STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Tariff filing of Green Mountain Power Corporation requesting a change in rates, effective October 1, 2026	)))	Case No. 26-____-TF
Petition of Green Mountain Power for approval of its new multi-year regulation plan pursuant to 30 V.S.A. §§ 209, 218, and 218d.	)))	Case No. 25-1955-PET

PREFILED DIRECT & SUPPLEMENTAL TESTIMONY OF JOSHUA CASTONGUAY ON BEHALF OF GREEN MOUNTAIN POWER

January 16, 2026

Summary of Testimony

Mr. Castonguay covers several topics in this testimony, beginning by summarizing Green Mountain Power's ("GMP") Customer Driven Energy Storage Programs, how this work continues to provide important benefits for customers, and plans to continue energy storage programs during FY27 and the Proposed Regulation Plan ("Proposed Plan") period. He also discusses GMP's other innovative New Initiative work and capital investments for these programs during the Rate Year. Mr. Castonguay then describes the forecasted power output from GMP's owned generation resources in the Rate Year, the Rate Year O&M expense associated with these resources, the capital investments included in this filing for GMP-owned generation, and GMP's compliance plan to meet Tier III of Vermont's Renewable Energy Standard ("RES"). Finally, he reports on GMP's customer service, which continues to exceed internal and external benchmarks.

EXHIBIT LIST

Exhibit GMP-JC-3[1]	New Initiatives Capital Planning Framework
Exhibit GMP-JC-4	New Initiatives and Customer-Driven Storage Capital Additions (2026–27)
Exhibit GMP-JC-5	ESS Program Financial Model
Exhibit GMP-JC-6	Integrated Energy Storage Pilot Financial Model
Exhibit GMP-JC-7	GMP Generation from Owned and Joint Ownership Projects (2027)
Exhibit GMP-JC-8	Generation Capital Planning Framework
Exhibit GMP-JC-9	Generation Capital Additions (incl. Joint Ownership) (2026–27)
Exhibit GMP-JC-10	GMP Service Quality Monitoring and Reporting Plan (2026)

[1] Because this testimony is also filed as supplemental testimony in the Proposed Plan proceeding, Case No. 25-1955-PET, exhibit numbering in this testimony continues from the exhibits submitted in that case, ending with Exhibit. GMP-JC-2.

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I. Introduction

Q1. Please state your name and occupation.

A1. My name is Joshua Castonguay. I am employed by GMP as Vice President, Chief Innovation Executive.

Q2. Please describe your educational and business background.

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

Q3. Have you previously testified before the Public Utility Commission ("PUC" or the "Commission")?

A3. Yes. I have provided testimony on behalf of GMP in numerous proceedings, including GMP's 2019 Rate Case (Case No. 18-0974-TF), GMP's 2018 Multi-Year Regulation Plan proceeding (Case No. 18-1633-PET), GMP's Bring your Own Device ("BYOD") & Energy Storage System ("ESS") joint tariff proceeding (Case Nos. 19-3167-TF & 19-3537-TF), GMP's Climate Plan proceeding (Case No. 20-0276-PET), GMP's petition to

modify its service territory in support of GLOBALFOUNDRIES U.S. 2 LLC's request to operate a self-managed utility (Case Nos. 21-1109-PET & 21-1107-PET), GMP's petition to modify the 2018 Plan Case No. 21-1965-PET), GMP's current regulation plan ("Current Plan")(Case No. 21-3107-PET), GMP's Zero Outages Initiative ("ZOI") proceeding (Case No. 23-3501-PET), and GMP's Zone 4 Energy Storage Tariff proceeding (Case No. 25-0719-TF). I submitted prefiled direct testimony in support of this petition for a new Regulation Plan (the "Proposed Plan") (Case No. 25-1955-PET), which I am now supplementing.

Q4. What is the purpose of your testimony?

A4. I provide testimony on several topics in this rate filing:

In **Section II,** I provide an overview of GMP's innovative work, including the next iterations of our popular residential energy storage programs, that will include in the Rate Year a pilot to further evaluate residential energy storage as a resiliency alternative. I describe these storage initiatives in detail while also explaining how our innovation team develops its capital projects and setting forth the innovation and storage capital investments we have underway during the Interim Year (Fiscal Year 2026, or "FY26," October 1, 2026–September 30, 2027) and are planning in the Rate Year (Fiscal Year 2027, or "FY27," October 1, 2027–September 30, 2028) to support these innovative efforts to benefit customers.

Sections III–V provide an overview of GMP's power generation (also called production) portfolio and the capital projects associated with our generation assets. I detail the projected generation from GMP's wholly owned and jointly owned facilities,

and the operation and maintenance ("O&M") expenses associated with generation facilities during the Rate Year. I also identify and describe the Interim Year and Rate Year capital costs associated with generation projects.

Section VI describes the steps GMP is taking to comply with Vermont's Renewable Energy Standard Tier III requirements and advance state energy policy during the Rate Year.

And lastly in **Section VII** I discuss GMP's strong culture of customer service and report on the metrics we use to measure our customer satisfaction and customer service performance, including our Service Quality & Reliability Performance, Monitoring & Reporting Plan ("SQRP") and independent surveys. As I explain, GMP continues to exceed our SQRP metrics on customer satisfaction and maintain very high customer satisfaction outcomes as reported in independent surveys.

