

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)	Docket No. 7970
distribution mainlines in Addison County,)	
together with three new gate stations in)	
Williston, New Haven and Middlebury,)	
Vermont)	

RESPONSE OF PETITIONER TO MONKTON'S
SECOND SET OF INFORMATION REQUESTS ON PETITIONER

This is the response of Vermont Gas Systems, Inc. ("VGS" or "Petitioner") to the Second 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 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 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.2-1: Please produce a GIS shape file that delineates the following: (a) pipeline siting/ (2) laydown areas; and/or (3) any anticipated access roads/routes for construction in the Town of Monkton (hereinafter "Town" or "Monkton").

A.Monkton:VGS.2-1: See **Attachment A.Monkton:VGS.2-1**. Refer to the shapefiles provided in the ANGP_Monkton_LOD.zip folder.

Person Responsible for Response: John Heintz
Title: Project Manager
Date: June 4, 2013

Q.Monkton:VGS.2-2: Please identify and describe fully how VGS intends to tests wells, septic systems and residences to determine if there has been any damage or adverse impact due to pipeline construction including blasting.

A.Monkton:VGS.2-2: VGS has prepared a draft Blasting Plan (see **Attachment A.ANR.1-3 (Heintz)**). Prior to performing any blasting for the Project, VGS shall file for Board approval, a final blasting plan that includes a pre-construction survey of any residential or agricultural water sources within the Town of Monkton within 600 feet of blasting, In addition, VGS shall perform the following:

- a. VGS shall utilize seismic monitoring equipment during blasting at the closest structure to the blast epicenter regardless of distance (e.g., more than 600 feet).
- b. Blasting mats shall be utilized for blasting activity.
- c. All blasting shall occur in conformity with the maximum safe values recommended by Appendix B of the U.S. Bureau of Mines Standard RI 8507.

Water quality and flow testing of wells will be offered to all property owners within the Town within a 600 foot radius of the blasting at no charge to the property owners.

Person Responsible for Response: John Heintz
Title: Project Manager
Date: June 4, 2013

Q.Monkton:VGS.2-3: Please provide all available map(s) of areas that will be impacted by blasting within the Town including proposed blast sites and water resources within 2000 feet of the proposed blast sites.

A.Monkton:VGS.2-3: Please refer to A.ANR:VGS.2-56. For purposes of Project costing, it has been assumed that approximately 35% of the entire Project corridor may require blasting during construction. The determination of actual blasting locations will be made by a qualified blasting contractor, in consultation with VGS.

Person Responsible for Response: John Heintz
Title: Project Manager
Date: June 4, 2013

Q.Monkton:VGS.2-4: Identify those section(s) of the proposed transmission pipeline within the Town that have not been surveyed including, but not limited to, anticipated surveys for impacted lands and animals. Identify the dates when VGS anticipates the non-surveyed lands will occur. Produce all maps delineating those sections identified above.

A.Monkton:VGS.2-4: The table titled "Supplemental Resource Delineation/Field Activities for ANGP Reroute" and associated 2/21/2013 email communication from Jeff Nelson to Billy Coster and Judith Dillon of VT ANR that were provided as attachments in response to ANR:VGS.2-42 identify additional natural resource inventories that had yet to be conducted as the time Exhibit Petitioner Supp. JAN-2 was prepared. Additional work that has been completed at this point is provided in the Re-filed Collateral Permit Applications (5/3/2013 which were provided as supplemental discovery to CLFs first round of interrogatories on 5/8/13). VHB has prepared the "Remaining Natural Resource Investigation Areas" memorandum dated 5/28/2013 (see **Attachment A.ANR:VGS.2-42.3**) which provides an inventory of the remaining field assessments to be completed in consideration of seasonal constraints and landowner permission.

Person Responsible for Response: Jeffrey A. Nelson
Title: Director of Energy and Environmental Services, Vanasse Hangen Brustlin, Inc.
Date: June 4, 2013

Q.Monkton:VGS.2-5: Describe fully how VGS intends to notify Town landowners and current residents about specific locations and times for blasting and other construction activities impacting the use and enjoyment of the respective resident's and/or landowner's properties.

A.Monkton:VGS.2-5: VGS has prepared a Draft Blasting Plan (see **Attachment A.ANR:VGS.1-3 (Heintz)**). Prior to performing any blasting for the proposed Project (and in fact likely by the June 28, 2013 Rebuttal Testimony date), VGS will develop and file for Board approval, a Final Blasting Plan that will include a pre-construction survey of any residential or agricultural water sources within 600 feet of blasting, and shall arrange for a public information session with surrounding landowners to address concerns related to blasting. Parties with standing on this issue will have two weeks, from the date this Plan is filed with the Board, to comment on the Plan. VGS will not commence any blasting activities until the plan is approved by the Board.

