

**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)	Docket No. 7970
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)	

**FIRST SET OF INFORMATION REQUESTS
SERVED UPON PETITIONERS BY VELCO**

Vermont Electric Power Company, Inc. and Vermont Transco LLC (collectively “VELCO” or the “Company”), by and through its counsel, pursuant to Vermont Public Service Board (the “Board” or PSB”) Rule 2.214 and V.R.C.P. 33 and 34, request that Vermont Gas Systems, Inc. (“VGS” or “Petitioner”) answer the requests in accordance with V.R.C.P. 33 and 34.

INSTRUCTIONS

1. Please reproduce each request along with your response per V.R.C.P. 33.
2. Per V.R.C.P. 33, please make each response 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 business department 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.
3. 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’s workpapers and files or that is otherwise available.
4. 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.

5. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.
6. 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.
7. Some of VELCO's requests may make particular reference to a portion of Petitioner's filings. 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. "Board" means the Vermont Public Service Board.
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. All spreadsheets provided must have all formulae intact and accessible.
10. "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.
11. "Petition," as used herein, means Petitioner's original petition and supplemental filing filed with the Vermont Public Service Board in this docket, unless the context indicates otherwise.
12. "Project" means the above-captioned VGS pipeline project and all related planning, construction, operations and maintenance activities.
13. "VELCO ROW" includes any and all VELCO rights of way, in fee parcels, access rights, and other VELCO property rights or interests upon/over/under/through which, or adjacent to which the Project will be constructed, installed, maintained, accessed, and operated.
14. "VELCO's Electric Transmission System" and "VELCO's system" includes VELCO's electric transmission and telecommunications facilities.
15. With respect to each document produced by Petitioner, identify the person who prepared

the document and the date on which the document was prepared.

16. If any interrogatory or request requires a response that Petitioners believe to be privileged, please state the complete legal and factual basis for the claim of privilege, provide the information required by the 5/16/95 order in Docket No. 5771 and respond to the parts of the interrogatory or request as to which no privilege is asserted.
17. 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.
18. To expedite the discovery process and the resolution of this docket, Petitioners should contact VELCO as soon as possible, and prior to the above deadline for response, if it seeks clarification on any of these information requests.

INTERROGATORIES AND REQUESTS TO PRODUCE

Interrogatories

1. If VGS intends to make any changes or modifications to the Project design and routing plans previously submitted to the Board, 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.
2. Temporary use of VELCO ROW: For each area of the VELCO ROW that Petitioner intends to temporarily use for purposes of constructing or maintaining the Project, e.g., laydown areas, staging areas, access routes, etc., please identify the location and size/length/width of the area, the nature of the use of that area, the expected duration of that use, and by what conveyance or means (e.g., lease, license, etc.) VGS intends to obtain such rights.
3. Permanent use of VELCO ROW: Please state to the nearest tenth of a mile the total linear miles of the Project that will be sited permanently in the VELCO ROW. For each area of the VELCO ROW that Petitioner intends to permanently site the Project, please identify

the location with reference to the closest VELCO transmission structure number(s) and the intended width and length of the permanent Project right of way Petitioner intends to obtain from VELCO, including the following information:

- a. Location: Please explain why each VELCO ROW location was chosen, identify what alternative (i.e., non-VELCO ROW) locations were considered, and explain what factors (e.g., specific landowner, local government, and state or federal agency, and other regulatory concerns) VGS considered in making each decision to site the Project in the VELCO ROW; and
 - b. Width: Please explain why the particular width identified in response to this Interrogatory 3 is necessary for the Project. Please explain the methodology used and the factors considered by VGS in determining the intended width of its permanent ROW in VELCO's ROW. Please identify any industry, regulatory, or other standards that VGS considered in deciding on this width. If the width is different than the 20' width that VGS previously represented to VELCO, please explain why the intended width was increased, who made that decision, when the decision was made, and the full basis for that decision.
 - c. VELCO ROW crossings: For each segment of the Project that crosses (versus runs parallel to) the VELCO ROW, please describe the location and alignment of each crossing (with reference to the nearest VELCO transmission structure number) including the specific angle and length of each crossing. If the crossing angle is greater than 90 degrees, please explain the basis for this design. Is a 90 degree crossing acceptable to VGS? If not, please identify the reason(s) why not, and identify any industry, regulatory, or other standards upon which those reasons are based. If cost differential is a basis for not using 90 degree angle for VELCO ROW crossings, please explain the difference in the installation cost for 90 degree crossings versus the proposed pipeline crossing angles.
4. Construction activities: Please explain how the Project will be constructed in the VELCO ROW including a description of expected pre-construction activities, construction activities, and remediation activities VGS expects to undertake in VELCO's ROW. In

addition, please answer the following:

