

# Addison County Regional Planning Commission

14 Seminary Street Middlebury, VT 05753 www.acrpc.org Phone: 802.388.3141 Fax: 802.388.0038

December 14, 2016

Public Service Board  
Attention Judith Whitney, Board Clerk  
112 State Street  
Drawer 20  
Montpelier, Vermont 05620-2701

Re: Docket # 8847 In re: Petition of Vermont Green Line Devco, LLC; Notice of Appearance, Motion to Intervene and Comments from the Pre-hearing Conference of the Addison County Regional Planning Commission

Dear Ms. Whitney:

Enclosed for filing in the above matter please find the original and six copies of the Notice of Appearance of Adam Lougee, Esq. on behalf of the Addison County Regional Planning Commission ("ACRPC") and a Motion to Intervene also on behalf of ACRPC.

Also, ACRPC hereby makes the following comments to the Board in response to their request at the pre-hearing conference in the above noted matter. The issue regarding the potential reconductoring of the transmission line from Vermont Transco's New Haven substation to its Williston substation is significant. If this project directly causes the need for an estimated \$120 Million Dollars of improvements on that transmission line, the impacts of those improvements should be considered as a part of this project and additional landowners, municipalities and other entities impacted by those improvements should be given the timely opportunity to move to intervene in this docket as parties and to participate in this docket as full parties to the docket. Additionally, Vermont Greenline shall need to provide those parties with sufficient access to the planned improvements to allow each party to evaluate them on their merits. Thank you for this opportunity to comment.

Please note that pursuant to the Certificate of Service attached hereto on this date, photocopies of this filing were forwarded to all other parties, as of this date, on the Service List in this proceeding. If anything further is required at this time, please contact me. Thank you.

Sincerely,

  
Adam G. Lougee, Esq.  
Executive Director

Cc (w/encl): Service List in PSB Docket # 8847

Addison	Bridport	Bristol	Cornwall	Ferrisburgh	Goshen	Leicester
Lincoln	Middlebury	Monkton	New Haven	Orwell	Panton	Ripton
Salisbury	Shoreham	Starksboro	Vergennes	Waltham	Weybridge	Whiting



**IN THE PUBLIC SERVICE BOARD  
OF THE STATE OF VERMONT**

Petition of Vermont Green Line Devco, )  
 LLC, pursuant to 30 V.S.A. §§ 231 and )  
 248, for a certificate of public good to )  
 own, operate, and construct an )  
 underwater and underground 400 MW )  
 high-voltage direct current (“HVDC”) )  
 electric transmission line, converter )  
 station, and associated facilities in Lake )  
 Champlain and the Towns of Ferrisburgh, )  
 Waltham, and New Haven, )  
 Vermont, and for *de minimis* regulation )

Docket No. 8847

**MOTION TO INTERVENE**

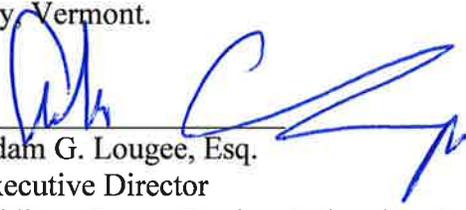
Now comes Adam G. Lougee, Esq. the Executive Director of the Addison County Regional Planning Commission and hereby enters this Motion to Intervene on behalf of the Addison County Regional Planning Commission pursuant to Title 30 of the Vermont Statutes Annotated, Section 248 and Vermont Public Service Board Rule 2.209 governing Intervention. By this motion, ACRPC represents as follows:

