

From: [Libby Moyer](#)
To: [Act250 - Board](#)
Subject: Pls Add To Comments No Grid Calculations / Electrification Point 2 COMMENTS. Re: TRORC Regional Plan Comment / Formal Objection / 12 Objections
Date: Sunday, August 2, 2026 8:09:05 PM

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Hello Catherine,

Vermonts Grid has issues for further electrification load. Please refer to VELOCO, ISO NEW ENGLAND and Regional Planning Commssion Enhanced Energy Plans VS Grid Analysis. TRORC' s proposed plan ignores any all calculations for The Grid including imaginary futuristic visioning of building “ shall not” use fuel as source of energy + EV chargers etc “ shall’ be installed

Please consider these three citations and add them to the record for your consideration. Thank you . Sincerely, Libby Moyer Vershire Orange -1 Vermont

Cited sources for Point #2 (Electrification & Grid Performance)

Here are the three references with proper source details

:1. VELCO 2024 Vermont Long-Range Transmission Plan

- For the first time since 2015, the high-electrification “VT Roadmap” scenario creates bulk-system thermal and voltage reliability concerns within the 10-year horizon. Winter peaks are more severe. Northern Vermont requires ~75 MW of load reduction by 2033 to avoid overloads/voltage collapse. Significant new transmission investment may be needed.
- Source: Vermont Electric Power Company (VELCO), 2024 Vermont Long-Range Transmission Plan(finalized and filed July 2024; presented to Vermont Legislature / House Energy & Digital Infrastructure, January 2025). Available via VELCO planning page and legislative documents (e.g., legislature.vermont.gov presentations by Shana Louiselle).

2. ISO New England winter reliability and load forecasts

- New England is shifting toward winter-peaking due to heating electrification. Winter peaks are projected to rise substantially (e.g., from ~20,500 MW in 2026/27 toward ~26,400 MW by 2035/36 under normal conditions). During prolonged cold snaps the region relies on constrained natural-gas pipelines plus LNG sendout and oil-fired generation. Winter 2025/2026 demonstrated elevated demand, high gas prices, and fuel-oil/LNG dependence while the system remained reliable only through extensive preparation.
- Source: ISO New England, 2026–2035 Forecast Report of Capacity, Energy, Loads, and Transmission (CELT Report) (May 2026); ISO-NE Winter 2025/2026 operational and quarterly markets reports; ISO Newswire recaps (March 2026).

3. Regional Planning Commission Enhanced Energy Plans vs. grid analysis

- All 11 Vermont RPCs set aggressive EV and heat-pump targets consistent with the high-electrification pathway used in VELCO's VT Roadmap scenario. Only three of the 11 cite any quantified transmission or distribution upgrade costs. The majority contain no detailed analysis of whether the regional/statewide grid can support the assumed scale of electrification — the exact gap identified in the VELCO plan.
- Source: Cross-review of Act 174 Enhanced Energy Plans (2024–2026 versions from ACRPC, CVRPC, CCRPC, and the eight others); VELCO 2024 VLRTP deficiency and cost findings; prior legislative and VSPC documentation.

On Jul 27, 2026, at 3:11 PM, Act250 - Board <Act250.Board@vermont.gov> wrote:

Hi,

I am confirming receipt of your email and letter.

Kind Regards,
Catherine

Catherine Gott | Legal Services Specialist
Land Use Review Board
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802-476-0185
<https://act250.vermont.gov>

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-----Original Message-----

From: Libby Moyer <libmoyer@gmail.com>

Sent: Sunday, July 26, 2026 7:29 AM

To: regionalplan@trorc.org; Act250 - Board <Act250.Board@vermont.gov>

Cc: John Benson <john.benson@vtleg.gov>; Michael Tagliavia

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Subject: TRORC Regional Plan Comment / Formal Objection / 12 Objections

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Hello:

Attached, please find Comments and formal 12 Objections to be considered and included in the Hearings and Decisions Process and also included in the Permanent Record of TRORC Regional Plan / LURB (founded 2025) on this date July 26 2026 : Document Comments with 12 Objections

Thank you. Resepectfully, JHP Garnett & EJ Moyer, Vershire VT 05079