

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

**SECOND SET OF INFORMATION REQUESTS SERVED UPON
PETITIONER 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

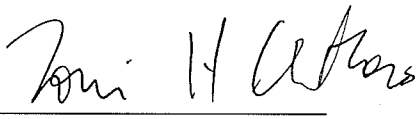
Interrogatories

1. Has VGS conducted any valuations, including but not limited to appraisals of any property in Addison and/or Chittenden counties in connection with the Project?
 - a. If your answer is yes, please produce a copy of each such valuation and/or appraisal.
 - b. If your answer is no, please state whether VGS intends to conduct any such valuations and/or appraisals in the future and when VGS anticipates conducting such valuations and/or appraisals.
2. Has VGS entered into any contracts, licenses, or any other agreements with any persons, including but not limited to individuals, corporations, organizations, associations, utilities or any other entities which concern VGS' use and/or purchase of any property in Addison and/or Chittenden counties in connection with the Project?
 - a. If your answer is yes, please produce a copy of each such agreement.
3. Please identify the names of each person or other entity who has participated in the preparation of valuations and/or appraisals with any property owner/s in Addison and/or Chittenden counties in connection with the Project.
4. Please identify the names of each person or other entity who has participated in negotiations with any property owner/s in Addison and/or Chittenden counties in connection with the Project.
5. Does VGS contend that its status as a regulated entity entitles it to locate its utilities in the VTrans' ROW without paying fair market value to VTrans for the use of such VTrans' ROW?
 - a. If your answer is yes, please explain the legal basis for your contention.
 - b. If your answer is no, please describe what amount VGS intends to offer VTrans as compensation for locating its utilities in VTrans' ROW and how VGS determined that amount, including the method VGS utilized to value VTrans' ROW and why VGS contends such method is the appropriate method for valuing VTrans' ROW.

Dated: May 17, 2013

VTrans' Second Set of
Discovery Requests to
Petitioner
May 17, 2013
Page 2 of 3

AGENCY OF TRANSPORTATION
STATE OF VERMONT
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