

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Petition of Green Mountain Power Corporation for	)	
approval of its new Multi-Year Regulation Plan	)	Case No. 25-1955-PET
pursuant to 30 V.S.A. Sections 108, 209, 218, and	)	
218d		

Tariff filing of Green Mountain Power	)	
Corporation for a 7.5% rate increase effective	)	Case No. 26-0096-TF
with bills rendered on or after October 1, 2026	)	

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

May 27, 2026

Summary of Testimony

1 Mr. Castonguay responds to the Department’s recommendations regarding Customer-Driven
2 Energy Storage investments proposed in the FY27 Rate Year. He also reports on GMP’s follow-
3 up on customer public comments and provides an update on GMP and the Department’s work to
4 identify refinements to the performance metrics to be reported under the Proposed Plan.

5

6

Exhibit List

Exhibit GMP-JC-11 Revised MYRP Attachment 7 (redline)

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

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. Have you previously submitted testimony in this proceeding?**

5 A2. Yes, I previously provided prefiled direct testimony in this proceeding on January 16,
6 2026 along with supplemental testimony filed in the corresponding Multi-Year
7 Regulation Plan (“MYRP” or “Proposed Plan”) Case No. 25-1955-PET. I also submitted
8 direct and rebuttal prefiled testimony in the MYRP case.

9 **Q3. How is your rebuttal testimony organized?**

10 A3. My testimony begins by addressing the Department’s recommendations on GMP’s
11 Customer Driven Storage investments in FY27. I then discuss GMP’s response to
12 customer comments filed in this proceeding and report on our efforts, working with the
13 Department, to refine and streamline our existing MYRP performance metrics.

14 **Q4. Please summarize your rebuttal testimony on Customer Driven Storage.**

15 A4. First, I want to acknowledge the Department’s continued support for our successful
16 Energy Storage System (“ESS”) tariff program. Consistent with the DPS’s comments on
17 the related ESS tariff renewal filing in Case No. 26-0476-TF, Mr. Poor recommends that
18 the proposed base capital investments associated with the ESS be approved subject to a
19 performance guarantee mechanism being established in the Proposed Plan. I proposed

1 such a mechanism in my MYRP rebuttal testimony,¹ in which I described in detail why a
2 direct measure of monthly peak shaving performance is the most accurate and
3 straightforward way to implement an interim guarantee for the term of the Proposed Plan.
4 The Commission has since opened an investigation into the proposed ESS tariff extension
5 “to allow the Commission to consider whether there should be any changes to the ESS
6 and BYOD tariffs as a result of performance metrics or any other issues arising from the
7 Proposed MYRP and FY27 Rate Case proceedings.” Case No. 26-0476-TF, April 27,
8 2026, Order Opening Investigation at 2. Should the Commission determine such
9 guarantee is necessary for the ESS Program, the mechanism proposed in my MYRP
10 rebuttal testimony is the correct starting point and notably results in a guarantee accruing
11 to customers for any RNS performance below the forecasted average—even when the
12 program still provides an overall net benefit.

13 Second, the Department recommends removal of approximately \$7.22M of base
14 capital in FY27 associated with the Integrated Energy Storage (IES) pilot. While we
15 disagree with the Department’s rationale for excluding this important work that is
16 expected to create value for all customers and improve resilience, all while exploring new
17 technology, we nonetheless agree to withdraw this capital investment for the FY27 rate
18 year while we continue to refine the pilot proposal. Consequently, base capital levels will
19 be reduced by \$7.22M and the IES will be removed from rate base. Laura Doane and Rob
20 Bingel have reflected the associated changes in their revised cost of service (**Exh. GMP-**
21 **LD-RB-3 (Rev.)**).

¹ See prefiled rebuttal testimony of Josh Castonguay, filed April 15, 2026, at 6-7.

1 **Q5. Can you explain your plans for the IES Pilot and why GMP is removing it from the**
2 **FY27 Cost of Service?**

3 A5. Yes. Like all our pilot programs, our goal for the IES pilot is a structure that provides the
4 best learning opportunity and incorporates the latest technology. As I described in my
5 MYRP rebuttal testimony, we have been reassessing this proposal with these goals in
6 mind and particularly with an eye toward using this pilot program to provide broader
7 insights on how storage may look and function on the grid in the future. For example, I
8 noted that the pilot would be structured to provide data on the potential for storage and
9 metering integration, among other parallel pilot goals. This remains an emerging area of
10 technological development, and as such we are focused on designing a pilot that is
11 responsive to our current innovation needs. While we determine the best approach to the
12 pilot, we have removed the capital investment from base rates. Any future investment not
13 otherwise in base capital would be reviewed under the Customer Driven Storage
14 provision of the Proposed Plan or within the New Initiatives budget.

