

VERMONT SYSTEM PLANNING COMMITTEE

EVALUATION OF THE DOCKET 7081
PLANNING STRUCTURE

*SUBMITTED TO THE VERMONT PUBLIC SERVICE BOARD
DECEMBER __, 2009*

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1.0 INTRODUCTION

The Memorandum of Understanding in Docket 7081 (MOU) requires that the Vermont System Planning Committee (VSPC) conduct an evaluation in 2009 of the planning processes established by the docket. Specifically, the MOU states:

Section X: Further Evaluation in 2009

99. Between July 1 and December 31, 2009, the Parties agree to convene one or more meetings for the purpose of evaluating the planning structure set forth in this MOU in light of experience to date and, if appropriate, recommending that the Board modify that structure. All VSPC participants will be invited to attend any such meetings. The Parties will report to the Board by December 31, 2009 concerning the evaluation described in this paragraph. In the event that the evaluation process or report contemplated under this paragraph is not completed by December 31, 2009, a Party may request an extension from the Board. (Docket 7081 MOU at 39)

To fulfill this requirement, the VSPC adopted an evaluation plan in early 2009 to conduct a comprehensive review of how the process has worked to date. The plan sought input from all stakeholders, including VSPC and subcommittee participants, and Docket 7081 parties.

Input was gathered from VSPC and Docket 7081 participants through various means:

- An on-line survey that all VSPC participants and Docket 7081 parties were invited to complete.
- Meetings and email exchanges within the VSPC voting sectors to gather sector input.
- Meetings and email exchanges within VSPC subcommittees to gather subcommittee input.
- Individual discussions between the VSPC staff and individual members.
- A workshop meeting on October 21, 2009, to which all VSPC participants and Docket 7081 parties were invited.

This document is the report of input and recommendations gathered through the processes listed above. Section 2.0 reports the feedback on the VSPC process received from evaluation participants. Section 3.0 compiles recommendations gathered through this process. The appendices include the written input gathered during the evaluation process and a glossary of abbreviations.

The evaluation gathered many opinions about the process, from the philosophical to the practical. The one area of overall consensus (not unanimity) is that the process is too new to draw conclusions about its fundamental effectiveness. The full cycle of planning envisioned by the MOU began with the preparation of the 2009 Vermont Long-Range Transmission Plan (LRTP) that was filed with the Public Service Board (PSB or Board) July 1, 2009. The ultimate test will be how effectively the process meets its objectives with respect to the reliability deficiencies identified in the 2009 plan.

Therefore, while this report contains many recommendations for process improvements, these improvements are generally within the control of the VSPC to implement. Other than a minor administrative change, the VSPC is not recommending any changes that require Public Service Board action, but suggest that the Board keep Docket 7081 open for potential future improvements as well as a mechanism to address issues related to Critical Energy Infrastructure Information (CEII).

2.0 PARTICIPANT INPUT TO THE EVALUATION

A number of themes, both strengths and weakness, emerge from the input generated by the VSPC evaluation. This section captures those themes along with illustrative excerpts.

ENHANCED COMMUNICATION

The most consistent positive feedback about the VSPC/Docket 7081 process concerns the way the process has enhanced communication, cooperation and collaboration among its participants. On the average, participants rated the effectiveness of the VSPC process in increasing utility collaboration on transmission planning at 3.06 on a four point scale. More than 80 percent (15 out of 18) rated this dimension “very effective” or “somewhat effective.” Multiple participants expressed views that the process has increased information sharing and learning, led to greater communication, and provided opportunities for stakeholders to raise questions about underlying assumptions regarding transmission planning. There were a few contrary views.

Multiple participants highlighted the way the process increases communication among utilities:

- *The VSPC process has resulted in more pro-active discussions between VELCO and the distribution utilities relative to transmission planning.*
- *While VELCO must expend substantial effort and cost to produce the Long Range Transmission Plan in this formal format and venue, the Plan in its current form provides significant value by articulating the nature and estimated timing of future reliability resource needs. We believe that the Plan and the VSPC process improve the awareness of stakeholders (including distribution utilities) regarding the reliability needs that VELCO has identified, and the methods and assumptions upon which VELCO’s assessments are based.*

Other participants highlighted the way the process brings stakeholders to the table who might not otherwise have a forum to interact with utilities on transmission planning. This includes a regular dialogue with DPS, EVT, the Speed Facilitator and even the Board (through regular reporting).

- *Bringing people to the table who haven’t been there before, e.g., SPEED facilitator, other utilities who may not have been invited before.*
- *The Board is getting info about the status of more efforts they might not have heard about except in a docket.*
- *The VSPC has provided a forum to talk about what alternatives might work. Previously the conversation involved a more limited subset of people. Now there is a greater sharing of concepts, issues and perspectives than previously was possible. Some of the communication that is taking place in the VSPC previously happened only in the context of a contested case.*
- *Public members – in fact all members – are getting info and education to which they may not previously have had access.*

Participants highlighted the value of two-way or multi-party dialogue and the opportunity for the various interests to better understand each others’ points of view.

- *On one hand, a beneficial aspect of the VSPC process is shedding more light on transmission planning standards, and the assumptions and judgments that are used to identify the need for reliability resources and to compare alternative resources— particularly by VELCO. My experience, as someone who is not a transmission planner but interacts somewhat regularly with VELCO, is that VELCO is more inclined than the DUs to use conservative assumptions and/or methods that tend to support greater and earlier need for new transmission facilities, and less inclined to "work the problem" to fully explore what non-transmission alternatives could work. This observation is based on a limited sample size, and it may reflect the regulatory context within which VELCO is required to work (i.e., increasing federal attention to transmission planning, mandatory reliability standards). In any case, it appears that the VSPC process can serve as a useful check on the transmission planning process, including at VELCO.*
- *The VSPC stimulates conversation that may not have occurred in the past, e.g., discussion of assumptions that are used in planning. This helps more parties to understand the transmission side and it helps VELCO to understand the distribution utility side. Learning goes both ways.*
- *The process serves as a forum for active participants in the public dialogue and to hear and educate.*
- *One of the most positive aspects of the VSPC process (and most likely to move the VSPC toward achieving its goals) is the sharing of information among utilities and the persistence of members when raising questions about the VELCO plan and assumptions.*
- *The VSPC has spurred much greater discussion of non-transmission alternatives, and provided a forum for people to have questions/concerns.*

Various parties highlighted the effectiveness of the process in creating a focus on transmission issues that previously may have gone unaddressed.

- *Has forced us to address the reliability issues facing Vermont. The process makes it impossible to sweep reliability issues under the rug or delay dealing with them. Previously some transmission issues were known in utility circles, but not necessarily by the Board and Department.*
- *One clear VSPC success has been to communicate transmission planning details to a much wider audience than had been previously done. Most of this increased communication has been within the utilities. There has been a valiant attempt to include the non-technical public; this has had limited success.*
- *The sector feels that the VSPC process has worked well during its startup phase and has resulted in more pro-active discussions between VELCO and the distribution utilities relative to transmission planning.*

A few participants expressed skepticism about the value added by the process. The skepticism focused on the cumbersome nature of the process or a belief that the progress made would have been made without the VPSC.

- *I think it ensures many voices are heard, but probably suffers from the fact that so many voices are heard.*

- *Honestly, I don't know if anything has come from the VSPC process that wouldn't have happened anyways. Asking that question and getting an honest answer might help us determine its validity and or efficiency.*
- *A web site was created and materials are made available to the general public. Utilities had been collaborating prior to the VSPC process. Therefore, very little improvement was made.*

PUBLIC ENGAGEMENT

Two aspects of public engagement emerged as themes in the evaluation. The first concerns public engagement in the VSPC process through the public seats on the Committee and participation in subcommittees. The second concerns public outreach on transmission planning by the VSPC and utilities to the general public.

Participants gave an average rating of 3.15 (out of 4) for the effectiveness of the MOU in creating a transparent, public process for transmission planning. Seventeen of 20 respondents rated the process "very effective" or "somewhat effective." Yet participants also felt that the process had not yet fully realized its potential. For example:

- *The sector also feels that public outreach on the Long Range Transmission Plan and on individual projects has been improved as a result of the VSPC process, although the VSPC itself has not generated the level of public participation that some VSPC members hoped for.*
- *One clear VSPC success has been to communicate transmission planning details to a much wider audience than had been previously done. Most of this increased communication has been within the utilities. There has been a valiant attempt to include the non-technical public; this has had limited success.*

PARTICIPATION BY PUBLIC MEMBERS

Since the start, the VSPC has had difficulty achieving full participation by public members. The seat representing residential ratepayers has been filled with a very active member who has had no alternate. The seat representing business customers has been filled but the representative has attended few meetings and has no alternate. The environmental organization seat has been filled and has had an alternate, but attendance has been an issue for this seat as well.

Participants expressed frustration over the VSPC's inability thus far to have full involvement by public representatives:

- *The sector is also concerned about Public Member Sector participation, or lack thereof. Only one Public Sector member attends meetings with regularity. Input from that member has been instrumental in many VSPC discussions. If there is any aspect of the VSPC's existing structure that sector members felt needed to be discussed/revisited it was methods for obtaining greater participation by Public member sector participants.*
- *Given the lack of involvement by those who advocated for the process that led to Docket 7081, abolishing the VSPC would appear to be in the interest of Vermont's ratepayers.*
- *The VSPC lacks public input due to lack of interest to participate.*

Much discussion and strategizing has been devoted to the issue of public member participation. Several people have pointed out that public interest is understandably tied to specific projects:

- *The question remains, How interested is the public in discussing transmission planning issues? VELCO and the distribution utilities have made significant efforts to reach out, but the public is primarily interested in discussing transmission issues when there is a concrete project close enough to affect them individually.*
- *The dryness of the topic. It's difficult to get people to turn out unless they think something is going through their own backyard.*

Numerous other barriers to public participation have been identified:

- *The commitment of time needed to participate fully.*
- *The technical nature of the subject matter.*
- *The lack of a sense of immediacy to the issues.*

Some public members respond that the process is not tailored to invite or facilitate meaningful public involvement. These participants attribute low public participation to the narrowness of the VSPC's focus on technical solutions, the lack of independent experts to support public participants in a highly technical and complex field, and the lack of empowerment to make decisions. This perspective holds that the public will participate when and if its participation makes a real difference and the playing field is leveled in terms of technical expertise.

