

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

Docket No. 7970

RESPONSE OF PETITIONER TO DAVID AND CLAUDIA AMBROSE’S  
FIRST SET OF INFORMATION REQUESTS ON PETITIONER

This is the response of Vermont Gas Systems, Inc. (“VGS” or “Petitioner”) to the First Set of Discovery Requests (“Discovery Requests”) of David and Claudia Ambrose (“Ambrose”). Petitioner is filing one complete hard copy of its responses with the Public Service Board (“Board”), with two copies served on David and Claudia Ambrose and a copy served on each other party of record.

**General Objections:**

1. Petitioner objects to any instructions contained in the Discovery Requests to the extent such instructions purport to place on Petitioner greater requirements or reserve greater rights to David and Claudia Ambrose than are permitted by the Vermont Rules of Civil Procedure as made applicable to Board proceedings through Board Rule 2.214 (A).

2. Petitioner objects to any request for information or production of document(s) that is (or are) subject to the attorney-client privilege, constitute work product, are protected under state or federal law or are proprietary, competitively sensitive or confidential.

3. Petitioner objects to requests to the extent that they (a) are overbroad or unduly burdensome; (b) are cumulative; (c) call for the production of documents not in the possession, custody or control of Petitioner; (d) call for the review, compilation, or production of publicly-available documents that could be obtained by the requesting party in a less burdensome manner; (e) are vague and/or ambiguous; (f) seek information not reasonably calculated to lead to the discovery of admissible evidence; or (g) call for the review, compilation, or production of a voluminous number of documents at great expense to Petitioner.

4. Petitioner does not hereby waive any objections, and it reserves the right to later raise any additional, available objections.

5. Responses and objections indicated herein reflect the position of the individual specified by Petitioner and not the other respondents unless specifically stated otherwise.

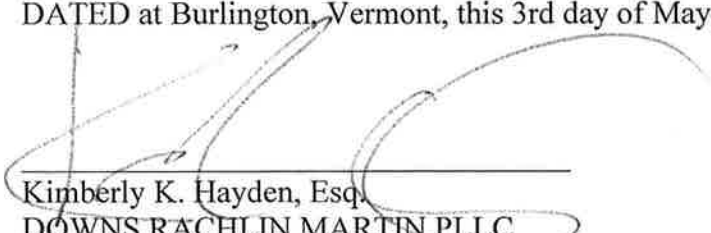
**Q.Ambrose:VGS.1-1:** Having been granted intervention status, I request that the schedule for construction on the section of Plank Road, from South Middlebrook to Rt7 be identified.

**A.Ambrose:VGS.1-1:** That has not yet been determined.

Person Responsible for Response: John Heintz  
Title: Project Manager  
Date: May 3, 2013

**As to objections:**

DATED at Burlington, Vermont, this 3rd day of May, 2013.



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