

**Department of Public Service Comments  
on VELCO's December 22, 2008  
2009 Vermont Transmission System 20-Year Reliability Analysis**

- ☞ The Plan identifies transmission projects that address *reliability* deficiencies. The Plan should make clear to the reader that projects, not identified in the Plan, could otherwise be proposed. For example, a transmission line could be proposed and constructed for the purpose of importing power from renewable resources located outside of Vermont. Likewise, new transmission could result from federal initiatives seeking to enhance economic, reliability, national security, and environmental goals.
- ☞ A significant number of Bulk category projects show a year of need of 2009. The Plan should discuss why this number of projects are presently needed and should indicate whether VELCO intends to permit and construct these projects in 2009.
- ☞ The Plan should indicate when, in what manner, the upcoming demand-side resources forecast (the EEU's so-called Forecast 20) will be integrated into the Plan.
- ☞ Included among the recommendations at page 38 are the installations of a 12.5 MVAR capacitor bank at Irasburg and two 12.5 MVAR capacitor banks at Bennington. These projects should be included in the summary table at pages VIII, IX and X.
- ☞ How does the recently revised ISO load forecast impact the Plan? Differences between the ITRON and ISO forecasts should be resolved and incorporated into the Plan.
- ☞ An appendix describing transmission line designations would be helpful. One possible format is as follows:

<b>Designation</b>	<b>Location</b>	<b>Voltage</b>
K-35	North Rutland to Cold River	115kV
K-43	New Haven to Williston	115 kV
370	West Rutland to New Haven	345 kV

- ☞ An appendix showing the VELCO map would be helpful.