II. Innovation and Customer-Driven Storage Programs

Q5. How is your testimony on GMP's innovative work organized?

A5. In my opening testimony in support of GMP's Proposed Plan, I described how important innovation is to how GMP controls costs for customers, manages the evolving grid, and improves resiliency as we address economic, climate, and cyber challenges. Our Proposed Plan will continue to support this innovation as a critical component of our affordability and resiliency work as it has in previous regulation plans, carrying forward the successful Innovative Pilot framework and providing for additional investment in popular and valuable energy storage programs. This testimony focuses on the implementation of that framework, summarizing the innovative projects GMP plans to

undertake during the Rate Year, and introducing the supporting exhibits for these projects.

Q6. What priorities drive selection of innovation projects?

A6. **Exhibit GMP-JC-3** sets out the planning framework we apply to innovation projects. Four key objectives help determine if we pursue a project: 1) whether it makes sense, economically or in support of other goals such as emissions reductions, for the participating customer; 2) whether it produces value for all non-participating customers; 3) whether it provides us with new resources to better manage a distributed and connected two-way grid; and 4) whether the program can be accessed by all interested customers, regardless of income or other circumstances. Many innovative projects begin as pilot offerings under our longstanding Innovative Pilot Program. These pilot projects provide invaluable data from real-world performance and customer experiences so we can iterate with modified pilot offerings, advance a technology to full implementation, or determine that a program is not the right fit to move forward. In a rapidly changing environment, this process allows us to continuously evaluate new technology and ideas that may produce benefits for our customers and help develop and adapt to a modern distributed, two-way grid.

Projects that have performed well through pilots may be advanced for broader implementation by other GMP operational teams. Examples of past successful pilots in this filing include EV charging and residential energy storage. We also respond to and meet customer demand for successful and proven programs that are now tariffed, like our residential energy storage offerings that continue forward in this filing.

Q7. Can you explain further how innovation programs are used to create value for all GMP customers?

A7. Our innovation programs are designed for equitable access and to create value for nonparticipants with a specific focus on providing new means to control and manage costs, including those otherwise beyond GMP's direct control. Investments in innovative projects and technology over the years have been crucial for generating real-time and lasting savings for customers. This focus continues with the projects proposed in this filing. We seek to generate savings through flexible resources that can stack benefits in ways that maximize as many of the four program objectives as possible.

Our leading residential energy storage programs embody this proactive approach and have resulted in significant savings for customers against regional power supply cost pressures experienced by utilities across New England. Just this past summer, a June heat wave exceeding 100 degrees pushed the ISO-NE annual peak to its highest level in over a decade coupled with other system challenges resulting in ISO-NE declaring a scarcity event. During this event we successfully dispatched our energy storage systems and other flexible load resources, projecting to save customers over $3M in power supply costs. A scarcity event also initiates the first steps that ultimately can lead to rolling blackouts for regional grid stability. Although a small percentage of the total need, every bit of demand reduction helps avoid this type of situation, which our storage provided. In addition, our flexible resources reduced transmission costs nearly $750,000 for the month of June. Altogether, storage and other flexible load resources have reduced power supply costs more than $11.6M in 2025, and more than $26M since 2022. Benefit stacking is the key

to the success of our storage programs, which provide a growing range of power supply and power quality benefits when not being used for customer backup or peak reduction.

In other existing innovative programs, benefit stacking has been achieved through shared access to flexible loads. Once connected, everyday household devices including heating/cooling, water heaters, and an increasing number of EV chargers become load management resources. Having a range of flexible loads provides further options and solutions as we manage across the grid with storage to reduce loads during peak events to deliver benefits to customers now. For example, curtailing water heating or residential EV chargers can be done for longer durations than other devices, offering flexibility to increase the time we are managing total load and increasing the probability of covering the longer-duration and flatter peaks we expect to see.

Q8. What specific innovation projects are included in this rate filing?

A8. This filing focuses on important, ongoing innovation work including continued investment in residential energy storage programs reflecting current customer demand. In the Rate Year this includes:

- The renewal of the popular ESS Tariff, subject to Commission approval, which will result in $17.4M in capital investment in the Rate Year based on expected enrollment.
- A targeted Integrated Energy Storage Pilot proposal in Zone 4 to deploy energy storage on one circuit as a companion to on-going T&D hardening in Zones 1-3 on this circuit, to evaluate the comprehensive resilience benefits

and storm response cost reductions, which will result in a $7.2M investment in the Rate Year.

- Investments made under Energy Storage Assistance Program (ESAP), an ESS tariff rider providing storage to customers on our Energy Assistance Program (EAP), totaling $1.87M in the Rate Year. These storage investments are described in greater detail below in my testimony. Other innovative pilots to be pursued in the Rate Year include:
- EV charging infrastructure supporting continued build-out of Level 3 charging infrastructure.
- Resilient Neighborhoods Pilot. This pilot was launched in 2023 with O'Brien Brothers Construction to design and build a neighborhood of fully resilient all-electric homes. Each home is equipped with a smart panel, solar and storage backup, and a Level 2 EV charger along with its all-electric appliances. One more iteration of the pilot is being proposed to gather sufficient data to determine how to best offer the program to more customers.

