

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 PUBLIC SERVICE DEPARTMENT'S
THIRD SET OF INFORMATION REQUESTS ON PETITIONER

This is the response of Vermont Gas Systems, Inc. ("VGS" or "Petitioner") to the Third Set of Discovery Requests ("Discovery Requests") of the Public Service Department ("PSD"). Petitioner is filing one complete hard copy of its responses with the Public Service Board ("Board"), with two copies served on the PSD 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 PSD 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.PSD:VGS.3-1: Based on the Memorandum of Understanding with VELCO regarding the cathodic protection system under the high voltage power lines, please provide a summary of the design and what measures VGS is taking to eliminate the threat of AC corrosion.

- a. Please provide the specific mile post locations for all test stations along the pipeline.
- b. Please provide the specific mile post locations for all coupon testing stations along the pipeline.
- c. Please provide the mile post locations and the type of AC interference mitigation that is being proposed along the pipeline.
- d. Please provide the mile post locations and the type of DC interference mitigation that is being proposed along the pipeline.
- e. Please provide the location using mile post data of all the rectifiers, anode beds, sacrificial anode locations along the pipeline and any special features they are being designed to protect.

A.PSD:VGS.3-1:

- a. The design is still in development and will be forwarded to DPS upon completion.
- b. The design is still in development and will be forwarded to DPS upon completion.
- c. The design is still in development and will be forwarded to DPS upon completion.
- d. There is no DC mitigation currently being proposed.
- e. The design is still in development and will be forwarded to DPS upon completion.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

Q.PSD:VGS.3-2: In David Berger's pre-filed testimony of June 14, 2013, he stated that VGS should consider the applicable additional safety requirements proposed in the Pipeline and Hazardous Material Safety Administration (PHMSA) Advanced Notice of Proposed Rulemaking of August 25, 2011, and those already listed in the current regulations for the Alternative MAOP rule in 49 CFR §192.112, §192.328, and §192.610. Below is a listing of those "additional safety requirements." For each of the below-listed safety requirements, please respond to the following questions:

- a. Has VGS already committed to adopting the specific requirement?
- b. Is compliance with the specific requirement a part of any executed MOU?
- c. Will VGS commit to adopting the specific requirement?
- d. Does VGS reject the specific requirement? If so, why?

Additional Safety Requirements

1. General Standards for the steel pipe

- a. The plate, skelp, or coil used for the pipe must be micro-alloyed, fine grain, fully killed, continuously cast steel with calcium treatment.

A.PSD:VGS.3-2(1)(a): VGS agrees to meet this standard.

- b. The carbon equivalents of the steel used for pipe must not exceed 0.25 percent by weight, as calculated by the Ito-Bessyo formula (Pcm formula) or 0.43 percent by weight, as calculated by the International Institute of Welding (IIW) formula.

A.PSD:VGS.3-2(1)(b): VGS agrees to meet this standard.

- c. The ratio of the specified outside diameter of the pipe to the specified wall thickness must be less than 100. The wall thickness or other mitigative measures must prevent denting and ovality anomalies during construction, strength testing and anticipated operational stresses.

A.PSD:VGS.3-2(1)(c): VGS agrees to meet this standard.

- d. The pipe must be manufactured using API Specification 5L, product specification level 2 (incorporated by reference, see § 192.7) for maximum operating pressures and minimum and maximum operating temperatures and other requirements under this section.

A.PSD:VGS.3-2(1)(d): VGS agrees to meet this standard.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

2. Plate/coil quality control

- a. There must be an internal quality management program at all mills involved in producing steel, plate, coil, skelp, and/or rolling pipe. These programs must be structured to eliminate or detect defects and inclusions affecting pipe quality.

A.PSD:VGS.3-2(2)(a): VGS agrees to meet this standard.

- b. A mill inspection program or internal quality management program must include (i) and either (ii) or (iii):
 - i. An ultrasonic test of the ends and at least 35 percent of the surface of the plate/coil or pipe to identify imperfections that impair serviceability such as laminations, cracks, and inclusions. At least 95 percent of the lengths of pipe manufactured must be tested. For all pipelines designed after December 22, 2008, the test must be done in accordance with ASTM A578/A578M Level B, or API 5L Paragraph 7.8.10 (incorporated by reference, see § 192.7) or equivalent method, and either
 - ii. A macro etch test or other equivalent method to identify inclusions that may form centerline segregation during the continuous casting process. Use of sulfur prints is not an equivalent method. The test must be carried out on the first or second slab of each sequence graded with an acceptance criteria of one or two on the Mannesmann scale or equivalent; or
 - iii. A quality assurance monitoring program that includes audits of: (a) all steelmaking and casting facilities, (b) quality control plans and manufacturing procedure specifications, (c) equipment maintenance and records of conformance, (d) applicable casting superheat and speeds, and (e) centerline segregation monitoring records to ensure mitigation of centerline segregation during the continuous casting process.