- *Much more support [is needed] for public participation. The process remains utility and transmission dominated. Have opportunities for independent expertise. This limits the effectiveness of public participants. It still feels like a VELCO driven process to lead to a VELCO desired outcome. Ideally it should be led by an independent entity with authority to hire and call upon independent experts. The process needs to meet the needs of the participants beyond VELCO.*
- *Although current planning processes have major impacts on end-use customers and a wide range of other stakeholders that are not specifically in the electricity business, their resources are far too limited to fund the engineers or other experts needed to participate effectively on their behalf. Most public interest organizations and non-governmental organizations do not have staff with the technical expertise, or time, to participate in the planning processes as currently conducted locally or regionally. Even when states, such as Vermont, have established transmission planning processes to specifically include public interest entities, their participation has been very limited due to a lack of funding and access to the needed expertise.¹*

PARTICIPATION BY THE GENERAL PUBLIC

Participants, particularly the Public Participation Subcommittee, generally shared a desire to increase public awareness of the VSPC process and transmission planning. There was general disappointment that so much effort went into public outreach on the long-range plan with limited numbers of people attending forums.

¹ Excerpted from Conservation Law Foundation comments to FERC technical conference on transmission planning, September 21, 2009, Philadelphia, PA, submitted by Sandra Levine.

- *The sector also feels that public outreach on the Long Range Transmission Plan and on individual projects has been improved as a result of the VSPC process, although the VSPC itself has not generated the level of public participation that some VSPC members hoped for.*
- *I don't see that the merits of the process have been made public in a way that will convince educated lay persons that it is being done effectively.*
- *I know of the outreach efforts that have been made and it is definitely an improvement. However, if I weren't involved with the VSPC I'm not sure I would have known about it.*

The commitment is strong, led by the Public Participation Subcommittee, to increase public information and outreach in the future.

- *The subcommittee recognizes that there will be a more clear opportunity for focused outreach when there are projects undergoing the full VPSC process, but also sees the need for providing information about VSPC activities to keep the public informed generally about transmission issues.*

While many participants shared a commitment to increasing public participation, there was also a concern about conflicting requirements between the MOU provisions for the long-range plan and the topics of interest to the general public. Paragraph 28 of the MOU contains very detailed requirements for the content of the plan, establishing the document as the first step and foundation for the work of the VSPC on individual reliability deficiencies. Based on public feedback in the long-range plan outreach process, it was clear that the term “plan” created an expectation that the document would articulate a vision for Vermont’s electric grid. The statutory language in 30 V.S.A. § 218c also calls for a plan but only the MOU details what this term means .

- *The public outreach process required by the MOU regarding the plan is somewhat mismatched to the situation. Significant outreach is required for a document that is really the first step in a long process and is mainly focused on identifying the reliability problems that need to be addressed. The intensive public outreach at this stage is premature and mismatched to public expectations.*
- *The statute (30 V.S.A. § 218c) describes the three-year updates as a transmission integrated resource plan, but the MOU requires that the document identify reliability deficiencies to serve as the springboard and first step in selecting and implementing the best solutions. The statutory description and the MOU requirements for the contents of the plan are somewhat out of synch.*

The subcommittee has developed a strategy addressing both full public representation on the VSPC and public awareness of transmission issues. The strategy includes:

- *Some possible solutions: (1) Identify people who are likely to be interested in the process from lists of people who attended public outreach meetings and people who have become active in transmission issues through recent VELCO projects. (2) Create a means for participation that does not necessarily involve or initially involve having to attend full VPSC meetings. For example, potential participants could be invited to Public Participation Subcommittee meetings. (3) Increase visibility of the process through increased public information.*
- *The subcommittee is interested in taking a more active role in public outreach, consistent with the purposes stated in the MOU. The group discussed the development of OpEd/My Turn columns on relevant, interesting subjects facing the VSPC and seeking publication of these in*

newspapers and other appropriate forums. An initial column could be written from a public member's perspective describing the experience of participating. Topics of interest: CEII, coordination of DSM and load forecasting, increased communication and coordination brought about by the VSPC.

CRITICAL ENERGY INFRASTRUCTURE INFORMATION (CEII)

The impact of restrictions on access to information resulting from Federal CEII requirements is a concern for VSPC participants for two reasons. First, limitations on access to information by VSPC members may threaten the ability of the VSPC to carry out its role. Second, limitations on public dissemination of information about the transmission system may threaten the goals of transparency and public trust that are embedded in the MOU.

CEII emerged as a significant issue only recently, during consideration of the 2009 Vermont Long-Range Transmission Plan. Adoption of a VSPC-specific non-disclosure agreement and related processes is a critical step for resolving the uncertainties surrounding CEII. While the VSPC non-disclosure agreement does not resolve the issues of transparency in public outreach, it is a necessary step to facilitate the ongoing VSPC process.

Alternative text for above paragraph proposed by Steve Litkovitz: CEII emerged as a significant issue only recently, during consideration of the 2009 Vermont Long-Range Transmission Plan. Adoption of a VSPC-specific non-disclosure agreement and related processes may assist in resolving the uncertainties surrounding CEII. The VSPC non-disclosure agreement will not, in itself, resolve the issues of transparency in public outreach.

Comment [DLF1]: Jenny Cole expressed strong concern about the implications of CEII for transparency of transmission planning.

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Participants across multiple sectors expressed the need to resolve the CEII issues quickly. Some representative comments follow:

- *Critical Energy Infrastructure Information (CEII) requirements present a tension between transparency and security. Members are understandably reluctant to take on obligations for protecting the information. CEII presents challenges to having useful discussions about alternatives in specific. People become suspicious when VELCO says it has to withhold information.*
- *While we recognize VELCO's need to keep critical data confidential, it is important for the VSPC to have full information when evaluating the LRTP and individual project proposals.*
- *Overcoming confidentiality requirements arising under CEII obligations will challenge some of the transparency objectives of the process.*

RESOURCE INTENSITY OF THE PROCESS

A widely shared concern about the Docket 7081/VSPC process is the demand it places on already scarce resources, both people and time, and therefore, financial. Representative comments capture the issue:

- *The MOU lays out a process that assumes adequate resources to carry out the envisioned steps. None of the utilities is adequately resourced to carry out the steps fully. Not having resources, utilities must choose whether to fully participate in VSPC based on cost benefit analysis. This problem actually applies to all the sectors, including public sector representatives.*
- *Lots of people, lots of meetings, lots of emails --- it is very challenging to find the time from your regular business and job to cover all the ground that needs to be covered.*
- *I believe 7081 is ensuring that "full, fair and timely consideration" is being met, but it also strikes me that it requires a great deal of human and financial resources to do that.*

Comments about the issue cut across sectors:

- *The overall process is cumbersome and time consuming. It is extremely difficult for business people to participate in the process and still meet their own work obligations.*
- *Except possibly for CVPS and GMP, no distribution utility has the staff to be adequately represented on the numerous committees, etc.*
- *Resources: the VSPC process constitutes additional work. VELCO, with several planners on staff, is feeling the pinch; the distribution utilities are feeling it even more intensely.*

The municipal utilities developed a process to participate effectively despite their limited resources, but the model is not necessarily applicable to other sectors.

- *One municipal similarity is that we are mostly small, and attendance at VSPC meetings requires a significant commitment of personnel resource. Those setting up procedures recognized this and set up a workable proxy and quorum process for the municipal utilities to use. A municipal representative played a key role in developing VSPC procedures. Our opinion is that this works for us as well as could be expected.*

Looking forward, some participants expressed concern that key pieces of the process may be difficult to accomplish through the complex process established by the MOU:

- *The MOU's cost allocation procedure is a barrier to considering NTAs because of the complexity of agreeing upon a cost allocation for NTAs. If you don't have enough human resources to do the current work, how will it work when you get into a full-blown collaboration on costs of NTAs?*

There was also some concern expressed about duplication of effort by the various entities now considering transmission issues:

- *Sector members noted that the Vermont Utility Planning Group (VUPG) appears to have been reactivated by VELCO. This group was disbanded when the VSPC was initially created and sector members now wonder about how the VSPC and VUPG will interact going forward. Members have some concern that the VUPG may be duplicative of the VSPC Transmission Committee.*

In spite of these widely shared concerns about the complexity of the process, some participants also perceived that complexity is inevitable when a diverse group of people collaborates, and that the process remains worthwhile.

- *There is seldom a sense of time being wasted. Though burdensome, it seems motivated to achieve efficiencies, which are appreciated.*
- *The process does lend structure to planning efforts that lacked some structure before.*

Participants offered many suggestions for improving the efficiency of the process. While the concerns about the burden of the process was an overarching issue for some, there was also a strong sense that the burden could be reduced by making the process more efficient.

Recommendations emerging from the evaluation include:

1. Engage a consultant skilled in process improvement to help the group achieve the greatest possible efficiency.
2. Review subcommittee charters, VSPC Rules of Procedure and process adopted by the VSPC. Where process complexity can be reduced, based on the experience of the past two years, streamline processes.
3. Use teleconferencing (or teleconferencing with web conferencing) for more meetings. The VSPC's advanced teleconferencing equipment was seen as an improvement, but remains an imperfect solution. Meetings seem to work better if they are either all by phone or all in person, but the hybrid is always difficult to follow for those on the phone.
4. Consider reducing meeting frequency to less than quarterly – three times a year or semi-annual, depending upon the demands of the agenda.
5. Continue to strengthen the subcommittee process. Ensure the work gets done in the subcommittees and recommendations for action are fully developed before coming to the full group.
6. Complete the procedures manual (started prior to the long-range plan process) that helps translate the complexity of the MOU into understandable, step-by-step form.
7. Focus on the core purposes of the VSPC and reduce the time spent on larger policy issues. (See discussion of Divergent Views of VSPC Mission, page __, for contrary views on this recommendation.)

NON-TRANSMISSION ALTERNATIVES

The core purpose of the Docket 7081 MOU is “the full, fair and timely consideration of cost-effective non-transmission alternatives.” (Final order, Docket 7081, 6/20/07, at 3.) Participants in this evaluation offered many observations and recommendations on two main issues regarding NTAs: the NTA screening and analysis process of the VSPC, and the larger issue of NTA feasibility.

NTA SCREENING

The MOU requires the VSPC to develop and submit to the Board a form for preliminary screening of projects to determine which ones merit full-blown NTA analysis. The tension inherent in the screening process is to ensure that every reliability deficiency that has any prospect of a non-transmission solution is fully evaluated, but that money and time are not wasted on projects with no realistic potential for deferment or avoidance. As stated in Paragraph 21, “the Preliminary NTA

Analysis will be designed to screen from further analysis only those projects that have no reasonable likelihood of being cost-effectively addressed by NTAs.”

The discussion within the VSPC and the comments in this evaluation process demonstrate that NTA screening is one of the central challenges of the process. Since the NTA screening form was filed with the Board in 2008² tensions have played out regarding the tool and its application.

Some participants have concluded that the screening tool is adequate, and the issues are about how it is interpreted and used.

