

STATE OF VERMONT
PUBLIC SERVICE BOARD

Petition of Vermont Gas Systems, Inc,
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 3 new gate stations
in Williston, New Haven and Middlebury,
Vermont

Docket No. 7970

**FIRST SET OF INFORMATION REQUESTS SERVED UPON PETITIONERS
BY VERMONT AGENCY OF TRANSPORTATION**

The Vermont Agency of Transportation (VTrans), 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 these requests in accordance with V.R.C.P. 33 and 34.

INSTRUCTIONS

1. "Document" means 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.
2. "Project" means the above-captioned VGS pipeline project and all related planning, construction, operations and maintenance activities.
3. "VTrans ROW" includes any and all VTrans' rights of way, in fee parcels, access rights, and other VTrans property rights or interests upon/over/under/through which, or adjacent to which the Project will be constructed, installed, maintained, accessed, and operated.
4. Please describe the complete legal and factual basis for any objections and respond to each request to the extent not subject to the objection/s.

INTERROGATORIES AND REQUESTS TO PRODUCE

Interrogatories

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.
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 VTrns ROW including a description of expected pre-construction activities, construction activities, and remediation activities VGS expects to undertake.

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.
4. Please describe any expected Project-related vegetation/tree clearing activities that VGS plans to take in the VTrans ROW.
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.
6. Provide a summary of all heavy equipment that VGS will use to construct the Project in the VTrans ROW.
7. Please describe how VGS plans to protect against potential Project-related damage to the VTrans ROW.
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.

Requests to Produce

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

Dated: April 19, 2013

AGENCY OF TRANSPORTATION
STATE OF VERMONT
WILLIAM H. SORRELL
ATTORNEY GENERAL



By: _____

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