

STATE OF VERMONT
PUBLIC SERVICE BOARD

Docket No. 7970

In Re: Petition of Vermont Gas Systems, Inc.)
for 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 new distribution mainlines in Addison County,)
together with three new gate stations in Williston,)
New Haven and Middlebury, Vermont)

**CHITTENDEN SOLID WASTE DISTRICT'S FIRST SET
OF INTERROGATORIES AND REQUESTS TO PRODUCE
TO VERMONT GAS SYSTEMS**

Pursuant to Vermont Public Service Board (the "Board") Rule 2.214(A) and Rules 26, 33 and 34 of the Vermont Rules of Civil Procedure Chittenden Solid Waste District ("CSWD"), requests that Petitioner Vermont Gas Systems ("VGS" and/or "Petitioner") answer under oath the Interrogatories contained herein and provide counsel for CSWD with copies of documents described in the following Requests to Produce or afford counsel the opportunity to inspect, copy, photograph or otherwise reproduce said documents in accordance with the Definitions and Instructions set forth below no later than May 3, 2013.

DEFINITIONS

1. Unless otherwise stated, the terms "VGS", "Petitioner" and/or "you" as used herein, shall include any present or former attorney, advisor, consultant, representative or other person acting for or on your behalf.

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2. The term "communication," as used herein, means any transmittal of information (in the form of facts, ideas, inquiries or otherwise), including, without limitation by means of documents (as defined herein).

3. The term "document," as used herein, includes "hard copies" as well as electronically stored information in your possession, custody or control and is designed to be synonymous in meaning and equal in scope to the language of Rule 34(a) of the Vermont Rules of Civil Procedure. A draft or non-identical copy is a separate document within the meaning of this term.

4. The term "person," as used herein, is defined as any natural person or any business, legal, or governmental entity or association.

5. The term "concerning," as used herein, means referring to, describing, evidencing or constituting.

6. The words "and" and "or" and the term "and/or" as used herein shall be construed conjunctively or disjunctively as necessary to make the request inclusive rather than exclusive. The use of the word "including" shall be construed without limitation.

7. "Project" means the Vermont Gas Systems Addison Natural Gas Project.

8. "Petition" means the Project's petition before the Public Service Board for a certificate of public good.

9. "CCCH" means the Chittenden County Circumferential Highway.

10. Terms used in the singular shall be deemed to include plural and terms used in the masculine shall be deemed to include the feminine.

INSTRUCTIONS

1. If you are unable to provide a complete response to any Interrogatory, provide a partial response, including as much information as may be available to you and/or subject to your control. If you object or fail to respond to all or any part of any Interrogatory contained herein, your response should set forth clearly for each such Interrogatory, the specific portion of the Interrogatory that you have not responded or objected to, the extent and the specific ground(s) for your objection and/or your failure to respond, and whether, in such case, there is responsive information that you have not provided.

2. All documents that respond, in whole or in part, to any portion of the discovery request shall be produced in their entirety. Any request for a document includes all attachments, schedules and exhibits to such document.

3. For each document produced, indicate its present location and custodian.

4. Produced documents shall be organized and labeled to correspond with the numbered Request(s) to which they pertain. It is not necessary to produce multiple copies of the identical documents found on different computers and servers if you identify all computers/servers on which the document is located. If you chose to produce multiple copies of identical documents, you are instructed to segregate such documents by reference to the specific computer or server on which the document is located.

5. If you fail to respond to any Interrogatory or produce documents on the basis of any claim of privilege or work product, please furnish a log that contains the following information:

- (a) type of communication (e.g., telephone call, letter, memorandum, etc.);
- (b) date of the communication;

- (c) author(s) or originator(s) of communication including identification of any person by organization or affiliation;
- (d) addressee(s) and additional recipient(s) of the document;
- (e) if a document, the title of document;
- (f) if a document, a summary of the subject matter of the document;
- (g) if a document, the number of pages in the document;
- (h) if a document, a list of attachments, if any, providing the information specified in subparagraphs (a) through (f) hereof, as to each such attachment; and
- (i) the basis for the claim of privilege and a statement as to whether the privilege is claimed as to the entire communication or only a portion thereof and, if so, what portion.