- *The challenges using the NTA screening tool are a result of interpretation; not of the MOU requirements for the screening tool. It is important that, in critiquing the process, the VSPC and the 7081 parties differentiate between flaws in the MOU and flaws in how it is being applied.*
- *There is a process and screening tool in place. There is probably room for improvement, but the parties are committed to accomplishing this objective.*
- *However, it still seems that too many projects are simply passed through the process under the guise of "reliability projects" without adequate NTA review. It still feels that the engineers among the group remain unconvinced that ANY NTA can be equivalent to transmission construction.*

Some participants expressed support for the way the NTA screening process allows utilities to screen and move on where that action is appropriate.

- *The VSPC process apparently aided the permitting process for this project. The VSPC set up standards and rationale for NTA (non-transmission alternative) screening. This process was followed and presented to a full VSPC meeting, where it was accepted. In [the example], the report of this process helped this part of the subsequent permitting process proceed more smoothly. This is a clear VSPC success.*
- *There is a process for ensuring formal NTA consideration for all projects, including a quick exit when it is clear that NTA is not feasible. This is good.*

On the other hand, a number of concerns have been raised about the effectiveness of the screening process in giving NTAs a fair chance to succeed.

- *The tool utilized for the NTA screening is flawed. Results vary based on the entity utilizing the tool. Some of the results from the tool do not make sense.*
- *The sector also shares concerns raised by others during recent VSPC meetings that existing screening tools may not appropriately evaluate generation and efficiency alternatives. The definition of "equivalence" required to make these NTA options comparable to transmission solutions under the existing screening process may set the bar too high and make NTA development extremely unlikely. A revisiting of the NTA screening criteria may be appropriate during the next LRTP cycle.*

A few comments were very specific in suggesting changes to the NTA screening process.

² See <http://www.vermontspc.com/VSPC%20Reports%20%20Correspondence/NTAscreeningtool-final.pdf>

- *The requirement to include NTA screening in the Long-Range Transmission Plan is premature. The transmission solutions proposed as part of the plan are conceptual in nature meaning there is quite a bit of transmission analysis that needs to follow the plan to determine whether the transmission solution posited is the one that would be built if transmission is the right path. If the transmission solution isn't final, there is no point in comparing the NTAs against a project that will likely change.*
- *Planning steps: The process may have a step missing. It would be more useful to perform a detailed transmission analysis before you do the NTA analysis. In the current scenario, the transmission analysis may totally change after the plan. This step is not described at all. Transmission plan level analysis is not sufficient to start talking about equivalence or NTA screening. Add a step between steps 7 and 8 to be more certain about the transmission solution.*

NTA FEASIBILITY

In addition to practical and philosophical questions about the NTA screening tool, a number of participants raised more fundamental questions about NTA feasibility. In fact, this issue has been an underlying discussion since establishment of the VSPC and reflects skepticism from multiple perspectives.

Some of the concern reflects the tension between Vermont's emphasis on NTA and regulatory processes and standards at the regional and federal levels that do not make NTAs central.

- *It is a challenge to strike the right balance between accommodating conceptually cost-effective NTAs and some entities' obligations to serve.*
- *My experience, as someone who is not a transmission planner but interacts somewhat regularly with VELCO, is that VELCO is more inclined than the DUs to use conservative assumptions and/or methods that tend to support greater and earlier need for new transmission facilities, and less inclined to "work the problem" to fully explore what non-transmission alternatives could work. This observation is based on a limited sample size, and it may reflect the regulatory context within which VELCO is required to work (i.e., increasing federal attention to transmission planning, mandatory reliability standards).*

Others have expressed concern that NTAs may not be realistic in practice because of issues like siting and funding.

- *I don't believe that it is a lack of planning that prevents NTA from being implemented but rather a host of other barriers that transcends planning, including regional cost allocation for network transmission, the difficulties of generation development and siting, and capital requirements.*
- *While it provides information on those locations where non-transmission alternatives may be applied, there seems to be little support—from a resource perspective— by the proponents of the alternatives to support the process. In addition, these non-transmission alternatives are not manifesting themselves at a [\[level\]](#) sufficient to change the need for transmission infrastructure.*

DIVERGENT VIEWS OF VSPC MISSION

Participants had divergent views of the appropriate breadth of the VSPC's focus. This tension ~~was~~ has been especially evident on the question of whether or not the VSPC should become involved in issues related to transmission for purposes other than reliability, specifically "economic transmission" to bring renewable to market. Some participants were generally concerned about the amount of time and energy the group devotes to other policy issues as well.

The two sides of this discussion can be summarized as follows:

Broad view of mission

The VSPC exists in part to ensure public understanding of and involvement in transmission planning. This purpose cannot be served effectively if the VSPC does not discuss significant emerging transmission issues such as economic transmission

Narrow view of mission

The purpose of Docket 7081 was to address planning to address reliability issues on the transmission grid. The negotiators of the MOU agreed to a process for this purpose. Expanding beyond this focus is inconsistent with the MOU and further expands an already time-consuming process.

A middle view suggests that the group should address economic transmission issues to the degree that they have an impact on system reliability. This approach will bring some, if not all, economic transmission projects into the VSPC discussion, but in a manner consistent with the reliability focus of the MOU.

Some participants suggested that the VSPC should attempt to resolve the mission question, but should turn to the Board for resolution if no consensus can be reached.

Representative comments follow:

- **Broad mission:** *The Subcommittee expressed the need for a means for the public to understand the full spectrum of issues related to transmission, including projects being considered to bring renewable power to Vermont and the New England market ("economic transmission"). The VSPC may be an appropriate forum for this discussion, but it was recognized that there is concern by some VSPC members about expanding the mission of the VSPC beyond the reliability focus of the MOU. There may be a need for the Public Service Board to resolve this tension.*
- **Narrow mission:** *I think the VSPC needs to refocus on its priority task which in my view is to review the VELCO LRTP and projects, and spend less time debating transmission policy. The present track sets the VSPC up as a debate society, which some parties clearly want (to be able to say that the VSPC took such and such position) thereby leveraging their own position.*
- **Middle ground:** *We observe that there appear to be several significant potential transmission projects (e.g., an upgrade of the PV-20, other regional renewable projects, etc.) that are motivated primarily by economic considerations, but which could meaningfully affect the nature and timing of Vermont reliability projects. We believe that it is appropriate for the VSPC to identify and discuss such potential projects, and for VELCO to assess (to the extent practical) and describe their effects on the Vermont transmission system and reliability projects. This is most important for the largest and most credible economic transmission projects; some judgment will be needed to ensure that VELCO and the VSPC are not required to*

spend substantial amounts of time on very small projects, or projects that are not sufficiently advanced.

ADMINISTRATIVE SUPPORT

The VSPC participants are generally satisfied with the support for operation of the VSPC being provided by VELCO. On the question, How would you rate the effectiveness of administrative support to the VSPC (e.g., staffing, website, schedule)?, participants' average rating was 3.82 on a four-point scale. All responses were 3s and 4s (very effective or somewhat effective). The VSPC website, timely agendas and meeting materials, and the responsiveness of staff were among the specific factors cited.

Some representative comments follow:

- *The VELCO staff who support the VSPC (led by Deena Frankel and Kim Pritchard) effectively frame and guide the process, and improve the efficiency of meetings by ensuring that meeting agendas and other supporting materials are circulated in advance.*
- *Adequate time is provided to review documents. Meeting notices are sent early enough. Meeting agendas are planned with VSPC members.*
- *The meetings have been very well organized, with ample notification of committee members. Required deadlines have been met and there has been sufficient opportunity for members to comment on draft documents. The staff has been very helpful in providing information and coordinating subcommittee work. The web site has been a good tool to make information available—but is due for review and update.*
- *This all works well largely due to the highly professional support provided by VELCO.*
- *The website & responsiveness of VELCO staff is exemplary.*

SUBCOMMITTEE CHARTER CHANGES

Only two subcommittees reported a need for changes to their subcommittee charters. These changes are within the power of the VSPC to adopt. They include:

- The Generation Subcommittee recommended that its charter be more sharply focused on reviewing generation-related assumptions in specific NTA analyses for reasonableness in light of then-available information. They observed that the requirement in the existing charter for development of standardized generation assumptions in advance of NTA analyses may be problematic. Confidentiality concerns may also limit group members' ability to provide actual cost assumptions, but would likely not bar the ability to comment on specific evaluations.
- The Public Participation Subcommittee recommended that the final paragraph of its charter be revised as follows:
~~Providing oversight of~~ Facilitating communications (website, media, etc.) regarding the work of the VSPC to ensure clarity, comprehensiveness and transparency of the VSPC process to two distinct target audiences: committee and subcommittee members (internal communications); and the public (external communications).

MINOR FIX TO THE PROCESS FOR ALLOCATING PUBLIC MEMBER COSTS

The parties to the Docket 7081 proposed, and the Board approved, a cost allocation mechanism for public member expenses as follows:

Agreement of parties concerning cost allocation of public member expenses

Pursuant to this proposal the per diem and travel reimbursements to be paid to the public members of the Vermont State (sic) Planning Committee would be allocated to distribution utilities based on each utility's pro rata previous year annual kWh sales using the same factors as the Rule 4.100 allocation process employed by the Purchasing Agent currently VEPP Inc. Consistent with its responsibilities under MOU ¶69, VELCO would administer this process and all payments and reimbursements would be administered by VELCO.

This cost allocation mechanism is slightly different from the cost allocation mechanism used by VELCO for all other operating costs. Operating costs are allocated to distribution utilities under the Vermont Transmission Agreement based on actual monthly peak load, the "PDP" method. The two methods produce similar but not identical results. In 2006 and 2007, the PDP method results allocated CVPS 3 to 4 percent more than its share under the VEPP Inc. mechanism. This difference might be significant if the costs in question were significant, but on the contrary, the total reimbursement to public members through July 1, 2009, was less than \$500.

The amount of money involved is very small and the cost allocation difference between the two mechanisms is therefore miniscule. These small amounts do not justify the costs of VELCO maintaining a separate accounting system it would not otherwise use for this small subset of expenses. The alternative is for the Board to approve treating the public member expenses in the same manner as other VELCO operating costs, including the costs of supporting the VSPC.