- a. Will VGS perform any blasting of ledge and/or rock in or near the VELCO ROW and System? If so, please identify each location (with reference to the nearest VELCO transmission structure number) and the planned safety measures that will be taken to protect the reliability of VELCO's system.
- b. Please describe any expected Project-related vegetation/tree clearing activities that VGS will undertake in VELCO's ROW.
- c. Please describe what measures and precautions VGS will take to avoid electrical contact when conducting pre-construction and construction related activities in the VELCO ROW. Please indicate whether VGS intends to obtain prior VELCO review and VELCO approval of the Project's pre-construction and construction related activities in the VELCO ROW. Please describe the field oversight that VGS will have during pre-construction and construction activities. Will VGS have a qualified person(s) who understands the electrical risks associated with construction in a high voltage bulk electrical transmission right of way conduct oversight of Project activities in the VELCO ROW?
- d. Please identify the intended depth below surface at which the Project infrastructure will be installed in VELCO's ROW. Please explain what standards and factors VGS considered in determining that this depth was appropriate for the Project. Please explain whether the intended depth will be uniform or not throughout VELCO's ROW.
- e. Please describe the cathodic protection equipment and/or technologies that VGS will use to protect VELCO's system. Please explain how those systems will be designed, installed, monitored, and maintained. What is the life expectancy of these systems? Will the proposed cathodic protection system be adequate to protect the gas transmission line if VELCO constructed a second electric transmission line in the VELCO ROW?
- f. Provide a summary of all heavy equipment that VGS will use to construct the Project in VELCO's ROW. Include the type, weight, pounds per square inch

- (PSI) rating and height of vehicles and equipment that will traverse and/or operate in the VELCO ROW.
- g. Please describe how VGS plans to protect against potential Project-related damage to VELCO's underground electric system facilities including: ground wires, counterpoise grounding systems, grounding rods and grids, guys and guy anchors.
 - h. Will the Project be constructed, installed, protected, maintained, accessed, and operated in a manner that does not interfere with VELCO's ability to construct additional electric transmission lines in the VELCO ROW in the future? If the answer is anything other than an unqualified "Yes," please explain any such qualifications and any measures VGS proposes to mitigate the Project's potential impacts on VELCO's ability to install additional electric transmission facilities in the VELCO ROW.
 - i. Please advise if VGS plans or intends to request an outage of any portion of VELCO's system during the pre-construction, construction or maintenance phases of the Project? If yes, please provide details as to why, detailing the duration of each required outage. If not, please explain why no outage is required.
5. Will the Project or its construction in any way and for any duration limit or constrain VELCO's ability to access VELCO's ROW and system? If the answer is anything other than an unqualified "No" please explain any such limits and constraints, the timing and duration of any such constraints, the nature of any such constraints, and what measures VGS will employ to mitigate any such limits or constraints.
 6. Will the Project (during construction and post-construction) adversely impact the stability and reliability of Vermont's electric transmission system? Whatever the answer is, please identify the basis for this opinion, the assumptions underlying this opinion, all potential Project-related risks to the VELCO system VGS considered in arriving at its conclusion (and any specific risk mitigation considered), and the qualifications of the witness supporting this opinion that support this opinion.

Requests to Produce

1. Please produce any and all documents identified, referred to, or relied upon in response to the preceding interrogatories.

Dated at Rutland, Vermont this 19th day of April, 2013.

**VERMONT ELECTRIC POWER COMPANY, INC.
and
VERMONT TRANSCO LLC**

By:



S. Mark Sciarrotta, Assistant General Counsel
VELCO
366 Pinnacle Ridge Road
Rutland, Vermont 05701
(802) 770-6339

c: Service List