Prior to any actual blasting, VGS shall provide landowners and VGS shall utilize best efforts to notify tenants with one week written notice followed by twenty-four hour advance notice, including "door hangers" (e.g., notes on the door).

VGS plans to limit the hours of construction to Monday through Friday 7 am to 7 pm. Construction on Saturday is planned to occur between the hours of 8 am to 5 p.m. No construction shall occur on Sunday or state and federal holidays.

Person Responsible for Response: John Heintz
Title: Project Manager
Date: June 4, 2013

Q.Monkton:VGS.2-6: Would VGS consent, as a condition of the CPG, to develop and file with the Board for prior approval a blasting plan, which includes preconstruction surveys of any residential or agricultural water resources within one half mile of any proposed blasting site within the Town? If the answer is no, please explain fully VGS' position for not agreeing to such a condition.

A.Monkton:VGS.2-6: No. However VGS would accept as a CPG condition that prior to performing any blasting for the proposed project, VGS will develop and file for Board approval, a blasting plan that includes a pre-and post-construction survey of any residential or agricultural water sources within the Town within 600 feet of blasting, and shall arrange for a public information session with surrounding landowners to address concerns related to blasting. VGS will not commence any blasting activities until the plan is approved by the Board. VGS will also offer at no charge to such property owners with wells within 300' of the transmission pipeline pre-construction water testing of well water through the Vermont Department of Health program for testing drinking water from private water supplies and testing to establish water yields and verify pump access.

Person Responsible for Response: Eileen Simollardes; John Heintz
Title: Vice President, Supply and Regulatory Affairs, Vermont Gas Systems, Inc.; Project Manager
Date: June 4, 2013

Q.Monkton:VGS.2-7: Does VGS agree that it will be responsible to fully remediate, indemnify and hold harmless property owners within the Town for any damaged caused by VGS' construction and/or blasting outside of the respective rights of ways that it acquires related to this Project? If the answer is no, please explain fully VGS' position.

A.Monkton:VGS.2-7: VGS will be responsible to property owners for any physical damage to property if and to the extent such damage is caused by construction and/or blasting for the Project and to the extent the property damage is not otherwise compensated with easements provided for the Project.

Person Responsible for Response: Eileen Simollardes
Title: Vice President, Supply and Regulatory Affairs, Vermont Gas Systems, Inc.
Date: June 4, 2013

Q.Monkton:VGS.2-8: Would VGS consent, as a condition to the CPG, to pay for the services of an engineer hired by the Department of Public Service to oversee construction for the purpose of insuring that the Project conforms to the terms and conditions of the CPG? If the answer is no, please explain fully VGS' position for not agreeing to such a condition.

A.Monkton:VGS.2-8: VGS understands that the Department of Public Service already has a gas engineer on staff qualified to and who plans to oversee construction for the purpose of insuring that the Project conforms to the terms and conditions of the CPG. Should the DPS determine that additional resources are required, Vermont Gas would coordinate with the DPS to determine the most appropriate and efficient means of insuring that the Project conforms to the terms and conditions of the CPG.

Person Responsible for Response: Eileen Simollardes
Title: Vice President, Supply and Regulatory Affairs, Vermont Gas Systems, Inc.
Date: June 4, 2013

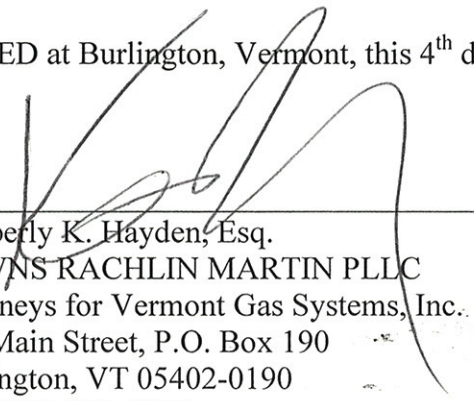
Q.Monkton:VGS.2-9: Please provide copies of any request for proposals or other documents reflecting the qualifications needed for all contractors and subcontractors that will be used on the construction of the Project (e.g. technical training, certifications, bonding, etc).

A.Monkton:VGS.2-9: VGS has not yet put the Project out to bid and therefore these documents have not yet been developed.

Person Responsible for Response: Jean-Marc Teixeira; John Heintz
Title: Vice President of Operations, Vermont Gas Systems, Inc.; Project Manager
Date: June 4, 2013

As to objections:

DATED at Burlington, Vermont, this 4th day of June, 2013.



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