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 VERMONT AGENCY OF TRANSPORTATION'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 Agency of Transportation ("VTrans"). Petitioner is filing one complete hard copy of its responses with the Public Service Board ("Board"), with two copies served on the Vermont Agency of Transportation 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 the Vermont Agency of Transportation 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.VTrans:VGS.1-1: For each area of the VTrans 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, including the amount of compensation, if any, VGS proposes to pay VTrans for the use of the VTrans ROW.

A.VTrans:VGS.1-1: Each area of the VTrans ROW that Petitioner intends to temporarily use for purposes of constructing or maintaining the Project, e.g., laydown areas, staging areas, access routes, etc., and the location and size/length/width of the area, and the nature of the use of that area, can be readily identified from review of **Attachment A.CLF:VGS.1-6.1** (VGS 19 VSA § 1111 Permit Application dated 4/17/13 (VAOT permit application)).

The expected duration of use of the access roads, ROW, Temporary Work Space (TWS) and Additional Temporary Work Space (ATWS) is between 1 and 6 months (2014 construction season).

Permanent occupancy is indefinite.

The right would be permitted use authorized by 19 VSA § 1111 and a Certificate of Public Good.

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

Q.VTrans:VGS.1-2: Please state to the nearest tenth of a mile the total linear miles of the Project that you intend to permanently locate in the VTrans ROW. For each such area, please identify the location and the intended width and length of the permanent Project right of way Petitioner intends to obtain from VTrans, including the following information:

a. Please explain why each VTrans ROW location was chosen, identify what alternative (i.e., non-VTrans 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 VTrans ROW; and Width: Please explain why the particular widths of the permanent locations are necessary for the Project and explain the methodology used to determine the intended widths of its permanent ROW in VELCO's ROW. Please identify any industry, regulatory, or other standards that VGS considered in deciding on this width.

b. For each segment of the Project that crosses the VTrans 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.

c. Please explain how the Project will be constructed in the VTrans ROW including a description of expected pre-construction activities, construction activities, and remediation activities VGS expects to undertake.

A.VTrans:VGS.1-2:

VGS currently proposes 8.1 total linear miles to be permanently located in the VTrans ROW as presented in **Attachment A.CLF:VGS.1-6.1** (the 19 VSA § 1111 permit application).

a. Refer to Exh. Petitioner Supp. JAN-13 (2/28/13)
b. VGS does not understand the question with reference to VELCO.
c. Please refer to **Attachment A.CLF:VGS.1-6.1** (19 VSA § 1111 permit application). In addition, see following sequence of activities provided below.

General Description of Activities

Stormwater management controls will be installed along the proposed pipeline corridor. The proposed corridor will be cleared of vegetation. All work will be confined to the pipeline corridor, designated access roads and laydown areas as depicted in the VAOT permit application.

All upland areas of disturbed or exposed soil that are not actively being cultivated will be stabilized with seed and mulch, seed and rolled erosion control product ("RECP"), and/or other means of providing permanent stabilization per the Erosion Prevention and Sediment Control (EPSC) Plan, as discussed in Mr. Nelson's testimony. All areas will be restored to original grades and revegetated following construction to the degree feasible.

Installation of the Transmission Mainline will generally involve excavation of a five foot wide trench to a depth of approximately five feet, with soil temporarily stockpiled adjacent to the trench.

Following excavation of the trench, pipe will be strung out, welded together and placed in the trench. The pipe will be backfilled with sand and stockpiled soil.

In association with construction of the project, temporary laydown/staging areas will be made available for equipment staging, bulk material stockpiling, vehicle parking, job trailers/meeting locations, etc. These laydown/staging areas are proposed to be located off of U.S. Route 2 in Williston and northwest of the Plank Road/Lime Kiln Road intersection in New Haven. The laydown/staging areas will be stabilized with stone on geotextile fabric, which will be removed following construction.

Per the EPSC Plan, stabilized construction entrances/exists will be installed to minimize tracking of material onto public roadways, as discussed in Mr. Nelson's testimony.

Throughout the Transmission Mainline and Distribution Mainline corridors, smaller temporary laydown/staging areas (known as Additional Temporary Work Spaces or "ATWSs") will be installed to provide space for equipment staging, material stockpiling, and vehicle parking.