3.0 RECOMMENDATIONS

1. **Continuing the process and further evaluation:** The VSPC process has had preliminary positive results, but has not yet fully realized its objective. The process has just begun its first full cycle, outlined in the MOU, that begins with the three-year update of the Long-Range Plan. It will be timely to reevaluate the effectiveness of the process at the end of this cycle. The VSPC should revisit its self-assessment at the end of the 2009-2012 cycle.
2. **VSPC authority to make recommended changes:** The process improvements proposed in this section are within the control of the VSPC, by changes in its processes, Procedural Rules or subcommittee charters. If changes in the Procedural Rules are needed, the amended rules should be filed with the PSB.
3. **Leaving Docket 7081 open:** The Board should leave Docket 7081 open to provide a continuing mechanism to resolve disputes related to CEII that arise in the VSPC context and to address future recommendations for process changes that may emerge from further assessment conducted by the VSPC.
4. **Public engagement:** Increase public representation in the VSPC by ensuring that all seats are filled by people who are willing to commit to regular attendance and full participation. Pursue this goal by implementing the strategies developed by the Public Participation Subcommittee:
 - a. Identify people who are likely to be interested in the process from lists of people who attended public outreach meetings and people who have become active in transmission issues through recent VELCO projects.
 - b. Create a means for participation that does not necessarily involve or initially involve having to attend full VPSC meetings. For example, potential participants could be invited to Public Participation Subcommittee meetings.
 - c. Increase visibility of the process through increased public information.
5. **CEII:** The VSPC should quickly adopt a non-disclosure agreement covering CEII and other confidential information. The VSPC, VELCO and the distribution utilities should continue educate themselves on CEII requirements and to develop clear-cut policies and procedures. The utilities should expeditiously expand the discussion to include the Public Service Board so more clarity can be gained on how the CEII issues will play out in Section 248 and other Board proceedings.
6. **Making the process more efficient:** The VSPC should implement the following recommendations regarding process efficiency.
 - a. Engage a consultant skilled in process improvement to help the group achieve the greatest possible efficiency.

Comment [DLF2]: Richard Sutor states he does not agree with this recommendation and believes that sufficient expertise exists within the VSPC to carry out this review.

- b. Review subcommittee charters, VSPC Rules of Procedure and process adopted by the VSPC. Where process complexity can be reduced, based on the experience of the past two years, streamline processes.
 - c. Use teleconferencing (or teleconferencing with web conferencing) for more meetings. The VSPC's advanced teleconferencing equipment was seen as an improvement, but remains an imperfect solution. Meetings seem to work better if they are either all by phone or all in person, but the hybrid is always difficult to follow for those on the phone.
 - d. Consider reducing meeting frequency to less than quarterly – three times a year or semi-annual, depending upon the demands of the agenda.
 - e. Continue to strengthen the subcommittee process. Ensure the work gets done in the subcommittees and recommendations for action are fully developed before coming to the full group.
 - f. Complete the procedures manual (started prior to the long-range plan process) that helps translate the complexity of the MOU into understandable, step-by-step form.
 - g. Focus on the core purposes of the VSPC and reduce the time spent on larger policy issues.
7. **NTA screening process:** Convene a review of the NTA screening tool based on the input gathered in the current evaluation. The product of the review would be a recommendation to the VSPC to amend the screening tool and/or the NTA screening process, to maintain the tool and address issues of interpretation, or to take no action.
 8. **Broad vs narrow mission:** Continue discussion within the VSPC regarding the appropriate breadth of the committee's focus. The product of such discussion would be guidance on the setting of agendas for future meetings. If consensus cannot be reached, consider seeking Board guidance.
 9. **Charter changes:** Approve the charter changes recommended by the Public Participation and Generation Subcommittees.
 10. **Public member cost allocation methodology:** Request that the Public Service Board modify the cost allocation methodology for public member expenses to be consistent with the allocation of other VSPC operating expenses.

Comment [DLF3]: Richard Suitor suggests a focus on getting people to speak up. "We need someone with a (virtual) stick to rap knuckles when appropriate or to get soft-voiced people near a pickup ... we need attention to discipline in the room for a while until people learn proper habits ... VSPC has improved a lot, but more technically than in behavior."

Comment [DLF4]: Richard Suitor observes there has been much progress but more work is needed to define what a good job is.

Comment [DLF5]: Richard Suitor proposes that the tool should include explanations that can be understood by the educated non-expert. Confidence in the screening tool is essential to confidence in the ultimate conclusion of the screening.

APPENDIX 4.1 — SECTOR COMMENTS

Sector Comments: Distribution Utilities Providing Transmission GMP/VEC/CVPS

The sector is comprised of three distribution utilities: Central Vermont Public Service (“CVPS”), Green Mountain Power Corporation (“GMP”), and Vermont Electric Cooperative (“VEC”). Feedback from this sector was gathered in a series of phone calls between the members’ VSPC representatives.

The sector’s comments on VSPC process to date are:

- The VSPC process has worked reasonably well during its startup phase, although significant effort had to initially be devoted to process issues. The VSPC process has resulted in more pro-active discussions between VELCO and the distribution utilities relative to transmission planning.
- While VELCO must expend substantial effort and cost to produce the Long Range Transmission Plan in this formal format and venue, the Plan in its current form provides significant value by articulating the nature and estimated timing of future reliability resource needs. We believe that the Plan and the VSPC process improve the awareness of stakeholders (including distribution utilities) regarding the reliability needs that VELCO has identified, and the methods and assumptions upon which VELCO’s assessments are based.
- The VELCO staff who support the VSPC (led by Deena Frankel and Kim Pritchard) effectively frame and guide the process, and improve the efficiency of meetings by ensuring that meeting agendas and other supporting materials are circulated in advance.

The following are our observations regarding to topics relating to the substance of transmission planning in Vermont.

Our understanding is that VSPC participants are divided about the extent to which the VSPC process and dialogue should be expanded to address potential economic transmission projects. We observe that there appear to be several significant potential transmission projects (e.g., an upgrade of the PV-20, other regional renewable projects, etc.) that are motivated primarily by economic considerations, but which could meaningfully affect the nature and timing of Vermont reliability projects. We believe that it is appropriate for the VSPC to identify and discuss such potential projects, and for VELCO to assess (to the extent practical) and describe their effects on the Vermont transmission system and reliability projects. This is most important for the largest and most credible economic transmission projects; some judgment will be needed to ensure that VELCO and the VSPC are not required to spend substantial amounts of time on very small projects, or projects that are not sufficiently advanced.

We support the Large Transmission-Dependent Utility sector's comments with respect to the VSPC needing to address the Critical Energy Infrastructure issue and confidentiality requirements for seeing specific project data. While we recognize VELCO's need to keep critical data confidential, it is important for the VSPC to have full information when evaluating the LRTP and individual project proposals.

Finally, we would recommend that when VELCO's planning analyses identify a potential reliability issue on the subtransmission system that VELCO be sure to inform and consult with the affected DUs as early as practical. This will ensure that the issues are clearly understood by all, and that all potential transmission solutions (including ones on the subtransmission system level) are appropriately considered.

We appreciate the opportunity to comment.

Sector Comments: Transmission Sector
VELCO

The following are the comments of VELCO as the Transmission Sector of the VSPC.

STRENGTHS & SUCCESSES OF THE DOCKET 7081 PROCESS:

- Has forced us to address the reliability issues facing Vermont. The process makes it impossible to sweep reliability issues under the rug or delay dealing with them. Previously some transmission issues were known in utility circles, but not necessarily by the Board and Department.
- Bringing people to the table who haven't been there before, e.g., SPEED facilitator, other utilities who may not have been invited before.
- The Board is getting info about the status of more efforts they might not have heard about except in a docket.
- Public members – in fact all members – are getting info and education to which they may not previously have had access.
- The VSPC stimulates conversation that may not have occurred in the past, e.g., discussion of assumptions that are used in planning. This helps more parties to understand the transmission side and it helps VELCO to understand the distribution utility side. Learning goes both ways.
- Increased communication among utilities isn't completely a result of the VSPC, but the VSPC has helped.
- It contributes to improved process that all parties are getting to know each other better.
- The VSPC has provided a forum to talk about what alternatives might work. Previously the conversation involved a more limited subset of people. Now there is a greater sharing of concepts, issues and perspectives than previously was possible. Some of the communication that is taking place in the VSPC previously happened only in the context of a contested case.

CHALLENGES AND BARRIERS

- Vermont utilities are still in the process of addressing past reliability problems, which is clouding the opportunity to deal with future problems.

- The intended coordination of the EVT forecast (Forecast 20) and the VELCO forecast has not yet been fully realized.
- Resources: the VSPC process constitutes additional work. VELCO, with several planners on staff, is feeling the pinch; the distribution utilities are feeling it even more intensely.
- Time is an issue both for attending meetings and for preparation
- Timeliness is an issue. The process is not necessarily efficient for dealing with issues where the reliability deficiency occurred at load levels that have already been exceeded, and yet NTA screening/analysis is still required.
- It is a challenge to strike the right balance between accommodating conceptually cost-effective NTAs and some entities' obligations to serve.
- It is a challenge to balance regional and national standards to which VELCO must adhere with state values related to NTAs. This is a barrier to NTA consideration. It remains to be reconciled how to deal with situations in which NERC compliance is at odds with state expectations and standards, especially where the issues involve distribution utility facilities.
- The MOU lays out a process that assumes adequate resources to carry out the envisioned steps. None of the utilities is adequately resourced to carry out the steps fully. Not having resources, utilities must choose whether to fully participate in VSPC based on cost benefit analysis. This problem actually applies to all the sectors, including public sector representatives.
- Geographical challenge: Teleconference has been improved but still doesn't work well, particularly where attendance is a mix of face-to-face and telephone participation. Pure teleconferences can be productive, particularly with the use of tools like WebEx.
- The question remains, How interested is the public in discussing transmission planning issues? VELCO and the distribution utilities have made significant efforts to reach out, but the public is primarily interested in discussing transmission issues when there is a concrete project close enough to affect them individually. This is a barrier to involving the public in the way envisioned by the Docket 7081 MOU. A part of the problem is that transmission planning is inherently a dry and technical subject.
- The public outreach process required by the MOU regarding the plan is somewhat mismatched to the situation. Significant outreach is required for a document that is really the first step in a long process and is mainly focused on identifying the reliability problems that need to be addressed. The intensive public outreach at this stage is premature and mismatched to public expectations.
- The statute (30 V.S.A. § 218c) describes the three-year updates as a transmission integrated resource plan, but the MOU requires that the document identify reliability deficiencies to serve as the springboard and first step in selecting and implementing the best solutions. The statutory description and the MOU requirements for the contents of the plan are somewhat out of synch.
- The challenges using the NTA screening tool are a result of interpretation; not of the MOU requirements for the screening tool. It is important that, in critiquing the process, the VSPC and the 7081 parties differentiate between flaws in the MOU and flaws in how it is being applied.

