

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Green Mountain Power Corporation for)
approval of its new Multi-Year Regulation Plan) Case No. 25-____-PET
pursuant to 30 V.S.A. Sections 209, 218, and 218d)

**PREFILED DIRECT TESTIMONY
OF JOSHUA CASTONGUAY
ON BEHALF OF
GREEN MOUNTAIN POWER**

August 29, 2025

Summary of Testimony

Mr. Castonguay describes GMP's customer-facing innovation programs, including continuation of GMP's Innovative Pilots and modifications to GMP's New Initiatives program to continue support of popular customer-driven energy storage programs such as GMP's ESS Tariff. He also describes how investments in technology support innovation for customers and GMP's operations, and how GMP has modified the strategic exception in the New Plan to account for specific potential generation plant investments not yet certain to occur. Finally, Mr. Castonguay describes the continued reporting on a wide range of innovation and performance metrics that will occur under the New Plan, and how these metrics work in conjunction with the SQRP mechanisms to ensure positive outcomes for customers.

Exhibit List

Exh. GMP-JC-1	2025-05-12 Prefiled Testimony of Madeline Murray-Clasen (Case No. 25-0948-PET)
Exh. GMP-JC-2	Redline of Innovation and Performance Metrics (Attachment 7 to New Plan)

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**PREFILED DIRECT TESTIMONY OF
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I. Introduction

1 **Q1. Please state your name and occupation.**

2 A1. My name is Joshua Castonguay. I am employed by Green Mountain Power (“GMP”) as
3 Vice President, Chief Innovation Officer, Generation and Power Supply.

4 **Q2. Please describe your educational and business background.**

5 A2. I have been employed by GMP since 2003, working in engineering until 2009, and then
6 moving into various leadership positions throughout the organization, including the
7 control center and the transmission and distribution line department, among other
8 responsibilities. In 2017, I became Vice President, Chief Innovation Officer, leading
9 generation, engineering, and the team working on our innovative technology and service.
10 I graduated from the University of Maine in 2003 with a Bachelor of Science in Electrical
11 Engineering Technology.

12 **Q3. Have you previously testified before the Public Utility Commission?**

13 A3. Yes, I have provided testimony on behalf of GMP in numerous proceedings, including,
14 most recently, GMP’s Zone 4 Energy Storage Program Tariff (Case No. 25-0719-TF),
15 GMP’s Zero Outages Initiative Petition (Case No. 23-3501-PET), GMP’s Electric
16 Assistance Program Tariff (Case No. 22-5173-TF), GMP’s 2023 Multi-Year Regulation
17 Plan (MYRP) (Case No. 21-3707), and GMP’s Fiscal Year 2023 (FY23) Rate Case (Case
18 No. 22-0175-TF).

1 **Q4. What is the purpose of your testimony?**

2 A4. My testimony describes GMP’s customer-facing innovation programs, including
3 continuation of GMP’s Innovative Pilots and modifications to GMP’s New Initiatives
4 program to continue support of popular customer-driven storage programs such as
5 GMP’s Energy Storage System (ESS) Tariff. I also describe how investments in
6 technology promote innovation for customers and GMP’s operations. Moving to
7 generation, I describe how this New Plan limits the “strategic exception” to account for
8 specific potential generation plant investments. Finally, I describe the continued reporting
9 on a wide range of innovation and performance metrics that will occur under the New
10 Plan, helping in conjunction with the Service Quality and Reliability Plan (SQRP)
11 mechanisms to ensure positive outcomes for customers.

