VSPC
VERMONT SYSTEM PLANNING COMMITTEE

366 Pinnacle Ridge Road
Rutland, Vermont 05701

November XX, 2026

Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620

Re: Vermont System Planning Committee reliability plan and energy efficiency geotargeting recommendations

Dear Ms. Anderson:

The Vermont System Planning Committee (VSPC) respectfully submits its recommendations for geographic targeting (GT) of energy efficiency as requested by the Public Utility Commission (PUC)[1], and the need for reliability plans in accordance with the Docket 7873 & 7874 Attachment II, Screening Framework and Guidelines for Implementation of 30 V.S.A. § 8005a(d)(2). These recommendations were developed by the Geotargeting Subcommittee (GTS) of the VSPC and were adopted by the VSPC at its quarterly meeting on October 28, 2026. The consolidated recommendations including both energy efficiency geographic targeting and the identification of areas requiring new reliability plans are consistent with the process improvements that were approved by the Commission on January 24, 2014 (EEU-2013-11).

SUMMARY

We make three recommendations in this letter:

1. No newly identified areas "screen in" using the applicable screening tools for the potential to be resolved with non-transmission alternatives, therefore no new reliability plans are required.
2. With respect to Northern and Northwestern Vermont, no geographically targeted energy-efficiency funding or program activity is recommended for 2027. The reliability needs in these areas are being addressed principally through flexible load management efforts, including managed EV charging and battery-storage programs, consistent with the Northern and Northwestern Vermont reliability plan filed on June 26, 2026.
3. No newly identified areas are recommended for new geographically targeted energy-efficiency services at this time.

Each of these recommendations is supported below.

[1] Pursuant to EEU-2010-06 Public Service Board Order of 2/16/2012, p. 6.

RECOMMENDATION 1— NO NEW RELIABILITY PLANS ARE NEEDED

Recommendation summary: No newly identified area "screens in" using the applicable screening tools for the potential to be resolved with non-transmission alternatives, therefore, no new reliability plans are required.

Rationale for the recommendation

Paragraph 1 of the Docket 7873 & 7874 Attachment II, Screening Framework and Guidelines for Implementation of 30 V.S.A. § 8005a(d)(2) states that:

> The Vermont System Planning Committee ("VSPC") processes, reporting mechanisms, public engagement, and subcommittees shall be utilized for the purpose of making recommendations to the Public Service Board ("Board") regarding constraints within the electric grid, and the potential for non-transmission alternatives ("NTAs"), including new Sustainably Priced Energy Enterprise Development ("SPEED") standard-offer plants, to mitigate those constraints, pursuant to 30 V.S.A. § 8005a(d)(2).… The VSPC shall make its recommendations to the Board no later than January 1 of each year2, or more frequently if constraints are identified or analysis is completed mid-year.

This filing, and the process by which it was developed, fulfill that requirement.

The screening framework provides that transmission and distribution (T&D) constraints shall be screened for their potential to be resolved by non-transmission alternatives using the NTA screening tool adopted by the VSPC pursuant to the Docket 7081 Memorandum of Understanding. Distribution constraints are screened for non-wires alternative potential using the screening tool established in Docket 6290. The host utility may use either screening tool to screen sub-transmission constraints. A constraint that "screens in" using the appropriate tool requires a reliability plan be filed by the utility by April 1 following the January 1 due date of the VSPC recommendation (or more frequently if constraints are identified or analyzed mid-year).

The GTS of the VSPC obtained reports from all utilities to identify any areas that screened in. Green Mountain Power and VELCO described upcoming infrastructure projects, and vetted the results of screening using either the Docket 7081 or 6290 Screening tools. Other utilities reported that they have no load growth related projects. No newly identified area screened in.

GMP has already filed a plan for the two areas that previously screened in: Northern and Northwestern Vermont. GMP's analysis found that the 2024 Long-Range Transmission Plan did not reflect the peak-load reductions provided by existing EV charging-management programs or the dispatch of existing residential and utility-scale battery storage.

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[2] Subsequent to the order quoted here, the VSPC made various process improvements to harmonize the energy efficiency geographic targeting process with its Docket 7873/7874 Screening Framework obligations. The process improvements resulted in an earlier (November XX) filing date for this letter, which fulfills the quoted "no later than January 1 of each year" requirement.

