

**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 )  
new distribution mainline in Addison County, )  
together with three new gate stations in )  
Williston, New Haven, and Middlebury, )  
Vermont )

Docket No. 7970

**TOWN OF MONKTON’S FIRST SET OF DISCOVERY REQUESTS**

**NOW COMES** the Town of Monkton, by and through its attorney, Joshua R.

Diamond of Diamond & Robinson, P.C., pursuant to VT Public Service Board (the  
“Board” or “PSB”) Rule 2.214 and V.R.C.P. 33 and 34, hereby request that Vermont Gas  
Systems, Inc. (“VGS” or “Petitioner”) answer the following discovery requests in writing  
in accordance with V.R.C.P. 33 and 34:

**INSTRUCTIONS**

The full text of the definitions and rules of construction set forth below are incorporated by reference into all interrogatories, requests to produce, and requests to admit but shall not preclude (i) the definition of other terms specific to the particular litigation, (ii) the use of abbreviations or (iii) a more narrow definition of a term defined below. The following definitions apply to all interrogatories.

A. **COMMUNICATION.** “Communication” means the transmittal of information (in the form of facts, ideas, inquiries or otherwise). The term includes, but is not limited to, oral discussions, written correspondence, e-mails, etc.

B. **DOCUMENT.** “Document” is defined to be synonymous in meaning and equal in scope to the usage of the term in V.R.C.P. 34. Please note that a draft or non-identical copy is a separate document within the meaning of this term. The term “document” includes, but is not limited to, writings, memoranda, e-mail, excel files,

M. V.R.C.P. 33 requires the response to each request to 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.

N. 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.

O. These requests shall be deemed continuing and must be supplemented in accordance with V.R.C.P. 26(e). Petitioner is directed to change, supplement and correct its answers to conform to all information as it becomes available to Petitioner, 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.

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

Q. If in response to any interrogatory you refer to industry practice, industry standard, regulatory standard, or similar requirements, please identify the specific practice, standard, or requirement to which you are referring or relying upon.

R. If any interrogatory 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.

S. The Town of Monkton reserves the right to submit additional discovery requests to VGS after receipt of answers to these interrogatories and requests to produce.

## DISCOVERY REQUESTS

1. Please provide a copy of each of your responses, both narrative and documentary, to each discovery request propounded to you by a party other than Monkton in this proceeding.

2. If VGS intends to make any changes or modifications to the Project design and routing plans previously submitted to the Board within the Town of Monkton, please identify and provide all updated Project design, and routing drawings, spreadsheets, and other documents depicting and explaining VGS' intended Project route and design. If there are no such modifications or changes to the route and design previously filed with the Board, please so state.

3. Will VGS perform any blasting of ledge and/or rock in the Town of Monkton? If so, please identify each location and the planned safety measures that will be taken to protect the integrity of the property owners that will be impacted.

4. Does VGS intended to build a distribution network within the Town of Monkton? If so, please provide a full description of the routing of the proposed distribution network along with routing drawings and/or maps. In addition, please identify the time table for the construction of the distribution network and the anticipated cost.

5. Identify the precise location and produce maps depicting the location of construction laydown areas within the Town of Monkton.

6. For those agricultural lands located in the Town of Monkton that will be impacted by the transmission pipeline (i.e. servient estate), please identify: (1) the depth that the transmission pipeline will be placed below the ground; and (2) any limitations of use upon the agricultural lands resulting from the construction of the transmission pipeline.

7. Does VGS intend to limit the use of the transmission pipeline to natural gas or other gas products and exclude the transportation of oil or oil related products. If the answer is in the negative, please explain fully the decision underlying your response.

DATED at Montpelier, Vermont this 19<sup>th</sup> day of April, 2013.

DIAMOND & ROBINSON, P.C.

By: 

Joshua R. Diamond, Esquire  
Attorney for Town of Monkton  
P.O. Box 1460  
Montpelier, VT 05601-1460  
(802) 223-6166  
E-mail: [jrd@diamond-robinson.com](mailto:jrd@diamond-robinson.com)