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July 15, 2021

Chittenden County Regional Planning Commission
Richmond Selectboard
Richmond Planning Commission
ePUC Statutory Entities

Re: Petition of Vermont Electric Cooperative and Green Mountain Power for a Certificate of Public Good pursuant to 30 V.S.A. § 248 authorizing upgrades to the jointly owned Richmond Substation-45-Day Advance Notice Package

Dear Statutory Entities:

This letter is to notify you that Vermont Electric Cooperative (“VEC”) and Green Mountain Power (“GMP”) are preparing to file a petition with the Vermont Public Utility Commission (“Commission”) for approval to upgrade the VEC and GMP owned Richmond Substation located on 254 Governor Peck Highway in the Town of Richmond, Vermont (the “Project”). The Project is needed to improve reliability with the addition of new equipment. The upgrades will increase the reliability and security of service provided to VEC and GMP customers in Richmond and throughout Chittenden County.

We anticipate filing the petition with the Commission on August 30, 2021, and are providing the following Project overview and related information in this 45-day advance notice package in accordance with Commission Rule 5.402 and 30 V.S.A. § 248 (“Section 248”). VEC and GMP have also provided this notice to the Department of Public Service, Agency of Natural Resources, Vermont Division for Historic Preservation, and the Commission.

I. Project Overall Description:

The Project consists of upgrades to the Richmond Substation existing 34.5 kV and 15 kV equipment, and includes an expansion of the existing substation yard to encompass a new control building. A new control building is necessary because three new 34.5 kV breakers with associated relaying and a new battery bank will be installed. The ground grid will be modified to cover the

expanded area. Additional substation yard improvements include a new oil containment system, security, animal fence, lights, and surface material.

An aerial photograph of the Project site is attached here as Exhibit 1. A detailed site plan for the Project construction is attached as Exhibit 2.

II. Project Need:

The upgrades to the Richmond Substation are needed to improve reliability for the Richmond/Bolton area of Chittenden County. The GMP Richmond substation, which also supplies both GMP and VEC distribution at 12.47 kV, is sourced from the GMP 34.5 kV Sand Road to Bolton Falls transmission line (3334 line). This Project will install three circuit breakers, one feeding VEC 34.5 kV subtransmission and two on either side of the Richmond tap, to enhance the reliability of the 18.1 miles of 34.5 kV transmission supply to this area. At present, a permanent fault on the 3334 line opens the breakers at Sand Road and Bolton Falls, which results in outages to customers supplied by the Bolton, Richmond, and VEC Hinesburg substations. Adding breakers to the 3334 line on either side of the Richmond tap sectionalizes the line preventing the loss of supply to the Richmond and VEC Hinesburg customers for any permanent fault on the 3334 line. These breakers would also prevent the loss of supply to GMP Bolton customers for a fault between Sand Road and Richmond.

The existing three 15 kV recloser controls are 2006 vintage and will be upgraded to allow for advanced relaying capability to implement reclose block protection schemes, and will be relocated away from the reclosers themselves to enhance safety during manual switching. The fence will be expanded to allow for a new control building, which is needed to house the protective relays associated with the three new 34.5 kV breakers.

III. Project Impact:

VEC and GMP plan to upgrade the Richmond Substation on its existing site, expanding the site to allow for a new control building. A portable substation will be installed within the Richmond Substation fence to facilitate the replacement of equipment during the Project without an outage to customers (reference Exhibit 2).

VEC and GMP has engaged VHB Inc. to inventory and assess natural resource features in the Project area in consultation with the Vermont Agency of Natural Resources, and to address options for properly avoiding or mitigating any potential impacts. Northeast Archaeological Resource Center of Farmington, ME has been hired by GMP to assess the Project area to determine if there are any significant archaeological sites within the Project area that would be impacted by the Project. GMP has also engaged VHB Inc. to ensure that any sound emanating from the Project is within accepted standards.

Materials will be transported to the construction site by truck over I-89 and Routes 2 and 117 in Richmond. Any traffic impacts will be minor and limited almost entirely to the period of Project construction.