II. Supporting Continued Innovation Under the New Plan

12 **Q5. What innovation areas has GMP been focused on during the term of the Current**
13 **Plan?**

14 A5. As in previous regulation plans, innovation remains key to managing an evolving grid
15 with a focus on proactively improving resiliency and reducing costs in a rapidly changing
16 climate, with greater risk of grid and cyber events, as well as maintaining flexibility in
17 how we obtain power during volatile economic conditions. A large focus of this
18 innovation is responding to the strong customer interest in our residential energy storage
19 programs following several years of destructive winter and summer storms. The Current
20 Plan included important provisions allowing for customer-facing energy storage
21 programs to adapt to demand, and we made significant investments in our Energy Storage

1 System Tariff as a result. This energy storage work, building on innovative pilot
2 programs that continue to test new storage technology and applications with the many
3 benefit streams we have identified and developed, has led to the capacity to deploy
4 storage for larger-scale resiliency projects, including the Zone 4 Energy Storage
5 resiliency proposal currently under review by the Commission.

6 In addition to this energy storage work, we have increased deployment of
7 residential and public electric vehicle (EV) charging infrastructure; integration of
8 distributed energy resources (DERs) in customers' homes with smart panels (SPAN
9 Pilot), flexible load management (FLM) options; expanded access to local renewables
10 (ACRE Pilot, Sun Match Pilot, Energy Match, and Shared Solar Tariff); and a continued
11 focus on developing IT capabilities to secure and support all of this work, especially as
12 we modernize the grid to provide improved resilience for customers and address evolving
13 security risks.

14 Our innovation programs are iterative, building upon the work we have done in
15 previous regulation plans, and maturing to tariffed offerings for customers where
16 appropriate. That was consistent in this Current Plan period, where we implemented our
17 Resilient Neighborhood Pilot, which combined technologies and learnings from several
18 prior pilots to deliver a fully electrified, resilient neighborhood with a solar and energy
19 storage resiliency package, EV charging, and SPAN smart panels. We also transitioned
20 the frequency regulation pilots to a tariff rider after the success of the Frequency
21 Regulation 2.0 Pilot, under which customers participating in prior energy storage pilots

1 and the ESS Tariff are able to provide regulation services in response to ISO-NE
2 frequency regulation signals, creating additional value from these existing grid resources.

3 **Q6. Can you elaborate more on the work GMP has been doing to develop energy storage**
4 **programs and offerings?**

5 A6. Building from the innovation team's first residential storage pilots and some of the first
6 solar/storage combined projects, GMP has almost a decade of experience using energy
7 storage to support the grid and respond to customer needs. We are now managing or
8 developing a wide range of energy storage solutions, including:

- 9 • *Utility-scale storage*, such as the solar and storage microgrid in Panton and the North
10 Troy BESS project.
- 11 • *Mobile storage* that can be deployed to keep neighborhoods or businesses powered up
12 during planned or unplanned outages and provide local grid relief if needed during
13 specific times of the year;
- 14 • *Commercial storage*, through the Commercial & Industrial (C&I) Bring Your Own
15 Device (BYOD) pilot program to keep commercial customers powered up and
16 receive compensation for peak shaving performance
- 17 • *Residential storage leasing and incentives*, through the ESS and BYOD programs for
18 customers who opt to join regardless of their geographic location or reliability. The
19 ESS Tariff has been expanded several times in response to customer demand, with a
20 petition currently under review to cover ESS demand during the final year of the
21 Current Plan. GMP will file an updated ESS Tariff later this year, and as discussed

below, will be aligning the New Plan provisions that support this important offering to more narrowly focus on energy storage;

- *Residential storage deployment*, with no customer payment through Vermont Low Income Trust for Electricity (VLITE) and the Energy Storage Access Program Rider (ESAP) to customers in our Electric Assistance Program.
- *Energy Storage as a grid resiliency solution*, part of comprehensive and targeted resiliency improvements based on reliability needs to supplement distribution line hardening in certain geographic locations on the circuit. The first phase of this approach is pending before the Commission in Case No. 25-0719-TF.

