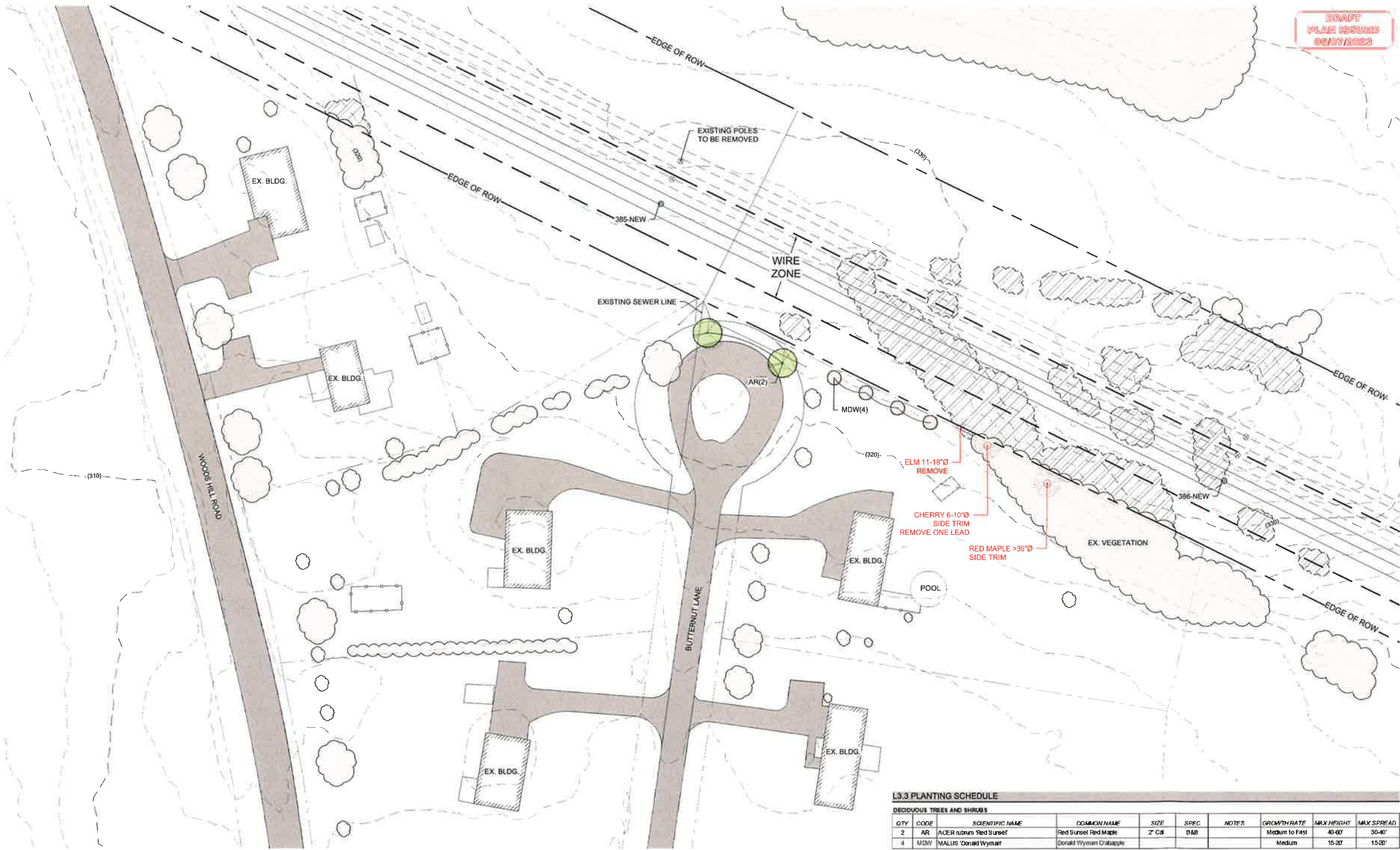
DECIDUOUS TREES AND SHRUBS									
QTY	CODE	SCIENTIFIC NAME	COMMON NAME	SIZE	SPEC.	NOTES	GROWTH RATE	MAX HEIGHT	MAX SPREAD
7	AR	ACER rubrum 'Red Sunset'	Red Sunset Red Maple	2" Cal	B&B		Medium to Fast	40-60'	30-40'





L3.2 PLANTING SCHEDULE

DECIDUOUS TREES AND SHRUBS									
QTY	CODE	SCIENTIFIC NAME	COMMON NAME	SIZE	SPEC.	NOTES	GROWTH RATE	MAX HEIGHT	MAX SPREAD
6	MS	MALUS 'Sargentii'	Sargent Crabapple	1 1/2' Cal	B&B		Slow	6-10'	10-15'



L3.3 PLANTING SCHEDULE

DECIDUOUS TREES AND SHRUBS

QTY	CODE	SCIENTIFIC NAME	COMMON NAME	SIZE	SPEC	NOTES	GROWTH RATE	MAX HEIGHT	MAX SPREAD
2	AR	ACER rubrum 'Red Sunset'	Red Sunset Red Maple	2" Cal	B&B		Medium to Fast	40-60'	30-40'
4	MDW	WALUS 'Donald Wymann'	Donald Wymann Crabapple				Medium	15-20'	15-20'