

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 20-2570-PET

Petition of Green Mountain Power Corporation, under 10 V.S.A. Chapter 43 and pursuant to the March 27, 2020 Order in Case No. 18-2549-PET, for approval of improvements to the Emergency Spillway at the Marshfield #6 Dam in Cabot, Vermont, part of the Molly's Falls Hydroelectric Facility	
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Order entered: 03/23/2021

**FINAL ORDER GRANTING 10 V.S.A. CHAPTER 43 AUTHORIZATION FOR IMPROVEMENTS AT
THE MOLLY'S FALLS HYDROELECTRIC FACILITY**

In this Order, the Vermont Public Utility Commission adopts the following proposal for decision.

PROPOSAL FOR DECISION

I. INTRODUCTION

This case involves a petition filed with the Vermont Public Utility Commission ("Commission") by Green Mountain Power Corporation ("GMP") for approval of improvements to the emergency spillway at the Marshfield #6 Dam in Cabot, Vermont ("Molly's Falls Dam") under Chapter 43 of Title 10 of the Vermont Statutes Annotated. Based on the findings below, I recommend that the Commission conclude that GMP's proposed modification of the emergency spillway at the Molly's Falls Dam will serve the public good and approve the proposed changes.

II. PROCEDURAL HISTORY

On March 27, 2020, the Commission issued an order in Case No. 18-2549-PET granting GMP's request for authorization to upgrade the service spillway and install a bypass flow pipe at the Molly's Falls Dam (the "18-2549-PET Final Order"). The Commission did not grant GMP's request to upgrade the emergency spillway, but instead required GMP to file a new petition for the emergency spillway upgrades after GMP had prepared a final design plan.

On September 9, 2020, GMP filed its petition for approval of improvements to the emergency spillway at the Molly's Falls Dam.

On October 15, 2020, I held a prehearing conference via videoconference and adopted GMP's proposed schedule.

On October 23, 2020, the Commission provided notice of this Petition to the selectboards of the towns of Marshfield, Cabot, and Peacham.

On December 1, 2020, the Commission retained GZA GeoEnvironmental, Inc. ("GZA") as a dam safety consultant on the issues raised in GMP's petition.

On December 28, 2020, GMP filed a memorandum of understanding between GMP and the Vermont Agency of Natural Resources ("ANR") (the "2020 ANR MOU") and supplemental testimony. The Vermont Department of Public Service ("Department") also filed supplemental testimony supporting the 2020 ANR MOU.

On January 7, 2021, ANR filed the Commissioner of Fish and Wildlife Certification under 10 V.S.A. § 1084.

On January 12, 2021, I issued a memorandum requesting responses to comments and questions submitted by GZA.

On January 21, 2021, GMP filed responsive documents to GZA's comments and questions.

On January 29, 2021, GZA submitted its Emergency Spillway Review Report to the Commission, and I provided it to the parties on February 2, 2021.

On February 5, 2021, I held a remote evidentiary hearing via the online software application GoToMeeting. At the hearing, I admitted the testimony and exhibits contained in a jointly filed exhibit list as Commission Exhibit 1.

On February 19, 2021, GMP submitted a proposed final order. On the same date, the Department submitted comments stating that it did not oppose the findings and conclusions in GMP's proposed order.

III. LEGAL STANDARD

Section 1082 of Title 10 of the Vermont Statutes Annotated requires State authorization to "construct, enlarge, raise, lower, remodel, reconstruct, or otherwise alter any nonfederal dam,

pond, or impoundment or other structure that is or will be capable of impounding more than 500,000 cubic feet of water.”

Pursuant to 10 V.S.A. § 1086, when considering a request to modify a dam under the Commission’s jurisdiction, the Commission must determine whether the proposed modification will serve the public good giving due consideration to 13 factors, including:

- (1) the quantity, kind, and extent of cultivated agricultural land that may be rendered unfit for use by or enhanced by the project, including both the immediate and long-range agricultural land use impacts;
- (2) scenic and recreational values;
- (3) fish and wildlife;
- (4) forests and forest programs;
- (6) the existing uses of the waters by the public for boating, fishing, swimming, and other recreational uses;
- (7) the creation of any hazard to navigation, fishing, swimming, or other public uses;
- (8) the need for cutting clean and removal of all timber or tree growth from all or part of the flowage area;
- (9) the creation of any public benefits;
- (10) attainment of the Vermont water quality standards;
- (11) any applicable State, regional, or municipal plans;
- (12) municipal grand lists and revenues;
- (13) public safety; and
- (14) in the case of the proposed removal of a dam that formerly related to or was incident to the generation of electric energy, but that was not subject to a memorandum of understanding dated prior to January 1, 2006 relating to its removal, the potential for and value of future power production.

