

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 VELCO'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 Vermont Electric Power Company, Inc. and Vermont Transco LLC ("VELCO"). Petitioner is filing one complete hard copy of its responses with the Public Service Board ("Board"), with two copies served on VELCO 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 VELCO 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.VELCO:VGS.1-1: 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.

A.VELCO:VGS.1-1:

Based upon discussions with VELCO, VGS understands that this question has been withdrawn.

Person Responsible for Response: Kimberly K. Hayden, Esq.
Title: Director, Downs Rachlin Martin PLLC
Date: May 3, 2013

Q.VELCO:VGS.1-2: 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.

A.VELCO:VGS.1-2:

Based upon discussions with VELCO, VGS understands that this question has been withdrawn.

Person Responsible for Response: Kimberly K. Hayden, Esq.
Title: Director, Downs Rachlin Martin PLLC
Date: May 3, 2013

Q.VELCO:VGS.1-3: 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.

A.VELCO:VGS.1-3:

Based upon discussions with VELCO, VGS understands that these questions have been withdrawn.

Person Responsible for Response: Kimberly K. Hayden, Esq.
Title: Director, Downs Rachlin Martin PLLC
Date: May 3, 2013

Q.VELCO:VGS.1-4: 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.

A.VELCO:VGS.1-4: Based upon discussions with VELCO, VGS understands that this question has been withdrawn.

a: There may be blasting to facilitate the installation of the pipeline. The exact location of blasting, if necessary, is yet to be determined. VGS will use a blasting contractor licensed in the State of Vermont. It should be noted that blasting for projects of this nature will have limited impacts. Any blasting that is required for the Project would be conducted by state-licensed professionals in accordance with applicable blasting codes and local blasting requirements and in conformance with the American Gas Association (AGA) Blasting Guide (latest edition). VGS will adhere to a rigorous blasting plan, highlights of which are described in the 2/28/13 prefiled testimony of John Heintz at pages 34-39.

b. VGS will brush hog its 20' corridor area within the VELCO ROW on average every three years. VGS does not use herbicides.

c. See A.VELCO:VGS.1-6, below.

d. Four feet below the surface. The four foot depth is based upon the pipeline design basis to support HS20 equipment loading. As noted in the specifications accompanying the Transmission Mainline Design Plans, Exhibit Petitioner Supp. JH-3 (2/28/13), the minimum depth is 36 inches below ground. This depth will change depending land features (for examples in agricultural fields the pipe will be placed four feet below the surface, and where directional drilling is involved to avoid impacts to a waterway, the depth will be **greater**.)

e. The cathodic protection design is currently being developed in coordination with VELCO.

f. The following is a list of the type of heavy equipment (or equivalent) that could potentially be located within the Project ROW during construction:

- 3 - Caterpillar D6 Dozers
- 2 - Caterpillar D8 Dozers
- 6 - Caterpillar 325 Excavators

- 2 - Caterpillar 583 Side Booms
- 8 - 572 or 571 Caterpillar Side Booms
- 2 - Ozzie Padding Machines
- 1 - CRC Bending Machine

g. VGS plans to avoid this infrastructure and is working with VELCO engineers in developing the design to accomplish this.

h. Yes. VGS has been working with VELCO engineers to develop acceptable design, construction and operating parameters and specifications and is currently working with VELCO to develop a Joint Operating Agreement for this purpose. VGS design parameters are taking into account or assuming a potential 345 kV circuit in the VELCO corridor.

i. No. VGS has asked VELCO to provide VGS with information on any planned outages so that VGS can coordinate its construction activities during such periods. VELCO is undertaking study to determine hot conductor sag clearance requirements for the VELCO lines involved and VGS construction specifications will require that these line clearances and all OSHA and NESC clearances and requirements are met during construction. In addition, VGS has requested VELCO to assign personnel to be in the field during VGS construction in the VELCO corridor.

Person Responsible for Response: Jean-Marc Teixeira, John Heintz
Title: Vice President of Operations, Vermont Gas Systems, Inc., Project Manager
Date: May 3, 2013

Q.VELCO:VGS. 1-5: 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.

A.VELCO:VGS. 1-5: No. The parties are developing a Joint Operating Agreement to address mutual use and maintenance of the corridor so as to not unduly interfere with the reliability of each company's system.

Person Responsible for Response: Jean-Marc Teixeira, John Heintz
Title: Vice President of Operations, Vermont Gas Systems, Inc.; Project Manager
Date: May 3, 2013

Q.VELCO:VGS. 1-6: 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.

A.VELCO:VGS. 1-6: No. The VGS pipeline is being designed so VELCO will not be required to curtail or modify its operations during construction. Once completed, the operation and maintenance of the pipeline will not impact the VELCO system, under normal operating conditions. The pipeline and its cathodic protection and grounding systems are being designed to coexist with VELCO's existing and proposed infrastructure and in accordance with VELCO guidelines. VGS will maintain continuous communication with VELCO personnel during construction within the VELCO corridor and will have ongoing communication and coordination during operation. VGS has agreed to work with VELCO to develop a Joint Operating Agreement.

Person Responsible for Response: Jean-Marc Teixeira, John Heintz
Title: Vice President of Operations, Vermont Gas Systems, Inc.; Project Manager
Date: May 3, 2013

REQUESTS TO PRODUCE

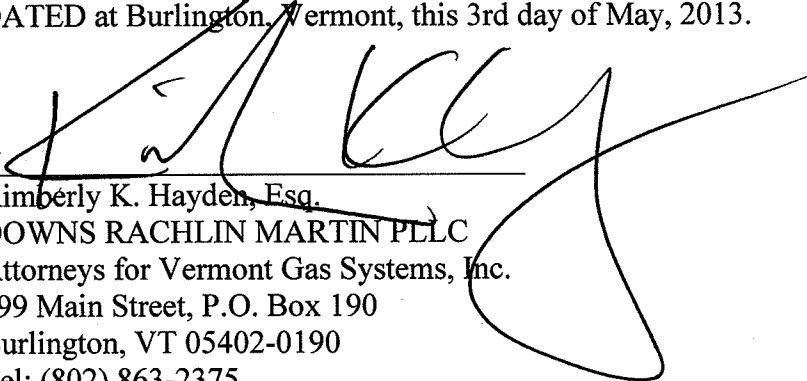
Q.VELCO:VGS.RTP.1-1: Please produce any and all documents identified, referred to, or relied upon in response to the preceding interrogatories.

A.VELCO:VGS.RTP.1-1: All documents referenced have been previously provided.

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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