These resources address a number of grid and customer needs and provide a wide range of benefits. GMP and our customers use energy storage for (1) continuous energy supply in the event of grid outages; (2) grid support such as peak reduction, load management, frequency regulation, and voltage support; and (3) for cost optimization such as lowering power supply costs (and often the carbon that comes with it) and extending substation capacity and electrical equipment life. We have deployed nearly 75 MW of energy storage (45+ MW residential and nearly 30 MW grid-scale and mobile).

This fleet of storage is continuing to provide these benefits. On June 24th of this year, in the middle of a major heat and humidity wave—which are unfortunately expected to be more common in the region—the regional ISO-NE peak demand reached the highest level since 2013. At the same time, the New England system experienced an issue which created a Capacity Scarcity Condition and extremely high real time energy prices. GMP deployed our aggregated storage and flexible resources during the peak and

1 scarcity event. If that period remains as the New England summer peak, the storage will
2 have saved an estimated \$2.7 million from that single event (and well over \$3M when
3 including transmission RNS reduction), which is 100% passed along to all customers. In
4 between peak events and outages, storage resources maintain grid stability and power
5 quality by providing frequency regulation across the regional grid and can help manage
6 power flows at the substation and within a circuit, increasing the ability to support
7 electrification resources and distributed generation without infrastructure upgrades.

8 This range of benefits demonstrates the flexibility of energy storage to address
9 grid needs, while the significant value produced allows us to build towards energy
10 storage as a critical resiliency resource. Participating customers in our residential energy
11 storage leasing programs have long experienced the resiliency benefits of home storage,
12 and now—because residential energy storage continues to be forecasted as a net-positive
13 investment for all customers—we are able to deploy storage as a targeted resiliency
14 solution as part of our comprehensive resiliency work described by Mr. Burke. In certain
15 areas within our circuits, particularly in the hardest hit rural areas of the state, residential
16 energy storage is uniquely able to provide resiliency to the most remote, “last mile” lines
17 that are more costly to storm harden. This solution is the basis for the Zone 4 Energy
18 Storage Tariff under review, and which we are proposing to continue in this New Plan.
19 All of this is possible thanks to the experience that GMP was able to gain through the
20 very first pilots that were deployed using residential battery storage.

1 **Q7. Can you update the Commission on the deployment under the ESS Tariff?**

2 A7. Our ESS Tariff program, first introduced in 2020 following successful pilots, is offered
3 under the Current Plan’s Tariffed New Initiatives provision. That provision helped
4 respond to and maintain strong customer interest in the ESS program, which continues to
5 generate net positive benefits for all our customers. As discussed in the May 12, 2025,
6 testimony of Madeline Murray-Clasen,¹ there were more than 4,220 customers enrolled
7 in the ESS program as of that date, including the approximate 1,500 who piloted the
8 program before the tariff. I have attached Ms. Murray-Clasen’s testimony in Case No. 25-
9 0948-PET as **Exh. GMP-JC-1**, which provides a broader summary of our approach to
10 meet customer demand for these systems.² Altogether, the storage programs contribute
11 over 45 MWs of residential storage to GMP’s fleet of flexible stored energy resources,
12 providing all the benefits described above for all customers—savings that are reported
13 annually in GMP’s MYRP and storage program reports—all while adding individual
14 resilience for leasing customers. While still addressing only a fraction of GMP’s peak
15 demand, this is an important step in the continuous growth of our flexible resources.
16 Through the end of 2024, ESS Program systems have responded to outage events over
17 45,000 times providing over 225,000 hours of backup power in total.³ Demand for these
18 systems has continued to be stronger than original estimates of necessary investment, and
19 the ability to seek approval for further support during the term of the Current Plan has
20 been critical for maintaining this momentum. Below, I discuss the New Plan regulatory

¹ *GMP Petition for Investment in ESS Tariffed New Initiative*, Case No. 25-0948-PET

² Calendar Year 2024 annual reports were submitted January 30, 2025 in Case Nos. 25A-0220 and 25A-0222.