A.PSD:VGS.3-2(2)(b): We agree with the intent of this specification. Mills may have alternative processes for meeting the intent of this specification. We reserve the option to review and accept alternative testing methods.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

3. Seam quality control

- a. There must be a quality assurance program for pipe seam welds to assure tensile strength provided in API Specification 5L (incorporated by reference, see § 192.7) for appropriate grades.

A.PSD:VGS.3-2(3)(a): VGS agrees to meet this standard.

- b. There must be a hardness test, using Vickers (Hv10) hardness test method or equivalent test method, to assure a maximum hardness of 280 Vickers of the following:
- i. A cross section of the weld seam of one pipe from each heat plus one pipe from each welding line per day; and
 - ii. For each sample cross section, a minimum of 13 readings (three for each heat affected zone, three in the weld metal, and two in each section of pipe base metal).

A.PSD:VGS.3-2(3)(b): We agree with the intent of this specification. Mills may have alternative processes for meeting the intent of this specification. We reserve the option to review and accept alternative testing methods.

- c. All of the seams must be ultrasonically tested after cold expansion and mill hydrostatic testing.

A.PSD:VGS.3-2(3)(c): VGS agrees to meet this standard.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

4. Mill hydrostatic test

- a. All pipe to be used must be hydrostatically tested at the mill at a test pressure corresponding to a hoop stress of 95 percent SMYS for 10 seconds. The test pressure may include a combination of internal test pressure and the allowance for end loading stresses imposed by the pipe mill hydrostatic testing equipment as allowed by API Specification 5L, Appendix K (incorporated by reference, see § 192.7).

A.PSD:VGS.3-2(4)(a): Because this requirement is not standard industry practice or Code requirement, VGS is concerned that this requirement may reduce the number of mills from whom VGS can procure pipe for the Project.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

5. Coating

- a. The pipe must be protected against external corrosion by a non-shielding coating.

A.PSD:VGS.3-2(5)(a): VGS agrees to meet this standard.

- b. Coating on pipe used for trenchless installation must be non-shielding and resist abrasions and other damage possible during installation.

A.PSD:VGS.3-2(5)(b): VGS agrees to meet this standard.

- c. A quality assurance inspection and testing program for the coating must cover the surface quality of the bare pipe, surface cleanliness and chlorides, blast cleaning, application temperature control, adhesion, cathodic disbondment, moisture permeation, bending, coating thickness, holiday detection, and repair

A.PSD:VGS.3-2(5)(c): VGS agrees to meet this standard.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
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6. Fittings and flanges

- a. There must be certification records of flanges, factory induction bends and factory weld ells. Certification must address material properties such as chemistry, minimum yield strength and minimum wall thickness to meet design conditions.

A.PSD:VGS.3-2(6)(a): VGS agrees to meet this standard.

- b. If the carbon equivalents of flanges, bends and ells are greater than 0.42 percent by weight, the qualified welding procedures must include a pre-heat procedure.

A.PSD:VGS.3-2(6)(b): VGS agrees to meet this standard.

- c. Valves, flanges and fittings must be rated based upon the required specification rating class.

A.PSD:VGS.3-2(6)(c): VGS agrees to meet this standard.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
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7. Quality assurance

- a. The construction of the pipeline segment must be done under a quality assurance plan addressing pipe inspection, hauling and stringing, field bending, welding, non-destructive examination of girth welds, applying and testing field applied coating, lowering of the pipeline into the ditch, padding and backfilling, and hydrostatic testing.

A.PSD:VGS.3-2(7)(a): VGS agrees to meet this standard.

- b. The quality assurance plan for applying and testing field applied coating to girth welds must be:
 - i. Equivalent to that required under (5)(c), above, for pipe; and
 - ii. Performed by an individual with the knowledge, skills, and ability to assure effective coating application.

A.PSD:VGS.3-2(7)(b):

- i. VGS agrees to meet this standard.
- ii. VGS agrees to meet this standard.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

8. Girth welds

- a. All girth welds must be non-destructively examined in accordance with 49 CFR § 192.243(b) and (c).

A.PSD:VGS.3-2(8)(a): VGS agrees to meet this standard.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

9. Depth of cover

- a. Notwithstanding any lesser depth of cover otherwise allowed in § 192.327, there must be at least 36 inches (914 millimeters) of cover or equivalent means to protect the pipeline from outside force damage.

A.PSD:VGS.3-2(9)(a): Agree.

- b. In areas where deep tilling or other activities could threaten the pipeline, the top of the pipeline must be installed at least one foot below the deepest expected penetration of the soil.

