



TO: Town and Regional Planning Commissions and Town Select Boards Entitled to Notice Pursuant to Vermont Public Service Board Rule 5.402(C) and 30 V.S.A. § 248(f)

CC: Other Interested Parties (See Attachment A)

RE: The Vermont Green Line Project

DATE: June 3, 2016

Vermont Green Line Devco, LLC (VGLD)¹ is pleased to submit this pre-filing notice regarding the Vermont segment of the Vermont Green Line (VGL or the Project), a high-voltage direct-current (HVDC) electric transmission line delivering 400 megawatts (MW) of renewable energy from the New York Power Authority's (NYPA) Plattsburgh Substation in Beekmantown, New York, to New England's transmission grid via the Vermont Electric Power Company's (VELCO) New Haven Substation located in New Haven, Vermont. VGLD will file a petition for a Section 248 Certificate of Public Good (CPG) to install the VGL with the Vermont Public Service Board on or about August 18, 2016.

VGLD is distributing this notice to the municipal and regional planning commissions and municipal legislative bodies affected by the Project. VGLD is also providing a courtesy notification to other interested parties listed on Attachment A. The following attachments are included with this notice:

- A- List of Pre-Filing Notice Recipients
- B- Project Location Map and Route Maps
- C- Vermont Converter Station Layout
- D- Overview of Construction Plans
- E- Converter Station Photo Simulation
- F- Alternatives Analysis

Project Overview

The Project involves the installation, operation, and maintenance of an underwater and underground HVDC transmission line, a new converter station, and a short underground high-voltage alternating-current (HVAC) transmission line to connect the Project to the ISO New England power grid via the VELCO New Haven Substation. The HVDC transmission line will leave New York and enter Vermont under Lake Champlain near the Town of Grand Isle, Vermont and will run underwater for approximately

¹ VGLD is a development company formed for Anbaric Transmission and National Grid as part of their Green Infrastructure Alliance to deliver wind and hydroelectric energy to the New England market. More information about the Alliance is available at: <http://greenlineinfrastructurealliance.com/alliance/>.

32.5 miles to the shore of Kingsland Bay State Park (Underwater Cable Route). At Kingsland Bay State Park, the line will make landfall using horizontal directional drilling and will continue underground largely beneath or adjacent to public roadways for approximately 13.1 miles from Ferrisburgh to New Haven (HVDC Land Cable Route). In New Haven, the line will connect to a new converter station located on private property southeast of the junction of Route 7 and Route 17. The converter station will convert power delivered by the transmission line from direct current to alternating current. From there, an approximately 1,000-foot underground HVAC cable will be installed to deliver power from the converter station to the VELCO New Haven Substation where it will interconnect with the regional grid (HVAC Land Cable Route). The transmission line will consist of two solid dielectric-type cables for electric transmission that do not contain insulating oils or fluids and one fiber optic cable for the purposes of transmitting data to control and monitor the line.

Underwater Cable Route

VGLD has proposed the Underwater Cable Route based on in-water surveys to avoid sensitive benthic communities, cultural resources (e.g., ship wrecks), and significant geological and geotechnical features, such as large rock outcrops, that could interfere with construction and operation of the Project. The route avoids or mitigates potential economic, environmental, and social impacts on Lake Champlain.

HVDC Land Cable Route

VGLD has sited and designed the HVDC Land Cable Route primarily along existing public road rights-of-way (ROWS) to avoid or mitigate potential impacts to protected and sensitive resources. The HVDC Land Cable Route will traverse Kingsland Bay State Park and continue through Ferrisburgh and Waltham, terminating at the converter station site in New Haven (a distance of approximately 13.1 miles).

VGLD plans to install the HVDC underground cable approximately 3 to 5 feet below grade depending on location, using underground joint bays located approximately every 0.5-mile, where discrete segments of cable can be spliced together and buried. An underground joint bay will also be installed adjacent to the horizontal directional drilling land entry point to facilitate splicing of the underwater-to-land cable transition.

Vermont Converter Station

The Vermont converter station will be located on approximately 6 acres within a larger parcel abutting the VELCO New Haven Substation property. VGLD selected a location for the converter station close to the VELCO New Haven Substation to minimize potential land-use impacts, and designed the converter station to be efficient, reliable, and to mitigate aesthetic and sound impacts. The converter station location is shown on Sheet 31 of Attachment B.

The converter station includes three buildings and an equipment yard, all depicted in the layout provided as Attachment C. The converter building is the largest and will be approximately 235 feet by 200 feet, with the building's highest point at 55 feet above ground level (AGL). The other two buildings within the converter station fenceline are the administration building (approximately 105 feet by 45 feet) and the storage building (approximately 150 feet by 70 feet), both of which will have a height of approximately 26 feet AGL. The equipment yard, which measures approximately 380 feet by 240 feet, will accommodate the AC cable termination structures and filter equipment, switches, circuit breakers, and additional control and protection equipment.