Detailed program information and capital investment by year are set forth in **Exhibit GMP-JC-4**, along with more detail on Interim Year projects completed under the Current Plan but included in rate base in this filing. Many of the Interim Year projects are preceding rounds of the projects listed above. Altogether, the filing includes $3.98M in Interim Year investments that will be closed under the Current Plan's base capital and $29.24M in Rate Year investment in both innovation and customer driven storage.

Q9. Are there other important innovation pilot programs that you expect to begin in the Proposed Plan not associated with a capital project?

A9. Yes. We anticipate pilot programs to use electric vehicles as energy storage to power homes for customers. Called "vehicle-to-anything" (V2X), this bi-directional charging would happen through our existing managed EV charging programs and allow vehicles to provide all the same benefits of stationary storage, including home backup. Subject to equipment availability, we will partner with EV original equipment manufacturers (OEM) or manufacturers of EV charging equipment to offer V2X options to customers. Capital associated with potential pilots would be expected to close after the Rate Year.

Many innovative pilots do not require capital investment. One of our most important programs is our Flexible Load Management Pilot (FLM) in partnership with commercial and industrial ("C&I") customers. We plan to transition this program to a full tariffed offering in the coming Rate Year. This program utilizes the flexibility of C&I customer load to manage peak periods while also giving the customer a better alternative to traditional peak rates and curtailment programs. A great example of this is how FLM is allowing our ski area customers to make snow more predictably and avoid the need for significant operational interference due to curtailment.

Q10. Turning to the residential energy storage investments, your opening direct testimony in the Proposed Plan proceeding provided an overview of the work GMP is currently doing to develop these offerings. How does GMP envision this work evolving over the term of the Proposed Plan?

A10. In the Proposed Plan term, we will continue our existing popular and successful residential energy storage programs, providing a suite of grid services and value streams that allow these systems to pay for themselves and produce benefits for all customers. This includes renewal of both the ESS Tariff to continue to meet customer demand, as well as the complementary Bring Your Own Device ("BYOD") Tariff, and the ESAP Tariff Rider to ensure the ESS program is available to customers in our Energy Assistance Program ("EAP"). In addition to providing participating customers with this option for home resiliency, we are always looking to develop additional value and use cases for our residential storage fleet to manage power supply and other grid costs going into the Proposed Plan period. We are closely following new developments in storage technology including other ways to integrate storage so it can be an advanced meter or smart panel.

This period will also involve the evolution and iteration of storage programs. We will be filing a pilot to evaluate the use of residential energy storage as non-poles-and-wires alternative to provide greater resilience to customers in remote, less dense Zone 4 sections of our system. This Integrated Energy Storage Pilot is a targeted iteration of the Zone 4 Tariff filed in Case No. 25-0719-TF, focusing on the East Jamaica EJ-G7 circuit as an important testing ground. The pilot filing is expected to closely follow this rate

filing and is supported by a full benefit-cost analysis including expected values of resilience, and importantly will provide real-world experience on the implementation and efficacy of coupling residential energy storage in Zone 4 with the on-going T&D hardening in Zones 1-3 on this circuit. As described in Mr. Burke's testimony, GMP engaged Current Energy Group ("CEG") to provide a benefit cost analysis for all our resilience work, and this included an analysis of our Integrated Energy Storage Pilot to incorporate both the typical power supply benefits along with resiliency and other customer external benefits.

More broadly, to allow flexibility for residential storage programs to evolve over the term of the Proposed Plan—including as we test and potentially integrate advances in technology like V2X—we will be seeking a shorter term for the ESS Tariff and related tariffs and riders. Rather than running for the full length of the Proposed Plan as we have sought in previous plans, we will file for a two-year tariff beginning coincident with the Proposed Plan in October 2026. This will allow the 18-month Integrated Energy Storage Pilot to conclude by the time we file any successor tariff, and for evaluation of the pilot results, customer demand at the time, advances in technology, and any changes to the benefits and costs realized for residential storage systems, in developing any future programs to fall under the Customer Driven Storage provisions of the Proposed Plan.

Q11. You mentioned ongoing customer demand for the ESS program; can you describe the current and expected demand at this time?

A11. Over the past twelve months preceding this filing, an average of 75 customers each month have signed up for the ESS program, with a trailing installation rate of 61 systems

per month over the same period. The long-term demand trend has remained steady, and we expect that trend to continue into the Rate Year. In 2025, we added another battery option to the program as well through Enphase.

Q12. How were the ESS investments in this filing developed?

A12. Rate Year ESS investments are planned to meet customer demand, using an estimate of approximately 60 systems installed per month. The required capital investment was developed using the same methodology as previous ESS programs updated with current equipment and installation costs. I provide a current ESS Financial Model as **Exhibit GMP-JC-5**. This model is grounded in our extensive experience with the ESS program and the actual benefits we have measured, which informs our forecasts of benefits over the life of the program.