If the Commission determines that a proposed project will serve the public good after considering the above factors, the Commission’s order approving the project must include “conditions for attainment of water quality standards, as determined by the Agency of Natural Resources” and any other conditions that it considers necessary to protect the public good.

IV. FINDINGS

Pursuant to 30 V.S.A. § 8(c), and based on the record and evidence before me, I present the following proposed findings of fact to the Commission.

A. Description of the Molly's Falls Hydroelectric Facility

1. The Molly's Falls Hydroelectric Facility ("Molly's Falls Facility") includes infrastructure that spans approximately 4.5 miles in multiple towns, including Cabot, Marshfield, and Peacham, Vermont. Its primary components include: the Peacham Pond Dam and gatehouse in Peacham; the Molly's Falls Dam in Cabot, which includes a gatehouse, service spillway, and emergency spillway; the penstock and surge tank; and the powerhouse and substation on the Winooski River in Marshfield. Prefiled testimony of Jason Lisai and John Greenan, GMP ("GMP Panel pf.") at 4-5; exh. GMP-Panel-2.

2. GMP installed the emergency spillway in the early 1990s to improve the discharge capacity of the Molly's Falls Dam. GMP Panel pf. at 6.

3. GMP completed improvements to the Service Spillway, including replacing the gate system, in October 2020, pursuant to the 18-2549-PET Final Order. Exh. GMP-GZA-1.

4. The Commission authorized the installation of a minimum-flow bypass structure and pipe system in Case No. 18-2549-PET, but GMP has not completed the project. GMP Panel pf. supp. at 3-4; exh. GMP-Panel-7.

5. The Emergency Spillway consists of an approximately 70-foot channel of reinforced concrete followed by an approximately 370-foot excavated earthen channel with riprap armoring placed at a downstream bend in the channel. Two sets of stoplogs approximately 10 feet high function as a gate that can be operated to release water through the emergency spillway if necessary to lower water levels in the reservoir. GMP Panel pf. at 6; exh. GMP-Panel-5.

6. The emergency spillway was built as a backup if the main service spillway is unable to convey the needed flows from the reservoir during a flood or other highwater event. The emergency spillway is not designed for routine use and has not been activated in its full capacity since it was constructed. GMP Panel pf. at 7-8.

B. Proposed Modifications to the Emergency Spillway

7. The earthen design of the emergency spillway and its steep gradient make it susceptible to erosion if exposed to high water velocities. GMP Panel pf. at 8; prefiled testimony of Adam Haskell, GMP (“Haskell pf.”) at 6-7.

8. The 2018 Safety Inspection Report for the Marshfield Dam recommended the following improvements to the emergency spillway:

- The emergency spillway should be reconfigured to mitigate the potential for head cutting and erosion of the spillway chute for flows up to and including the Probable Maximum Flood.
- The toe area of the emergency spillway should be configured to dissipate flow energy and/or be remediated to prevent undercutting/headcutting of the spillway chute.
- Security should be implemented to prevent gate opening by unauthorized personnel.
- The operation of the stanchion gates should be thoroughly reviewed for controlling sudden releases that could result in significant downstream incremental impacts.

Haskell pf. at 6-7; exh. GMP-Panel-4 at 5-6.

9. Based on the recommendations in the 2018 Safety Inspection Report, GMP proposes the following modifications to the emergency spillway (“Emergency Spillway Modifications”):

- construct a new concrete chute spillway with an underdrain system;
- remove and replace the wing walls downstream of the emergency spillway gate;
- replace existing temporary extensions to the abutment walls with reinforced concrete extensions;
- install of a cutoff wall;
- armor the existing plunge pool; and
- add security and personnel safety improvements.

Haskell pf. at 3; exh. GMP-AH-3.

10. GMP’s initial construction schedule proposed to complete work on the emergency spillway by November of 2021. Haskell pf. at 13.

11. GMP has concluded that the Emergency Spillway Modifications will require two construction seasons due to the complexity of the work. Tr. 2/5/21 at 30, 40-42 (Lisai).

