

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 THE TOWN OF MONKTON'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 the Town of Monkton ("Monkton"). Petitioner is filing one complete hard copy of its responses with the Public Service Board ("Board"), with two copies served on the Town of Monkton 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 Town of Monkton 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.Monkton:VGS.1-1:** Please provide a copy of each of your responses, both narrative and documentary, to each discovery request propounded to you by a party other than Monkton in this proceeding.

**A.Monkton:VGS.1-1:** All interrogatory responses and documents produced in connection with them in this proceeding are being provided to counsel for Monkton.

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

**Q.Monkton:VGS.1-2:** If VGS intends to make any changes or modifications to the Project design and routing plans previously submitted to the Board within the Town of Monkton, 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.Monkton:VGS.1-2:** VGS has made changes and modifications to the Project design and routing plans within the Town of Monkton that are different than those submitted to the Board in December 2012. These changes are reflected on Exhibit Petitioner Supplement JH-3 (2/28/13), Plan Sheets ANGP-T-C-049 through ANGP-T-C-065. Any revisions to those plans have not yet been finalized and will be provided by Petitioner with its supplemental and rebuttal filing on June 28, 2013.

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

**Q.Monkton:VGS.1-3:** Will VGS perform any blasting of ledge and/or rock in the Town of Monkton? If so, please identify each location and the planned safety measures that will be taken to protect the integrity of the property owners that will be impacted.

**A.Monkton:VGS.1-3:** 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 supplemental prefiled testimony of John Heintz at pages 34-39.

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

**Q.Monkton:VGS.1-4:** Does VGS intended to build a distribution network within the Town of Monkton? If so, please provide a full description of the routing of the proposed distribution network along with routing drawings and/or maps. In addition, please identify the time table for the construction of the distribution network and the anticipated cost.

**A.Monkton:VGS.1-4:** Please see **Attachment A.Monkton:VGS.1.4**. The map shows approximately 101 homes, four businesses and one school that would be served by the proposed distribution system to be built in 2016.

The Company estimates that the cost of building the proposed distribution system is \$736,000 including gate station, mains, services and meters based on a 40% conversion rate.

Person Responsible for Response: Timothy S. Lyons  
Title: Vice President of Sales and Marketing, Vermont Gas Systems, Inc.  
Date: May 3, 2013

**Q.Monkton:VGS.1-5:** Identify the precise location and produce maps depicting the location of construction laydown areas within the Town of Monkton.

**A.Monkton:VGS.1-5:** The only construction laydown areas are those areas designated as Additional Temporary Work Space (ATWS) associated with Horizontal Directional Drills (HDD) for the avoidance of natural resource and archeologically sensitive areas. These areas are identified on Exhibit Petitioner Supplement JH-3 (2/28/13) Plan Sheets:

ANGP-T-C-056, Station 1451+00 105'x1524';

ANGP-T-C-057, Station 1461+00 200'x200'

ANGP-T-C-059, Station 1490+00 50'x200', 1501+00 25'X700', 1508+00 50'x200';

ANGP-T-C-060, Station 1514+00 25'x380', 1524+00 50'x170'

Person Responsible for Response: John Heintz

Title: Project Manager

Date: May 3, 2013

**Q.Monkton:VGS.1-6:** For those agricultural lands located in the Town of Monkton that will be impacted by the transmission pipeline (i.e. servient estate), please identify: (1) the depth that the transmission pipeline will be placed below the ground; and (2) any limitations of use upon the agricultural lands resulting from the construction of the transmission pipeline.

**A.Monkton:VGS.1-6:** VGS will install the pipeline with a minimum of four (4) feet of cover to the top of the pipe in agricultural areas. VGS will work with individual landowners to determine if specific farming techniques would require additional depth of bury. There will be no limitations on the future agricultural use of the land with the exception that no trees can be planted within the permanent ROW.

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



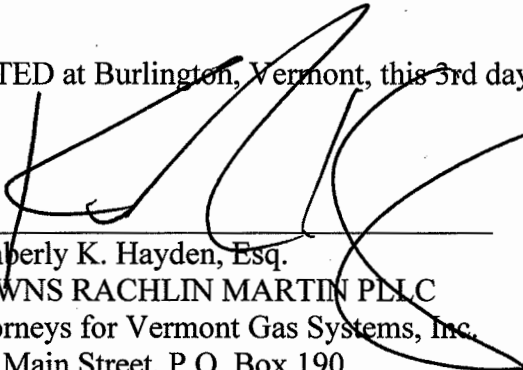
**Q.Monkton:VGS.1-7:** Does VGS intend to limit the use of the transmission pipeline to natural gas or other gas products and exclude the transportation of oil or oil related products. If the answer is in the negative, please explain fully the decision underlying your response.

**A.Monkton:VGS.1-7:** Yes.

Person Responsible for Response: Eileen Simollardes  
Title: Vice President, Supply and Regulatory Affairs, Vermont Gas Systems, Inc.  
Date: May 3, 2013

**As to objections:** Kimberly K. Hayden, Esq.

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



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