

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. \_\_\_\_\_

---

Petition of Green Mountain Power for a Certificate of Public Good pursuant to 30 V.S.A. § 248 authorizing the rebuild of the Lowell Substation and the upgrade of 18.1 miles of the B20 line from Johnson to Lowell, and Joint Petition of GMP, the Village of Morrisville Water and Light Department, and the Village of Johnson Water and Light Department for a CPG pursuant to 30 V.S.A. § 248 to authorize the upgrade of 1.5 miles of the B22 line, in the Towns of Lowell, Eden, Johnson, and Morristown, Vermont	
--	--

---

---

DIRECT TESTIMONY OF WITNESS CRAIG MYOTTE  
ON BEHALF OF THE VILLAGE OF MORRISVILLE WATER & LIGHT AND  
THE VILLAGE OF JOHNSON WATER & LIGHT DEPARTMENT

---

November 4, 2019

Mr. Myotte explains how the B22 upgrade component of the overall Project, which is owned by Morrisville Water and Light and the Village of Johnson Water and Light Department, will provide asset condition and reliability benefits to municipal customers. He also discusses the proposed risks and benefits that will be considered by municipal voters under 30 V.S.A. § 248(c)(1).

**DIRECT TESTIMONY OF CRAIG MYOTTE**

1   **1.    Q.    Please state your name, business address and occupation.**

2           **A.    My name is Craig T. Myotte. I am the General Manager of the Village of**  
3 **Morrisville Water and Light Department (“Morrisville”), 857 Elmore Street, Morrisville, Vermont,**  
4 **05661-0460.**

5

6   **2.    Q.    Have you provided testimony to the Vermont Public Utility Commission (the**  
7 **“Commission”) previously?**

8           **A.    Yes, most recently in Case No. 19-0448-PET.**

9

10 **3.    Q.    What is the purpose of your testimony?**

11           **A.    The purpose of my testimony is to provide evidence in support of the issuance of**  
12 **a Certificate of Public Good authorizing construction of the Project, which includes (1) an**  
13 **upgrade of the B22 line, (2) upgrade of the B20 line, and (3) the rebuild of the Green Mountain**  
14 **Power (“GMP”) Lowell Substation (the “Project”). As a co-owner of the B22, Morrisville is**  
15 **working closely with GMP to implement the B22 component of the Project. Overall, the Project**  
16 **is being implemented at this time to reduce congestion in the Sheffield-Highgate Export**  
17 **Interface (“SHEI”), but it also has asset condition and reliability benefits.**

18           **GMP’s witnesses describe the B22, B20 and Lowell Substation components of the**  
19 **Project and explain in detail how this Project is expected to provide significant value to Vermont**  
20 **electric customers by mitigating a substantial portion of the adverse impacts of SHEI**  
21 **transmission congestion. Additionally, GMP’s witnesses provide a detailed description of the**

1 B22 line, the construction work that will be performed on the B22, efforts to mitigate impacts of  
2 the Project, and why the Project, including the B22 component, meets the criteria of 30 V.S.A. §  
3 248.

4 In my testimony, I explain how the B22 upgrade component of the overall Project will  
5 provide asset condition and reliability benefits to the owners of the B22 line, Morrisville and the  
6 Village of Johnson Water and Light Department (“Johnson”, and together as the  
7 “Municipalities”), and their customers. Because the B22 portion of the Project is owned by the  
8 Municipalities, it is considered “municipal plant” under 30 V.S.A. § 248(c)(1). Accordingly, the  
9 B22 component of the overall Project is subject to the approval of Morrisville and Johnson  
10 voters at a duly warned meeting. My testimony discusses the risks and benefits of the proposed  
11 B22 component of the Project that should be considered as part of the municipal approval  
12 process.

13

14 **4. Q. Please describe the benefits of the Project for Morrisville and Johnson**  
15 **customers.**

16 **A.** Generally, the Project benefits the Municipalities’ customers in two different  
17 ways. First, as described by GMP Witness Doug Smith, the overall Project is part of a larger  
18 strategy to implement steps that will reduce SHEI congestion, and as a result, the Project benefits  
19 Vermont electric customers broadly. Some portion of those benefits flow to the Municipalities’  
20 customers.