12. The Emergency Spillway Modifications and the minimum-flow bypass structure and pipe system authorized in Case No. 18-2549-PET cannot be performed concurrently because the temporary construction access road to the emergency spillway will interfere with the construction of the bypass pipe. Additionally, the penstock and generating unit must be available to control water levels during the Emergency Spillway Modifications, and the bypass pipe and flow system installation will require the penstock to be dewatered. Haskell pf. supp. at 2.

13. Dividing the Emergency Spillway Modifications into two construction phases over two construction seasons will ensure the project can be completed in a safe manner consistent with the proposed design plans. Tr. 2/5/21 at 40-41 (Lisai).

14. GMP has proposed the following revised construction schedule:

- Spring 2021: mobilization and site preparation.
- Summer/Fall 2021: Installation of the penstock bypass flow system; installation of emergency spillway construction access road, spillway toe cut-off wall, and portions of plunge pool armoring.
- Spring 2022: Mobilization and site preparation for the remainder of work on the emergency spillway.
- Spring/Summer 2022: Demolition work on existing emergency spillway structure.
- Summer/Fall 2022: Installation of new concrete emergency spillway structure; completion of project and demobilization.

C. The 2020 ANR MOU

15. On December 23, 2020, GMP and ANR entered into the 2020 ANR MOU, which includes a schedule for completing certain conditions of the memorandum of understanding entered into between GMP and ANR in Case No. 18-2549-PET (the “2019 ANR MOU”). The Commission approved the 2019 ANR MOU in the 18-2549-PET Final Order. GMP Panel pf. supp. at 1; exh. GMP-Panel-7; supplemental prefled testimony of Meddie Perry (“Perry pf. supp.”) at 2.

16. Under the terms of the 2020 ANR MOU, GMP will install the bypass pipe and flow system and implement the Flow and Water Level Management and Monitoring Plan (“FWLMMP”), the Dissolved Oxygen Monitoring Plan, and the Control of Water Plan requirements of the 2019 ANR MOU in 2021. GMP Panel pf. supp. at 3; Haskell pf. supp. at 2.

17. ANR and GMP agree that, subject to the conditions contained in the 2020 ANR MOU, the Emergency Spillway Modifications will serve the public good, with due consideration given to the impact on scenic and recreational values, fish and wildlife, forests and forest programs, existing uses of the waters by the public for boating, fishing, swimming, or other public uses, the creation of public benefits, attainment of the Vermont Water Quality Standards, and applicable State, regional, or municipal plans. Exh. GMP-Panel-7 at II.

D. Engineering Review of the Proposed Modifications

18. Pursuant to 10 V.S.A. § 1087, the Commission retained GZA Environmental, Inc., to review the proposed modifications and prepare a report addressing public safety issues. Memorandum re: Notice of Intent to Retain Consultant issued 11/10/2020; GZA Emergency Spillway Review Report.

19. GZA concluded that the completion of the proposed improvements to the Emergency Spillway will improve public safety. GZA Emergency Spillway Review Report at 6.

20. GZA identified several areas for further consideration by GMP during the final design of the Emergency Spillway Modifications, including:

- Lessons learned from recent dam safety events, and reference to federal-issued Best Practices in Dam and Levee Safety Risk Analysis.
- Further consideration of the structural fill material and filter options.
- Verifying and augmenting positive seepage cutoff.
- Assessing seepage gradients during elevated water surface levels.
- Examining measures that will also disrupt direct seepage paths along the soil sides of the new training walls near the top of the chute.
- Examining the details of the underdrainage system.
- Assessing the upstream extent of the plunge pool riprap.

GZA Emergency Spillway Review Report at 4-6.

21. GZA noted that deferring the Emergency Spillway Modifications until 2022 resulted in a marginal increase in risk from a dam safety standpoint but that the annual likelihood that the emergency spillway would be activated was low. To mitigate the risk, GMP recommended that GMP develop appropriate construction-phase water control and emergency

action plans to reduce the potential for spillway activation and potential damage during construction. GZA Emergency Spillway Review Report at 6.

22. GMP has agreed to implement GZA's recommendations. Tr. 2/5/21 at 34 (Haskell).

E. Section 1086 Review of the Emergency Spillway Modifications

Effect on Cultivated Agricultural Land

[10 V.S.A. § 1086(a)(1)]

23. The proposed Emergency Spillway Modifications will not render any cultivated agricultural lands unfit for use or enhance any cultivated agricultural lands beyond the existing conditions. Perry pf. at 7.

24. No cultivated agricultural land is present on or adjacent to where the Emergency Spillway Modifications will occur. Perry pf. at 7.

