



MEMO

Date: March 20th, 2026
To: Project Review Committee
From: Sam Lash, Climate & Energy Planner
Re: Updates on Recent Section 248, and Section 248a Permit Applications

Summary: This memo includes a variety of updates on ongoing projects, and one new infrastructure project in Northfield (3357 Subtransmission Line Realignment).

Proposed Action: Submit preliminary review of New Northfield Project (248j) to Petitioner and as public comment (#3 below).

General Updates:

1. Monthly Report on Small-Scale Distributed Energy Generation Projects:

- a. As noted last meeting (February 26, 2026), throughout 2025, the region saw approximately 1.6MW of solar projects proposed across all 23 municipalities as 143 projects (average size 12kW skewed larger by only a handful of commercial projects). There were noted trends in line with the end of the federal tax credits (increase in residential projects and drop-off).
- b. See regional total by town, along with year-to-date monthly tracking updates in the table at the end of this memo- we are still seeing a small handful of residential-scale projects each month.

248 Updates (Electric Infrastructure)

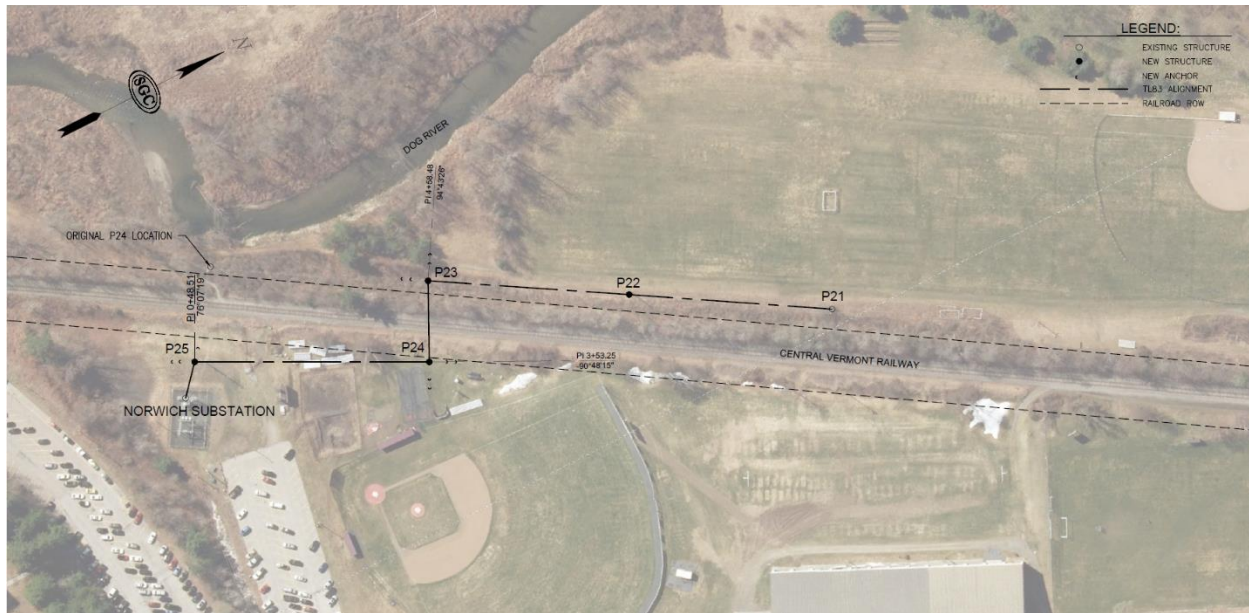
2. No new generation projects above residential-scale (see above for monthly small scale report).

3. NEW Northfield Electric Department- 3357 Subtransmission Line Realignment (248j)

CVRPC received a 21-Day Notice Pursuant to PUC Rule 5.402 for the Town of Northfield Electric Department to Realign a Portion of the 3357 Subtransmission Line in Northfield, VT (and in line with 248(f)). This project entails:

- Relocation of one pole structure,
- In-kind replacement of two other pole structures,
- The installation of a new conductor.

The project is on the 3357 Line to the west of Norwich University athletic fields along the railroad tracks and near a crossing of the Dog River.



Map of Project

Located just north of the Norwich Substation, the project consists of relocating on structure (P24) northeast of its current location to the other side of the railroad tracks and away from the Dog River. The relocation of this structure, P24, requires the in-kind replacement of three other structures (P22, P23, P25) and a new conductor between structures P22-25.

