

**STATE OF VERMONT
PUBLIC SERVICE BOARD**

Petition of Vermont Gas Systems, Inc.,)
requesting a Certificate of Public Good pursuant)
to 30 V.S.A. § 248, authorizing the construction)
of the **“Addison Natural Gas Project”**)
consisting of approximately 43 miles of new)
natural gas transmission pipeline in Chittenden)
and Addison Counties, approximately 5 miles of) Docket No. 7970
new distribution mainline in Addison County,)
together with three new gate stations in)
Williston, New Haven, and Middlebury,)
Vermont)

ANR's First Set of Information Requests

The Agency of Natural Resources (“Agency” or “ANR”) by undersigned counsel, hereby serves the following Second Set of Information Requests upon Petitioner Vermont Gas Systems, Inc. in accordance with Public Service Board Rule 2.214 and V.R.C.P. 33, 34, and 36 and requests that Petitioner answer the requests in accordance with V.R.C.P. 33, 34, and 36 and deliver its answers and all requested documents and materials to the Agency’s offices as soon as possible but in no case later than May 3, 2013. Petitioner is requested to provide a copy of its answers in electronic format, that is, Word or other format readable by the Agency. Please produce two copies of your responses.

INSTRUCTIONS AND DEFINITIONS

1. Reproduce the request being responded to before the response. Provide two complete hard copies of your responses and an electronic copy on disk. Provide two complete copies of all documents produced. All spreadsheets and computer data should also be provided on disk.
2. Responses to any and all Agency requests that are contained herein or that may be filed later should be supplied to the Agency as soon as they become available to PETITIONER. That is, PETITIONER should not hold answers to any requests for which it does have responsive data, documents, etc., until responses to any or all other requests are compiled.
3. The response to each request should be made under oath by a person competent to testify concerning the response and all documents and exhibits produced as part of the response. With respect to each request, please state (1) the name(s) and title(s) of the person or persons responsible for preparing the response; and (2) the administrative unit which maintains the records being produced or maintains the data from which the answer was prepared; and (3) the date on which each question was answered.
4. Where information requested is not available in the precise form described in the question or is not available for all years (or other periods or classifications) indicated in a series of years (or other periods or classifications), please provide all information with respect to the subject matter of the question that can be identified in PETITIONER work papers and files or that is otherwise available.
5. These requests shall be deemed continuing. PETITIONER is directed to change, supplement and correct its answers to conform to all information as it becomes available, including the substitution of actual data for estimated data. Responses to requests for information covering a period not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available.

6. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.

7. Some of the Agency's requests may make particular reference to a portion of a filing in this matter. Notwithstanding this specific direction, these items should be understood to seek discovery of all information available to PETITIONER that is responsive to the questions stated.

8. "Identify," when used in connection with natural person(s) or legal entities, shall mean the full name and current business address of the person or entity.

9. "Document," as used herein, shall be construed as broadly as possible to include any and all means and media, by which information can be recorded, transmitted, stored, retrieved or memorialized in any form, and shall also include all drafts, versions or copies which differ in any respect from the original. The term specifically includes and is not limited to written communications such as letters and e-mails.

10. Documents produced pursuant to these requests shall be organized and labeled in correspondence with the paragraph number to which they are alleged to respond. With respect to each document produced by PETITIONER, identify the person who prepared the document and the date on which the document was prepared.

11. If in response to any request for information, the responding party asserts attorney client privilege, attorney work product, or any other privilege, please provide in addition to the basis of the privilege the date of the allegedly privileged communication(s), the identity of all persons who were party to the allegedly privileged communication(s) or who received photocopies of such communication(s), and the subject matter of the allegedly privileged communication.

12. If any request to admit is responded to by a denial or an objection, explain in detail the reason for such denial or objection.

13. If any interrogatory or request is objected to in whole or in part, please describe the complete legal and factual basis for the objection, and respond to all parts of the interrogatory or request to the extent it is not objected to. If an objection is interposed as to any requested documents, please identify the document by author, title, date and recipient(s), and generally describe the nature and subject matter of the document as well as the complete legal and factual basis for the objection.