- The subcommittee charters and VSPC procedures were set up before it was completely clear how the VSPC process would actually work. Now that the group has experience implementing the MOU, it appears some processes are more complex than they need to be and could be streamlined. For example, the notice requirements sometimes hamper consideration of late breaking items.
- Critical Energy Infrastructure Information (CEII) requirements present a tension between transparency and security. Members are understandably reluctant to take on obligations for protecting the information. CEII presents challenges to having useful discussions about alternatives in specific. People become suspicious when VELCO says it has to withhold information.
- The requirement to include NTA screening in the Long-Range Transmission Plan is premature. The transmission solutions proposed as part of the plan are conceptual in nature meaning there is quite a bit of transmission analysis that needs to follow the plan to determine whether the transmission solution posited is the one that would be built if transmission is the right path. If the transmission solution isn't final, there is no point in comparing the NTAs against a project that will likely change.
- The concept of considering all cost effective NTAs assumes Vermont will wait for the identification of a reliability problem to choose to do cost-effective energy efficiency, when in fact, by its very nature, where energy efficiency is cost effective it should be done regardless of transmission reliability. For this reason, energy efficiency should be built in to the load numbers rather than geotargeted. The problem with looking at the avoided costs associated with energy efficiency as an alternative to specific transmission projects is that the assessment fails to take into consideration some necessary investment for the of updating aging infrastructure. It would be more useful to consider energy efficiency on a statewide basis, rather than in relation to the avoidance of specific projects.
- The MOU's cost allocation procedure is a barrier to considering NTAs because of the complexity of agreeing upon a cost allocation for NTAs. If you don't have enough human resources to do the current work, how will it work when you get into a full-blown collaboration on costs of NTAs?

HOW THE DOCKET 7081 PROCESS IS SERVING VELCO'S (TRANSMISSION) SECTOR INTERESTS

- The process serves as a forum for active participants in the public dialogue and to hear and educate.
- To the extent that VELCO's interests are to quickly solve reliability problems, the process acts as a barrier by introducing time and resource drain to the resolution.
- Helps stakeholder relations by showing VELCO is involving the public and doing business consistent with Vermont values; that VELCO is sensitive to the state's needs in considering NTAs and obtaining early public involvement. In this way, the process serves VELCO's interests.

SUGGESTIONS FOR IMPROVEMENT

- Better align expectations and available resources to carry them out.

- Find a way to better inform a decision-making on a statewide basis rather than project by project. It might be more useful to have global discussion of DSM rolled up and informing/updating the screening tool.
- Better address what is plausible and feasible for DSM and for generation.
- Planning steps: The process may have a step missing. It would be more useful to perform a detailed transmission analysis before you do the NTA analysis. In the current scenario, the transmission analysis may totally change after the plan. This step is not described at all. Transmission plan level analysis is not sufficient to start talking about equivalence or NTA screening. Add a step between steps 7 and 8 to be more certain about the transmission solution.
- Be clearer up front with participants and potential participants about the expectation for participation such as attendance and CEII.

***Sector Comments: "Large Transmission Dependent Distribution Utility"
BED/WEC/OMYA***

The sector is comprised of three distribution utilities: Burlington Electric Department ("BED"), Washington Electric Cooperative ("WEC"), and Vermont Marble Power Division of OMYA ("Vt. Marble"). Ken Nolan, VSPC Alternate Representative for BED, was tasked with gathering input from sector members and submitting these comments to the VSPC Secretary. Mr. Nolan spoke directly with representatives from each sector member: Bill Powell for WEC and Todd Allard for Vt. Marble.

The sector's comments on VSPC process to date are:

- The sector feels that the VSPC process has worked well during its startup phase and has resulted in more pro-active discussions between VELCO and the distribution utilities relative to transmission planning.
- The sector also feels that public outreach on the Long Range Transmission Plan and on individual projects has been improved as a result of the VSPC process, although the VSPC itself has not generated the level of public participation that some VSPC members hoped for.
- The quarterly meeting schedule is appropriate and meetings to date have been well organized, appropriately paced, and useful.
- The VSPC staff (Deena Frankel and Kim Pritchard) deserves enormous credit for keeping the discussions moving and discussions in-line with the meeting agendas. There is an enormous amount of work that needs to occur between meetings and they have done an outstanding job.
- The sector does have several specific concerns more related to the VSPC's future direction than with ongoing operational issues:
 - Sector members noted that the Vermont Utility Planning Group (VUPG) appears to have been reactivated by VELCO. This group was disbanded when the VSPC was

initially created and sector members now wonder about how the VSPC and VUPG will interact going forward. Members have some concern that the VUPG may be duplicative of the VSPC Transmission Committee.

- Sector members are concerned with seeming attempts to expand VSPC discussions into the merchant transmission arena. At least one sector member felt that the VSPC was created to address reliability projects and insure that non-transmission alternatives were evaluated as alternatives to transmission reliability improvements. The VSPC should focus on that mission and not attempt to expand its role into becoming an overall transmission policy committee.
- The sector also shares concerns raised by others during recent VSPC meetings that existing screening tools may not appropriately evaluate generation and efficiency alternatives. The definition of “equivalence” required to make these NTA options comparable to transmission solutions under the existing screening process may set the bar too high and make NTA development extremely unlikely. A revisiting of the NTA screening criteria may be appropriate during the next LRTP cycle.
- The VSPC needs to address the Critical Energy Infrastructure issue and confidentiality requirements for seeing specific project data. While sector members understood VELCO’s need to keep critical data confidential, it is imperative that the VSPC have full information when evaluating the LRTP and individual project proposals.
- The sector is also concerned about Public Member Sector participation, or lack thereof. Only one Public Sector member attends meetings with regularity. Input from that member has been instrumental in many VSPC discussions. If there is any aspect of the VSPC’s existing structure that sector members felt needed to be discussed/revisited it was methods for obtaining greater participation by Public member sector participants.

The “Large Transmission Dependent Distribution Utility” sector appreciates the opportunity to comment and looks forward to working with other VSPC members to develop the joint status presentation to the Public Service Board.

Sector Comments: Municipal Utilities except BED

The Municipal Electric Utilities’ perception of the VSPC operations is divided into observations of:

1. Effects on current municipal operations: the instance to date has been the Lyndonville Substation project.
2. VSPC operational procedure, to judge how these procedures might affect future municipal operations.
3. VSPC accomplishments, to judge how the VSPC is affecting transmission planning in Vermont.

CURRENT MUNICIPAL OPERATIONS: LYNDONVILLE SUBSTATION PROJECT

The VSPC process apparently aided the permitting process for this project. The VSPC set up standards and rationale for NTA (non-transmission alternative) screening. This process was followed and presented to a full VSPC meeting, where it was accepted. In Ken Mason's opinion, the report of this process helped this part of the subsequent permitting process proceed more smoothly. This is a clear VSPC success.

VSPC PROCEDURES

From the initial meetings, the VSPC has made a clear attempt to be inclusive. The sectors were defined to group those with some similarities of interest and composition. One municipal similarity is that we are mostly small, and attendance at VSPC meetings requires a significant commitment of personnel resource. Those setting up procedures recognized this and set up a workable proxy and quorum process for the municipal utilities to use. A municipal representative played a key role in developing VSPC procedures. Our opinion is that this works for us as well as could be expected.

VSPC ACCOMPLISHMENTS

One clear VSPC success has been to communicate transmission planning details to a much wider audience than had been previously done. Most of this increased communication has been within the utilities. There has been a valiant attempt to include the non-technical public; this has had limited success.

The Long Range Transmission Plan was presented several times before it was released. Those responsible for issuing it were responsive to feedback, and made significant changes to improve the accuracy of the document and make it more comprehensible to the educated layperson.

Other potential transmission projects have been described and prioritized. Most of these do not directly affect municipal utilities. The municipal utilities feel that we are kept reasonably informed about the transmission planning process in Vermont.

APPENDIX 4.2 — SUBCOMMITTEE COMMENTS

Public Participation Subcommittee

The need continues to increase public participation in the VSPC/Docket 7081 process. There are two elements of this need:

- Ensuring that the seats on the VSPC are filled and there is consistent participation by public members in VSPC meetings.
- Increasing public outreach and information regarding planning for transmission and non-transmission alternatives.

The subcommittee recognizes that there will be a more clear opportunity for focused outreach when there are projects undergoing the full VPSC process, but also sees the need for providing information about VSPC activities to keep the public informed generally about transmission issues.

The barriers to public participation include:

- The commitment of time needed to participate fully.
- The technical nature of the subject matter.
- The lack of a sense of immediacy to the issues.

Some possible solutions:

- Identify people who are likely to be interested in the process from lists of people who attended public outreach meetings and people who have become active in transmission issues through recent VELCO projects.
- Create a means for participation that does not necessarily involve – or does not initially involve -- having to attend full VPSC meetings. For example, potential participants could be invited to Public Participation Subcommittee meetings.
- Increase visibility of the process through increased public information.

The subcommittee is interested in taking a more active role in public outreach, consistent with the purposes stated in the MOU. The group discussed the development of OpEd/My Turn columns on relevant, interesting subjects facing the VSPC and seeking publication of these in newspapers and other appropriate forums. An initial column could be written from a public member's perspective describing the experience of participating. Some key issues to be addressed:

- CEII
- The coordination of DSM and load forecasting
- Increased communication and coordination brought about by the VSPC

The Subcommittee expressed the need for a means for the public to understand the full spectrum of issues related to transmission, including projects being considered to bring renewable power to Vermont and the New England market ("economic transmission"). The VSPC may be an appropriate forum for this discussion, but it was recognized that there is concern by some VSPC members about

expanding the mission of the VSPC beyond the reliability focus of the MOU. There may be a need for the Public Service Board to resolve this tension.

The subcommittee's review of the existing subcommittee charter concluded that only one small change is needed. The final paragraph should be revised as follows:

~~Providing oversight of~~ Facilitating communications (website, media, etc.) regarding the work of the VSPC to ensure clarity, comprehensiveness and transparency of the VSPC process to two distinct target audiences: committee and subcommittee members (internal communications); and the public (external communications).

Generation Subcommittee Potential Charter Changes

The VSPC may want to consider a Generation Subcommittee charter change, in light of the limited time resources, to focus the subcommittee tasks on reviewing generation-related assumptions in specific NTA analyses for reasonableness in light of then-available information. The requirement in the existing charter for development of standardized generation assumptions in advance of NTA analyses may be problematic. Confidentiality concerns may also limit group members' ability to provide actual cost assumptions, but would likely not bar the ability to comment on specific evaluations.

As long as generation is an alternative that can be on the table, a group of persons with a frame of reference focused on generation and markets available to offer input has value. Many generation options may be so case specific that attempting to maintain what amounts to generation screening values would require time disproportionate to its value.