Q13. What are the expected benefits of these investments for non-participating customers?

A13. Since the first energy storage pilot programs almost a decade ago, creation of financial benefit for non-participating customers has been a core goal of our storage programs including the ESS program. Through its many iterations, the ESS Tariff has forecasted to provide positive net present value over a system's lifetime, and the installed systems continue to project as overall net positive investments for all customers.[2] That remains

[2] On January 30, 2026, we will be making our annual storage report pursuant to the PUC's Final Orders in Case Nos. 24-1715-PET and 25-0948-PET, which will provide additional detail on the positive NPV we continue to expect from existing ESS installations based on current performance.

true for the anticipated renewal of the ESS Tariff included in this filing, which continues to produce a positive NPV based on a reasonable range of model assumptions. Please refer to the financial model for detailed results.

Q14. What are some examples of new value streams these energy storage systems may be able to provide?

A14. Energy storage is an important resource in our overall power supply cost management strategy, especially as we continue to experience significant cost pressures from the region that are not directly in our control. One of the significant new drivers of regional power costs is the ISO-NE Day Ahead Ancillary Services market ("DASI"), described in detail in Maria Fischer's testimony. The future of this new and costly market is uncertain, but depending on the form it takes, there may be opportunities for energy storage to provide some incremental benefit by offsetting costs now for customers. While this benefit is modest at this time, it is new and additional to the expected power supply benefits, including substantial value streams for reducing transmission and capacity costs through peak shaving. Please refer to the ESS Financial Model (**Exh. GMP-JC-5**) for a breakdown of these benefits.

Q15. Why is it appropriate and in customers' best interest for FY27 ESS installations to be included in base rates?

A15. Including this level of investment based on the expected installations in the Rate Year is consistent with the methodology for ESS investments in GMP's FY23 traditional rate filing, and with the treatment of expected ESS work throughout the Current Plan.

Moreover, this work continues to provide net positive benefits for customers and is therefore beneficial to customers to continue to include this investment in base rates.

Q16. What level of investment is expected in the second year of the ESS Tariff?

A16. If the upcoming ESS Tariff extension is approved by the Commission, the second year will be handled under the Customer Driven Storage provision of the Proposed Plan. Consistent with the intent of that provision, we would evaluate what we are seeing for continued customer interest, evaluate overall installation pace, and propose additional capital to be set based on the demand closer in time to the investment. This process, together with annual metrics tracking performance, will allow us to match the ESS program to customer demand, subject to regular Commission review.

Q17. Can you please describe the upcoming Integrated Energy Storage Pilot in more detail.

A17. The Integrated Energy Storage Pilot is a limited trial deployment of residential storage systems to comprise the third and final component of the fully resilient circuit described in our ZOI proceeding (Case No. 23-3501-PET), along with hardened overhead lines and undergrounding. The EJ-G7 circuit in East Jamaica and surrounding towns has been selected for this pilot deployment. That circuit was a focus of the ZOI proceeding as the worst-performing circuit during storms at the time; it also overlaps communities where customers are more vulnerable based on income and other metrics in the State's Municipal Vulnerability Index. The Commission's ZOI Order authorized and expected

comprehensive resilience work across this circuit.[3] Since the authorization of that work, GMP has completed or has in progress significant T&D hardening work across the EJ-G7 going into the Rate Year other than in the remote Zone 4 areas, described further in Mr. Burke's testimony. This pilot proposal will provide additional resilience for those Zone 4 areas that are still susceptible to damage during storms, providing the whole-circuit solution originally proposed in the ZOI filing with a goal of proving out the performance and benefits that can be achieved when an entire circuit is electrically resilient.

In my opening MYRP testimony, I described GMP's filing for Zone 4 Energy Storage Tariff pending at the time of that testimony. That initial tariff would have provided a residential energy system to Zone 4 customers on the EJ-G7 and the 56G1 circuit, the other circuit planned for comprehensive upgrades, as well as investments on two additional circuits indicated by reliability metrics. Following that testimony, we withdrew that tariff filing to continue to evaluate the benefits and costs of a Zone 4 energy storage solution, including through our engagement with CEG. In light of updates to our resiliency program described by Mr. Burke, we concluded that the proposed Zone 4 storage solution would benefit—much like our other Innovative Pilot proposals—from additional real-world testing before seeking a broader tariff.

The upcoming pilot filing will involve the deployment of around 300 residential energy storage systems to the customers in identified Zone 4 areas on the EJ-G7 circuit. With this deployment, the EJ-G7 will be hardened as proposed in the initial ZOI filing,

[3] See Case No. 23-3501-PET, Final Order of 10/18/2024 at 23–24.

allowing us to test the performance during storms—and particularly the impact on storm response operations and costs—of a "full ZOI" circuit compared to a range of alternatives, including circuits with varying levels of hardening treatment under the ZOI and Resiliency Project approaches. Including this pilot within our ongoing resiliency work in the rate year provides a wider range of alternative approaches across the treated circuits for measurement and after-action analysis as we continue to refine this work.