Access to the converter station will be by way of a new paved access road to be installed off of Route 17. Entrance to the site will be secured at all times. The converter station is capable of being remotely operated and requires minimal maintenance. VGLD will install lighting meeting Dark Sky requirements

at the converter station for use at times when personnel are on site for inspections, maintenance, and repairs.

HVAC Land Cable Route

The HVAC Land Cable Route is a direct path heading southeast from the converter station to the VELCO New Haven Substation. The Project team will coordinate installation with VELCO. Horizontal directional drilling will be used to install the cable in a manner that avoid impacts to a forested area and isolated wetlands between the two facilities. The Project team will continue consulting with the Agency of Natural Resources to ensure that installation of the cable will not cause undue adverse impacts to the isolated wetlands on the site.

Materials Transport

The in-lake portion of the Project will require transport of materials via terrestrial and waterway routes. Equipment and materials transported via waterway routes will transit through ports in either New York or New Jersey for further transport through the Champlain canal system to Lake Champlain. VGLD will coordinate with the U.S. Coast Guard, the U.S. Army Corps of Engineers, and local harbor and marina masters to mitigate potential impacts to marine traffic and public use of the lake resulting from waterway deliveries.

VGLD will transport other equipment and materials to Vermont by truck, including several modular barge sections, transformers, cable drums, and installation equipment. With limited exceptions, deliveries will be scheduled at times that pose the least disruption to local communities and traffic. VGLD may schedule some deliveries during off hours to help mitigate possible traffic impacts. The Project team will coordinate the scheduling of such deliveries with local and state officials.

The Project will obtain any necessary transportation-related permits for delivery of equipment and materials associated with both the terrestrial and underwater segments of the Project.

Construction

VGLD has sited the transmission line and converter station and planned construction sequencing and construction methodologies in a manner that limits potential impacts to protected environmental, cultural and other sensitive resources and public investments while still achieving Project goals and providing benefits for the region. The implementation of water quality monitoring during in-lake activities, as well as stormwater and erosion control best management practices defined through a stormwater pollution prevention plan will minimize potential impacts to Lake Champlain, groundwater, and other water bodies to the maximum extent practicable. Construction mitigation measures, such as jet plow and direct lay cable installation methodologies in Lake Champlain, horizontal directional drilling for the landfall at Kingsland Bay State Park and under streams, wetlands, and infrastructure crossings, and traffic management will further reduce temporary construction impacts. VGLD will coordinate with the U.S. Coast Guard, the U.S. Army Corps of Engineers, and local harbor and marina masters to ensure that activities associated with underwater cable installation and horizontal directional drilling at the landfall in Ferrisburgh will not unduly interfere with public use of the lake or marine traffic. An overview of the Project's construction plan is provided in Attachment D.

Preliminary Aesthetic Impact Assessment

The Project is designed to minimize aesthetic impacts to the communities in which it is located. VGLD will install the cable underwater and underground, and has designed the most visible component of the Project, the converter station, to fit into the agricultural surroundings of the area in which it is located.

Please see the photo simulation of the converter station that is provided with Attachment E. In consultation with the Town of New Haven, VGLD will install and maintain landscaping to screen and soften views of the converter station from public vantage points and adjoining lands where necessary and feasible. VGLD will submit a complete aesthetics analysis of the Project, based on the *Quechee* analysis as applied by the Public Service Board, when it files its petition later this summer.

Sound

Sound from construction activities will be typical of large construction projects and will be temporary. During operation, the Project has voluntarily committed to meeting the World Health Organization (WHO) guidelines for nighttime community noise (2009 Night Noise Guideline for Europe) at any existing residence of 40 dBA broadband and 35 dBA for tonal sounds as defined by the American Standards Institute (ANSI). The restrictive WHO guidelines were specifically developed as a health-based limit to prevent harmful effects of nighttime noise — principally sleep disturbance — to the public. By meeting these restrictive limits, the Project will not cause undue adverse sound impacts.

Preliminary Assessments of Other Potential Project Impacts

VGLD has undertaken preliminary assessments to determine what potential impacts may result from installation and operation of the Project and to identify appropriate impact mitigation strategies. Through these preliminary assessments, VGLD has concluded that the Project will not result in any undue adverse impacts to Lake Champlain, in-lake or terrestrial transportation, water and air quality, rare or endangered plant or animal species, necessary wildlife habitat, cultural or historical resources, wetlands, shorelines, or streams. Lastly, any electromagnetic frequency (EMF) impacts associated with the operation of the Project will be minimal, with the HVDC Cable producing less than ~0.1 percent of the recognized standard for healthy human exposure to static magnetic fields. At this level EMF from the Project will not result in undue adverse impacts to public health or in-lake GPS navigation. The petition with the Public Service Board will include all technical assessments that are necessary for the Project to satisfy the Section 248(b) criteria. VGLD will secure all other state and federal permits necessary to construct the Project prior to commencing construction.