Sequence of Major Project Components

Transmission Mainline – Trenching Installation
To install the Transmission Mainline, there may be up to three (3) installation crews working at one time within separate segments of the VTrans right of way. Each crew typically installs several hundred feet of pipe each day, and could install up to 2,000 linear feet of pipe in a day under optimal conditions. Installation of the mainline occurs sequentially (similar to an assembly line) and involves:

1. Flagging resource areas
2. Staking pipeline centerline and corridor limits
3. Installing EPSC measures per the EPSC Plan
4. Clearing/grubbing vegetation
5. Grading/topsoil segregation
6. Ditching/trenching
7. Blasting rock or rock trenching (if needed)
8. Stringing pipe

9. Bending pipe
10. Welding/radiography and coating pipe
11. Installing (lowering) pipe
12. Tying-in to previously installed pipe
13. Backfilling soil
14. Stabilizing exposed soil and conducting restoration

Transmission Mainline – Horizontal Directional Drilling Installation

To conduct an HDD, the HDD crew requires additional work space on either side of the area to be drilled (e.g., protected resource area, roadway, or railroad) to allow for setup of the drilling equipment, pipe assembly and welding. The timeframe for conducting a HDD is dependent upon soil and rock material that may be encountered and length of pipe that is being installed. Sequencing of HDD activities generally involves:

1. Flagging resource areas
2. Staking pipeline centerline and corridor limits
3. Installing EPSC measures per the EPSC Plan
4. Clearing/grubbing vegetation
5. Grading/topsoil segregation
6. Drilling, with concurrent stringing and welding pipe
7. Pulling pipe
8. Tying-in to previously installed pipe
9. Stabilizing exposed soil and conducting restoration

Transmission and Distribution Mainlines – Roadside/Roadway Installation

Transmission and Distribution Mainlines that are to be installed via trenching within or immediately adjacent to roadways generally proceeds as follows:

1. Flagging resource areas
2. Demarcating pipeline centerline and corridor limits
3. Installing EPSC measures per the EPSC Plan
4. Clearing/grubbing vegetation (if any) and/or removing pavement
5. Grading/topsoil segregation (if any)
6. Ditching/trenching
7. Blasting rock trench (if needed)
8. Stringing pipe
9. Bending pipe
10. Welding/radiography and coating pipe
11. Installing (lowering) pipe
12. Tying-in to previously installed pipe
13. Backfilling soil
14. Stabilizing exposed soil and conducting restoration, including repaving as needed

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

Q.VTrans:VGS.1-3: Please advise whether VGS will be performing any blasting of ledge and/or rock in or near the VTrans ROW. If so, please identify each location and the safety measures and assurance that VGS will be making to protect the VTrans ROW.

A.VTrans:VGS.1-3: Please refer to VGS 19 VSA § 1111 Permit Application dated 4/17/13, **Attachment A.CLF:VGS.1-6.1**. Specific identification of areas where blasting of ledge and/or rock may be necessary in or near the VTrans ROW have not been determined at this time.

The following Blasting Standards will be followed during all drilling and blasting operations within VTrans ROW: 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).

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

Q.VTrans:VGS.1-4: Please describe any expected Project-related vegetation/tree clearing activities that VGS plans to take in the VTrans ROW.

A.VTrans:VGS.1-4: VGS will clear the width of the permanent and temporary corridor areas as shown in Exhibit Petitioner JH-3. The permanent corridor will be maintained through mechanical mowing approximately once every three (3) years.

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

Q.VTrans:VGS.1-5: Please identify the intended depth below surface at which the Project infrastructure will be installed in the VTrans ROW and explain the basis for VGS' decision to install its facilities at that depth and whether that depth is uniform, and if not, describe where it differs and explain why it differs.

A.VTrans:VGS.1-5: The pipeline will be installed with a minimum of 3-feet of cover over the top of the pipe. The pipeline will be installed with a greater depth at certain locations to facilitate horizontal directional drilling installation, stream crossings, agricultural areas and to avoid existing and proposed infrastructure. Please see Exhibit Petitioner JH-3 and VAOT 19 VSA § 1111 Permit Application dated 4/17/13, **Attachment A.CLF:VGS.1-6.1.**

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

Q.VTrans:VGS.1-6: Provide a summary of all heavy equipment that VGS will use to construct the Project in the VTrans ROW.

A.VTransVGS.1-6: The following is a list of the type of heavy equipment (or equivalent) that could potentially be located within the VTrans 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

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

Q.VTrans:VGS.1-7: Please describe how VGS plans to protect against potential Project-related damage to the VTrans ROW.

A.VTrans:VGS.1-7:

VGS will employ standard construction techniques as outlined in John Heintz's and Jeff Nelson's testimony. Areas impacted by construction will be restored to original grades and restored following construction to the degree feasible. All work will be conducted as outlined in the VAOT 19 VSA § 1111 Permit Application dated 4/17/13, **Attachment A.CLF:VGS.1-6.1**.

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

Q.VTrans:VGS.1-8: Will the Project or its construction in any way and for any duration limit or constrain VTrans' ability to access the VTrans' ROW and system? If so, please describe 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.VTrans:VGS.1-8: No.

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

REQUESTS TO PRODUCE

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

A.VTrans:VGS.RTP.1-1: Refer to previously filed testimony, exhibits and **Attachment A.CLF:VGS.1-6.1** (19 VSA § 1111 permit application).

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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