Q.DPS.GMP.3-6: With respect to GMP Witness Lieberman's conclusion that GMP's proposed 9.94% ROE is supported by GMP's business and regulatory risk profile, please identify all:

a. credit rating agency reports;

b. investor presentations;

c. bond offering materials;

d. analyst reports;

e. third-party assessments; and

f. other documents relied upon in concluding that GMP's risk profile warrants an ROE of 9.94% rather than the 8.91% ROE recommended by DPS witness Zamora. For each document identified, provide the specific portions supporting GMP's conclusion regarding its relative business and regulatory risk.

A.DPS.GMP.3-6:

a. credit rating agency reports; Please see Attachments DPS.GMP.3-6.a.1 and 3-6.a.2 , highlighted portions, which indicate that GMP's small customer base, limited geographic and regulatory diversity, and its Vermont service territory, which exposes it to extreme winter weather events that could damage infrastructure, are considered key risks. Overall, S&P rates GMP as being in the lower half of range relative to its peers for business risk. Further, S&P considers that GMP has significant financial risk.

b. investor presentations; n/a, GMP does not have investors other than its parent.

c. bond offering materials; GMP completed a first mortgage bond issuance on December 3, 2025. Such issuances are guaranteed by the assets of the Company with the Vermont PUC's authorization. The issuance relied on S&P ratings similar to those referenced in A.DPS.GMP.3-6a, above, for an indication of credit risk. As stated in the Commission's Order Consenting to the Issuance of First Mortgage Bonds, attached at Attachment DPS.GMP.3-6c, the "bond issuance was necessary to support GMP's overall financial position and access to capital markets. Without the bond issuance, GMP's short-term liquidity would be limited and would be at risk from unforeseen events such as large storms. GMP must also maintain adequate liquidity levels to protect customers from unforeseen changes in the markets or load."

d. analyst reports; n/a, GMP does not have investors other than its parent.

e. third-party assessments; Kroll (formerly Duff and Phelps) provides an assessment of the incremental return on equity that investors demand for taking on the higher risk of owning smaller, less diversified businesses compared to larger, publicly traded peers. According to the Kroll size deciles, GMP should receive an ROE size premium of 78 basis points relative to its proxy group peers' ROE result. Please see size premium calculation at Attachment DPS.GMP.3-6.e.

f. Other documents; Please reference Attachment DPS.GMP.1-202 which provides GMP's actual earnings history under its previous MYRP. This is probably the best indication of GMP's business risk profile and why it is necessary to allow a just and reasonable ROE that meets each of the three requirements of the fair return standard, i.e., i) capital attraction, ii) financial integrity, and iii) comparable to returns of other like risk companies. As the data shows, even after its earnings sharing mechanism, GMP has underearned its allowed ROE in four out of the last five years and its under earnings have grown substantially over the last three years.

Person/s Responsible for Response: Julie Lieberman
Title of Person/s: Managing Consultant, Atrium Economics, LLC
Date: June 10, 2026

SIZE PREMIUM ANALYSIS

Breakdown of Deciles 1-10	[1] Market Capitalization of Smallest Company ($ millions)	[1] Market Capitalization of Largest Company ($ millions)	[1] Size Premium
1-Largest	53,677	4,542,663	0.01%
2	20,548	53,648	0.27%
3	10,748	20,494	0.40%
4	6,449	10,708	0.37%
5	4,237	6,443	0.65%
6	2,522	4,232	0.88%
7	1,472	2,518	1.05%
8	783	1,472	0.77%
9	351	782	1.68%
10-Smallest	4	351	4.37%
Green Mountain Power - Implied Market Capitalization [2]		2,430	1.05%
Proxy Group Average Market Capitalization [2]		46,610	0.27%
Size Premium [3]			0.78%

Notes:
[1] Kroll 2025 Cost of Capital Navigator - Size Premium: Annual Data as of 12/31/2025
[2] See Exhibit JFL-9 Market Cap
[3] Equals 1.05% − 0.27%

Green Mountain Power Corp.