Energy Efficiency & Forecasting Subcommittee	Strongly Agree	Agree	Disagree	Strongly Disagree	No Opinion	Comment Field
In your opinion has the EE&F been effective in serving its intended purpose (according to the charter)		100%				It may be a little premature as the EE&F committee is just beginning a significant project.
Factors relating to Effectiveness:						
Comprehensive - The EE&F is chartered with (at least) 10 responsibilities - should the number & scope of responsibilities be reduced or condensed?			50%		50%	All responsibilities s/b revisited for relevance / Reduced. Coordinate now that real goals have come into focus
Comprehensive - Should the number & scope of responsibilities be expanded ?		25%		50%	25%	All responsibilities s/b revisited for relevance
The EE&F has clear unambiguous objectives and responsibilities		25%	25%		50%	
The EE&F needs to meet more often		25%	75%			
The EE&F would benefit from inviting 'outside' expertise to quarterly meetings		100%				Possibly not "all" meetings, but as necessary / As needed / As planned
The EE&F should establish a forecast/DSM reference library of best practices		25%	75%			Would be nice, but not part of EE&F job
The EE&F should establish/maintain an economic/energy database for members		75%	25%			This is more the EE&F focus
Should the EE&F maintain, track, compare forecast results		100%				As planned
Inclusive - EE&F members are regularly and uniformly included/consulted in subcommittee decisions		100%				
Integrated - the EE&F effectively coordinates its activities with other VSPC subcommittees			25%		75%	
Transparency - the EE&F clearly posts/reports its findings, conclusions and decisions		100%				
The EE&F needs a logo, hats, and tee shirts	75%	25%				
Going Forward:						
The EE&F should adopt an annual (or multi-year) work plan		25%	25%		50%	

APPENDIX 4.3 — COSTS OF THE PROCESS

~~to be added~~ The following is an estimate of the costs associated with the VSPC process. As part of VELCO operating costs, they are allocated to Vermont utilities according to their load share and recovered regionally to the same extent as other transmission operating costs.

DIRECT SUPPORT COSTS

Oct-Dec 2007 2008 Jan-Jun 2009

Direct costs: meetings direct staff support, public outreach. The 2009 half-year figure includes costs of public outreach on the Long-Range Transmission Plan. \$ 10,884 \$ 119,009 \$ 123,397

ROUGH ESTIMATE OF PARTICIPATION COSTS

VSPC meetings	
People	30
Hours	8
Meetings	4
Hourly cost + overhead @ 1.7	51
Full committee total	\$ 48,960
Subcommittee meetings	
Subcommittees	7
Average meetings/subcomm/year	3
Average meeting length	2
Average subcommittee members	8
Hourly cost + overhead @ 1.7	51
Subcommittee total	17,136
Total meeting personnel cost	\$ 66,096

Assumptions:

- Staff cost estimated at an average of \$30 per hour.
- Staff cost including overhead calculated at \$30 X 1.7
- Does not include costs of meeting preparation
- Does not include costs for technical

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APPENDIX 4.4 — ONLINE SURVEY, RATINGS

The purpose of Docket 7081, as stated by the Board, is "to ensure full, fair and timely consideration is given to cost-effective non-transmission alternatives and the implementation of such alternatives." How would you rate the effectiveness of the VSPC process in serving this objective?

Answer Options	Very effective	Somewhat effective	Somewhat ineffective	Very ineffective	No opinion	Rating Average	Response Count	
Rating:	2	15	5	0	0	2.86	22	
	<i>answered question</i>							22
	<i>skipped question</i>							0

How would you rate the effectiveness of VSPC processes (such as meetings, rules, subcommittee structure):

Answer Options	Very effective	Somewhat effective	Somewhat ineffective	Very ineffective	N/A	Rating Average	Response Count	
Rating:	6	12	4	0	0	3.09	22	
	<i>answered question</i>							22
	<i>skipped question</i>							0

How would you rate the efficiency of the VSPC processes?

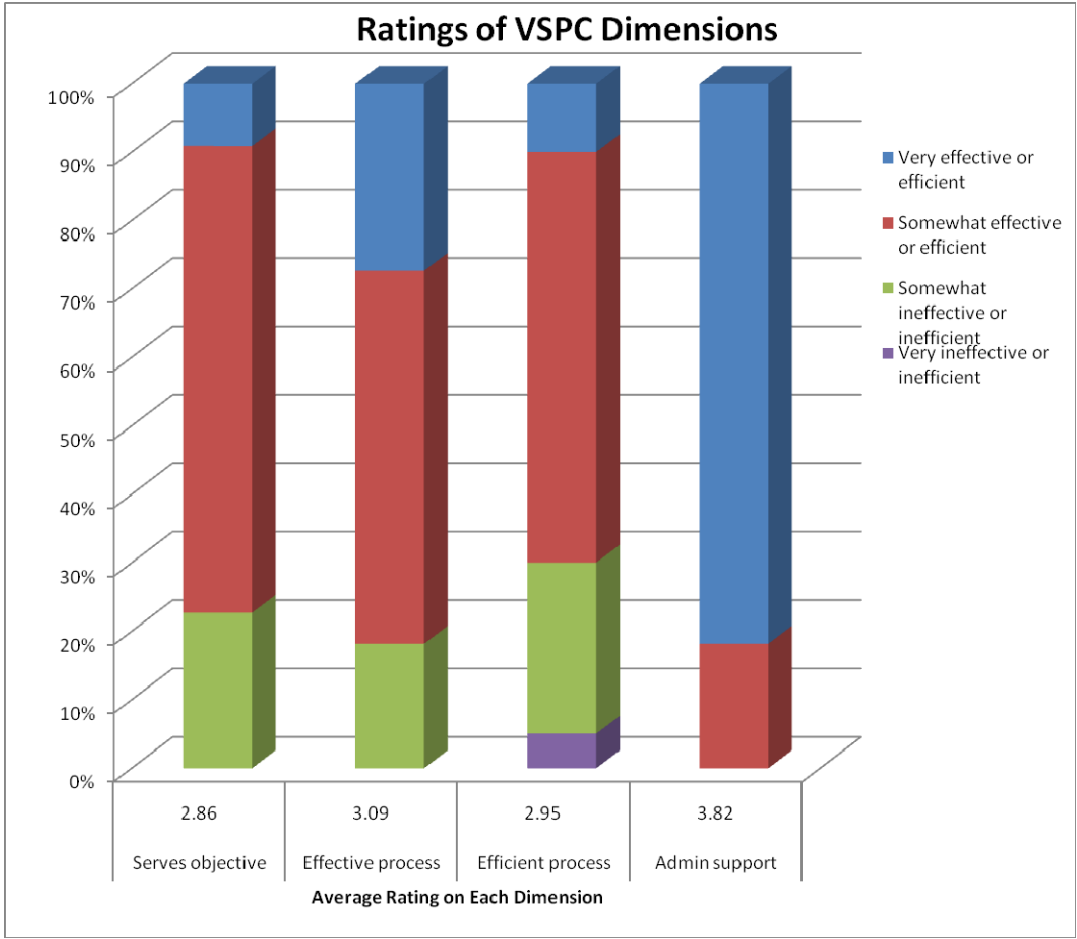
Answer Options	Response Percent	Response Count	
Very efficient	9.5%	2	
Somewhat efficient	57.1%	12	
Somewhat inefficient	23.8%	5	
Very inefficient	4.8%	1	
N/A	4.8%	1	
	<i>answered question</i>		21
	<i>skipped question</i>		1

How would you rate the effectiveness of administrative support to the VSPC (e.g., staffing, website, scheduling)?

Answer Options	Very effective	Somewhat effective	Somewhat ineffective	Very ineffective	N/A	Rating Average	Response Count	
Rating:	18	4	0	0	0	3.82	22	
	<i>answered question</i>							22
	<i>skipped question</i>							0

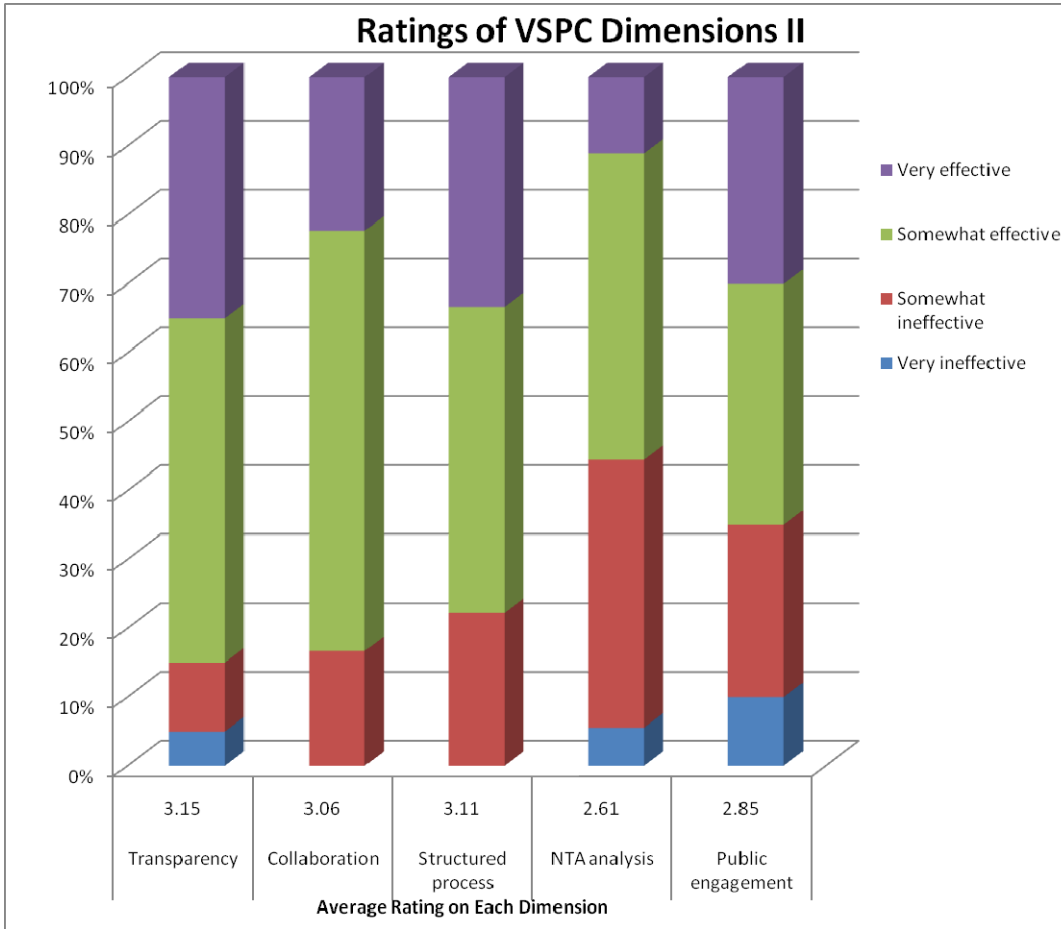
How well has the VSPC process served the following objectives addressed by the MOU:

Answer Options	Very effective	Somewhat effective	Somewhat ineffective	Very ineffective	N/A	Rating Average	Response Count
Transparent, public process	7	10	2	1	0	3.15	20
Increased utility collaboration on transmission planning	4	11	3	0	1	3.06	19
Structured process with specific timelines for addressing identified transmission reliability issues	6	8	4	0	1	3.11	19
Rigorous approach to NTA analysis	2	8	7	1	2	2.61	20
Public engagement based on stated principles	6	7	5	2	1	2.85	21



Full text of the dimensions:

- **Serves objective:** The purpose of Docket 7081, as stated by the Board, is “to ensure full, fair and timely consideration is given to cost-effective non-transmission alternatives and the implementation of such alternatives.” How would you rate the effectiveness of the VSPC process in serving this objective?
- **Effective process:** How would you rate the effectiveness of VSPC processes (such as meetings, rules, subcommittee structure)?
- **Efficient process:** How would you rate the efficiency of the VSPC processes?
- **Administrative support:** How would you rate the effectiveness of administrative support to the VSPC (e.g., staffing, website, scheduling)?