³ 2024 GMP Proposed IRP filed in Case No. 24-3614-PET, p. 1-10.

1 provisions that support innovation, including residential energy storage installations
2 under the New Plan.

3 **Q8. Ms. Fischer discusses some of the challenges in rising regional transmission costs,**
4 **can you speak to how GMP's energy storage capability relates to transmission**
5 **costs?**

6 A8. The cost of regional transmission is a significant cost pressure facing GMP customers
7 along with all utilities in New England, as Ms. Fischer notes. Traditionally, these costs
8 were not something that a load serving entity like GMP could hedge or reduce through
9 any kind of specific action. However, with energy storage and flexible loads we can now
10 reduce what would otherwise be even more significant rate impacts due to these
11 increases. A key benefit in the deployment of energy storage has been the reduction or
12 smoothing of monthly peaks that directly tie to the transmission cost calculation.
13 Following the strong success of the storage in the early years of deployment, we
14 anticipate, and have modeled, a reduction in these benefits in the future due to the
15 flattening of our peaks that has occurred. We will continue to leverage these systems to
16 reduce these costs. If and when we see upward pressure on the actual peak demand, the
17 storage systems will be able to react, providing us with a unique cost management tool.
18 With enough storage and other flexible loads deployed in the region, overall lower
19 regional demand then reduces the ultimate transmission needs for demand growth and
20 reliability further reducing costs.

1 **Q9. You noted technology investments in your overview, what investments has GMP**
2 **been making to support innovation and how does the New Plan support that?**

3 A9. Innovation and IT are closely connected; not only do IT solutions increasingly drive and
4 support our innovative programs, but the increasingly connected grid and integration of
5 technology in our operations require rapid and constant improvements in cybersecurity.
6 We have invested thoughtfully and aggressively in cybersecurity throughout the Current
7 Plan period, managing within the base capital program budgets. In our upcoming FY27
8 Rate Case the Commission will hear more detail on the IT investments we are making,
9 but for the purposes of this New Plan structure, we had good success managing
10 investments without the need for additional capital through the Current Plan's
11 cybersecurity plan provision, and will continue to invest in IT improvements as part of
12 our base capital levels.

13 In addition to this key, ongoing security work, IT developments help all our
14 departments operate efficiently and directly support our resilience efforts. These include
15 generative artificial-intelligence (AI)-based systems to supplement our existing analytical
16 and management tools. For example, AI solutions are being used for directing vegetation
17 management cycles based on satellite imagery, and for load-matching renewable
18 generation for customers (GMP Match Pilot). And as we build out a resilient T&D
19 system ready to weather the changing climate and other grid disruptions, technology will
20 ensure we get the most benefit out of these investments, including by managing
21 automated reclosers and automatic circuit backup through new hardened feeders, and by
22 controlling distributed storage to keep customers powered up.

1 **Q10. What innovation areas is GMP expecting to focus on in the New Plan period?**

2 A10. Our work in the coming years will focus on evolving and expanding existing areas of
3 innovation to bring resiliency to customers and proactively adapt to future opportunities
4 and challenges. As with our energy storage work, many innovation projects identify and
5 build around flexible solutions that can address multiple grid and customer needs,
6 providing a combination of financial benefits, grid management, and resiliency. This is
7 demonstrated by the following types of programs, which we anticipate advancing in the
8 New Plan period:

- 9 • We will utilize the significant energy storage capacity of Vermont’s growing EV
10 fleet to better support the grid and provide resiliency to customers. We have been
11 closely following the development of brand-agnostic technologies and planning
12 testing to continue exploring “vehicle-to-anything” (V2X) bi-directional charging
13 to develop programs incentivizing vehicle-to-home or -building (V2H/V2B) and
14 vehicle-to-grid (V2G) EV chargers. V2H and V2G allow an EV to act like a
15 stationary energy storage system to power a home or send power to the grid.
16 Through this New Plan period, we expect to develop V2H and V2G offerings to
17 residential customers subject to technology availability, through partnerships with
18 EV original equipment manufacturers (OEM) and/or electric vehicle supply
19 equipment manufacturers. As more bi-directional chargers become available for
20 EVs, we plan to pilot these through our managed EV charging programs, giving
21 customers the option to have home backup through their car and achieve savings
22 through charging management and grid support.

