

October 2, 2024

Holly R. Anderson  
Clerk of the Public Utility Commission  
112 State Street  
Montpelier, VT 05620-2701

Re: Advance Notice for amendments to the Addison Natural Gas Project (ANGP), Case #24-2913-AN

Dear Ms. Anderson,

The Chittenden County Regional Planning Commission (“CCRPC”) has received the above-named notice submitted by Vermont Gas Systems, Inc. (VGS). CCRPC has reviewed this project’s conformance with CCRPC’s 2018 *Chittenden County ECOS Plan* (“the Plan”), which gained a Determination of Energy Compliance from the Vermont Department of Public Service on August 9, 2018.

The scope of the proposed Certificate of Public Good (CPG) amendment is limited to correcting the 6 identified violations of the original CPG which involve modifications to the construction methods for the original project. The CCRPC will evaluate the project’s conformance with the ECOS Plan based on this narrowed scope of review. The CCRPC is concerned about potential safety issues in the pipeline, but those issues are beyond the locational considerations of our ECOS Plan goals, strategies and action.

Conformance with ECOS Goals, Strategies, and Actions

- Goal 16 of the 2018 ECOS Plan states: *Infrastructure – Ensure adequate infrastructure and facilities to support areas planned for growth while conserving resources.*
- Strategy 2, Action 4(a)(xi) states: *Support in-place upgrades of existing facilities, including renewable energy generation, storage, transmission lines, distribution lines and substation as needed to reliably serve municipalities and the region.*

Provided that the CPG violations and appeals are resolved to the satisfaction of the PUC and involved parties, the CCRPC finds the proposed CPG amendment is consistent with the goals, strategies, and actions of the ECOS Plan. The CCRPC requests that the PUC undertake a careful review of the proposed changes to make sure that this natural gas pipeline is as safe as possible to protect the communities and residents along the route.

This review is based on the information currently available. CCRPC will review and comment on materials submitted as the Section 248 review process continues.

Thank you for your time and attention.

Sincerely,



Charlie Baker  
Executive Director