14. "Project" "project site" "project area" means the 1MW solar electric generation facility described in Petitioner's filings in this docket.

15. "You" or "Your" refers to Petitioner.

16. "Petitioner" refers to Vermont Gas Systems, Inc., and any of its agents, employees, or consultants working on its behalf in connection with the above captioned matter.

17. The Agency reserves the right to submit additional information requests to Petitioner.

INTERROGATORIES, REQUESTS TO PRODUCE, AND REQUESTS TO ADMIT

1. Please identify any person who assisted in the preparation of the Petition and testimony of each of Petitioner's witnesses. For each such person identified, please provide curriculum vitae or resume indicating that person's employment, education and work experience history.
2. Please identify any person who assisted in providing responses to the information requests. For each such person identified, please provide curriculum vitae or resume indicating that person's employment, education and work experience history.
3. Has VELCO approved the proposed route for the project through the VELCO right of way?
4. Please produce the resume of Eileen Simollardes
5. Please identify any and all support for the testimony of Eileen Simollardes in response to question 7, that the project will "lower[]Addison County energy bills by over \$200 million over the next 20 years reducing greenhouse gas emissions ("GHGs") by a total of almost 300,000 tons over the same period, removing trucks from Vermont's roads."

6. Please identify the households for which the project will reduce energy bills. Please provide the amount of energy bills per household that will be reduced. Please identify the amount and source of energy currently being utilized by each household.
7. Please identify the current GHG emissions of each household that Vermont Gas asserts will be reduced by the Project.
8. Please identify the amount of truck and construction vehicle traffic and use that will be employed during construction of the project.
9. Please identify the amount of emissions of the truck and construction vehicles that will be utilized during construction of the project.
10. Please provide the experience and educational background of Eileen Simollardes that supports the foundation for her testimony on greenhouse gas emissions.
11. As used in the testimony of Eileen Simollardes, please define what is meant by "greenhouse gas emissions." What are the constituents that comprise or make-up greenhouse gas emissions?
12. Please identify and describe the capacity and specifications for the "typical oil furnace" and "natural gas furnace."
13. Please provide the source of the information provided in response to question 8.
14. Identify who prepared Exhibit Petitioner EMS-1, and please provide his or her CV and all information requested in response to Request to produce 4.
15. How many customers does EMS-1 assume will convert from propane to natural gas?
16. How many customers does EMS-1 assume will convert from propane to natural gas?
17. Please provide all facts supporting the basis for this assumption.

Requests to Produce

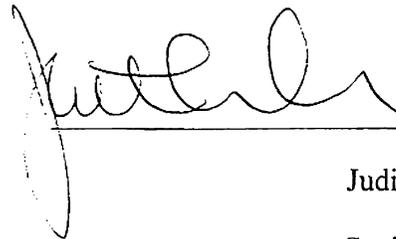
1. Please produce all documents requested in the preceding questions.
2. Please produce any and all documents identified, referenced, relied upon, or referred to in responding to these information requests.
3. Please produce any and all documents identified, referenced, relied upon, or referred to in preparing the testimony of Petitioner's witnesses.
4. For each expert you intend to call as a witness in this proceeding with regard to the topics on which they have offered expert testimony, and any and all subjects related to the aforesaid (including those experts who offered prefiled direct testimony), please provide:
 - a. A resume or CV (unless such resume has already been provided);

- b. A copy of any reports, studies, documents or other analytical work relating to the subject matter of this proceeding performed in whole or in part by the expert or at the expert's direction;
- c. An identification and copy of all documents relied upon by the expert in reaching the opinions he or she may offer in this proceeding;
- d. All exhibits that may be offered in this proceeding through the expert (unless they have already been provided in connection with the expert's prefiled direct testimony);
- e. A list of all publications authored in whole or in part by the expert;
- f. A list of all administrative and court proceedings and depositions in which the expert offered an opinion; and
- g. A list of all professional licenses held by the expert.

DATED at Montpelier, Vermont, this 12th day of April, 2013.

VERMONT AGENCY OF NATUAL RESOURCES

BY



Judith L. Dillon, Esq.

Senior Legal Counsel

Cc: Service List for Docket No. 7981