- 1 • Expanding commercial customer offerings for resiliency and load management—
2 including workplace EV charging, vehicle-to-building and -grid, and new
3 stationary energy storage technologies.
- 4 • New customer offerings for power supply to support customers with specific
5 carbon goals or requirements that may differ from GMP’s current supply mix,
6 including community solar options.
- 7 • A focus on the future of metering and load management, including exploring
8 beyond traditional AMI metering. Many DER and load management devices
9 include high quality metering, and we continue to evaluate how best to use these
10 technologies for customers. We will continue to explore and test new approaches
11 to customer metering during this period, including the use of DER devices such as
12 the SPAN panels we have piloted to replace the need for dedicated utility meters.
- 13 • Advancing solar and storage programs for customers. We will look to build from
14 existing successful pilots that provide new solutions for more customers to access
15 solar or bundle solar and storage for resilience that move beyond the traditional
16 net metering approach. This includes evolving community solar models and pilots
17 that were new in the Current Plan like Sun Match and the ACRE pilot.

18 As with all our innovation pilot programs, when evaluating new innovative pilots,
19 we consider several questions to ensure customers are benefitting from this work:

- 20 1. Does the pilot provide value to the participating customer? For example, is it
21 something customers want to participate in such as increasing customer resiliency
22 or providing new options for their own carbon and emissions goals.

1 2. Does it produce value for all our customers, whether by reducing costs for all
2 customers or providing new options for meeting regulatory obligations such as
3 renewable energy requirements?

4 3. Does it provide GMP with a new way to manage distributed energy resources?
5 For example, does it increase flexibility of demand control?

6 4. How can any customer, regardless of income or other circumstances, participate
7 in the program?

8 With these objectives in mind, in the New Plan period we will continue to
9 develop pilots and test the results through surveys and direct engagement with the
10 participating customers.

11 **Q11. How are innovation projects handled under the Current Plan from a regulatory**
12 **perspective?**

13 A11. There are two primary regulatory mechanisms in the Current Plan that support the
14 development and implementation of these transformative customer-facing energy
15 projects: the Innovative Pilot Program and the Tariffed New Initiatives Provision. The
16 Innovative Pilot Program has evolved over the last several plan periods and remains a key
17 provision of the Current Plan. It allows us to test the types of emerging concepts
18 highlighted above on a limited scope and timeline so that we can adopt cutting-edge
19 solutions that benefit customers. Innovative Pilots are evaluated under the eligibility
20 requirements in Attachment 2 in the Current Plan, which contains criteria that have
21 guided the program's success since its launch.

1 In conjunction with this pilot program, the Current Plan also includes a provision
2 to support New Initiative programs that have matured and developed into full tariffed
3 offerings. This provision – the Tariffed New Initiative Program – provided a new
4 mechanism that addressed budgeting for programs that were broadly available to
5 customers, and for which the investments were largely driven by customer demand. The
6 Current Plan established a set level of capital investment for all New Initiatives at the
7 beginning of the plan period. This included investments associated with approved and
8 future Innovative Pilots, a base level of annual capital investment on Tariffed New
9 Initiative programs that exist at the outset of the Current Plan, and other specific New
10 Initiative capital projects, such as EV Chargers, mobile energy storage, and the Grafton
11 Resiliency Zone. But the Current Plan also recognized that some of these programs –
12 particularly the tariffed residential energy programs – could require additional
13 investments to support their continued development as Customers sign up for services.
14 As a result, the Tariffed New Initiatives provision was added to provide a mechanism to
15 seek Commission approval for additional investments for these programs (which are
16 otherwise separately approved by the Commission) to match the level of customer
17 participation.

