

**STATE OF NEW HAMPSHIRE**  
**BEFORE THE**  
**NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION**

**DE 20-\_\_\_\_\_**

**GREEN MOUNTAIN POWER CORPORATION**

**PETITION FOR AUTHORITY TO DISCONTINUE SERVICE**

NOW COMES Green Mountain Power Corporation ("GMP"), by and through its attorneys, Orr & Reno, P.A., and respectfully petitions the New Hampshire Public Utilities Commission ("Commission" or "NHPUC") for authority under RSA 378:28 to discontinue service in a limited area in Chesterfield, New Hampshire. In support of this request, GMP states as follows:

1. GMP is a public utility engaged in the sale of electric power in Vermont. Its corporate headquarters is located at 163 Acorn Lane, Colchester, Vermont.

2. GMP is authorized to conduct business as public utility in New Hampshire. *See Central Vermont Public Service Corporation*, Order No. 25, 367 (May 21, 2012). GMP's New Hampshire operations include owning and operating certain transmission assets formerly owned by Central Vermont Public Service Corporation ("CVPS") in Cheshire County. *Id.*

3. Among the aforementioned assets owned and operated by GMP is a 69 kV transmission line (TL30) which connects National Grid's ("NGRID's") 69 kV network in Chesterfield, New Hampshire to GMP's 46 kV network in Brattleboro, Vermont. This line

intersects the NGRID G-33 69 kV transmission line at pole P462 in Chesterfield, New Hampshire and terminates at GMP's North Brattleboro Substation located at 387 Putney Road, Brattleboro, Vermont. The line is 0.25 miles long, consists of three structures, identified as P1 and P2 in New Hampshire, and P3 in Vermont, and is built with a typical horizontal construction. A gang operated air break, switch #661, is located at P1. An aerial photo and a retirement diagram of GMP's transmission line TL30 are submitted herewith as Attachments 1 and 2, respectively.

4. The Commission granted a license to GMP's predecessor, CVPS, to construct and maintain this line over and across public land known as the Wantastiquet State Reservation in Chesterfield, New Hampshire, and across the Connecticut River from the westerly boundary of the Wantastiquet State Reservation on the east bank of the Connecticut River to the west bank of the river. *See* Order No. 7279 (April 30, 1959).

5. The line was originally constructed for the purpose of providing an alternate source to the GMP 46kV network during transmission contingencies. The line does not serve customers in either New Hampshire or Vermont and its need as an alternative source to the GMP 46kV system has been replaced with improvements GMP has made to its system in Vermont.

6. GMP has not used the above-described line in several years as it has alternative means to mitigate contingencies at this location. GMP does not anticipate the need for this line in the future and is planning to retire all 69kV infrastructure within the N. Brattleboro Substation; as such, GMP wishes to retire and disconnect the line. After this line is retired, all of the customers who are currently served from the North Brattleboro

Substation will continue to be served from that Substation which will be upgraded in the fall of 2020.

7. GMP has informed NGRID of GMP's plans to remove this line from service, and NGRID has consented to the removal. *See* Attachment 3. In addition, GMP has notified VELCO, the Vermont state transmission operator and conduit to ISO-NE, of GMP's plans to retire this 69kV branch. VELCO has informed GMP that there is no requirement to notify and receive consent from ISO-NE to retire this type of asset, as ISO-NE models this as an inactive branch. Upon receipt of Vermont and New Hampshire approvals to discontinue use of this line, GMP will ask ISO-NE to remove this branch from its model.

8. RSA 378:28 authorizes the Commission to permit a public utility to permanently discontinue service and remove associated equipment "whenever it shall appear that the public good does not require the further continuance of such service."

9. Because GMP has made 46kV system improvements eliminating the need for this alternative source, and because GMP does not need the line to provide future service, the public good standard articulated in RSA 378:28 has been met.

10. GMP is in the process of conducting environmental assessments and evaluating the applicability of various federal, state and local permits, approvals, reviews and notices. Based upon the results of field research and related regulatory analyses, GMP will comply with all applicable requirements before commencing work, including but not limited to requirements falling within the jurisdiction of the U.S. Army Corps of Engineers ("ACOE") and the New Hampshire Department of Environmental Services.

11. GMP will follow its best management practices to retire the conductor from the poles, then remove the poles from the ground. First, GMP will coordinate with NGRID to remove the section of wire between NGRID's G33 P462 and GMP's TL30 P1, after which GMP will become decoupled from the NGRID 69kV transmission network at this location. Second, GMP will retire the conductor between TL30 P1 and TL30 P2 leaving only the conductor crossing the Connecticut River remaining. GMP will coordinate with the ACOE to schedule the appropriate time to retire the conductor across the river. It is GMP's intention to perform this retirement during the winter, after the river has frozen and the river traffic has ceased. In order to retire the conductor across the river, GMP will set two crews up, one at TL30 P2 in New Hampshire and the other at TL30 P3 in Vermont. Each crew will then disconnect the conductor from their respective structures, and the crew on the Vermont side will reel the cable up, dragging it across the frozen river. Once the conductor is removed, GMP plans to follow its standard practice which is to excavate the poles and backfill the holes with native soil. Alternatively, GMP could flush-cut the poles at the base and leave the stump in the ground if that alternative is recommended by its environmental consultant.

12. The removal of this line is part of GMP's planned upgrade of its North Brattleboro Substation. The construction schedule for the Substation upgrade calls for this line to be removed by March, 2021. In order to meet its construction schedule, GMP respectfully requests an order *nisi* in this matter which becomes effective no later than September 1, 2020.

WHEREFORE, Green Mountain respectfully requests that the Commission issue an order *nisi*:

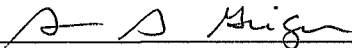
- A. Authorizing Green Mountain Power to remove line TL30 and permanently discontinue service from Chesterfield, New Hampshire to the North Brattleboro Substation;
- B. Authorizing Green Mountain Power to remove the poles and wires associated with the above-described line;
- C. Granting such further relief as the Commission deems appropriate.

Respectfully submitted,

**GREEN MOUNTAIN POWER CORPORATION**

By its Attorneys,

**ORR & RENO, P.A.**

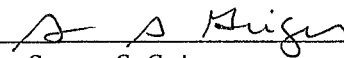
By: 

Susan S. Geiger, N.H. Bar No. 925  
45 South Main Street, P.O. Box 3550  
Concord, NH 03302-3550  
Telephone: 603-223-9154  
Email: [sgeiger@orr-reno.com](mailto:sgeiger@orr-reno.com)

Dated: April 3, 2020

Certificate of Service

I hereby certify that on the date set forth above a copy of this Petition was sent by electronic mail to the Office of Consumer Advocate.

  
Susan S. Geiger