6. These discovery requests are to be continuing to the full extent provided by the Vermont Rules of Civil Procedure and Rule 26(e) thereof. Take notice that you have a continuing obligation to correct or supplement your responses as information or documents are acquired by respondent, its agents, attorneys, or representatives.

7. When requested to identify documents, give, to the extent known, the:

- (a) type of document;
- (b) general subject matter;
- (c) date of the document; and
- (d) author(s), addressee(s) and recipient(s).

8. When requested to identify communications, give the:

- (a) type of communication;

- (b) general subject matter;
- (c) date of the communication;
- (d) author(s), addressee(s) and recipient(s); and
- (e) if the communication is a document provide the information requested in Instruction, Paragraph 4, above.

9. When requested to identify a person, give, to the extent known, the person's full name, present or last known address, and, when referring to a natural person, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

10. If any documents or communications responsive to any of the Interrogatories contained herein have been destroyed, identify as much of the information as you can responsive to Instructions 4 and 5 hereof, identify the person(s) destroying such document and provide copies of all relevant Document retention/destruction protocols or procedures applicable to such documents.

11. Wherever responses include estimated information, include an explanation of the methods and calculations used to derive the estimates.

12. Some of CSWD's discovery 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.

INTERROGATORIES

INTERROGATORY NO. 1

For each of your responses to the Interrogatories contained herein, please: (1) identify each person assisting and/or providing information regarding such including a statement that each such person has read and agreed to comply with the Definitions and Instructions set forth above, (2) identify each person, by name, address, and telephone number, known to you having knowledge concerning such Interrogatory, and (3) for each such person identified please provide curriculum vitae or resume indicating that person's employment, education and work experience history.

INTERROGATORY NO. 2

Pursuant to the Petition's Vermont Wetland Permit Application Summary dated February 26, 2013, the gas transmission line was re-routed to Redmond Road in Williston to reduce impact on the wetlands in the CCCH corridor. Please state and identify any and all other basis for choosing Redmond Road in lieu of the CCCH corridor. Specifically, but not exclusively, please state the following:

- a. the constructability of the transmission gas mainline on Redmond Road in comparison to the CCCH corridor;
- b. the effect on the length of the pipeline, if there is any, in placing the pipeline by the CCCH corridor in lieu of on Redmond Road;
- c. any safety issues related to placement of the pipeline on the CCCH corridor in lieu of Redmond Road;
- d. any difference in providing reliable service to customers if the pipeline is placed on the CCCH corridor instead of Redmond Road; and

- e. the cost differential, if any, in placing the pipeline on the east side of Redmond Road
in lieu of the CCCH corridor.

INTERROGATORY NO. 3

Please identify all documents and communications that reflect, refer or otherwise relate to Interrogatory No. 2.

INTERROGATORY NO. 4

Please state and identify any and all other alternative plans to the current Redmond Road path for re-routing the transmission line away from the CCCH corridor to avoid wetland, waters and other natural resources.

INTERROGATORY NO. 5

Please identify all documents and communications that reflect, refer or otherwise relate to Interrogatory No. 4.

INTERROGATORY NO. 6

Please state and identify the economic analysis applied when choosing Redmond Road as the alternative route to the CCCH corridor for the gas transmission line.

INTERROGATORY NO. 7

Please identify all documents and communications that reflect, refer or otherwise relate to Interrogatory No. 6.

INTERROGATORY NO. 8

Please state and identify any and all wetland, waters and other natural resources impact there is on the area surrounding Redmond Road as a result of re-routing the transmission line away from the CCCH corridor.

INTERROGATORY NO. 9

Please identify all documents and communications that reflect, refer or otherwise relate to Interrogatory No. 8.