The pilot approach is appropriate and useful here. We recognize based on the Department's comments in the initial Zone 4 tariff proceeding that varying perspectives remain on the benefits and the best method to implement this type of resiliency program. As described below, many benefits of this solution are well-understood—these are expected to be net-positive investments just like our other residential storage programs, as a result of the forecasted power supply benefit—but how they perform as part of a holistic integrated storm response, and details like how best to calculate restoration cost savings, warrants additional real world learning and analysis. This resource also provides an important method to equitably address areas of our system that have seen lower service levels and which are more costly to address with a T&D solution, such as undergrounding. Historically, many customers have endured lower levels of reliability in challenging areas of our system despite paying the same as those with higher levels of reliability. We now have the tools to provide these customers with a similar, if not identical, level of resiliency and do it in a way that benefits all other customers. The pilot will allow us to refine and advance these offerings further, integrating comprehensive

solutions, while answering questions about the approach, and ensuring it is done in the most cost-beneficial manner for all customers.

Q18. Please describe the benefit-cost work GMP has performed to evaluate whether to proceed with this pilot program.

A18. Benefit-cost has been calculated in several ways for these systems. First, power supply benefits and other grid services are quantified using the same iterative residential storage model validated through several ESS, BYOD, and ESAP filings. I provide a copy of this model as **Exhibit GMP-JC-6.** This model reflects our latest experience utilizing our storage fleet in various power supply markets and for grid management. Our storage model also calculates the revenue requirement for this pilot project.

Second, values of resilience have been developed together with an outside expert, Andy Eiden of CEG, as described in detail by Mr. Eiden and Mr. Burke, and these values have been applied for the anticipated resilience benefits associated with this work. Because of the pilot nature of this proposal, the reported societal benefit was developed specific to this implementation on the East Jamaica EJ-G7 circuit and takes into account the existing and planned T&D hardening work that will be completed on this circuit. It is not a generalized evaluation of Zone 4 Storage standing alone without the improvements planned for the EJ-G7, resulting in an integrated approach. The resulting analysis is therefore conservative in resilience value relative to a circuit with less comprehensive corresponding hardening.

Q19. What are the results of that benefit-cost analysis?

A19. Based on our proven residential storage programs, this pilot investment is also forecasted to result in a positive NPV over its lifetime under reasonable mid-range model assumptions, while delivering resiliency now to participating customers and other storm response savings. CEG's analysis arrived at a total benefit-cost ratio ("BCR") of 1.11, including $161k of direct resilience benefit for customers, and the modeled benefits remain positive even without these resilience benefits, at a BCR of 1.09. Therefore, from a rate perspective, this proposal is net-positive for non-participating customers over its lifetime, with power supply benefits accruing as soon as the systems are energized. As described by Mr. Eiden, the valuation of resilience under current industry methods, including the ICE 2.0 calculator, assigns a moderate value to the residential customers expected in Zone 4. This high-level analysis does not take into account all the specific circumstances of Zone 4—which represent the most remote and impacted areas of our service area in Southeast Vermont where we are focused. Customers in Zone 4 are more likely to also face dangerous tree covered roads during storms and are far from emergency or repair services, making a loss of heat, well pumps, or durable medical equipment function, among other storm impacts, much more significant for these customers.

Because these systems are expected to be net-positive investments even without accounting for the resilience value and because this limited pilot is focused on learning and data gathering, this approach is appropriate for this phase of work.

Q20. What does GMP hope to learn from this pilot filing?

A20. As I noted above, GMP will soon have built out a resilient distribution system across Zones 1-3 of the East Jamaica EJ-G7 and the Wilmington 56G1 circuits and is moving towards more targeted investments on the next ten circuits that are most impacted during storms. With this pilot filing, the EJ-G7 circuit will have resilience work completed across all four zones, as proposed in the ZOI filing. Its performance during storms and other challenges will be comparable to the 56G1, with a similar level of T&D investment, and also to the targeted work planned in this Proposed Plan. A fully hardened EJ-G7 will provide an opportunity for further understanding and comparison during storm response to evaluate how T&D and storage deployment together allow for restoration improvements and savings in comparison to similar circuits with different treatments. This will advance our evaluation of how this resource can contribute to a more integrated, two-way grid that supports customers in more remote portions of our system. We also intend to focus on direct customer outreach and service, with customer uptake being critical for success. This will include meetings, door-to-door conversations, phone calls, emails, and other targeted outreach and education. Customers will be provided with direct cell phone numbers of GMP team members who will always be available to help answer any questions. Here, we expect to improve upon the Grafton Resiliency Zone Pilot and use this pilot to advance our ability to deploy storage for resiliency going forward as may be proposed in the future.

Q21. When can we expect these storage filings to be made?

A21. We anticipate filing the renewal of the ESS Tariff by the end of January and a notice of the Integrated Energy Storage Pilot by middle of February.

Q22. Have you made any changes to the Proposed Plan related to these storage investments?

A22. Yes, we made a small modification to the Customer Driven Storage provision of the Proposed Plan (Section IV.A.1.v) to include innovative pilot programs under that provision. The section is otherwise unchanged. This change provides upfront flexibility on the form our next storage program may take when we re-evaluate the ESS tariff and any resiliency investments in two years. As before, this provision does not impact the storage investments included in this filing, which are part of our base capital investment, and whether a tariff or pilot approach is used, if at all, for future storage programs. Commission approval is required before any additional cost-of-service impacts are included in rates through the process described in the Proposed Plan.

