

**STATE OF VERMONT**  
**PUBLIC SERVICE BOARD**

Petition of Green Mountain Power Corporation )  
for a Certificate of Public Good pursuant to 30 )  
V.S.A. § 248 authorizing the removal of an )  
existing substation and the construction of a )  
new substation in the Town of Rockingham )  
)

Docket No. \_\_\_\_\_

**PREFILED TESTIMONY OF JOHN A. STEELE, ASLA**  
**ON BEHALF OF**  
**GREEN MOUNTAIN POWER CORPORATION**

**Summary of Testimony**

**Mr. Steele's testimony addresses aesthetic issues concerning the proposed Green Mountain Power Substation and the reconfiguration of the associated distribution lines. He explains how the proposed project is consistent with the Section 248 aesthetic criteria.**

**PREFILED TESTIMONY OF JOHN A. STEELE, ASLA**  
**ON BEHALF OF**  
**GREEN MOUNTAIN POWER CORPORATION**

1 **1Q. Please state your name and address.**

2

3 **1A.** My name is John A. Steele. My business address is DuBois & King, Inc., 34 Blair Park  
4 Road, Suite 10, Williston, Vermont 05495.

5

6 **2Q. What is your training and experience as a landscape architect?**

7 **2A.** I am a landscape architect registered in neighboring New York State. I have been

8 engaged in landscape architecture, site planning, design review, visual impact

9 assessment, permitting, and construction of land development, transportation and utility

10 projects in northern New England for over 20 years. A copy of my most recent resume is

11 attached as Exhibit\_\_[JAS-1].

12

13 **3Q. With whom have you been employed and for how long?**

14 **3A.** I am currently employed by DuBois & King, Inc., a multidiscipline engineering firm

15 headquartered in Randolph, Vermont, where I have been employed as a landscape

16 architect for the past 10 years.

17

18 **4Q. Have you ever testified before the Vermont Public Service Board before, and if so,**  
19 **in what dockets?**

20

21 **4A.** Not recently.

1 **5Q. Could you briefly describe the process you used in assessing the visual impact of the**  
2 **proposed relocation of the Bridge Street substation?**  
3

4 **5A.** My visual impact assessment for the proposed substation relocation project included the  
5 following steps. I have:

6 ▪ Examined a draft copy of the Relocation Study and the available site plans and  
7 maps within the context of the Public Service Board's Section 248 Process.  
8

9 ▪ Visited the project area, discuss substation relocation options and details with  
10 Green Mountain Power Corporation ("Green Mountain Power") representatives,  
11 and observed the utility pole and orange flagging set at Upper Island Station Site  
12 #2 to simulate the proposed open frame substation height of 30 feet.  
13

14 ▪ Walked and driven the surrounding area within a one quarter mile radius of Site  
15 #2 in search of ground level public vantage points from which the simulation pole  
16 with orange flagging could be seen; photograph views to Site #2 from these  
17 vantage points.  
18

19 ▪ Analyzed site photographs, plans and maps, and prepared a visual impact  
20 assessment report base on the findings.  
21

22 **6Q. What conclusions did you reach in your visual impact assessment report for the**  
23 **Upper Island Station Site #2?**  
24

1   **6A.**   It is my assessment that Green Mountain Power’s proposed construction of a new  
2           replacement substation outside the downtown area and removal of the existing substation  
3           from the southern end of the Bellows Falls downtown will not have an adverse visual  
4           impact on the area. In fact, removing the old existing substation will have a positive  
5           visual impact on the area. Should others contend that the project will have an adverse  
6           visual impact, the minimally adverse impact would not likely be considered undue  
7           according to the Town of Bellows Falls Zoning Ordinance and the Quechee Analysis. A  
8           copy of my analysis of the visual impact of the new substation and associated distribution  
9           line upgrade is attached as Exhibit\_\_[JAS-2]. As noted above the substation will result in  
10          improved aesthetics because the new location will replace a highly visible facility that is  
11          adjacent to significant vehicle and pedestrian traffic with one that is set back from the  
12          public way and screened by vegetation. The new substation will thus be removed from  
13          view by the public. Views of the affected areas from highly frequented sites are  
14          contained in Exhibit \_\_ [PJK-3].