INTERROGATORY NO. 10

Please state and identify each basis for choosing to place the gas transmission line on the east side of Redmond Road in lieu of the west side of Redmond Road. Specifically, but not exclusively, please state the following:

- a. the constructability of the transmission gas mainline on the west side of Redmond Road in comparison to the east side of Redmond Road;
- b. the effect on the length of the pipeline, if there is any, in placing the pipeline on the west side of Redmond Road in lieu of the east side;
- c. any safety issues related to placement of the pipeline on the west side of Redmond Road in lieu of the east side;
- d. any difference in providing reliable service to customers if the pipeline is placed on the east side in lieu of the west side of Redmond Road;
- e. any environmental impact the pipeline would have on the west side of Redmond Road; and
- f. the cost differential, if any, in placing the pipeline on the west side of Redmond Road in lieu of the east side.

INTERROGATORY NO. 11

Please identify all documents and communications that reflect, refer or otherwise relate to Interrogatory No. 10.

INTERROGATORY NO. 12

Please state and identify any and all planned safety procedures and policies VGS will employ to monitor any potential rupture or leakage in the vicinity of CSWD's properties in Williston, Vermont if the transmission line is constructed as currently proposed. Specifically, but not exclusively:

- a. any fire safety plans, proposals and precautions;
- b. any monitoring and detection of potential gas leaks plans;
- c. plans for construction of any fire hydrants or extension of water lines for water sources for extinguishing fires; or
- d. any analysis as to the need for extending water lines.

INTERROGATORY NO. 13

Please identify all documents and communications that reflect, refer or otherwise relate to Interrogatory No. 12.

INTERROGATORY NO. 14

Please state and identify how VGS plans on working with CSWD to effectively monitor and detect any and all potential gas line leaks. Specifically, but not exclusively, how does VGS plan on differentiating contaminants detected in the vicinity of CSWD groundwater monitoring wells as originating from the gas pipeline as opposed to contaminants from a solid waste facility?

INTERROGATORY NO. 15

Please identify all documents and communications that reflect, refer or otherwise relate to Interrogatory No. 14.

INTERROGATORY NO. 16

Please state and identify any and all VGS policies and procedures that reflect, refer or otherwise relate to specialized care in constructing and placing gas transmission lines over property used for solid waste disposal. Specifically, but not exclusively, Petitioner's plans to avoid or mitigate disruption to the following on CSWD's properties:

- a. groundwater well monitoring;
- b. stormwater treatment pond;
- c. berm and plantings (i.e. trees) located along Redmond Road to hide visual impact of CSWD's waste disposal systems and facilities as required by the Town of Williston Design Review Board permit and Act 250;
- d. CSWD's wetlands and drainage areas;
- e. Septic system leach field; and
- f. Lost space from the compost facility and landfill currently in the planning phase.

INTERROGATORY NO. 17

Please identify all documents and communications that reflect, refer or otherwise relate to Interrogatory No. 16.

INTERROGATORY NO. 18

If the gas transmission line is located on the east side of Redmond Road, please state and identify the steps the Petitioner will take to avoid any unduly burdensome impact by the Project on CSWD's several solid waste management systems located on CSWD's properties during the construction phase and final placement of the gas pipelines.

INTERROGATORY NO. 19

Please identify all documents and communications that reflect, refer or otherwise relate to Interrogatory No. 18.

INTERROGATORY NO. 20

Please identify all documents which you used in connection with preparing your response to the preceding interrogatories that have not already been disclosed in previous responses.

DOCUMENT REQUESTS

REQUEST NO. 1

Please produce most recent and current design plans, including details of all pipelines, valves, gates, etc., that pertain to sections of the Project traveling over CSWD's properties located off Redmond Road in Williston. Specifically, but not exclusively, the path of the gas transmission line in the vicinity of MV-1 exhibited on Exhibit JH-2 and more specifically in Exhibit JH-3.

REQUEST NO. 2

Please produce all documents that reflect, refer or otherwise relate to plans on typical set back requirements of facilities, buildings, structure and underground wells and foundations that are necessary or advisable for distance from VGS' gas pipelines and for VGS mainline valves.