18 Each of these two mechanisms has worked well for customers, advancing new
19 innovative services during the Current Plan period which provide greater resiliency and
20 reliability, better integrate clean and distributed resources across our grid, and produce
21 net-positive benefits for all customers. Building on success in prior plans, the Innovative
22 Pilot program has helped support a wide range of successful pilots, including some that

1 have developed into tariffs, and this work continues to be at the forefront of our energy
2 transformation efforts. Prior pilots have included:

- 3 • Energy storage: Grid Transformation Pilot (residential energy storage lease),
4 Residential BYOD Pilot, Resilient Home Pilot, Frequency Regulation 1.0 and
5 2.0 Pilot, C&I BYOD Pilot, Aggregator Pilot, Energy Bundle Pilot, Enphase
6 Battery Pilot, Grafton Resiliency Zone Pilot, Resilient Neighborhood Pilot,
7 Battery Tariffs (ESS and BYOD), Frequency Regulation Rider, Energy Storage
8 Access Program Rider;
9
- 10 • Transportation Electrification: EV Make Ready Pilot, Flat EV Charging Rate
11 (ECHARGER) Pilot, DC Fast Charging Project, Workplace Charging Pilot,
12 Residential EV Charging Rates 72 and 74;
13
- 14 • Others: SPAN Pilot, FLM 1.0, 2.0, and 3.0 Pilots, Vermont Green Pilot, Sun
15 Match Pilot, ACRE Pilot, eWater Pilot, Cold Climate Heat Pump Pilot, Save
16 and Share.

17 The Tariffed New Initiatives provision has also helped advance and maintain
18 strong customer interest in our ESS offering, as described above. There are now over
19 4,500 customers enrolled in this tariff and generating net positive benefits for all
20 customers, up from about 1,500 prior to the tariff.

21 **Q12. Is GMP proposing changes to this regulatory framework in the New Plan?**

22 A12. The overall structure of the Innovative Pilot Program will remain the same, described in
23 Attachment 2 to the Plan (**Exh. GMP-LD-RB-1**). This mechanism has worked well and
24 provides an important foundation for continuing innovative work for customers. In other
25 areas we are proposing several targeted improvements to continue to build on past
26 successes for customers.

27 First, the Tariffed New Initiative provision will be updated to focus on storage
28 programs as a new Customer Driven Storage Program provision. The ESS tariff is the

1 only Tariffed New Initiative, and is highly popular, requiring several reauthorizations and
2 two updates to proposed investment levels during the term of this Plan. In conjunction
3 with other important storage work, we intend to streamline the Tariffed New Initiative
4 provision in the Plan to focus on supporting critical customer-driven storage. This new
5 customer driven storage program provision will function similarly to the Tariffed New
6 Initiative provision, but with a narrower program scope. The ESS Tariff itself is due for
7 renewal in 2026, which will provide an opportunity to evaluate the investment levels for
8 this program in parallel with GMP's upcoming FY27 Rate Case. The proposed Customer
9 Driven Storage Program provision of the New Plan then provides a regulatory accounting
10 mechanism to manage investments in this program over the term of the Plan to the extent
11 additional investments are necessary to meet customer demand. This provides a
12 foundation for initial investments but keeps the same flexibility so that investment is
13 driven by actual customer interest and tied to supporting that momentum at appropriate
14 levels.

15 Moving forward, GMP is considering how to structure our storage programs in
16 the future when the current programs have expired. We anticipate using the lessons from
17 the Zone 4 Energy Storage request, if approved, along with our continued experience
18 with the significant, sustained customer interest in the ESS lease in developing the next
19 set of storage programs that will be proposed to take effect after September 30, 2026.