- **Transportation:** Access will be via overland travel from the existing substation and along the athletic fields located west of the railroad (not expected to require oversize nor overweight deliveries).
- **Aesthetic Impact:** No aesthetic impact anticipated (line and substation decades old); consistent with current use of area and unlikely to unduly interfere with the orderly development of the region.
- **Alternatives:** recent flooding ruled out leaving the structure in place and highlighted the serious risk of damage to this critical subtransmission line. Moving the line away from the river at an earlier pole would have raised the number of structures needing to be replaced.
- **Other:**
 - This project will improve system stability and reliability,
 - The project will relocate P24 from the FEMA Special Flood Hazard Area to just outside it; it is still located within the DEC River Corridor,
 - The existing pole and new pole are both located on agriculturally important soil and within blocks considered highest priority for surface water and physical landscape (possible constraints). However, given this is an existing line and proximate to the substation, it would be extremely costly and unlikely to fully relocate this infrastructure away from these possible constraints; lastly, it is unlikely this project will have additional impact beyond the existing one.
 - **Given the increase this project is specifically intended to improve resilience of vulnerable critical infrastructure, proximate to existing infrastructure, is unlikely to have undue adverse impacts, and is consistent with the current and**

future use of the area, as proposed, it is likely to be in line with the regional plan.

Reminder: the RPC has the right to (248(f))

- convene public hearings on the proposed petition,
- Request the Department of Public Service review the proposed facility,
- submit recommendations to the Petitioner within 40 days of the Petitioner's submittal,
- make recommendations to the Commission after a petition is filed.

The Petitioner's application to the Commission must address any written comments provided to the Petitioner in response to the 21-day advance submission that are related to the Section 248(b) criteria and any oral comments related to those criteria made at a public hearing, if any.

Possible Action: Submit this preliminary review, reserving the right to review once filed, to the petitioner and as public comment.

4. Update: GMP Irasville Substation Upgrade, Waitsfield & Fayston (25-2468-PET)

The petition was filed for the GMP Irasville Substation Upgrades in Waitsfield/Fayston on 10/10/2025. The Project would include rebuilding the Irasville #39 and reconfiguring both 34.5kV transmission line 3310 and 12.5kV distribution circuits. GMP states that the substation is at the end of its useful life and that the rebuild will improve backup capacity for the Madbush #38 substation.

Last Meeting (February 26, 2026) Update: The Agency of Agriculture, Food, and Markets found the project, as proposed, has the potential to impact less than one acre of primary agricultural soils and thus is under the two acre *de minimis* threshold. **They concluded with the request that the Commission finds that the Project will not have an undue adverse impact on primary agricultural soils under 30 V.S.A. 248(b)(5).**

Update Since Last Meeting:

- 2/25/26 Stipulation/MOU/Settlement Agreement ANR and GMP:
 - GMP will submit to the PUC supplemental prefiled testimony and revised exhibits to describe and depict Project changes necessitated by the CPG conditions and conform to them.
 - The conditions include (in summary):
 - Site preparation, construction, operation, and maintenance shall be in accordance with the plans and advanced approval must be sought for material deviations or a substantial change to the project.
 - Before beginning site preparation, construction, operation, or maintenance, GMP will obtain all ANR permits and approvals required:
 - Construction Stormwater Discharge Permit (DEC),
 - Vermont Individual Wetland Permit (DEC Wetlands Program)

- ANR may enter upon and inspect non-energized portions of the Project to determine compliance.
 - subject to compliance with the above conditions, the Project will avoid an undue adverse effect on the natural environment and the use of natural resources under section 248(b)(5), with due consideration having been given to the criteria specified in 10 V.S.A. §§ 1424a(d) and 6086(a)(1) through (8) and greenhouse gas impacts.
- 3/6/26 DPS filed Comments and 202(f) Determination
 - the Department finds that the proposed reconstruction of the substation does not raise a significant issue with respect to the substantive criteria of 30 V.S.A. § 248, including criteria related to public health and safety.
 - The Department has determined that the petition is consistent with the Vermont Electric Plan (within the 2022 Comprehensive Energy Plan).
- **3/19/26 Proposed Findings and Draft CPG which can be reviewed**
<https://epuc.vermont.gov/?q=downloadfile/802284/207594>

Background (Previous Action):

- Original Advanced Notice: 3/22/2024
- Updated Advanced Notice: 5/6/2025
- Staff and the Project Review Committee previously reviewed this project, which can be found in the memo from **May 22, 2025, pages 9-12** https://centralvtplanning.org/wp-content/uploads/2025/05/25-05-22_PRC-Packet.pdf;
- Update from our **October 23, 2025** meeting [2025-10-23 PRC Meeting Packet.pdf](#) (**item 2 on page 12**).
- Staff was set to attend a site visit on December 11th, 2025 which was canceled due to inclement weather.
- Staff continue to monitor proceedings as it goes through discovery rounds.

