

## **COMMENTS ON THE 2009 VERMONT TRANSMISSION LONG RANGE ANALYSIS OVERVIEW DRAFT #3**

These comments are in addition to earlier comments submitted on the larger analysis, some of which may apply to this draft as well.

The overview draft is much easier to read than the larger analysis. I found the explanation of electric system and regulatory issues helpful.

Page 1—consider the following changes:

“Since 2006, the last time a transmission analysis was published, there have been a number of modifications to the planning process. As part of a regulatory proceeding called Docket 7081, VELCO and other parties developed a new process for ensuring consideration of “non-transmission alternatives” and engaging the public and other representatives in the planning process. Other modifications were made on how the analysis itself is conducted such as incorporating mandatory national standards that became effective in 2007 and the extension of the planning horizon to 20 years.

One key assumption in this analysis is that Vermont’s peak electric demand will grow by 24 percent from 2008 to 2028, representing an annualized growth rate of 1.1 percent.”

“The 2009 analysis identified 23 major transmission issues that require reinforcement to meet VELCO projections for increased demand and comply with reliability and planning standards.”

**Much of the document appears to be arguing for and defending transmission. While it is important to present information about where and when transmission may be needed, an equally important message is VELCO’s intent to use the best and most current information in its analyses and to respond to changing demand and new technologies in a collaborative way that considers various options.**

Pages 21-22:

The amount of detail on funding may be more than needed. It has been pointed out that the shared funding favors transmission project construction.

Page 25-26:

Consider adding a bullet describing VSPC’s “open door policy.”

Page 32, Figure 6-1 explanation:

“Loss” may need further definition. Consider adding “Loss refers to\_\_\_\_\_”

Page 34:

“Project 3B is a proposed new transmission line that is needed before 2018. This 115-kV line would run from Georgia to St. Albans at a distance of **fewer than** 10 miles. Project 18 is a 230-kV line that would run from Plattsburg to Essex at a distance of **fewer than** 30 miles.”

**The use of terms or phrases such as “fewer than” or “rebuilding existing lines” (which occurs earlier in the same paragraph) can give the impression that proposed projects are insignificant or have minimal impact, which may or not be the case.**

Jenny Cole, VSPC Public Member