III. Owned Generation – Rate Year Power Production

Q23. Please describe projected energy output for GMP-owned generation for the Rate Year.

A23. GMP's owned and jointly-owned generation for the Rate Year is projected to produce approximately 836,000 MWh of energy, as shown on **Exhibit GMP-JC-7**. This includes projected output from the following categories of projects:

- Wind (including Kingdom Community Wind and Searsburg Wind)

- Hydro
- Solar
- Other wholly owned generation projects
- Jointly Owned Generation Projects

Wind Projects

The Kingdom Community Wind project ("KCW"), located in Vermont's Northeast Kingdom, is a 64.5-MW power plant consisting of 21 VESTAS V112 turbines rated at 3.075 MW each. GMP resells approximately 12.7% of the total site output to Vermont Electric Cooperative ("VEC"), resulting in a net GMP forecasted output for the Rate Year of approximately 160,000 MWh.

The first utility-scale wind facility installed in the Northeast, our Searsburg wind facility has operated for almost 30 years and consists of 11 550-kW turbines, with a total nameplate capacity of 6.05 MW, and an operational maximum capacity set by ISO-NE of 4.99 MW. While Searsburg has operated reliably, it is beyond its anticipated 25-year service life. As I described in my opening Proposed Plan testimony, we are analyzing repowering the site with three larger more efficient turbines that qualify as a RES Tier IV resource, which would include a Section 248 petition. While this analysis is underway, the existing site is expected to still be operational in the Rate Year with a projected output based on historical production of approximately 10,300 MWh.

The projected output of GMP's wind projects for the Rate Year, net of resale to VEC, is 170,300 MWh.

Hydro Projects

GMP owns and operates 41 hydroelectric stations with a total capacity of 119 MWs. The plant sizes range from the 200-kW Pierce Mills station to the 10.60-MW Proctor station. As described by GMP witness Maria Fischer, we have reviewed the long-term 20-year historical production data, unit availability, planned system outages, upcoming enhancement projects, and operational changes required by Federal Energy Regulatory Commission ("FERC") relicensing or Vermont Agency of Natural Resources ("ANR") Water Quality Certifications to forecast the monthly and annual production for our hydro facilities. Based on this data, our forecast for hydro production is 388,324 MWh in the Rate Year.

Solar Projects

GMP owns and operates several distributed solar projects in Vermont. These range from small projects located on GMP facilities to 5-MW solar projects in various locations, some of which were originally part of a joint-venture structure and became GMP's wholly owned resources. Our wholly owned solar resources are forecasted to produce 61,000 MWh in the Rate Year.

Other Wholly Owned Generation

In addition to the wind, hydro, solar, and storage facilities discussed above, GMP owns a fleet of four thermal peaker plants. These are the Gorge Gas Turbine, Essex Diesels, Berlin Gas Turbine, and the Ascutney Gas Turbine. GMP has retired two thermal peaker plants, Vergennes Diesels and Rutland Gas Turbine, during the previous plan period. Currently, these peaking plants are not often used and typically operate at an

annual capacity factor of less than 1%, with their primary value derived in the capacity and ancillary markets including the new DASI market. Based on a six-year average of production from these facilities, updated to account for retirements and recent plant upgrades, we forecast approximately 1,900MWh will be produced by our thermal peaker facilities in the Rate Year.

Jointly Owned Generation Projects

Lastly, GMP is a joint owner in four other power generation facilities that we do not manage:

1. The 50-MW McNeil Biomass Plant, located in Burlington and managed by Burlington Electric Department, in which GMP has a 31% ownership stake;
2. The Stony Brook Combined Cycle plant, located in Stonybrook, Massachusetts, in which GMP has an 8.80% ownership share;
3. The Wyman 4 oil-fired facility in Yarmouth, Maine, in which GMP has a 2.92% ownership share; and
4. The Millstone 3 Nuclear facility, located in Waterford, Connecticut, in which GMP has a 1.73% ownership stake.

Based on historical production from these facilities, we forecast our shares to include 213,892 MWh in the Rate Year.

Summary

Based on the above, GMP forecasts overall production from our wholly owned units to be 621,721 MWh in the Rate Year, and 213,892 MWh from jointly owned facilities, for a total production of 835,613 MWh. See **Exh. GMP-JC-7.** This

information is used by Ms. Fischer in developing GMP's Rate Year power costs as discussed in her testimony.

IV. Generation O&M Expense

Q24. Please describe the Rate Year O&M expense for GMP-owned generation.

A24. The generation O&M budget covers all ongoing necessary upkeep and repairs for GMP's 55 wholly owned generation plants including wind, hydro, solar, and thermal. This includes the payroll costs for the generation team employees, all outside consultants, FERC licensing costs, permitting and compliance, safety requirements, and smaller items that are not part of a capital project used at the various generation stations. The GMP generation team is always focused on keeping our fleet of power generation infrastructure operating optimally and as safely and reliably as possible at the lowest cost for our customers. This includes work to maintain all levels of compliance at our sites along with enhancements to maintain safe and reliable operations. In addition to these generation facilities, the GMP team inspects and maintains the Jay Synchronous Condenser, which supports KCW and nearly a dozen other small-scale wind and solar facilities.