20 We are also adjusting how we budget for other prior New Initiative programs that
21 started as innovative work but are now proven and becoming integrated into our Base
22 Capital investments through the relevant capital departments (for example, DC Fast EV

1 charging at GMP sites will move to Facilities). We anticipate that when detailed capital
2 planning is filed with the FY27 Rate Case, the Innovation department budget will
3 therefore be focused on implementing new technologies and initiatives that will be
4 developed over the term of the New Plan, including those highlighted above.

5 **Q13. Please summarize how customer driven storage projects will be handled under the**
6 **New Plan from a regulatory accounting perspective.**

7 A13. As noted above, this component of the New Plan will function similarly to the Tariffed
8 New Initiative provision in the Current Plan. First, the Commission will have the
9 opportunity to review any proposed renewal of the ESS program in a separate tariff
10 proceeding, which, along with the FY27 Rate Case, will provide an opportunity to set any
11 recommended base investment levels on customer storage programs under any proposed
12 tariffs. GMP will support any request for authorization with financial modeling including
13 costs, expected revenues and benefits, and net present value to customers, consistent with
14 the material provided by GMP for such approvals during the Current Plan. Unless
15 otherwise authorized by the Commission, any tariff extension will provide a mechanism
16 to establish not to exceed levels of investments in tranches to meet customer demand
17 during the term of the Plan. The Customer Driven Storage Program will then provide the
18 vehicle for the Commission to consider and approve any additional tranches of
19 investment, with appropriate annual not to exceed limits. GMP will then file a specific
20 report detailing additional Customer Driven Storage investments annually with each
21 Annual Base Rate filing under the New Plan, and any additional capital investments on
22 Customer Driven Storage will only be included in rates once approved by the

Commission. This follows the approach approved by the Commission for additional ESS investments in Case No. 24-1715-PET and we propose to continue the annual storage reporting established by the Commission in that case. The regulatory accounting methodology is detailed in Attachment 12 to the New Plan (**Exh. GMP-LD-RB-1**).

III. Strategic Investment Opportunities in Owned Generation

Q14. What are the strategic generation plant investments GMP is contemplating in the New Plan period?

A14. Currently, there are two larger strategic generation initiatives that GMP is reviewing and may need to be included in the next MYRP should they prove to be a benefit for customers and ultimately fall within the New Plan period. These are the repowering of our Searsburg wind project and the purchase of the Deerfield wind facility.

Searsburg Repower

GMP has owned and operated the Searsburg wind facility for almost 30 years. The site consists of 11 Zond Z40 wind turbines each rated at about 550kW for a total site capacity of about 6MW. The site produces approximately 12,000 MWhs annually. We are analyzing the replacement of the 11 turbines with 3 larger, modern wind turbines. This will nearly quadruple the annual output of the site and provide a Vermont RES Tier IV resource. As we move forward with permitting and analysis in accordance with federal requirements, we will determine if the project can be constructed in time to assure the appropriate tax credits are in place, and if so, we would be seeking to add the capital investment and associated cost of service changes for this project at that time. The project itself will go through a Section 248 review process.

1 **Deerfield Wind**

2 Deerfield Wind was brought online in 2017 and is located directly adjacent to the
3 Searsburg Wind project. In fact, a portion of the Deerfield Wind project shares an access
4 road with Searsburg which was upgraded at the time of construction and further benefits
5 the repowering analysis of Searsburg. GMP has a standard PPA for 100% of the offtake
6 from the facility and as part of the PPA we have the option to purchase the project at the
7 10th year of operation for a fixed price. GMP is undertaking the analysis now to
8 determine what will be better for customers – continue as a PPA or to purchase the
9 facility. Should we determine a purchase is the best outcome for customers, GMP would
10 seek additional capital investment for the acquisition.