July 22, 2024

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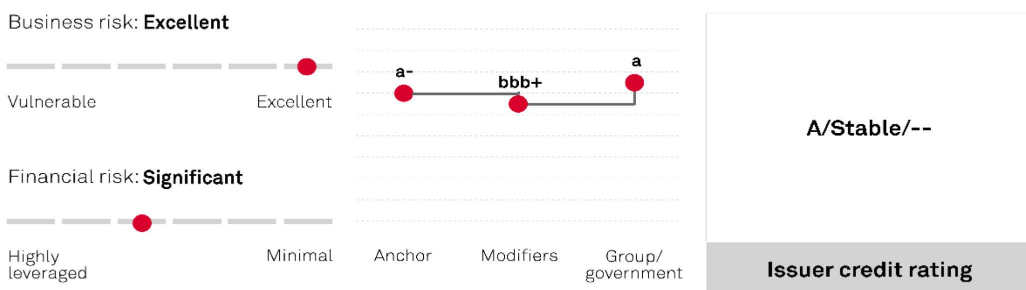
Ratings Score Snapshot



Credit Highlights

Overview

Key strengths	Key risks
Mostly low-risk electric utility operations.	Relatively small customer base and limited geographic and regulatory diversity given operation solely in Vermont.
Operates in a stable and generally supportive regulatory environment that allows for multiyear rate plans (MYRPs).	Service territory exposed to extreme winter events that could damage infrastructure.
Core subsidiary of parent Energir Inc., which leads us to apply two-notches of uplift to the stand-alone credit profile (SACP).	

Green Mountain Power Corp.'s (GMP) credit quality is supported by its low-risk, regulated utility operations. GMP's operations are regulated by the Vermont Public Utilities Commission (VPUC), which we view as generally constructive. In our view, this enhanced GMP's ability to manage its regulatory risk. Rates are set through MYRPs with pre-approved capital expenditure (capex) plans. MYRPs enhance GMP's cash flow predictability and reduce the risks of regulatory lag and material disallowances. Although the company is exposed to severe winter storms and higher costs in Vermont, the company reduces this risk through a storm reserve and the ability to defer excess costs for future recovery. GMP's unconsolidated transmission electric utility investment in Vermont, Vermont Transco (about 77% ownership), is regulated by the Federal Energy Regulatory Commission, which we view as credit supportive because of forward-looking rates and annual true-ups to recover prudently incurred costs.

That said, GMP's business profile is partially constrained by its midsize base of about 266,000 customers and geographic concentration in Vermont. In addition, it has an elevated concentration of high-consumption commercial and industrial customers (greater than 50% of its revenues), which could lead to some cash flow volatility. Overall, we consider GMP's business risk as being in the lower half of our range for the excellent business risk category relative to those of its peers.

We continue to monitor GMP's zero outage filing. In October 2023, the company filed an "unexpected or strategic capital exception" to its MYRP, requesting $280 million in capex over 2025 and 2026, to underground and storm hardening lines. GMP is proposing to defer the costs associated with the zero-outage plan, with projects in place to be included in the next base-rate proceeding. We expect a decision on the company's zero-outage plan during 2024. We also expect that GMP will seek additional resilience plans from the VPUC beyond 2026.

GMP filed for a fiscal-year 2025 rate increase under its current MYRP. The company is currently operating under an MYRP effective from Oct. 1, 2022, until Sept. 30, 2026, that governs its rates. In June 2024, GMP requested an increase about $38 million (about 5.3%) in its base rates reflecting a formulaic return on equity adjustment (9.97% for 2025 compared to 9.58% for 2024), inflationary adjustments for its operations and maintenance (O&M), and accumulated deferred taxes adjustments. The filing builds on the updated forecasts the company filed in 2023 for its cost of service in fiscal years 2025 and 2026 (ending September) that established a projected, smoothed, annual base rate for the MYRP.

We expect stable financial measures. We expect GMP's annual rate increases and the dividends it receives from Vermont Transco will support its financial measures. We also expect that, if its zero outage plan is approved, the company capex would increase by about $550 million in 2024-2026 relative to our previous base-case assumption of about $350 million. This robust level of capex would cause GMP to generate negative discretionary cash flow. We expect that the company will use operating cash flow to fund about 40%-60% of its needs and that deficits will be funded by debt and equity contributions. Overall, we expect GMP's financial measures will be in the middle of our expected range for the significant financial risk profile category. Specifically, we expect its funds from operations (FFO) to debt will be in the 15%-17% range through 2026.

Our rating on GMP's rating benefits from that of parent Energir Inc. (Energir). We rate the company two notches higher than our SACP to reflect Energir's strong credit quality. We view GMP as a core subsidiary of its parent because it is highly integrated in Energir's main line of business and has a track record of receiving financial support.

Outlook

The stable outlook on GMP reflects our outlook on Energir. The stable outlook on Energir reflects our expectation that it will consistently maintain consolidated FFO to debt of greater than 14%. The outlook also reflects our expectation that Energir will continue to primarily focus on growing its regulated businesses without experiencing any material adverse regulatory decisions. Under our base case, we assume GMP's stand-alone FFO to debt will be in the 15%-17% range through 2026.