In terms of visual impact, the Project consists of upgrades to an existing substation and the addition of similar appearing equipment, which results in a modest adjustment to the overall appearance of the substation. T.J. Boyle Associates conducted a preliminary review of aesthetic impacts and determined that no aesthetic mitigation is required. T.J. Boyle Associates will perform a more detailed aesthetic analysis which will be provided with VEC's and GMP's petition to the Commission and will further examine local and regional planning documents for criteria that address scenic resources and open space.

In connection with planning this Project, VEC and GMP considered a number of alternatives, including utilizing the existing RTU and expanding the scope to replace the existing bus regulation with new individual circuit regulation. The proposed Project was determined to be the least cost option that provided the desired system reliability, capability, and flexibility for the future. These upgrades cannot be cost effectively deferred or avoided by energy efficiency or distributed generation because this Project is needed to improve reliability and address asset management concerns.

IV. Additional Information:

As noted above, VEC and GMP have enclosed an aerial photo and site plans with this letter, showing the location and proposed design of the Project's elements. The information contained in this package is intended to provide a general understanding of the Project and is subject to change based on further analysis and the requirements of applicable permits.

Before beginning work on the Project, VEC and GMP must obtain a Certificate of Public Good ("CPG") from the Commission under 30 V.S.A. Section 248. Before issuing a CPG, the Commission must find, among other things, that the Project "will not unduly interfere with the orderly development of the region with due consideration having been given to the recommendations of the municipal and regional planning commissions, the recommendations of the municipal legislative bodies, and the land conservation measures contained in the plan of any affected municipality."

Projects submitted to the Commission pursuant to Section 248 require that local and regional planning commissions and municipal legislative bodies be given 45 days advance notice of the filing. This letter and accompanying attachments are being provided to satisfy that requirement. Please note that the Planning Commissions may make recommendations to GMP and VEC within 40 days of the submission of this 45-day notice. Additionally, Commission Rule 5.402(A) establishes that municipal and regional Planning Commissions "shall make recommendations, if any, to the [Commission] and to the petitioner at least 7 days prior to filing the petition with the [Commission]." 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 these plans. While Section 248(f)

and Commission Rule 5.402(A) focus only on the Planning Commission comment process, VEC and GMP welcome feedback from the affected municipal bodies and state agencies. So that GMP and VEC have sufficient time to incorporate your feedback prior to the August 30, 2021 anticipated filing date, GMP and VEC are requesting that comments be submitted by August 23, 2021.

For additional information regarding the Commission’s 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 on the Commission’s website at <https://puc.vermont.gov/document/public-participation-andintervention-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>.

VEC and GMP expect that the Project will not result in undue adverse impacts to the applicable Section 248 criteria. VEC and GMP will submit a full Section 248 petition package, which will contain the information required by the PUC to evaluate the merits of the Project for potential award of a Certificate of Public Good. VEC and GMP look forward to receiving any input or suggestions you may have as it moves through the Section 248 process. If you have any questions you may direct them to VEC by phone at 802-730-1155 or by email at ddenis@vermontelectric.coop.

The documents that accompany this letter have been electronically filed using ePUC.