Full text of the dimensions:

- **Transparency:** Transparent, public process
- **Collaboration:** Increased utility collaboration on transmission planning
- **Structured process:** Structured process with specific timelines for addressing identified transmission reliability issues.
- **NTA analysis:** Rigorous approach to NTA analysis
- **Public engagement:** Public engagement based on stated principles

APPENDIX 4.5 — ONLINE SURVEY, COMMENTS

Ratings in the following questions are on a four-point scale from 1-Worst to 4-Best.

The purpose of Docket 7081, as stated by the Board, is “to ensure full, fair and timely consideration is given to cost-effective non-transmission alternatives and the implementation of such alternatives.” How would you rate the effectiveness of the VSPC process in serving this objective? (Four-point scale, 1 worst, 4 best)

Rating: What are the major factors leading to your rating?

- 2 The overall process is cumbersome and time consuming. It is extremely difficult for business people to participate in the process and still meet their own work obligations
- 2 There are actually two objectives included in the statement above. In my view, the VSPC process adequately provides for the CONSIDERATION of NTAs. However, it is unlikely that the VSPC process will lead to the IMPLEMENTATION of NTAs. In my view, this is the unfortunate and inevitable result of the origins of the process, namely the Board's Order in Docket No. 6860 in which the Board concluded that NTAs could have deferred portions of the NRP but for the lack of sufficient advanced planning. I don't believe that it is a lack of planning that prevents NTA from being implemented but rather a host of other barriers that transcends planning, including regional cost allocation for network transmission, the difficulties of generation development and siting, and capital requirements.
- 2 There have been several challenges to the effectiveness of the VSPC process over the past year. These include:
1. The interpretation that generation does not equal transmission from a reliability standpoint.
 2. Economic transmission is not considered within the VSPC process.
 3. Overly conservative interpretation of CEII rules conflicts with the openness and transparency envisioned for the VSPC process.
 4. Studies of projected energy savings have not been completed early enough to be considered in the current VELCO long-range plan.
- One of the most positive aspects of the VSPC process (and most likely to move the VSPC toward achieving its goals) is the sharing of information among utilities and the persistence of members when raising questions about the VELCO plan and assumptions. A great deal of good work has been done at the subcommittee level, including the creation of the NTA screening tool and the drafting of the non-disclosure agreement.

The purpose of Docket 7081, as stated by the Board, is “to ensure full, fair and timely consideration is given to cost-effective non-transmission alternatives and the implementation of such alternatives.” How would you rate the effectiveness of the VSPC process in serving this objective? (Four-point scale, 1 worst, 4 best)

Rating: What are the major factors leading to your rating?

- 2 There is a process for ensuring formal NTA consideration for all projects, including a quick exit when it is clear that NTA is not feasible. This is good. I don't see that the merits of the process have been made public in a way that will convince educated lay persons that it is being done effectively. And it has used a lot of expensive person-hours - although the VSPC has taken up a number of other tasks not embodied in the above summary.
- 2 Timing; institutional bias & support for transmission alternatives; lack of effective participation by those who could advocate and provide information on alternatives
- 3 Every project that has been proposed has evaluated non-transmission alternatives. The 2009 long-range transmission plan analysis also included a screening of non-transmission alternatives as potential solutions to the transmission deficiencies identified.
- 3 I believe 7081 is ensuring that "full, fair and timely consideration" is being met, but it also strikes me that it requires a great deal of human and financial resources to do that.
- 3 I know of the outreach efforts that have been made and it is definitely an improvement. However, if I weren't involved with the VSPC I'm not sure I would have known about it.
- 3 My main concern with this process is once again - another unfunded mandate from the State of Vermont. On one hand, the State is saying it wants effective and efficient planning and infrastructure. On the other hand, it is spending enormous amounts of rate payer money which is being absorbed by the utilities. Somehow, this does not seem equitable. I would be fine with that if the ratepayers were actually made aware of how much this was costing. All the personnel from all the different utilities present, plus meeting spaces, meals, meeting prep time, materials, etc. If the State wants this done, it should be willing to pay for it, and be willing to be open about those costs, and write in a line item to support their mandate. After all, it is the State that is requiring this.

The purpose of Docket 7081, as stated by the Board, is “to ensure full, fair and timely consideration is given to cost-effective non-transmission alternatives and the implementation of such alternatives.” How would you rate the effectiveness of the VSPC process in serving this objective? (Four-point scale, 1 worst, 4 best)

Rating: What are the major factors leading to your rating?

- 3 On one hand, a beneficial aspect of the VSPC process is shedding more light on transmission planning standards, and the assumptions and judgments that are used to identify the need for reliability resources and to compare alternative resources - particularly by VELCO. My experience, as someone who is not a transmission planner but interacts somewhat regularly with VELCO, is that VELCO is more inclined than the DUs to use conservative assumptions and/or methods that tend to support greater and earlier need for new transmission facilities, and less inclined to "work the problem" to fully explore what non-transmission alternatives could work. This observation is based on a limited sample size, and it may reflect the regulatory context within which VELCO is required to work (i.e., increasing federal attention to transmission planning, mandatory reliability standards). In any case, it appears that the VSPC process can serve as a useful check on the transmission planning process, including at VELCO. On the other hand, it is not clear to me how cost-effective the Board's desired focus on non-transmission alternatives will be for Vermont ratepayers. In a time of slow demand growth, low capacity market prices, and substantial Vermont investment in energy efficiency, it is possible that few transmission projects will turn out to be cost-effectively deferrable, and that the net savings from such deferrals will be modest.
- 3 Process needs to move more quickly
- 3 The process requires participants to complete required NTA analysis and to proceed from preliminary to detailed studies in a transparent forum.
- 3 The VELCO LRTP was already well under way before the VSPC organized
- 3 The VSPC has spurred much greater discussion of non-transmission alternatives, and provided a forum for people to have questions/concerns. However, it still seems that too many projects are simply passed through the process under the guise of "reliability projects" without adequate NTA review. It still feels that the engineers among the group remain unconvinced that ANY NTA can be equivalent to transmission construction.
- 3 The VSPC is effective at assuring that specific requirements are met at the required times. However there is so much procedural/process and "interpretation" time involved that it seems burdensome. I am hopeful that this will be less the case as we go along.
- 3 There are very few viable non-transmission alternatives available in Vermont
- 3 There is a process and screening tool in place. There is probably room for improvement, but the parties are committed to accomplishing this objective.
- 3 VELCO transmission planners reluctance to accept NTAs

The purpose of Docket 7081, as stated by the Board, is “to ensure full, fair and timely consideration is given to cost-effective non-transmission alternatives and the implementation of such alternatives.” How would you rate the effectiveness of the VSPC process in serving this objective? (Four-point scale, 1 worst, 4 best)

Rating: What are the major factors leading to your rating?

- 3 While it provides information on those locations where nontransmission alternatives may be applied, there seems to be little support - from a resource perspective - by the proponents of the alternatives to support the process. In addition, these nontransmission alternatives are not manifesting themselves at a sufficient level to change the need for transmission infrastructure.
- 4 It brings together parties and their perspectives that traditionally have not had a venue (or an incentive) to communicate about these issues or to develop a common planning framework. In those ways, unprecedented progress is being made towards the objective.
- 4 Significant public outreach efforts, openness and media outreach.

How would you rate the effectiveness of VSPC processes (such as meetings, rules, subcommittee structure): (Four-point scale, 1 worst, 4 best)

Rating: What are the major factors leading to your rating?

- 2 Except possibly for CVPS and GMP, no distribution utility has the staff to be adequately represented on the numerous committees, etc.
- 2 Lots of people, lots of meetings, lots of emails --- it is very challenging to find the time from your regular business and job to cover all the ground that needs to be covered.
- 2 The meetings are very long given the amount of material & work to process. The availability of the information on the website is very helpful. The coordinators at VELCO are very responsive to questions and provide timely responses.
- 2 The meetings feel like they contain a lot of unnecessary policy discussion. The subcommittees still appear to be wrestling with their charters and how best to function. Some are meeting so often they are becoming a burden (i.e. energy efficiency). Others are barely meeting at all (i.e. generation) feeling like they really don't have a role. I feel that the VSPC is spending too much time trying to focus on transmission policy and too little time focusing on the charge it was provided in the Docket 7081 Order.
- 3 Attendees actively participate. Even when there are tensions in the group, the group continues with thoughtful discussion
- 3 I think it ensures many voices are heard, but probably suffers from the fact that so many voices are heard.
- 3 In terms of notice of meetings happening and that sort of thing, there is a very good process in place for notifying everyone. The SharePoint site is also very helpful; I

definitely should use it more to find out what's going on with the other subcommittees.

- 3 Subcommittees are most effective at plowing through specifics. The VSPC meetings provide an overview of what has been accomplished by each subcommittee. This is effective as long as the subcommittees proceed at required pace. One problem is that each utility has limited resources so there are times when the utility cannot have someone involved in a subcommittee. The VSPC requirements can be very time consuming, taking away from actually getting the required analysis completed.
- 3 The dryness of the topic. It's difficult to get people to turn out unless they think something is going through their own backyard.
- 3 The general structure is effective, the meetings are well-run. Some of the committees have a bit more to learn about bringing recommendations and supporting information to the main body for action.
- 3 The process does lend structure to planning efforts that lacked some structure before. The time and effort does detract from other activities, and with limited human resources and no additional ones for the requisite planning work, the planning process can suffer.
- 3 The VSPC allows entities that have an interest in transmission planning to discuss their concerns in an open forum.
- 3 There is very good discussion and debate at VSPC full and subcommittee meetings. Voting and non-voting members bring a wide range of experience and expertise. The utility members seem to be interested in innovative approaches and have often served as good public advocates.
- 3 Understandably, the VSPC process has turned into a significant amount of work and it generally moving forward at a pretty high level of technical understanding. For parties that are not engaged every day the process is difficult to follow let alone influence.
- 3 We get caught up in terminology and deadlines see to slip
- 4 Openness & transparency is key feature
- 4 The structure and organization of the VSP if very reasonable and the activities are undertaken in a professional manner.
- 4 There is seldom a sense of time being wasted. Though burdensome, it seems motivated to achieve efficiencies, which are appreciated.
- 4 This all works well largely due to the highly professional support provided by VELCO.