Downside scenario

We could downgrade GMP over the next 24 months if we downgrade Energir or no longer assess GMP as a core subsidiary of its parent. We could lower our rating on Energir over the next 24 months if its consolidated FFO to debt consistently weakens below 14%. This could occur if the company experiences a material adverse regulatory decision, undertakes a material debt-financed acquisition, faces significant operating challenges, or its business risk increases substantially.

Upside scenario

We could raise our rating on GMP over the next 24 months if we upgrade Energir. This could occur if Energir's consolidated FFO to debt consistently improves above 20% absent an increase in its business risk.

Company Description

GMP operates as an electric utility that purchases, generates, transmits, distributes, and sells electricity and utility construction services in Vermont to about 266,000 customers. GMP is a subsidiary of Northern New England Power Corp., which is a subsidiary of Energir Inc.

Group Influence

We view GMP as a core subsidiary of its parent Energir. This assessment reflects our view that it is highly unlikely to be sold; is important to the group's long-term strategy of owning and operating gas and electricity distribution, electricity transmission, and renewable energy generation in Vermont; constitutes a significant proportion (about 30% EBITDA) of Energir's EBITDA; is fully integrated with the parent; and has a strong, long-term commitment of support from the group. In addition, Energir has supported GMP's financial stability since acquiring it in 2007 through equity injections and dividend limitations, contributing to maintaining its capital structure while enabling it to invest in growth opportunities.

Issue Ratings--Recovery Analysis

Key analytical factors

- GMP's first-mortgage bonds benefit from a first-priority lien on substantially all of the utility's real property owned or subsequently acquired. Collateral coverage of greater than 1.5x supports a recovery rating of '1+' and an issue-level rating of 'A+', which is one notch above the issuer credit rating.

Rating Component Scores	
Foreign currency issuer credit rating	**A/Stable/--**
Local currency issuer credit rating	**A/Stable/--**
Business risk	**Excellent**
Country risk	Very Low
Industry risk	Very Low
Competitive position	Strong
Financial risk	**Significant**
Cash flow/leverage	Significant
Anchor	**a-**
Diversification/portfolio effect	Neutral (no impact)
Capital structure	Neutral (no impact)
Financial policy	Neutral (no impact)
Liquidity	Adequate (no impact)
Management and governance	Neutral (no impact)
Comparable rating analysis	Negative (-1 notch)
Stand-alone credit profile	**bbb+**

Related Criteria

- Criteria | Corporates | General: Corporate Methodology, Jan. 7, 2024
- General Criteria: Methodology: Management And Governance Credit Factors For Corporate Entities, Jan. 7, 2024
- General Criteria: Group Rating Methodology, July 1, 2019
- Criteria | Corporates | General: Corporate Methodology: Ratios And Adjustments, April 1, 2019
- General Criteria: Methodology For Linking Long-Term And Short-Term Ratings, April 7, 2017
- Criteria | Corporates | General: Methodology And Assumptions: Liquidity Descriptors For Global Corporate Issuers, Dec. 16, 2014
- General Criteria: Country Risk Assessment Methodology And Assumptions, Nov. 19, 2013
- General Criteria: Methodology: Industry Risk, Nov. 19, 2013
- Criteria | Corporates | Utilities: Key Credit Factors For The Regulated Utilities Industry, Nov. 19, 2013
- Criteria | Corporates | Utilities: Collateral Coverage And Issue Notching Rules For '1+' And '1' Recovery Ratings On Senior Bonds Secured By Utility Real Property, Feb. 14, 2013
- General Criteria: Principles Of Credit Ratings, Feb. 16, 2011

Ratings Detail (as of July 22, 2024)*	
Green Mountain Power Corp.	
Issuer Credit Rating	A/Stable/--
Issuer Credit Ratings History	

Ratings Detail (as of July 22, 2024)*	
18-Aug-2021	A/Stable/--
08-Dec-2015	A-/Stable/--
02-Dec-2014	BBB+/Positive/--
Related Entities	
Energir Inc.	
Issuer Credit Rating	A/Stable/--
Energir L.P.	
Issuer Credit Rating	A/Stable/--
Commercial Paper	
Local Currency	A-1
Canada National Scale Commercial Paper	A-1(MID)
Northern New England Energy Corporation	
Issuer Credit Rating	A/Stable/--
Senior Unsecured	A-

*Unless otherwise noted, all ratings in this report are global scale ratings. S&P Global Ratings credit ratings on the global scale are comparable across countries. S&P Global Ratings credit ratings on a national scale are relative to obligors or obligations within that specific country. Issue and debt ratings could include debt guaranteed by another entity, and rated debt that an entity guarantees.

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