Generation

GMP's Power Generation capital planning is focused on improving the safety, environmental and regulatory compliance, plant reliability, and operating efficiency of our hydro, wind, solar, and fuel-based generation, and battery storage assets. The capital planning strategy blends best practices with innovative technologies to optimize performance, enhance resiliency, and deliver long-term customer value. Capital projects generally fall into one or more of these categories:

Safety:

The safety of our employees and the public is central to our operations. Each year, GMP invests in projects that address potential or evolving safety risks and bring facilities into alignment with modern engineering standards. For Generation, this includes dam safety upgrades, electrical and mechanical plant modernizations, and hazard mitigation measures. FERC's heightened focus on potential failure modes at high- and significant-hazard dams continues to drive targeted investments in water control gates, conduits, and monitoring systems.

Environmental and Regulatory Compliance:

We proactively invest in facility upgrades to maintain compliance with environmental regulations, permits and FERC licensing conditions and renewals. An example of compliance-driven expenditures is GMP's Low Impact Hydro Institute (LIHI) certification on several of our hydro facilities. GMP has qualified several additional hydro plants as LIHI certified and will certify additional facilities in the future. In exchange for this certification, these facilities can qualify for additional Renewable Energy Credit ("REC") revenues, which provide an economic benefit to all GMP customers. The generating assets would not be eligible for certification without our constant focus on maintaining compliance requirements at the facilities. This includes, for example, fish passage improvements, bypass flows, and any other requirements that are borne out of State of Vermont water quality requirements, FERC requirements, and PUC/DEC rules.

In addition to LIHI certifying facilities, GMP has several facilities in the FERC relicensing process. The relicense process includes various studies that will produce data to be used in GMP's application, and ultimately direct FERC and State regulatory decisions for license conditions as well as process with stakeholders. These new license conditions will govern project operations and provide protection and mitigation measures for environmental, historical, and recreational resources for at least the next 30 years. GMP is currently in a cycle that includes multiple re-licensing of our FERC-regulated hydro facilities.

Furthermore, as owner of critical dam infrastructure, GMP is obligated to assure continued safe and reliable dam operations. FERC has focused heavily on potential failure modes

associated with earthen dams, water control gates, and conduits. Additionally, required automation, monitoring and security measures each enhance GMP's ability to safely operate the numerous dams within our fleet.

Resiliency:

We are accelerating upgrades at high/significant-hazard dams to address increased flooding risk and respond to more severe weather. Project selection is informed by updated hydrologic modeling, asset condition, and system elevation, with a focus on hardening electrical systems, improving remote operation capability, and ensuring continuity during extreme events.

Hydropower generation facility upgrades will be selected to improve GMP's management of high/significant hazard dams, high-water events, and catastrophic event emergency operating protocols.

Plant Reliability/Operating Efficiency:

To minimize unplanned outages and maintain cost-effective clean energy production, we invest in strategic component replacements and system upgrades—such as bearings, governors, control systems, and spillway infrastructure. Many of these assets, particularly hydro, are among our most durable and lowest-cost supply resources, but require ongoing modernization to sustain performance and flexibility.

Production Output:

Where feasible, the team identifies opportunities to increase power production at existing generation facilities. In the case of hydro, this can mean higher-efficiency runners, automated pond level controls, or complete turbine/generator replacements. In addition, these projects may include improving the required responsiveness of generation units to ISO New England operating commands such as improved SCADA controls and electrical upgrades for automating the power production facilities.