248a Updates (Telecommunications)

5. **De Minimis Cases:** 1 in Montpelier (on a building) reviewed & met criteria¹
6. **Moretown T-Mobile Tower Petition, [25-3123-PET](#)**

The Central Vermont Regional Planning Commission (CVRPC) received the petition from T-Mobile Northeast, LLC, pursuant to 30 V.S.A. § 248a(e), proposing to request a certificate of public good authorizing the installation of wireless telecommunications equipment at 373 Hoover Hill Road, Moretown, Vermont. This project is proposing to collocate telecommunications antennas and equipment with an existing facility (97' monopine tower). We previously received the 60-day advanced

¹ Project qualifies as a de minimis modification under 30 V.S.A. § 248a(b)(2) as long as: Excluding equipment, antennas, and ancillary improvements, the Project does not involve increasing the height or width of the existing structure. The Project will not increase the total amount of impervious surface by more than 300 square feet. The Project will not result in any new antennas or equipment on the support structure that will extend more than 10 feet above the structure or more than 10 feet horizontally from the structure. Finally, the net increase in surface area from new equipment on the structure will be less than 75 square feet. The project as proposed does not conflict with any existing permits.

submission and reviewed it at the October 23, 2025 meeting- petition was compared to earlier review and no changes have been made, this was also summarized in the January 2026 meeting:

- Extending the existing monopole by 15' (max height 115' above ground level),
- Install 3 new antennas (not above the top of the tower, some of the fake branches will be),
- Install 6 new reverse radio head units; all proposed equipment camouflaged by monopine;
- 10'x20' for base equipment entirely within existing equipment compound; impervious surface remains at 200sqft;
- Utilizing existing access to the tower compound- no clearing nor excavation outside current tower site and existing fence line.

Staff found at the January meeting that after initial and secondary review, that this project will likely meet the definition of a project of limited size and scope and be in compliance with the *Central Vermont Regional Plan, readopted July 9, 2024*. **No Anticipated Action.** See previous review for details (#6, page 15-17) https://centralvtplanning.org/wp-content/uploads/2025/10/2025-10-23_PRC_Meeting_Packet.pdf

Update: At the previous meeting (February 26, 2026) we reviewed that the Moretown Select Board filed comments on January 30, 2026, alleging that the existing monopine has been shedding plastic pieces from the conifer disguise portions of the tower and requesting it be addressed. T-Mobile responded to the Selectboard's comments as follows:

- they noted they do not own the tower nor yet have any equipment on the tower and thus this process is not the appropriate venue nor they the appropriate stakeholder to take steps to remedy the shedding;
- they did reach out to the current owner to raise the issue and were told there is regular (3x yearly) maintenance at the site that should pick up debris and that shedding is not uncommon (2/24). No anticipated action at this time.

The CPG was Issued 3/10/26.

7. Update: Marshfield Cell Tower (25-1543-PET)

Staff continue to follow the case and all activities are logged. Notably, the Vermont Department of Public Service submitted an Aesthetic & Orderly Development Analysis Report on 1/30/2026². This was summarized comprehensively in the memo from the February 26th, 2026 Project Review Committee meeting (7d)³.

In summary: The Department of Public Service found that while the project does have some adverse impact, it does not have undue adverse impact; the Project's siting and design appear to support key restrictions and goals embedded in the municipal and regional plans- which emphasize minimizing aesthetic and visual impacts while ensuring that essential wireless telecommunications service can be provided. Furthermore, they concluded:

- Petitioners demonstrated a documented, site specific coverage necessity, minimized visual and environmental impacts through thoughtful siting and design choices, and reasonably exhausted less intrusive alternatives while complying with most bylaw

² <https://epuc.vermont.gov/?q=downloadfile/796647/205750>

³ https://centralvtplanning.org/wpcontent/uploads/2026/02/7d.PRC_Memo_Draft26_02_26.pdf

standards. Although, the Project does not conform to certain municipal setbacks from wetlands and streams, it remains subject to, and must comply with, applicable state standards and protections for these resources.