What are some ways the process could be made more effective?

- 1. The issues related to CEII need to be resolved.
- 2. Economic transmission should have the same level of timely consideration and public involvement as transmission for reliability deficiencies, either through the VSPC or another process.
- 3. The VSPC process would be made more effective

with stronger member participation. There are still member slots that are not consistently represented.

Additional, dedicated resources for the effort and concentration on those efforts where alternatives as plausible and make sense, and not just feasible.

Better attendance by some of the members.

Clear defined goals for each subcommittee. If there is no need to have a meeting, don't have one. The VSPC lacks public input due to lack of interest to participate.

Focus more on goal, less on process, make deadlines and stick to them

Given the lack of involvement by those who advocated for the process that led to Docket 7081, abolishing the VSPC would appear to be in the interest of Vermont's ratepayers.

I think that with time we will gain the ability to be more proactive and hopefully flexible with regard to looking for ways to make NTA's cost effective.

I think the VSPC needs to refocus on its priority task which in my view is to review the VELCO LRTP and projects, and spend less time debating transmission policy. The present track sets the VSPC up as a debate society, which some parties clearly want (to be able to say that the VSPC took such and such position) thereby leveraging their own position. I think a focus on project review, and a clearer understanding by the sub-committees of how they fit into that review will streamline the process considerably.

Increase the technical capabilities of the members. Remind the members that the VSPC is a team effort so that the level of mistrust can be reduced.

Much more support for public participation. The process remains utility and transmission dominated. Have opportunities for independent expertise. This limits the effectiveness of public participants. It still feels like a VELCO driven process to lead to a VELCO desired outcome. Ideally it should be led by an independent entity with authority to hire and call upon independent experts. The process needs to meet the needs of the participants beyond VELCO

Not sure; until a major alternative to a transmission project is carried out and evaluated, the bottom line effectiveness remains theoretical.

Perhaps a brief statement/manual on a committee's responsibility to the main body? No one on the main body wants to give up their responsibility. They want to feel that the committee will study a problem, make recommendations where there are clear favored choices - and say why, briefly. Where there are not clear choices, the committee should summarize the advantages and disadvantages of each and make a recommendation when possible.

Perhaps online meetings could occur for various subjects using tools like WebEx.

How would you rate the efficiency of the VSPC processes? (Four-point scale, 1 worst, 4 best)

Rating What are the major factors leading to your rating?

- none Honestly, I don't know if anything has come from the VSPC process that wouldn't have happened anyways. Asking that question and getting an honest answer might help us determine its validity and or efficiency.
- 1 Already stated; there is an underlying desire among virtually all parties to stay on track and not waste time. Kudos!
- 1 Very good use of the VSPC website, the subcommittee structure, and tightly coordinated quarterly meetings.
- 2 As mentioned above, the process can take a lot of time, time better spent at doing the analysis.
- 2 Committee members and staff have paid attention to detail and done a good job putting into action the fairly complicated MOU for the VSPC.
- 2 Further rules of procedure needs to be developed to establish notice and filing requirements to satisfy Docket 7081 MOU terms and conditions.
- 2 I think VELCO and the other utilities do the best they can with the resources available. Things can always be improved.
- 2 Mostly covered in previous comments. The meeting tries to combine action items into a well-defined, early part of the meeting so that those with limited time can choose when to spend it.
- 2 VSPC still striving for optimal process.
- 3 As a business person, the early meetings I attended were long with minimal results and direction. With the critical demands of the business environment it is difficult to make time for activities without clear and concise deliverables.
- 3 Lack of clarity. Again, the VSPC was established in Docket 7081 to review the LRTP and resulting projects. NOT to be a transmission policy debate club. Some parties are trying to take the VSPC to places it was never intended to go, and make it both a bureaucratic process and a place to gain leverage on fellow utilities.
- 3 Significant DU and VELCO staff time is being spent on the VSPC process; this time could have been spent on other projects. It is therefore appropriate to consider the benefits of this time investment - in terms of transmission projects that were deferred, and resulting net savings to Vermont electric customers. My guess is that to date, those savings have probably been minimal or perhaps even zero.
- 3 The same issues are discussed at the subcommittee level and the VSPC level. Long discussions occur on items that should take a shorter amount of time, mostly because the members do not adequate understanding of transmission planning.
- 4 Time; failure to focus on matters that input / participation from broader interests would be most useful.

5 I don't know.

What can be done to improve efficiency of the process?

Bring together various subcommittees to discuss planning issues.

Firm deadlines make one person responsible to see that they are met

Have the State pay for its mandates.

In general, any way the process can be simplified (without losing effectiveness) would be helpful to lessen the burden on staff and participants.

Move to consider plausible alternatives not feasible.

Not much, in my view. As I see it, a primary benefit of the VSPC process is the associated interactions and exchanges of information between the participants - basically more people discussing transmission planning and NTA issues. This is inherently labor-intensive.

Not sure; am thinking that at some point semi-annual face-to-face meetings may be sufficient. For now 1/4-ly is good though. Committee meetings mostly happen telephonically, a good thing.

The extensive number of electric companies/distribution companies in the State of Vermont makes efficiency of the process a challenge. The right answer is to reduce the number of electric utilities to five or less.

How would you rate the effectiveness of administrative support to the VSPC (e.g., staffing, website, scheduling)? (Four-point scale, 1 worst, 4 best)

Rating: Major factors leading to your rating:

- 3 Meeting setup has been good; there has been faithful attention to the needs of the net-connected. Meeting materials have been effectively distributed. There have been problems, particularly in phone participation. Those setting up the meeting have consistently tried to improve the situation, and I believe the phone participation is now more effective. I have been impressed by the staff's continued efforts to make the meetings more effective.
- 3 The preparation of materials before VSPC meetings has been helpful.
- 4 Adequate time is provided to review documents. Meeting notices are sent early enough. Meeting agendas are planned with VSPC members.
- 4 All VSPC activities are planned/organized et al
- 4 Communications are very good and you always know what is going on with every committee

- 4 I think the people working to make the VSPC work are doing an excellent job.
- 4 I've found the people who support the VSPC process to be very responsive to reasonable requests made by the participants.
- 4 My interactions with staff have always been very professional, organized and thorough.
- 4 No problems at all. The support material is always on time and where you need it. What more is desired?
- 4 Professionalism and competency!
- 4 Staffing, scheduling, notices, and all of the day-to-day admin have been superb. It is the structure that causes me concern.
- 4 The folks at VELCO have been very thorough and helpful.
- 4 The meetings have been very well organized, with ample notification of committee members. Required deadlines have been met and there has been sufficient opportunity for members to comment on draft documents. The staff has been very helpful in providing information and coordinating subcommittee work. The web site has been a good tool to make information available- but is due for review and update.
- 4 The website & responsiveness of VELCO staff is exemplary.
- 4 Very good communication, minutes, etc. No complaints.

What issues not touched upon above do you think should be discussed in the evaluation process?

1. The VSPC process can be seen as helpful in that it identifies key issues and assumptions (e.g., load forecast, base case and contingency conditions on the transmission system) that affect transmission planning. But transmission planning is inherently complex, technical, and arcane, as is NTA analysis. It is probably impractical for the VSPC to explore all the key issues, or to fully review the "need date" or NTA cost-effectiveness for individual projects. 2. It feels like the VSPC process is still getting into gear, transitioning from early meetings focused on setting up the governance and processes to more discussion of substance (i.e., VELCO draft LRP, NTA screening for specific Vermont transmission projects). The true usefulness and effectiveness (or lack thereof) of the VSPC may not be clear until a complete "cycle" of VELCO LRP and DU reliability projects has occurred (i.e., several years). 3. The 7081 MOU and VSPC focus on reliability projects. But there could be large economic transmission projects (or combined reliability/economic) on the horizon, and it appears that VELCO is devoting significant attention to these. Should economic projects be addressed in some fashion on the VSPC process? My sense is not, but it may be worthy of discussion.

A web site was created and materials are made available to the general public. Utilities had been collaborating prior to the VSPC process. Therefore, very little improvement was made. The tool utilized for the NTA screening is flawed. Results vary based on the entity utilizing the tool. Some

of the results from the tool do not make sense.

Depth and breadth of participation by stakeholders & what should be done to remove barriers to broader and deeper participation. Streamline meetings & decision-making. It seems to take many months to make a decision.

I wonder what the cost of the whole process is -- in a time when we are cutting state services, is it money well spent? I don't know, perhaps it is.

NTA is a subject of interest to many people, most of whom are not engineers. There needs to be communication at an educated-lay level that will give interested people confidence that the right effort is being made or allow them to make pertinent objections if they feel otherwise.

The inherent structure of the utilities in Vermont is an issue. By definition the number of companies will make any decision making process inefficient. Also, the role of some of the non-profits is beyond what it should be.

The VSPC process is a good first step that can be built upon. Overcoming confidentiality requirements arising under CEII obligations will challenge some of the transparency objectives of the process. Need to understand how to amend process, if necessary, to restore any diminution in the regulatory risk mitigation elements of the VSPC should transparency objective be constrained under CEII requirements.

To me it's completely questionable (and no fault of VSPC participants or process) whether or not the public is any more interested or engaged in transmission planning than prior to VSPC. I think it's a boring topic until someone wants to put a power line through your back yard. Sorry.

Ways that the process be more time efficient

APPENDIX 4.6 — GLOSSARY OF ABBREVIATIONS

Board	Vermont Public Service Board
CEII	Critical Energy Infrastructure Information
DPS	Vermont Department of Public Service
DSM	Demand-Side Management
EVT	Efficiency Vermont
L RTP	2009 Vermont Long-Range Transmission Plan
MOU	Memorandum of Understanding (in Docket 7081)
PSB	Vermont Public Service Board
Speed	Sustainably-Priced Energy Enterprise Development
VELCO	Vermont Electric Power Company, Inc.
VSPC	Vermont System Planning Committee
VUPG	Vermont Utility Planning Group