For the Northern Vermont area, applying revised managed-EV charging assumptions reduced the 2033 load-reduction need from 75 MW and 230 MWh to 42 MW and 102 MWh. The plan identified 50.3 MW and 167.1 MWh of active storage in the area, which, after accounting for operating limitations, is sufficient to maintain load below the area's critical level. For the Northwestern Vermont area, managed EV charging reduced the modeled need from 80 MW and 318 MWh to 32 MW and 106 MWh. The Reliability Plan identified 62.5 MW and 206 MWh of active storage, which is sufficient to maintain load below the area's critical level after applying a conservative round-trip-efficiency assumption.

Based on these findings, GMP and the NTA Working Group concluded that no transmission solution needs to be planned or built for the Northern and Northwestern Vermont areas at this time. The affected utilities will continue to track EV charging-management participation and opt-out rates, coincident peak-load reductions, storage capacity and dispatch capability, and available flexible-load capacity.

RECOMMENDATION 2—NO AREA IS CURRENTLY GEOGRAPHICALLY TARGETED

Recommendation summary: With respect to Northern and Northwestern Vermont, no geographically targeted energy-efficiency funding or program activity is recommended for 2027. The reliability needs in these areas are being addressed principally through flexible load management efforts, including managed EV charging and battery-storage programs, consistent with the Northern and Northwestern reliability plan filed on June 26, 2026.

Rational for the recommendation

The Board's EEU-2010-06 order requests annual VSPC updates on geographic-targeting-area recommendations. This recommendation fulfills the energy-efficiency geographic-targeting component of that annual update. No geographically targeted energy-efficiency funding or program activity is currently underway in Northern or Northwestern Vermont, and no other area is currently subject to geographically targeted energy-efficiency services.

The Northern and Northwestern Reliability Plan found that existing managed EV charging and active battery-storage resources can address the modeled peak-load needs in the Northern and Northwestern Vermont areas and defer the need for a transmission solution at this time. The plan did not identify a need for new geographically targeted energy-efficiency services.

This conclusion does not eliminate the need for continued monitoring. The deferral relies on assumptions regarding EV charging-management participation and performance, storage capacity and dispatch, forecasted electrification, and the continued availability of other flexible resources. The VSPC will review updates from the affected utilities so that the potential role of energy efficiency, flexible load management, and other non-transmission alternatives can be reassessed if conditions change.

RECOMMENDATION 3—NO NEW AREAS WARRANT GEOGRAPHICALLY TARGETED ENERGY EFFICIENCY

Recommendation summary: No newly identified areas are recommended for new geographically targeted energy-efficiency services at this time.

Rationale for the recommendation

As described in Recommendation 1, the GTS 2026 project review identified no newly identified areas that screened in for full non-transmission-alternative analysis. Therefore, no new geographically targeted energy-efficiency services are recommended.

The Northern and Northwestern Vermont areas were previously identified for Reliability Plan analysis. The Northern and Northwestern Reliability Plan concluded that existing flexible load management resources, including managed EV charging and active battery storage, can address the modeled peak-load needs and defer the need for a transmission solution at this time. The plan did not identify a need for new geographically targeted energy-efficiency services in either area.

This conclusion is subject to continued monitoring. If projected reliability needs change, or if the performance of flexible load management, storage, or other non-transmission resources differs materially from planning assumptions, the affected utilities and the VSPC will reassess the full set of available solutions, including the potential role of geographically targeted energy efficiency.

PROCESS

The GTS is comprised of interested members of the VSPC and its meetings are open to the public. In 2026, the GTS met five times. At its June 30, 2026, meeting, members heard presentations from the distribution utilities and VELCO regarding the need for planned upgrades to distribution and transmission facilities. Materials and minutes associated with the GTS can be found at https://www.vermontspc.com/subcommittees. The GTS submits draft recommendations annually to the VSPC at the October quarterly meeting. The VSPC adopted the 2026 GT recommendations on October 28, 2026.

CONCLUSION

The VSPC respectfully submits the foregoing recommendations and welcomes questions from the Commission.

Sincerely,



Shana Louiselle
VSPC Secretary

cc: VSPC Distribution List