REQUEST NO. 3

Please produce all documents that reflect, refer or otherwise relate to the cost estimates for the current proposed placement of the gas line on the east side of Redmond Road in lieu of placing the gas line on the west side of Redmond Road.

REQUEST NO. 4

Please produce all documents and communications that reflect, refer or otherwise relate to the cost estimates for the alternative transmission mainline alignments in the towns of Williston, Essex, Essex Junction, and Colchester, Vermont. Specifically, but not exclusively, cost estimates for the effects of the alternative transmission mainline alignments indicated in Exhibit JBH-2 in the vicinity of Redmond Road.

REQUEST NO. 5

Please produce all documents and communications that reflect, refer or otherwise relate to all survey and field investigation reports and/or studies pertaining to the proposed gas transmission line through the Redmond Road area.

REQUEST NO. 6

For each expert Petitioner intends to call as a witness in this proceeding with regard with to any and all subjects related to Interrogatories and Requests to Produce, herein, (including those experts who offered prefiled direct testimony), please provide:

- a. A resume or curriculum vitae if not previously 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 party 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 profession licenses held by the expert.

REQUEST NO. 7

Please produce all documents responsive to Interrogatory No. 3 contained in the CSWD's Interrogatories *supra*.

REQUEST NO. 8

Please produce all documents responsive to Interrogatory No. 5 contained in the CSWD's Interrogatories *supra*.

REQUEST NO. 9

Please produce all documents responsive to Interrogatory No. 7 contained in the CSWD's Interrogatories *supra*.

REQUEST NO. 10

Please produce all documents responsive to Interrogatory No. 9 contained in the CSWD's Interrogatories *supra*.

REQUEST NO. 11

Please produce all documents responsive to Interrogatory No. 11 contained in the CSWD's Interrogatories *supra*.

REQUEST NO. 12

Please produce all documents responsive to Interrogatory No. 13 contained in the CSWD's Interrogatories *supra*.

REQUEST NO. 13

Please produce all documents responsive to Interrogatory No. 15 contained in the CSWD's Interrogatories *supra*.

REQUEST NO. 14

Please produce all documents responsive to Interrogatory No. 17 contained in the CSWD's Interrogatories *supra*.

REQUEST NO. 15

Please produce all documents responsive to Interrogatory No. 19 contained in the CSWD's Interrogatories *supra*.

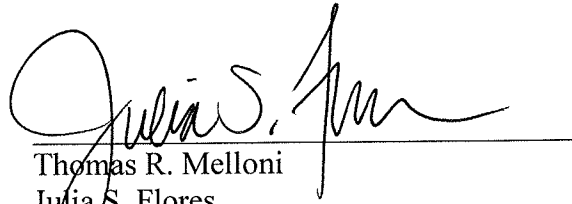
REQUEST NO. 16

Please produce all documents responsive to Interrogatory No. 20 contained in the CSWD's Interrogatories *supra*.

Dated: April 19, 2013
Burlington, Vermont

BURAK ANDERSON & MELLONI, PLC

By:



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30 V.S.A. § 248, authorizing the construction)
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consisting of approximately 43 miles of new)
natural gas transmission pipeline in Chittenden)
and Addison Counties, approximately 5 miles)
of new distribution mainlines in Addison County,)
together with three new gate stations in Williston,)
New Haven and Middlebury, Vermont)

CERTIFICATE OF SERVICE

I, Julia S. Flores, certify that on April 19, 2013, I served a copy of Chittenden Solid Waste District's First Set of Interrogatories and Requests to Produce to Vermont Gas Systems in the above captioned matter and Certificate of Service, filed herein, via U.S. First Class Mail upon the following:

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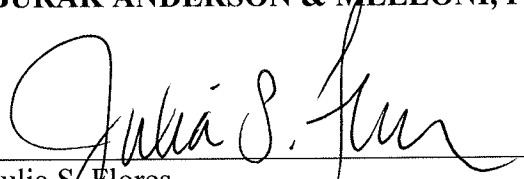
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[Signature page to follow]

Dated: April 19, 2013
Burlington, Vermont

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By:



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Attorneys for Chittenden Solid Waste District

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