Scenic and Recreational Values & Existing Uses of the Waters

[10 V.S.A. § 1086(a)(2) and (a)(6)]

25. The proposed Emergency Spillway Modifications will not affect scenic and recreational values in the surrounding area because the changes will be limited to modifications of existing infrastructure. Perry pf. at 8.

26. The Emergency Spillway Modifications will be located on the downstream side of the Molly's Falls Dam, at least 900 feet from public highways and fishing access areas, and will not be visible from boats on the reservoir or other public vantage points. Perry pf. at 8; exh. GMP-Panel-3; exh. GMP-Panel-5.

27. The Emergency Spillway Modifications will not enlarge the Molly's Falls Dam and will not change operations, water levels, or flows. Perry pf. at 8.

Fish and Wildlife

[10 V.S.A. § 1086(a)(3)]

28. The Emergency Spillway Modifications will not affect flows or water levels in any aquatic habitat, will not change the operation of the Molly's Falls Dam, and will not have any adverse effect on fish and wildlife habitats. Perry pf. at 8-9.

29. The construction activities for the Emergency Spillway Modifications will be limited to the area of the existing emergency spillway. Perry pf. at 8.

30. Pursuant to the 2020 ANR MOU, GMP will not perform site preparation or construction activity within a nearby mapped deer wintering area or its 300-foot buffer during the deer wintering period from December 15 to April 15 unless given specific prior written authorization by the Vermont Fish & Wildlife Department of ANR. Exh. GMP-Panel-7.

31. The Department of Fish and Wildlife issued a certification under 10 V.S.A. § 1084 stating that it does not anticipate adverse effects on fish or wildlife habitats from the Emergency Spillway Modifications as long as standard construction precautions are followed. The Department of Fish and Wildlife also states that it expects implementing the terms and conditions of the 2020 ANR MOU to result in “relatively rapid and measurable improvement to both stream and pond/reservoir habitats and associated animal and plant communities.” Exh. ANR-1.

32. Prior to site preparation or construction, GMP will obtain all applicable permits. Construction will be completed in accordance with all applicable permits and best management practices. Perry pf. at 12; Perry pf. supp. at 9; exh. GMP-Panel-7.

Forests and Forest Programs

[10 V.S.A. § 1086(a)(4)]

33. The Emergency Spillway Modifications will not affect forests or forest programs because the proposed work is located on an existing dam structure that is not forested. Perry pf. at 10.

Creation of Hazards to Public Uses

[10 V.S.A. § 1086(a)(7)]

34. The Emergency Spillway Modifications will not involve the placement or construction of hazards to boating, navigation, fishing, swimming, or other public uses in the vicinity of the Molly’s Falls Dam, because construction will occur on the downstream side. The Emergency Spillway Modifications will not change the operation of the Molly’s Falls Dam. Perry pf. at 12.

Need for Cutting and Removal of Timber or Tree Growth

[10 V.S.A. § 1086(a)(8)]

35. The Emergency Spillway Modifications are limited to the area of the existing emergency spillway. The only removal of tree growth associated with the Emergency Spillway

Modifications will be the routine maintenance and cutting of trees that emerge in the area of the Molly's Falls Dam, which is part of the routine vegetation management required for dam safety. Perry pf. at 12.

Public Benefits

[10 V.S.A. § 1086(a)(9)]

36. The Emergency Spillway Modifications will improve regional safety by reducing flood and erosion risks to public resources and public safety downstream. The Emergency Spillway Modifications will improve the performance, durability, and response of the Molly's Falls Dam during high-water events and will allow for the continued safe and reliable operation of the Molly's Falls Hydroelectric Facility. GMP Panel pf. at 9, 11.

37. The Department analyzed the economic benefits of upgrading the Molly's Falls Dam and concluded that the proposed modifications are prudent and beneficial because the levelized value of continued generation at the Molly's Falls Dam will exceed the levelized value of costs of operation. Prefiled testimony of Scott Wheeler, DPS ("Wheeler pf.") at 2-3.

Attainment of Vermont Water Quality Standards

[10 V.S.A. § 1086(a)(10)]

38. The Emergency Spillway Modifications will not affect the attainment of the Vermont water quality standards. Perry pf. at 12.

39. Construction related to the Emergency Spillway Modifications will be limited to the area of the existing Emergency Spillway and will be completed in accordance with all required permits and applicable best management practices. Perry pf. at 12-13.