Sincerely,



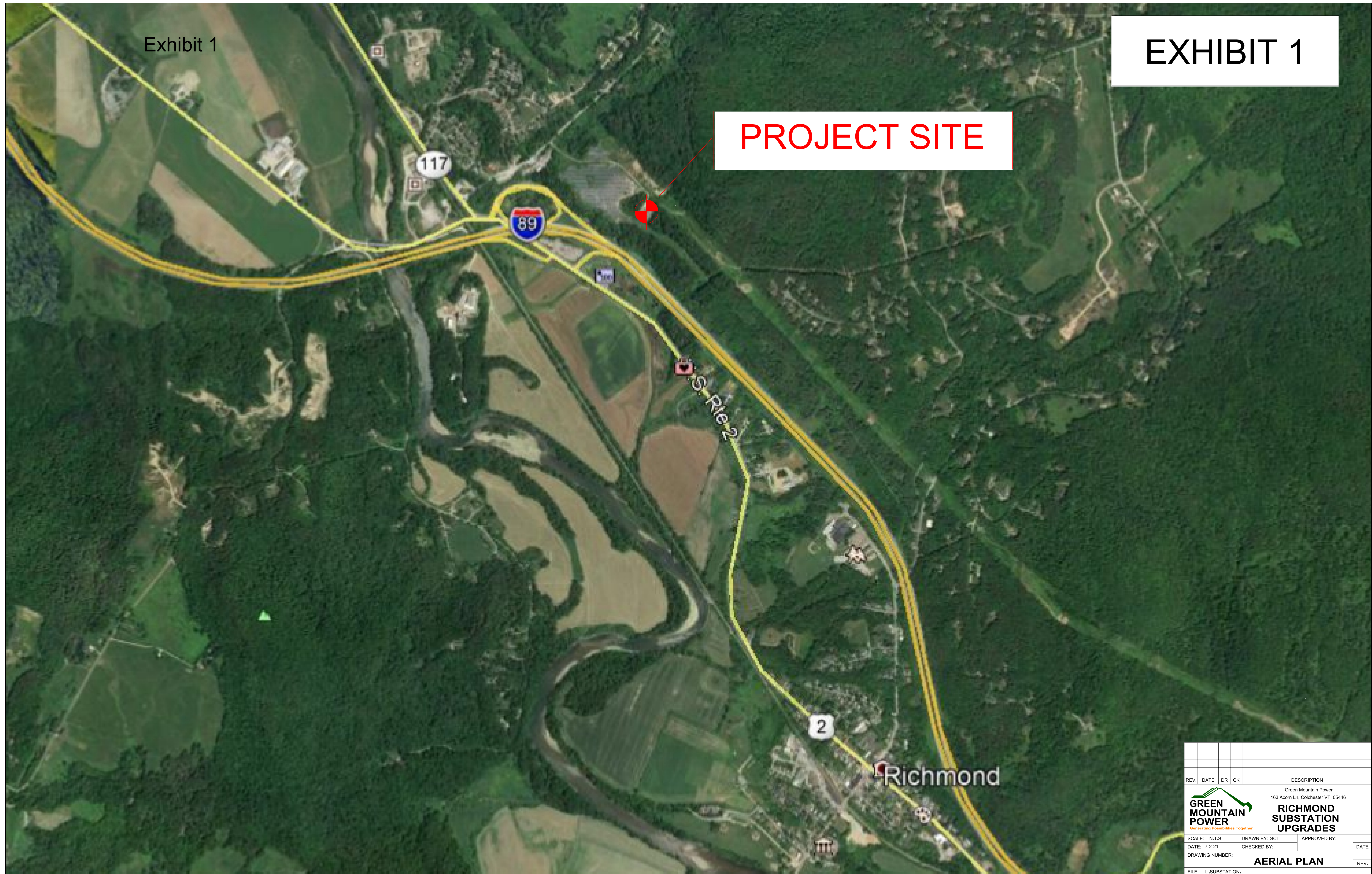
Joslyn L. Wilschek, Esq.