15

16   **7Q.**   **Does the project comply with the aesthetics requirements of 30 V.S.A. § 248(b)(5)**  
17           **(10 V.S.A. § 6086(a)(8)) and, if so, how does the project complies with this criteria?**  
18

19                           **Scenic and Natural Beauty of the Area, and Aesthetics**

20   **[10 V.S.A § 6086(a)(8)]**

21   **7A.**   The proposed 30-foot high open frame substation will be located immediately adjacent to  
22           the existing Vilas Bridge substation open frame structure adjacent to the proposed Green  
23           Mountain Power substation site. Green Mountain Power currently uses that area for pole

1 and transformer storage. Views of the proposed substation from within Bellows Falls and  
2 west of the Connecticut River are largely impeded by topography, buildings and  
3 structures, and existing vegetation. The proposed substation and distribution feeders are  
4 consistent with and in harmony with the adjacent substation and the surrounding power  
5 generation features that characterize the southern end of the Bellows Falls downtown.  
6 Power generation dominates the local landscape including: the Bellows Falls Canal that  
7 diverts much of the Connecticut River flow to the nearby hydroelectric station and  
8 creates the “island” on which the proposed substation will sit; the hydroelectric station  
9 itself; several substations; and numerous power distribution lines. This project will  
10 remove the existing Green Mountain Power/National Grid substation from its highly  
11 visible location in downtown Bellows Falls and construct a new substation on the  
12 “island” in a much less visible location, set apart from the historic downtown. Because  
13 these changes are consistent with the power generating character of Bellows Falls and  
14 because the substation will be less visible than it is currently, the impact of this project is  
15 not adverse. Even if it were determined to be adverse, the project’s minimally adverse  
16 visual impact would not be unduly adverse because, according to the Quechee Analysis,  
17 the project: does not violate a clear written community standard intended to preserve the  
18 aesthetics or scenic beauty of the area; will not offend the sensibilities of the average  
19 person; and Green Mountain Power is taking reasonable steps to lessen any adverse  
20 effects through good site design and landscaping.

1 **8Q. What will be the aesthetic impact of the distribution line work which Green**  
2 **Mountain Power proposes as a part of this project?**  
3

4 **8A.** The specifics of Green Mountain Power's distribution line build-out may be found in the  
5 prefiled testimony of Patrick J. Kearney and in particular on Green Mountain Power's  
6 prefiled Exhibits\_\_[PJK-5]. There will be no adverse aesthetic impact of these new  
7 distribution lines because they will be largely be replacements of existing circuits. Due  
8 to an agreement with the Town of Rockingham, one distribution circuit in the vicinity of  
9 the current Bridge Street Substation will be placed underground behind the Bellows Falls  
10 Post Office. In addition, following a temporary construction period, the Green Mountain  
11 Power distribution line crossing the Bellows Falls Canal at Bridge Street will be  
12 embedded in the roadway of the Vilas Bridge, thus removing it from public view. As  
13 further detailed in Mr. Kearney's testimony, one circuit on the west side of the Bellows  
14 Falls Canal will be removed entirely and replaced by one new overhead circuit across the  
15 canal just north of the existing railroad bridge, thus reducing the number of utility lines  
16 in the downtown Rockingham area. In several instances, overburdened utility poles  
17 supporting many circuits will be replaced by new poles with more neatly bundled wires.  
18 Because of this undergrounding, the net removal of circuits in the downtown and Canal  
19 areas, the overall aesthetic impact of Green Mountain Power's distribution build-out will  
20 not be adverse.

21

1 **9Q. Will the new distribution circuit pole heights impose an undue aesthetic**  
2 **burden?**  
3

4 **9A.** No. Although the new poles will be higher than the existing poles the increase in height  
5 in the distribution corridor will be 5 to 10 feet on average and should not change the  
6 character of the areas through which they pass. On the Eastern side of the Bellows Falls  
7 Canal, 55-foot poles are required in order to maintain proper clearances where the  
8 distribution line crosses railroad tracks.  
9

10 **10Q. What will be the aesthetic effects of the transmission tap structures that National**  
11 **Grid proposes to build next to its Vilas Bridge Substation to serve Green Mountain**  
12 **Power's substation?**  
13

14 **10 A.** National Grid has advised Green Mountain Power that National Grid will remove three  
15 existing structure and replace these with a single 70-foot tall structures to support the  
16 4402 lines running to and from the Vilas Bridge Substation and the proposed substation.  
17 See Exhibit\_\_[CEW-2], NEPCo. Transmission Line Data. The heights of the structures  
18 that will be removed are 30, 50 and 50 feet tall. Although the taller structure will break  
19 the skyline from several vantage points in Rockingham/Bellows Falls, it will be in  
20 keeping with the character of the Vilas Bridge Substation and will be obscured from most  
21 vantage points in Vermont by the background of Fall Mountain, and its aesthetic effect  
22 will not be adverse.  
23

24 **11Q. Does this conclude your Pre-filed Direct Testimony?**

25 **11A.** Yes.