40. The 2020 ANR MOU establishes deadlines for implementing the operational changes set forth in the 2019 ANR MOU, including the FWLMMP, the Dissolved Oxygen Monitoring Plan, and the Control of Water Plan, as well as the water management requirements for the interim period prior to full implementation of the FWLMMP, all of which are protective of water quality and aquatic habitat in the reservoirs and downstream waters. Perry pf. at 12- 13; Perry pf. supp. at 2-4; exh. GMP-Panel-7.

State, Regional, or Municipal Plans

[10 V.S.A. § 1086(a)(11)]

41. The Emergency Spillway Modifications are consistent with the applicable State and regional plans and the municipal plans from the communities in which the Molly's Falls Facility is located, including the 2016 Vermont Comprehensive Energy Plan, the 2012 Winooski River Basin Water Quality Management Plan, the 2018 Winooski River Tactical Basin Plan, the 2016 Central Vermont Regional Plan, the 2017 Cabot Town Plan, and the 2012 Cabot Local Hazard Mitigation Plan. GMP Panel pf. at 9-10; exh. GMP-Panel-6.

Municipal Grand Lists and Revenues

[10 V.S.A. § 1086(a)(12)]

42. The Emergency Spillway Modifications will not affect the municipal grand lists and revenues of the Towns of Cabot and Marshfield. The assessed value of the Molly's Falls Facility is based on annual power generation, which will not change as a result of the Emergency Spillway Modifications. GMP Panel pf. at 10.

Public Safety

[10 V.S.A. § 1086(a)(13)]

43. The Emergency Spillway Modifications will improve public safety at the Molly's Falls Dam and in the downstream communities by rehabilitating the existing emergency spillway, improving the performance, durability, and response of the Facility during flood events, and ensuring continued safe and reliable operation of the Molly's Falls Facility. GMP Panel pf. at 11; Haskell pf. at 14-15.

44. Safety improvements will be incorporated into the Emergency Spillway Modifications, including improvements to access, fall protection, site security, lighting, and signage. GMP Panel pf. at 11.

45. The emergency spillway was designed to be used for the discharge of flows exceeding a 500-year flood event, which has an annual likelihood of 0.2 percent. GZA Emergency Spillway Review Report at 6; GMP Panel pf. at 7-8.

46. The additional control over water management due to the operational and physical changes made to the Facility in 2020 will provide additional risk-mitigation capabilities during

the Emergency Spillway Modifications construction period. GMP Panel pf. at 11; GZA Emergency Spillway Review Report at 6.

47. A temporary construction emergency action plan (“TCEAP”) will be prepared and implemented prior to the start of construction. The TCEAP will meet the Federal Energy Regulatory Commission’s requirements for TCEAPs and will incorporate GMP’s current Emergency Action Plan. GMP Panel pf. at 12; Haskell pf. at 14-15.

48. A construction water management plan also will be developed for the Emergency Spillway Modifications construction period. The document will provide GMP’s plan for water and flow management during construction and provide additional procedures during construction for the contractors and GMP during a flood event. Haskell pf. at 15.

49. The pond level during construction of the Emergency Spillway Modifications will be lowered below 1223.6 feet to reduce risk to contractors from leakage and seepage in the work area and to provide GMP with more storage capacity during a high-water event to reduce the likelihood of emergency spillway activation. GMP Panel pf. at 11; Haskell pf. at 14.

Discussion

GMP originally proposed to complete the Emergency Spillway Modifications during the 2021 construction season, but now proposes to begin the emergency spillway work during the 2021 construction season and install the minimum-flow bypass structure and pipe system and complete the Emergency Spillway Modifications in 2022. GMP explains that additional time is needed because the complexity of the work was more than GMP had originally anticipated. To ensure that GMP was able to complete the Emergency Spillway Modifications as proposed, GMP divided the project into two phases.

Although extending the Emergency Spillway Modifications until 2022 also extends the current condition of the emergency spillway, GMP can mitigate any risks during high-water events by using the improved service spillway infrastructure to control water levels and by having appropriate safety plans in place. To ensure that GMP has adequate time to complete the project and to adjust for any complications that may arise without compromising quality and the safety of GMP’s workers and the public, I recommend that the Commission allow GMP to extend the schedule for completing the Emergency Spillway Modifications over a two-year period.

Potential for Future Power Production for Proposed Removal of Dam

[10 V.S.A. § 1086(a)(14)]

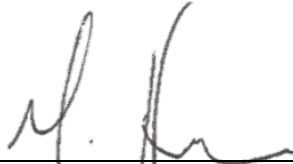
50. This criterion does not apply because the proposed modifications do not involve the removal of a dam. GMP Panel pf. at 12.