1. The Addison County Regional Planning Commission (“ACRPC”) is a political subdivision of the State of Vermont and serves as the regional planning commission for the Addison Region encompassing 21 of the 23 municipalities in Addison County including the Towns of Ferrisburgh, Waltham, New Haven and Monkton.
2. Vermont Green Line Devco, LLC (“VT GREENLINE”) has proposed that the transmission facility subject to this application shall be located in the service territory of ACRPC within the municipalities of Ferrisburgh, Waltham and New Haven, with the potential for significant additional related transmission infrastructure work caused by this project that would also impact New Haven and Monkton.
3. Title 30, Section 248(a)(4)(C) lists the regional planning commission for the area in which a project as located as a statutory party required to receive notice of the application when it is filed with the Public Service Board.
4. Title 30, Section 248(b)(1), states that before the Public Service Board issues a certificate of public good with respect to an in-state facility, with respect to a transmission line subject to board review, the line will not unduly interfere with the orderly development of the region with due consideration having been given to the recommendations of the municipal and regional planning commissions.
5. Pursuant to 24 V.S.A. §2345a, duties of the Addison County Regional Planning Commission pertinent to this application include:

- a. Sub-section 2345a(5)(D) creation of the regional plan that identifies areas of regional significance;
  - b. Sub-section 2345(a)(14)(A) provides regional planning commissions the right to appear and participate before the Public Service Board.
6. VT GREENLINE has the obligation to give due consideration to the recommendations of the Addison County Regional Planning Commission as noted in Section 4 of this motion,
  7. ACRPC has a duly adopted regional plan and the statutory duty to appear before the Public Service Board to aid the Board in making determinations under 30 V. S.A. §248 as noted in Section 5 of this motion.
  8. ACRPC has evaluated the pre-application and application of VT GREENLINE and has determined that this project may impact the Addison Region, that it has substantial and unique interests and obligations in protecting the Addison Region and desires to participate in the Public Service Board's consideration of the application concerning the following criteria:
    - a. Sub-section 248(b)(1) regarding the orderly development of the region and compliance with the regional and municipal plan;
    - b. Sub-section 248(b)(4) will result in an economic benefit to the state and its residents;
    - c. Sub-section 248(b)(5) with respect to an in-state facility, will not have an undue adverse effect on aesthetics, historic sites, air and water purity, the natural environment and the public health and safety, with due consideration having been given to the criteria specified in 10 V.S.A. §1424a(d) and § 6086(a)(1), (5), (7), (8) and (9)(K).

THEREFORE, the Addison County Regional Planning Commission requests that this Board grant this Motion to Intervene, pursuant to Public Service Board Rule 2.209, to allow it to exercise its right to appear and protect its substantial and unique interests in this proceeding.

Dated December 14, 2016 at Middlebury, Vermont.



Adam G. Lougee, Esq.  
Executive Director  
Addison County Regional Planning Commission  
14 Seminary Street  
Middlebury, Vermont 05753  
(802) 388 - 3141

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OF THE STATE OF VERMONT**

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Champlain and the Towns of Ferrisburgh, )  
Waltham, and New Haven, )  
Vermont, and for *de minimis* regulation )

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**NOTICE OF APPEARANCE**

**NOW COMES** Adam G. Lougee, Executive Director, of the Addison County Regional Planning Commission, 14 Seminary Street, Middlebury, Vermont 05753, and hereby enters his appearance on behalf of the Addison County Regional Planning Commission in the above-captioned matter.

Dated at Middlebury, Vermont, this 14th day of December 2016.

Addison County Regional Planning Commission

By: \_\_\_\_\_  
Adam G. Lougee, Esq.  
Executive Director



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**CERTIFICATE OF SERVICE**

I hereby certify that on this 14th day of December 2016, I served copies of the Notice of Appearance of Adam Lougee, Esq., the Motion to Intervene of the Addison County Regional Planning Commission and a cover letter enclosing the same and enclosing the comments of the Addison County Regional Planning Commission in response to the Board’s request at the pre-Hearing Conference in Public Service Board Docket No. 8847 by placing the same in the United States mail, postage prepaid, in accordance with the requirements of the Public Service Board Rules upon the list of parties attached to this certificate.



Adam G. Lougee, Esq.  
Executive Director  
Addison County Regional Planning Commission  
14 Seminary Street  
Middlebury, Vermont 05753  
(802) 388 - 3141

PSB Docket No. 8847 - Service List – Parties  
Parties:

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