- ***Based on this review, it appears the Project meets the ‘substantial deference’ standard, with appropriate consideration given to the recommendations of the municipal and regional plans*** (page 27)

Other Testimonies included (and can be found here [Case Details | Vermont Public Utility Commission](#))

- Alice Peal on behalf of the Intervenors notes 3 areas of concern including 1) application process, PU Review, and Substantial Deference; 2) Marshfield’s Town Plan emphasis on Rural Character and Scenic Beauty; and 3) Wetlands, Water, Habitat and Siting.
- Michael Xenakis and Robin Gomez on behalf of the Intervenors (they are 2 of 5) also submitted testimony focused on the visibility of the tower and the perceived inadequacy of the approximation of this visibility with the balloon test. Concerns also include proximity to village, as well as at least one conflict with the Telecommunication by-laws as noted above in the Aesthetics analysis, including the height above the surrounding trees.
- Staff did not identify concerns within these testimonies that weren’t addressed by the petition, the Department of Public Service’s report, and are within the scope of the Project Review Committee and Commissions’ review.

Most Recent Update: CVRPC received notice of the amended hearing schedule (see below), of the filing of the Intervenor’s response to Discovery (3/6/26), and of the Depositions of Michael Xenakis, Alice Peal, and Robin Gomez (3/16/26).

Background:

The Project Review Committee has discussed the proposed Cell Tower at 2264 U.S. Route 2 in Marshfield, Vermont (Advanced Notices 24-2988 on 9/23/24 and 25-0925 on 5/8/2025) several times including:

- February 26, 2026:
https://centralvtplanning.org/wpcontent/uploads/2026/02/7d.PRC_Memo_Draft26_02_26.pdf
- January 22, 2026 Project Review Committee Meeting: [1.-26-01-22_PRC-Pacet.pdf](#)
- October 23, 2025 Project Review Committee meeting: https://centralvtplanning.org/wp-content/uploads/2025/10/2025-10-23_PRC_Meeting_Packet.pdf
- February 27, 2025 Project Review Committee Meeting: <https://centralvtplanning.org/wp-content/uploads/2025/02/25-02-27-PRC-packet.pdf>
- May 22, 2025 Project Review Committee Meeting: https://centralvtplanning.org/wp-content/uploads/2025/05/25-05-22_PRC-Packet.pdf

Key resources:

- 25-1543-PET case landing page <https://epuc.vermont.gov/?q=node/64/205750/FV-Case%20Summary-Portal>
- Marshfield Town Meetings;
 - Selectboard (Public Comment- Special Meeting) February 12, 2025: https://marshfieldvt.gov/vertical/sites/%7BDE838A07-5D57-4E6F-95DF-7C05B7FB1126%7D/uploads/sb_minutes_021225_approved.pdf
 - Appears in many minutes, e.g. September 2, 2025 https://marshfieldvt.gov/vertical/sites/%7BDE838A07-5D57-4E6F-95DF-7C05B7FB1126%7D/uploads/sb_minutes_090225_approved.pdf
- The balloon test and tower photo simulations are included in Exhibit LH-4 and each are date and time stamped to the right of the photos **12/31/24 10:04-11:19am** ([Case Details | Vermont Public Utility Commission](#))

On 1/2/2026 the Public Service Department requested an extension for non-Petitioner pre-filed testimony and exhibits which was granted 1/8/2026. There was an updated schedule (middle column). On February 25, 2026 the Intervenor filed a motion to amend the schedule to allow for additional time to respond to discovery- the amended and current schedule is provided in the right-most column (changes bolded):

	Old Schedule	Previously Updated Schedule	New & Current Schedule
Deadline for parties to submit unavailable dates for evidentiary hearing	January 30, 2026	February 20, 2025	N/A
Deadline for non-Petitioners to respond to discovery	February 6, 2026	February 27, 2026	March 6, 2026
Deadline for completion of depositions	March 2, 2026	March 23, 2026	March 23, 2026
Deadline for dispositive motions	March 20, 2026	April 10, 2026	April 10, 2026
Deadline for prefiled rebuttal testimony	March 30, 2026	April 20, 2026	April 20, 2026
Evidentiary Hearing	Week of April 6, 2026	Week of April 27, 2026	April 30, 2026