21 Second, as described by GMP witness John Fiske, the Project involves upgrading  
22 approximately 1.5 miles of the B22 transmission line to 477 ACSR, including the replacement of  
23 aging poles. Morrisville completed a transmission and distribution study in 2018 that identified

1 the need to rebuild this section of the B22 in the period between 2024 and 2028. Since GMP is  
2 reconductoring this portion of the B22 as part of the proposed Project, including replacement of  
3 existing structures along the B22, the Municipalities will avoid future reconstruction of this  
4 portion of the line. The newly constructed portion of the B22 will provide reliability benefits to  
5 Municipalities' customers by improving the resiliency of the existing line, deferring related  
6 maintenance costs, and decreasing losses with the installation of larger conductor. Because these  
7 benefits are being obtained as part of a larger, cost-effective strategy to mitigate SHEI  
8 congestion and would be needed in the normal course of business for purposes of reliability and  
9 stability within the next 5-10 years, the B22 portion of the Project meets the need for present or  
10 future demand at least-cost as required by Section 248(b)(2).

11

12 **5. Q. Please describe the risks of the Project for Morrisville and Johnson**  
13 **customers.**

14 **A.** The Project involves two kinds of costs. First, GMP and a broad group of VDUs  
15 have engaged in discussions about how to share in the cost of investments designed to mitigate  
16 much of the SHEI congestion. GMP witness Doug Smith discusses GMP's engagement with  
17 other VDUs relating to a potential cost allocation agreement, and when such an agreement is  
18 developed, the Municipalities may agree to absorb some fraction of the SHEI-related  
19 investments to the extent that reduced congestion benefits the Municipalities' customers.

20 Second, some portion of the B22 construction will need to be performed even if GMP  
21 was not proposing the Project at this time as a cost-effective method to reduce SHEI congestion.  
22 As noted above, Morrisville's planning documents indicated that the B22 portion of the Project  
23 would need to be rebuilt by Morrisville in the period between 2024 and 2028. Construction of

1 the Project now will obviate the need for some future investments by Morrisville. Morrisville has  
2 determined that it and Johnson would have paid \$211,591 to maintain the B22 line absent the  
3 upgrades to address the SHEI transmission congestion. Morrisville owns 85 percent of the B22  
4 line and Johnson owns 15 percent of the B22 line.

5

6 **6. Q. When do you expect Morrisville and Johnson to vote on the B22 portion of**  
7 **the Project pursuant to 30 V.S.A. § 248(c)?**

8 **A.** The municipalities will only vote on the B22 portion of the Project—not the B20  
9 and Lowell Substation components—because the B22 is the only municipal plant component of  
10 the overall Project. The Municipalities are expected to vote on the B22 portion of the Project at  
11 their respective annual meetings, which occur on April 9, 2020, for Johnson and April 13, 2020,  
12 for Morrisville. Accordingly, GMP and the Municipalities are requesting that the Commission  
13 issue a final order and CPG in this matter by April 1, 2020 in order to allow the parties to  
14 proceed with a vote on the B22 at the regularly scheduled annual meetings. This will avoid the  
15 need to call a special meeting in both municipalities.

16

17 **7. Q. Will the municipal vote approve a cost allocation agreement among all VDUs**  
18 **relating to the SHEI solutions steps discussed by GMP witness Doug Smith?**

19 **A.** No, the VDU's efforts to develop a cost allocation framework for SHEI solution  
20 is a much broader issue than the costs and benefits that voters will be asked to consider and  
21 approve at the annual 2020 meetings. That vote will be limited to authorizing the construction of  
22 the B22 rebuild and the costs that the Municipalities may cover. My understanding is that the  
23 potential cost allocation agreement among VDUs will address potential contributions from

1 Municipalities for a broader set of projects, including non-municipal plant (such as GMP  
2 facilities) and upgrades to other facilities (like the Sheldon Springs AVR).

3

4 **8. Q. Is the Project consistent with the principles for resource selection expressed**  
5 **in the Municipalities' approved least-cost integrated plans?**

6 **A.** The Municipalities' least-cost integrated plans do not address the ultimate need  
7 that this Project is intended to address. It is my understanding from GMP's testimony that the  
8 Project is consistent with GMP's plan and with least cost planning principles in general.  
9 Moreover, the Project is not inconsistent with anything in the Municipalities' plans.

10

11 **9. Q. Does this conclude your testimony?**

12 **A.** Yes, it does.