11 **Q15. How does the New Plan account for these potential investments?**

12 A15. GMP has narrowed the strategic opportunities and unexpected circumstances provision of
13 the New Plan to focus on these two projects. As indicated in Section IV.A.1.vi., if the
14 timing of these projects results in the need to make the investment within the plan period,
15 GMP may seek approval from the Commission for additional capital investments above
16 the set locked capital amounts, either through an annual base rate filing or separately
17 depending upon timing. Any approval under this provision will require express PUC
18 authorization. In addition, any Searsburg repowering proposal will require Section 248
19 approval. Other strategic opportunities, if they arise and are appropriate, would require a
20 petition to amend the plan subject to Section 218d, unless otherwise enumerated in the
21 plan.

IV. Innovation, Resiliency, and Performance Metrics

Q16. What innovation, resiliency, and performance metrics is GMP currently tracking?

A16. Under the Current Plan, GMP has been tracking four related sets of performance metrics. The first set tracks compliance with traditional utility reliability service and standards under the Commission-approved SQRP, which is described in more detail in Mr. Burke's testimony. The second set was introduced in our 2018 multi-year regulation plan and updated in the Current Plan to include 49 innovation and performance metrics that capture GMP's performance in several areas related to innovation and the proactive transformation of utility operations and services for customers. These measurement areas focus on capital expenses, exogenous storm costs, power portfolio, distributed generation, other distributed energy resources, electric vehicles and charging infrastructure, and customer relationship automation, and are included in Attachment 7 to the Plan. The third and fourth sets of metrics are reported annually along with these innovation and performance metrics to track specific performance of GMP's residential energy storage programs and resiliency projects constructed under the ZOI Order, as established in Case No. 24-1715-PET and 23-3501-PET. Metrics related to the ZOI Order are proposed for inclusion in a pending SQRP update in Case No. 25-0751-PET, with annual reporting for informational purposes.

Q17. What has been GMP's experience with these metrics?

A17. The annual reporting of metrics under the Plan has been a valuable tool to track and report on the customer focused work GMP is doing. They provide a comprehensive external summary of a wide range of metrics for the Commission, the Department, and

1 other stakeholders. Each year we meet with the Department to review results, which
2 provides an opportunity to discuss the innovation and performance metrics. The SQRP
3 has been an important tool for us to evaluate our performance on service and reliability
4 for customers and is being specifically incorporated into the New Plan as discussed by
5 Mr. Burke. When we have missed the individual metrics in the SQRP (which has been
6 very rare), we have provided a Corrective Action Plan when required on the areas we
7 need to address to get back on track. We are motivated to achieve the best outcomes for
8 customers across all teams at GMP and those results are clear across reporting metrics.

9 **Q18. Is GMP proposing any adjustments to the reporting and metrics in the New Plan?**

10 A18. As mentioned above, the overall approach to Metrics under the Current Plan has been
11 working well. In the New Plan, we have identified some minor clarifications to be made
12 in the existing metrics. Given the passage of time since 2018, we have found there are a
13 few areas that are duplicative or can be clarified to better reflect how the data is reported.
14 These suggestions are included in **Exh. GMP-JC-2**, which is a redlined version of
15 Attachment 7 of the New Plan (**Exh. GMP-LD-RB-1**). There are also metrics we believe
16 may be outdated or less helpful than expected when initially proposed or are otherwise
17 covered by other processes in place. To provide for a collaborative evaluation of possible
18 improvements in this area, we propose to work with DPS before the next round of
19 testimony filed in January to identify possible mutually agreeable modifications to keep
20 the reported metrics as focused and helpful as possible, including continuing existing
21 metrics valuable to DPS and the Commission. In addition, as noted in Mr. Burke's
22 testimony, we will be incorporating our SQRP metrics and associated penalties directly

1 into the performance mechanism in the Plan, including the updated metrics established as
2 a part of the ZOI proceeding and proposed to be added to the SQRP in the pending Case
3 No. 25-0751-PET.

4 **Q19. Does this conclude your testimony?**

5 A19. Yes, it does.