

**STATE OF NEW HAMPSHIRE**  
Inter-Department Communication

**DATE:** May 6, 2020  
**AT (OFFICE):** NHPUC

**FROM:** Rich Chagnon  
Assistant Director – Electric Division



**SUBJECT:** DE 20-046 Green Mountain Power Petition to Discontinue Service  
Staff Recommendation

**TO:** Commissioners  
Debra Howland, Executive Director

**CC:** Tom Frantz, Director, Electric Division  
Randy Knepper, Director, Safety Division  
Lynn Fabrizio, Staff Attorney

Petition Summary

On April 3, 2020, Green Mountain Power Corporation (GMP) filed a petition for authority pursuant to RSA 374:28<sup>1</sup> to discontinue service in New Hampshire. GMP currently is authorized to conduct business as a public utility in New Hampshire in accordance with *Central Vermont Public Service Corporation*, Order No. 25,367 (May 21, 2012). National Grid consents and VELCO does not object to the proposed discontinuance of service.

Based on its review of the petition and applicable statute, Staff recommends that the Commission issue an order *nisi* granting GMP authority to discontinue electric service in New Hampshire and dismantle the TL30 Line. Staff finds that the discontinuance of service and removal of the TL30 Line is in the public good, as it removes redundant facilities that have not been operated to serve customers or provide backup power to GMP's electric operations in New Hampshire for several years. Furthermore, GMP does not anticipate a need to use the TL30 Line in the future, and wishes to retire and disconnect it.

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<sup>1</sup> Please note that while the petition cites to RSA 378:28, the applicable statute is RSA 374:28.

### Petition Background

GMP's New Hampshire operations include the ownership and operation of certain transmission assets formerly owned by Central Vermont Public Service Corporation. Those assets include a 69 kV transmission line (the TL30 Line) which connects National Grid's 69 kV network in Chesterfield, New Hampshire to GMP's 46 kV network in Brattleboro, Vermont. The TL30 Line is 0.25 miles long, starting at the National Grid 69 kV transmission line at Pole P462 in Chesterfield and terminating at GMP's North Brattleboro Substation in Brattleboro, Vermont. The TL30 Line crosses public land (the Wantastiquet State Reservation) in Chesterfield and the Connecticut River, from the westerly boundary of the Wantastiquet State Reservation on the east bank of the river to the west bank of the river in Brattleboro.

According to the petition, the TL30 Line was originally constructed to provide an alternate power source to GMP's 46kV network during transmission contingencies. The line does not serve customers in either New Hampshire or Vermont, and its function as an alternative power source for the GMP 46kV system has been replaced by improvements GMP has made to its 46kV system in Vermont. GMP has not used the line in several years and does not anticipate a need to use it in the future. GMP plans to retire all existing 69kV infrastructure within the North Brattleboro Substation. As a result, GMP wishes to retire and disconnect the TL30 Line.

GMP states that it has informed National Grid of its plans to remove the TL30 Line from service, and National Grid has consented to the removal. In addition, GMP has notified the Vermont Electric Power Company (VELCO), the Vermont state transmission operator and conduit for GMP's 46kV system to the ISO-New England (ISO-NE) grid. According to the petition, VELCO has informed GMP that there is no requirement to notify or receive consent from ISO-NE to retire this type of asset, as ISO-NE currently models this as an inactive branch of the regional grid. Upon receipt of Vermont and New Hampshire approvals to discontinue use of the line, GMP will ask ISO-NE to remove this branch from its model.

GMP avers that it will follow best management practices to retire the conductor from the poles along the TL30 Line in coordination with National Grid and the U.S. Army Corps of Engineers, and then remove the poles from the ground. GMP intends to retire the conductor in the winter, after the river has frozen and river traffic has ceased. Pole removal will be done in accordance with GMP's standard practice of excavating the poles and backfilling the holes with native soil. Alternatively, GMP will flush-cut the poles at the base and leave the stumps in the ground, if that method is recommended by its environmental consultant.

GMP states that it will comply with all applicable federal, state, and local permits, approvals, reviews, and notices before commencing work, including, but not limited to, requirements falling within the jurisdiction of the U.S. Army Corps of Engineers and the New Hampshire Department of Environmental Services.

The removal of the TL30 Line is part of GMP's planned upgrade of its North Brattleboro Substation. The construction schedule for the substation upgrade calls for the line to be removed by March 2021. Therefore, GMP requests an order *nisi* in this matter effective no later than September 1, 2020.

#### Governing Statute

RSA 374:28 authorizes the Commission to permit a public utility to permanently discontinue any part of its service in New Hampshire and to remove the equipment essential to that service "whenever it shall appear that the public good does not require the further continuance of such service." Under the statute, a public hearing is required only where the Commission has found that a utility has declined or unreasonably failed to render service or that its service is inadequate for no sufficient reason. Here, GMP demonstrates that the TL30 Line is not currently providing service to customers in New Hampshire and that the only electric operator connected to the line, National Grid, has consented to GMP's proposed discontinuance of service. Accordingly, a public hearing is not required.

#### Staff Recommendation

Based on its review of the petition and applicable statute, Staff recommends that the Commission issue an order *nisi* granting GMP authority to discontinue electric service in New Hampshire and dismantle the TL30 Line. Staff finds that the discontinuance of service and removal of the TL30 Line is in the public good, as it removes redundant facilities that have not been operated to serve customers or provide backup power to GMP's electric operations in New Hampshire for several years. Furthermore, GMP does not anticipate a need to use the TL30 Line in the future, and wishes to retire and disconnect it.

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