Enclosures

Exhibit 1

EXHIBIT 1

PROJECT SITE



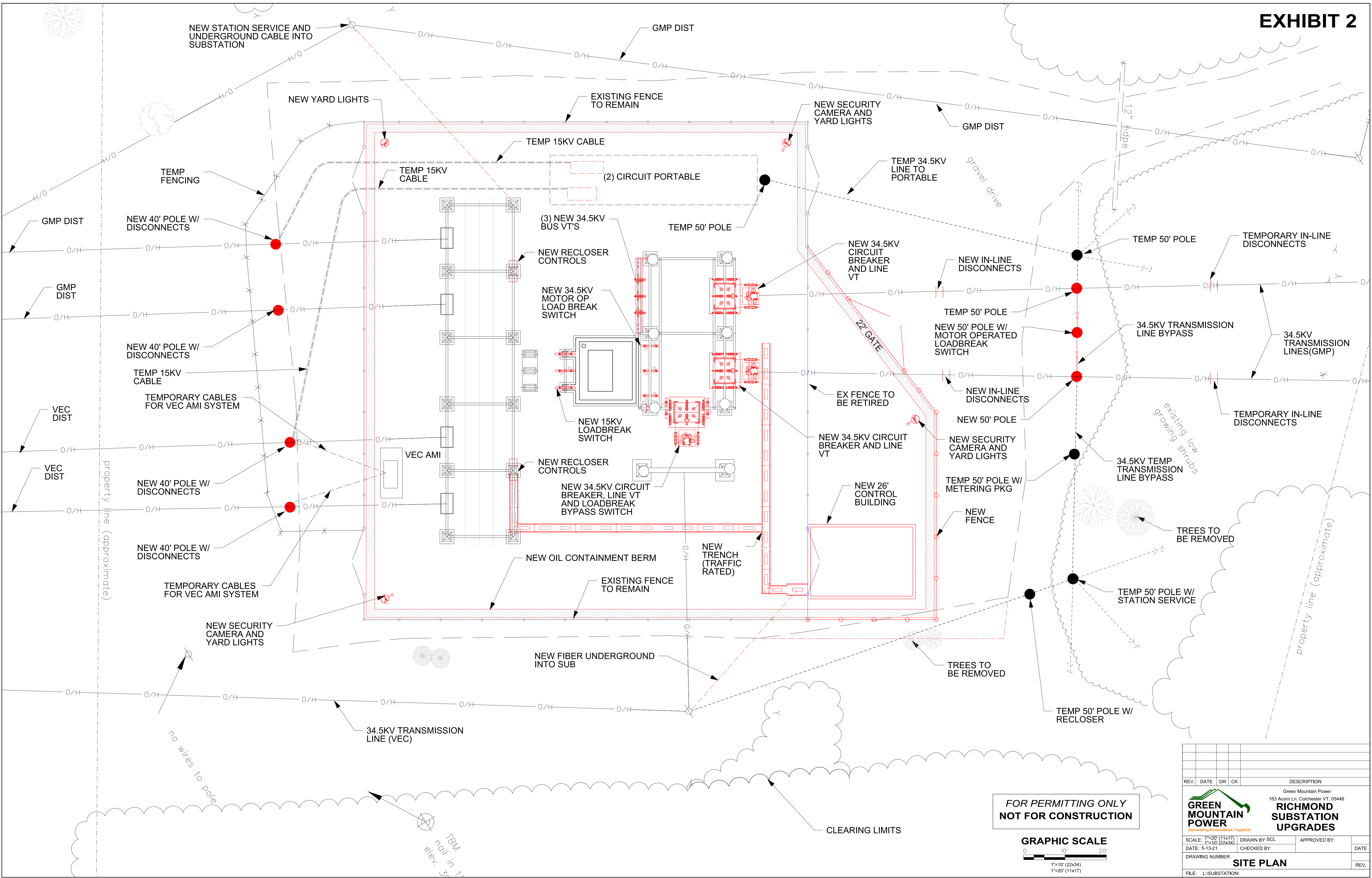
REV.	DATE	DR	CK	DESCRIPTION

Green Mountain Power
163 Acorn Ln, Colchester VT, 05446

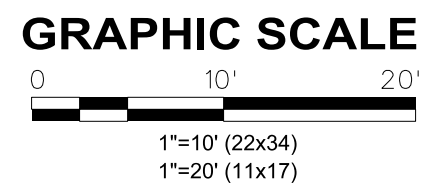
GREEN MOUNTAIN POWER
Generating Possibilities Together

RICHMOND SUBSTATION UPGRADES

SCALE: N.T.S.	DRAWN BY: SCL	APPROVED BY:	DATE:
DATE: 7-2-21	CHECKED BY:		
DRAWING NUMBER:	AERIAL PLAN		REV.:
FILE: L:\SUBSTATION			



**FOR PERMITTING ONLY
NOT FOR CONSTRUCTION**



REV.	DATE	DR	CK	DESCRIPTION

Green Mountain Power
 163 Acorn Ln, Colchester VT, 05446
RICHMOND SUBSTATION UPGRADES

SCALE: 1"=20' (11x17)
 1"=10' (22x34)
 DATE: 5-13-21
 DRAWING NUMBER: **SITE PLAN**
 FILE: L:\SUBSTATION

DRAWN BY: SCL
 CHECKED BY:
 APPROVED BY:
 DATE:
 REV.