Alternatives Analysis

Alternatives to the Project and proposed route are discussed in Attachment F. The alternatives analysis provided in Attachment F includes an evaluation of alternative technologies, alternative interconnection substation locations, alternative converter station locations, and alternative transmission line land and underwater routes. The evaluation describes the comparative merits and detriments of each alternative and explains why the Project is the preferred alternative.

Project Benefits

By transmitting renewable energy to New England, the Project will provide important benefits to the region. With over 4,200 MW of the region's generating capacity recently retired or soon-to-be retired and an additional 6,000 MW 'at risk' of closing,² VGL-delivered power will provide a clean, cost-effective source of new capacity to the region. By diversifying the region's energy supply, the Project will contribute to the long-term stability of energy markets and security of supply.

² <http://www.iso-ne.com/about/regional-electricity-outlook/grid-in-transition-opportunities-and-challenges/power-plant-retirements>, accessed May 26, 2016.

The Project also provides substantial direct and indirect economic benefits to Vermont and its residents, such as jobs and associated economic activity during construction, state and local tax revenues, permit fees, and long-term lease payments for use of state highway rights of way, among others. The Town of New Haven, as host of the Project's converter station, is expected to receive over \$70 million in direct financial benefits over the Project's anticipated 40-year life, including funds for needed infrastructure improvements for first responders. The Towns of Ferrisburgh and Waltham will directly benefit from the Project by, at a minimum, receiving additional tax revenues from the portion of the HVDC transmission line that is located within their borders. A full analysis of the Project's economic benefits to Vermont will be included with the Section 248 petition that is filed with the Public Service Board.

Public Outreach

For some time, the VGL Project team has been engaging with key state and local stakeholders to discuss the Project, including municipal officials in Ferrisburgh, Waltham, and New Haven, the Addison County Regional Planning Commission, local residents and business owners, community groups, abutting property owners, and the media. As a result of this outreach process, VGLD has improved the Project plans and refined them to better address stakeholder input and local concerns. Most recently, on May 24th, 2016, residents of New Haven responded to a week-long, town-wide survey almost two-to-one (252-128) in favor of hosting the Vermont converter station in New Haven and in support of an agreement the New Haven Select Board made with VGLD. The Project team will continue to work with local, state, and regional stakeholders throughout the Vermont Public Service Board Section 248 process to ensure the Project provides benefits to Vermont while minimizing impacts to the environment.

Local and Regional Planning Commissions' Rights to Comment on Plans

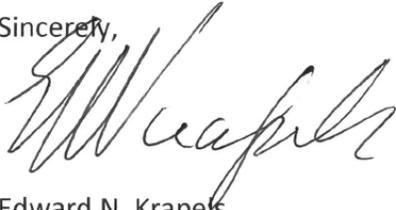
State law gives municipal and regional planning commissions the right to make recommendations about the Project to the Vermont Public Service Board at least 7 days before a Section 248 petition is filed. If significant changes to the Project plans are made during the pre-filing notice period and included in the petition filed with the Board, state law also allows the affected municipal and regional planning commissions to file revised recommendations with the Board within 45 days. Please refer to 30 V.S.A. § 248(f) and Public Service Board Rule 5.402(A) for further information on these rights. Additional information about the Section 248 process, including the right to participate as a party in the Public Service Board proceeding on the Project, is available in the "Guide to the Vermont Public Service Board's Section 248 process" that is posted on the Board's website at <http://psb.vermont.gov/> under the link "For Consumers and the Public."³ Recommendations made to the Board under Section 248(f), or the lack of such recommendations, do not preclude municipal and regional planning commissions from participating as parties and presenting evidence during technical hearings.

We greatly appreciate your attention to this matter and the time taken to consider it. VGLD looks forward to continuing the Section 248 process with input and recommendations from stakeholders to ensure that the Project fully meets the potential it holds for stakeholders in Vermont and New England. Please note that the CPG petition, as well as other pertinent information about the Project will be posted on the

³ Please note that although state law requires that this letter include information about the Board's Citizens Guide, the Guide is currently out of date and does not reflect recent legislative initiatives aimed at improving local participation in Section 248 proceedings. The Project is not responsible for the content in the Citizens Guide and therefore reliance on the information included in it is at the user's own risk.

Project website at www.vermontgreenline.com. Please do not hesitate to contact us at (781) 683-0711 for further information or with any questions you may have about the Project.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Krapels", written in a cursive style.

Edward N. Krapels
Manager Representative

Enclosures:

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- B- Project Location Map and Route Maps
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