15 **Q6. Has GMP reviewed the public comments submitted to the PUC?**

16 A6. Yes, customers are the reason we do the work we do, and we listen to all feedback. As in
17 all rate proceedings, we read all the public comments and reach out to customers to hear
18 their concerns, provide additional information, and answer questions. We have reached
19 out to all commenters in this proceeding that we could identify as a customer. Dozens of
20 customers expressed broader affordability concerns as summarized by Ms. Flint's
21 testimony, reflecting economic pressures across sectors in Vermont. Many customers
22 expressed gratitude for the direct outreach and conversation, while also talking about

1 their broader anxiety over the local and national economies, property taxes where they
2 live, their healthcare, food, and fuel costs, as well as their utilities. During the
3 conversations, we also provide information about our Energy Assistance Program
4 (“EAP”) and, if interested, share the application and details about enrolling through the
5 Department for Children and Families (“DCF”) which conducts the income verification
6 process and notifies our team of any newly eligible customers who are enrolled
7 automatically. In addition, when appropriate in response to comments, we shared
8 accurate information about net metering to try to help correct misconceptions, as there
9 were several net metering comments.

10 **Q7. Is GMP proposing any additional measures in response to customer comments on**
11 **affordability?**

12 A7. Yes. As described by Mr. Burke’s direct and rebuttal testimony, this rate filing reflects
13 proactive efforts across all GMP teams to ensure we are doing all we can to hold rates
14 low in the short and long term. This has resulted in some of the lowest residential rates in
15 the region and much greater rate stability than our New England peers. The EAP is a
16 critical backstop to this work and we have partnered with DCF to enroll as many eligible
17 customers as possible. We believe these efforts are worth tracking as a measure of our
18 performance and overall success for customers under the MYRP. To that end I am
19 proposing as an additional MYRP performance metric to be considered in the
20 Commission’s review of the Proposed Plan in Case No. 25-1955-PET, that would track
21 EAP enrollment against the total pool of EAP-eligible households based on DCF data.
22 We are currently discussing with DCF how they would calculate the potential pool of

1 eligible households based on existing data and reports to simplify the annual calculation.

2 Once finalized, this proposed metric reconfirms our focus on this important program and
3 provides information on EAP enrollment for the Commission and Department.

4 **Q8. Your prior testimony indicated that other revisions were being considered to the**
5 **performance metrics in the Proposed Plan, and that GMP and the Department met**
6 **to discuss these metrics. Do you have an update for the Commission on any**
7 **refinements?**

8 A8. Yes. GMP has prepared draft updates to the Proposed Plan's Innovation, Reliability, and
9 Performance Metrics (Attachment 7 to Exh. GMP-LD-RB-1 (Rev. 2)). These updates are
10 informed by our discussion with the Department and have been shared with DPS for
11 further feedback but remain subject to discussion. We are including them now, expecting
12 further input from the Department, so that the Commission staff can review proposed
13 changes as the proceeding progresses. **Exhibit GMP-JC-11** is a redlined version of
14 Attachment 7 to the Proposed Plan.

15 **Q9. Can you summarize the changes proposed to the performance metrics?**

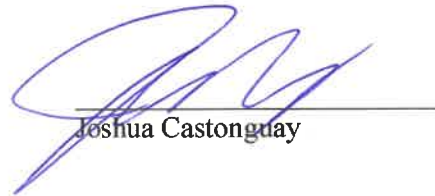
16 A9. Yes. Across the board, these changes were made to modernize these metrics for several
17 reasons, including program maturity, technological changes, and primarily to streamline
18 or improve metrics where a better alternative is or can be reported on. We worked to
19 incorporate Department feedback, applying the context of previous report data, to prepare
20 this new proposed set of metrics that are more current and more directly informative to
21 the Commission, Department, and our teams. A summary rationale for each change is
22 provided in the attached **Exh. GMP-JC-11**.

1 **Q10. Does that conclude your testimony at this time?**

2 A10. Yes, it does.

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, VT on the 27th day of May, 2026.



Joshua Castonguay