V. CONCLUSION

Based upon all of the above and provided that the conditions set forth in the 2020 ANR MOU are incorporated into any order issued by the Commission in this case, I recommend that the Commission conclude that the Emergency Spillway Modifications will not have an undue adverse effect on:

- the quantity, kind, and extent of cultivated agricultural land that may be rendered unfit for use by or enhanced by the project, including both the immediate and long-range agricultural land use impacts (10 V.S.A. § 1086(a)(1));
- scenic and recreational values (10 V.S.A. § 1086(a)(2));
- fish and wildlife (10 V.S.A. § 1086(a)(3));
- forests and forest programs (10 V.S.A. § 1086(a)(4));
- the existing uses of the waters by the public for boating, fishing, swimming, and other recreational uses (10 V.S.A. § 1086(a)(6));
- the creation of any hazard to navigation, fishing, swimming, or other public uses (10 V.S.A. § 1086(a)(7));
- the need for cutting clean and removal of all timber or tree growth from all or part of the flowage area (10 V.S.A. § 1086(a)(8));
- the creation of any public benefits (10 V.S.A. § 1086(a)(9));
- the attainment of Vermont water quality standards (10 V.S.A. § 1086(a)(10));
- any applicable state, regional or municipal plans (10 V.S.A. § 1086(a)(11));
- municipal grand lists and revenues (10 V.S.A. § 1086(a)(12)); and
- public safety (10 V.S.A. § 1086(a)(13)).

This Proposal for Decision has not been circulated to the parties pursuant to 3 V.S.A. § 811 because it is not adverse to any party.

A handwritten signature in black ink, appearing to read 'M. Howe', is positioned above a horizontal line.

Micah Howe
Hearing Officer

VI. ORDER

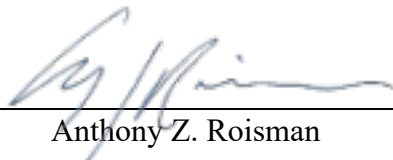
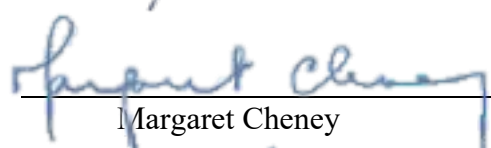
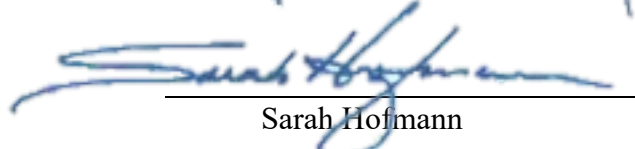
IT IS HEREBY ORDERED, ADJUDGED, AND DECREED by the Public Utility Commission (“Commission”) of the State of Vermont that:

1. The findings, conclusions, and recommendations of the hearing officer are adopted. All other findings proposed by parties, to the extent that they are inconsistent with this Order, were considered and not adopted.

2. In consideration of the criteria set forth in 10 V.S.A. § 1086 and in accordance with the plans and evidence presented in this proceeding, the proposed modifications to the emergency spillway at the Molly’s Falls hydroelectric facility in Cabot, Marshfield, and Peacham, Vermont, will serve the public good of the State of Vermont and will adequately protect the public safety, provided that Green Mountain Power Corporation (“GMP”) complies with this Order and the conditions of the memorandum of understanding between GMP and the Vermont Agency of Natural Resources (“ANR”) dated December 23, 2020.

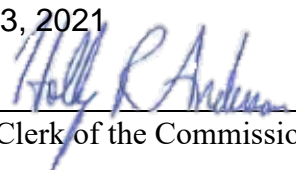
3. Site preparation, construction, operation, and maintenance of the project shall be in accordance with the plans and evidence as submitted in these proceedings. Any material deviation from these plans must be approved by the Commission.

Dated at Montpelier, Vermont, this 23rd day of March, 2021.

 _____ Anthony Z. Roisman)	PUBLIC UTILITY
)	
 _____ Margaret Cheney)	
)	COMMISSION
)	
 _____ Sarah Hofmann)	OF VERMONT
)	

OFFICE OF THE CLERK

Filed: March 23, 2021

Attest: 

Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Commission within 30 days. Appeal will not stay the effect of this Order, absent further order by this Commission or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Commission within 28 days of the date of this decision and Order.

PUC Case No. 20-2570-PET - SERVICE LIST

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