




5. Under Section 218c, approval of GMP's IRP requires the Commission find that the IRP:
- a. constitutes a plan for meeting the public's need for energy services, after safety concerns are addressed, at the lowest present value life cycle cost, including environmental and economic costs, through a strategy combining investments and expenditures on energy supply, transmission and distribution capacity, transmission and distribution efficiency, and comprehensive energy efficiency programs (See 30 V.S.A. § 218c(a)(1));
  - b. assesses economic costs with due regard to the State's greenhouse gas inventory and State progress in meeting its climate goals. (See 30 V.S.A. § 218c(a)(1)(A)-(C)); and
  - c. is consistent with the State's renewable energy goals in Section 8001 of Title 30, the requirements of Section 8004 and 8005 of Title 30, and the objectives of the Vermont Comprehensive Energy Plan (See 30 V.S.A. § 218c(a)(1)(D), § 218c(b)).

WHEREFORE, GMP respectfully requests that the Commission take such actions as will be necessary to decide this Petition, find that the 2021 IRP meets the requirements set out above, issue an order pursuant to 30 V.S.A. § 218c approving the 2021 IRP, and grant such other and further relief as the Commission may deem appropriate.

DATED at Burlington, Vermont this 10<sup>th</sup> day of December, 2021.

GREEN MOUNTAIN POWER CORPORATION

By:

  
\_\_\_\_\_  
Carolyn Browne Anderson,  
Associate General Counsel  
2152 Post Road  
Rutland, Vermont 05701  
(802) 770-3254