GMP's power generation team employees directly conduct necessary safety, maintenance, and reliability work, unless specialized skills or equipment are needed to assist (for example, engineering, concrete and civil work, and/or heavy equipment handling). Examples of these O&M activities include raking racks that gather debris at hydro facilities, planned and unplanned repairs on various generation components, and preventative maintenance such as changing oil, filters, and lubricants. The GMP power

generation team performs as much of the work as we can, and we use outside resources only when necessary. GMP also relies on outside resources for their expertise in FERC and state environmental compliance and permitting obligations.

The generation O&M budget is based on spending in the Test Year and adjustments for known upcoming major expenditure requirements, such as large annual FERC- or PUC-required dam inspections and any potential O&M cost reductions due to improvements made in the prior year. These adjustments and the Rate Year generation O&M budget are reflected in the cost of service at **Exh. GMP-LD-RB-3, Schedule C2-c**.

Q25. What are the relevant Rate Year O&M costs for the jointly owned facilities in GMP's power portfolio and how are these costs developed?

A25. The Rate Year power costs for GMP's ownership interest in our jointly owned facilities reflect an inflation-adjusted five-year average of actual, historical non-fuel O&M annual costs. Each of our jointly owned facilities is managed by a lead participant (e.g., Burlington Electric Department, for the McNeil plant) that is responsible for leading the operation of the facility on behalf of all its owners. The lead owner tracks the expenses and revenues, along with capital expenditures, which are recovered pro-rata from the remaining joint owners. In this way, each joint owner shares in the costs and accounts for their share of O&M and capital associated with the plant on its own books. For FY27, GMP's pro-rata share based on the five-year average noted above is as follows for each facility: Millstone $4.5M, McNeil $2.5M, Stony Brook $1.3M, and Wyman $0.4M for a total of $8.7M. For comparison, the Test Year costs for these facilities totaled about $8.4M. These costs are reflected in the cost of service at **Exh. GMP-LD-RB-3,**

Schedule C2-b, and incorporated in Ms. Fischer's calculation of Rate Year power supply costs.

V. Generation Capital Expenditures

Q26. What criteria does GMP use to select capital projects relating to owned generation?

A26. Overall, GMP's power generation capital planning is focused on safe and efficient operation of our generation assets, and prioritizes projects that improve the performance of our hydro, wind, solar, thermal generation, and energy storage assets in the following categories: safety, environmental and regulatory compliance, resiliency, plant reliability and operating efficiency, and production output. The generation team's capital planning philosophy is set forth in detail in **Exh. GMP-JC-8**. As with any capital improvement that GMP makes on behalf of our customers, the generation team first evaluates what value the project provides to customers, the environment, and to the safety of our team and then balances it against other department priorities to manage and balance costs.

Q27. How are projects identified and selected to be included in the generation capital plan?

A27. The GMP generation team's 10-year forecast is updated annually to prioritize potential projects based on the philosophy and process described above. Projects involving safety and regulatory compliance are the highest priority, with plant resiliency, reliability, and production output following as the next priority. The Generation Team uses this 10-year plan to recommend individual projects in each year, working with the Capital Management Team ("CMT") to ensure alignment of priorities and available resources

between generation capital and that of other teams, as described in Mr. Hassan's testimony.

Q28. Please summarize the generation projects included in this rate filing.

A28. The project categories and projected closed-to-plant totals are summarized in **Exhibit GMP-JC-9**. This filing includes $31.85M of Rate Year capital, and $9.89M of projects that will close in the Interim Year under the Current Plan. These amounts include GMP's pro rata share of capital expense in the joint owned facilities, which is determined by the principle owner. More detailed information about projects in each of these categories, including project description, plant addition amounts, in-service dates, and project criteria are contained in **Exh. GMP-JC-9** and further summarized below.

Q29. Can you please identify and describe some of the major projects included in the Owned Generation category for the rate filing?

A29. Yes. Planned generation capital investments on Owned Generation for this filing include numerous projects. The larger projects included in this filing include:

<u>Turbine Runner Replacements</u>

Two significant turbine replacement projects, the Middlebury Lower Runner and the Weybridge Runner, will be completed in the Rate Year. A similar turbine replacement, the Bolton Runner Unit 2, will be completed in the Interim Year and is also included in this filing; its capital expense falls under the Current Year base capital. The turbines at each of these facilities have reached the end of their useful lives and have degraded in performance, requiring replacement. In addition to allowing for continued

operation, the replacement turbines are more modern and increase generation efficiency and are more effective across a range of flows. Each of these generating units are among the largest in our fleet, and the replacement of these runners will provide for increased production.

