EXHIBIT VEC-AC-3

Transportation
Land Development
Environmental
Energy
Services

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Memorandum

To: VEC Alburgh Substation Project File

Date: October 30, 2014

Project No.: 57667.00

From: Tyler Gingras, PE

Re: Section 248 Stormwater Technical Memorandum

On behalf of Vermont Electric Cooperative, Inc. ("VEC"), Vanasse Hangen Brustlin, Inc. ("VHB") has prepared this memorandum to provide technical information related to the construction and operational phases of the proposed South Alburgh Substation Replacement Project ("Project"), as they apply to stormwater discharge permitting from the Vermont Department of Environmental Conservation ("VT DEC"). This information relates to Act 250 Criteria 1B (Waste Disposal) and 4 (Soil Erosion), which are also addressed in the petition for a Certificate of Public Good ("CPG") from the Vermont Public Service Board ("PSB"), under Section 248. More specifically, the information provided in this memorandum summarizes the results of an assessment of applicability that was conducted in association with the following stormwater discharge permits that are administered by the VT DEC:

- General Permit 3-9020 (GP 3-9020) or the Individual Permit equivalent for construction phase stormwater discharges
- General Permit 3-9015 (GP 3-9015) or the Individual Permit equivalent for operational phase stormwater discharges

Project Overview

As proposed, VEC is planning to replace its existing Alburgh Substation ("Existing Substation") with a new substation ("New Substation") in order to improve its reliability and capacity for estimated future demand. Located off of US Route 2 in Alburgh, Vermont, the planned Project will involve decommissioning and demolition of the Existing Substation infrastructure within the fenced perimeter, and construction of the New Substation approximately 0.8 mile north of the Existing Substation location. The New Substation site will require some forest clearing, grading, installation of a new gravel drive in the location of an existing field access road, and installation of a New Substation facility and overhead utility lines. The footprint of the New Substation will be approximately 10,800 square feet under proposed conditions. During substation decommissioning and construction, material and equipment will be staged within the Project boundaries. The Project also includes the installation of a new transmission line

corridor connecting the New Substation with existing transmission line to the west. A new utility Right-of-Way corridor will contain the new transmission main. The Project also includes construction of a new overhead distribution line from the New Substation to connect to roadside distribution to the east. Installation of the new transmission line corridor may require construction matting within wetland areas to avoid soil disturbance from vehicle travel (if work cannot be conducted during frozen ground conditions). Access for the new overhead line installations outside of roadways will be limited and occur via low ground pressure and/or tracked equipment where necessary to avoid soil disturbance from construction access.

Construction Phase Stormwater Discharge Permitting

Although most construction activities associated with decommissioning the Existing Substation will occur above-ground, those that will result in earth disturbance include: removal of equipment and placement of topsoil.

For the New Substation, construction activities that will result in earth disturbance include: earthwork and grading, installation of a perimeter fence, and installation of new substation infrastructure, including driveway, concrete supports, cable trench, and transformer secondary containment structure.

For the new section of transmission line, construction activities that will result in earth disturbance include: augering for installation of new poles. Forest clearing required will not include grubbing, therefore earth disturbance will not occur as a result of forest clearing.

The total area of disturbance associated with proposed construction and decommissioning activities will be less than one-acre, thereby not requiring coverage under a construction phase stormwater discharge permit from the VT DEC. Regardless, VEC's contractors will follow the Best Management Practices outlined in the VT DEC's *Low Risk Site Handbook for Erosion Prevention and Sediment Control* (DEC 2006, amended 2008). As the site reaches final grade, seed/mulch, rolled erosion control fabric, and stone should be used to provide final stabilization.

Operational Phase Stormwater Discharge Permitting

Permanent infrastructure that would generate new impervious surfaces is limited to the driveway, cable trench, concrete supports, utility poles, and other smaller structures. Combined, these surfaces generate over 5,000 square feet of impervious area. However, combining these areas with the total amount of existing impervious area yields significantly less than one acre of impervious area, therefore exempting the Project from requiring coverage under an operational phase stormwater discharge permit from the VT DEC.