Somersworth Switchgear Replacement

This project will replace the end-of-life electrical switchgear equipment at the Somersworth Hydroelectric Facility, a 1.3 MW FERC-licensed dam and generation facility. This project will install a new 5kV switchgear and is required to meet modern electrical protection standards and ensure long-term safe operation and arc-flash protection for our power production workers. In addition to these important safety benefits, planned replacement of the obsolete switchgear avoids significant production losses if we deferred the work until failure. Planned replacement requires four weeks of downtime to complete while an unplanned outage would result in an estimated 40 weeks of lost production.

Q30. Can you please explain what the generation blanket is used for?

A30. The generation blanket category is established to cover miscellaneous smaller projects that arise throughout the year due to equipment failure, replacement of damaged equipment from high-water or other weather-related events, updated regulatory requirements, and safety priorities, among other factors. Typically, projects that fall within this category are relatively low cost and are completed quickly. These projects are generally needed immediately and are unplanned or unexpected. The total budget

amount is developed based on a five-year historical spending average in these categories and includes hydro, wind, solar, and thermal projects, and stands at $928,566.

VI. Renewable Energy Standard Tier III Compliance

Q31. Please identify the Rate Year expenses included in this filing for complying with Vermont's RES for Tier III.

A31. Tier III of the RES establishes annual targets of fossil-fuel reductions based on a percentage of GMP's total load expressed in MWhes. GMP's Tier III target for calendar year 2025 was 7.33% of total load. Each year, the Tier III target escalates by 0.67%. In the 2027 rate year GMP's requirement will be about 344,695 MWhe of additional fossil-fuel-equivalent reductions. Note that the Tier III requirement is on a calendar year basis, which means the GMP rate year spans two compliance periods.

Included in this rate filing is $11.125M of forecasted power supply costs related to Tier III credits retired during the Rate Year. GMP has previously stacked Tier III credits. Therefore, our Tier III compliance cost is based on the average cost of these banked credits, which is currently $32 per MWh. Credits are added to power supply costs within the year they are retired to meet the obligation. The FY27 forecast is incorporated in Ms. Fischer's testimony and calculation of overall power supply costs.

VII. Customer Service

Q32. Can you provide an overview of GMP's customer service philosophy?

A32. At GMP, customer service starts with our culture across every operational department to put customers first. In recent years we have faced the pandemic, followed by

unprecedented storm impacts, plus global, national, and local economic pressures. During each challenge, we center our focus on customers, whether it means helping connect customers with financial aid, finding operational efficiencies to save customers money, having all team members help during storm response, or smoothing impacts from regional cost pressures. We continue to apply this approach by making resiliency investments that help manage costs and deliver savings for customers now.

Our direct customer service builds on this philosophy. We have implemented new technology to expand the ways our customers interact with us, including text, emails, web self-service, a mobile app, live web chat, social media, live customer service representatives ("CSRs"), and an automated phone system. Our goal is to continuously exceed customer expectations, quickly and kindly providing information or assistance in a way that works best for them.

Q33. What measures or metrics do you use to track customers' satisfaction and how has GMP performed under those measures?

A33. We use a variety of measurements, including our performance under our service quality reporting plan, and customer satisfaction surveys that we hire an independent service provider to conduct.

We regularly report on our performance under our Service Quality & Reliability Performance, Monitoring & Reporting Plan (SQRP) as recently updated and approved on October 10, 2025, in Case No. 25-0751-PET. The SQRP, which I include as **Exh. GMP-**

JC-10,[4] was developed in conjunction with the DPS to establish and track performance standards for GMP including service quality baselines for key service measures linked to customer satisfaction. As explained by Mr. Burke in his testimony introducing the Proposed Plan, the SQRP is now incorporated directly into the Proposed Plan to serve as a measure of GMP's performance for customers under the plan. Our 2025 Annual SQRP report will be filed on January 30, 2025, and will show 92.7% customer satisfaction for CY 2025. These results are in line with historical performance and exceed the state standard of 82.5% satisfaction. GMP was also recently recognized as the top-rated midsize utility in the East region for customer service in the J.D. Power Satisfaction Survey for 2025.

In addition, as part of the MYRP, we report on a wide range of performance metrics that capture parts of the customer experience, and our pilot filings also require customer surveys that help decide how to update the pilot, tariff it, or not move forward. We plan to continue refining these metrics with the Department and Commission in this case after we file several sets of annual metrics under the Current Plan on January 30, 2026, which will help further guide that conversation.

In addition to all the conversations we have with customers on the phone, in the field, and in communities, all of these various feedback tools help us to stay close with

[4] On January 8th, 2026, the Commission issued an order in Case No. 25-0751-PET directing GMP to file a revised version of its current approved SQRP in that case. The version I provide here is that approved version of the SQRP, which GMP will also be filing in 25-0751-PET to complete the record.

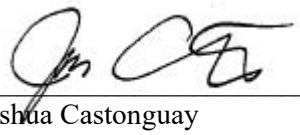
customers and are shared and reviewed regularly by the GMP team to continue to drive progress.

Q34. Does this conclude your testimony?

A34. Yes.

I, Joshua Castonguay, declare that the testimony and exhibits that I have sponsored are true and accurate to the best of my knowledge and belief and were prepared by me or under my direct supervision. I understand that if the above statement is false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

Dated at Colchester, Vermont on the 16th day of January, 2026.



Joshua Castonguay