A.PSD:VGS.3-2(9)(b): Generally, we agree to install the pipe with 4-feet of cover in active agricultural areas.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

10. Initial strength testing

- a. The pipeline segment must not have experienced failures indicative of systemic material defects during strength testing, including initial hydrostatic testing. A root cause analysis, including metallurgical examination of the failed pipe, must be performed for any failure experienced to verify that it is not indicative of a systemic concern. The results of this root cause analysis must be reported to the DPS.

A.PSD:VGS.3-2(10)(a): Agree.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

11. Interference currents

- a. For the pipeline segment, the construction must address the impacts of induced alternating current from parallel electric transmission lines and other known sources of potential interference with corrosion control. Whenever there is a significant change in the amount of alternating current from parallel electric transmission lines, a new interference survey must be performed to determine if the remedial measures are still sufficient to protect the gas transmission pipeline from the impacts of induced alternating current. Additional remedial actions, if necessary, must be taken within six months to prevent deterioration of the pipeline.

A.PSD:VGS.3-2(11)(a): Generally agree, but reserve the option to install additional mitigation based on a new interference survey within one year of a significant change in alternating current.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

12. Backfill Material

- a. Only suitable backfill material that will not shield the cathodic protection system or cause coating damage should be used on the pipeline. Screened and padded backfill or washed sand should be used especially in areas where the native soils contain rock or is made up of rock ledges. Special coatings or rock shield should be used to protect the coating of the pipe from damage during backfill operations, if necessary.

A.PSD:VGS.3-2(12)(a): Agree.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

13. Soaking or 'Pickling' the pipeline

- a. Prior to operating the new pipeline, ensure that the odorant will not be consumed by the new steel or plastic by adding extra odorant to the pipeline prior to operation and leaving the odorant to soak into the new steel and other materials. Once the new pipeline begins operation, test for the presence of sufficient odorant at locations at the ends of the pipeline within the new service territories monthly for the first year of operation. If sufficient odorant is not present, temporarily add extra odorant to ensure that there odorant at each customer location.

A.PSD:VGS.3-2(13)(a): Generally agree, we will install temporary odorant facilities at the tie-in and at each gate station, add additional odorant during pipeline purging and shut the pipeline in for 24-hours prior to putting the line into service. We will monitor odorant in the system monthly as suggested.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

14. Protecting the right-of-way

- a. Patrol the right-of-way at intervals not exceeding 135 days, but at least 4 times each calendar year, to inspect for excavation activities, ground movement, wash outs, leakage, or other activities or conditions affecting the safety operation of the pipeline.

A.PSD:VGS.3-2(14)(a): Agree.

- b. Develop and implement a plan to monitor for and mitigate occurrences of unstable soil and ground movement.

A.PSD:VGS.3-2(14)(b): VGS already has a plan to accomplish this. See existing VGS O&M Plan (Continuing Surveillance, Transmission Patrols).

- c. If observed conditions indicate the possible loss of cover, perform a depth of cover study and replace cover as necessary to restore the depth of cover or apply alternative means to provide protection equivalent to the originally-required depth of cover (for both transmission and distribution).

A.PSD:VGS.3-2(14)(c): Where erosion is observed, a plan will be developed to address the condition.

- d. Use line-of-sight line markers satisfying the requirements of § 192.707(d) except in agricultural areas, large water crossings or swamp, steep terrain, or where prohibited by Federal Energy Regulatory Commission orders, permits, or local law.

A.PSD:VGS.3-2(14)(d): Agree.

- e. Review the damage prevention program under § 192.614(a) in light of national consensus practices, to ensure the program provides adequate protection of the right-of-way. Identify the standards or practices considered in the review, and meet or exceed those standards or practices by incorporating appropriate changes into the program.

A.PSD:VGS.3-2(14)(e): VGS agrees in principal that periodic review of the damage prevention program is appropriate.

- f. Develop and implement a right-of-way management plan to protect the pipeline segment from damage due to excavation activities.

A.PSD:VGS.3-2(14)(f): It is not clear what this question has in mind. VGS has a damage prevention program consistent with § 192.614(a).

Person Responsible for Response: Jean-Marc Teixeira
Title: Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

15. Controlling internal corrosion

- a. Develop and implement a program to monitor for and mitigate the presence of, deleterious gas stream constituents.

A.PSD:VGS.3-2(15)(a): VGS relies upon the upstream supplier to monitor the gas upstream on behalf of VGS. VGS purchases its natural gas supply from TransCanada, which has as part of its rate tariff agreement a specified gas quality.

- b. At points where gas with potentially deleterious contaminants enters the pipeline, use filter separators or separators and gas quality monitoring equipment.

A.PSD:VGS.3-2(15)(b): See A.PSD:VGS.3-2(15)(a).

- c. Use gas quality monitoring equipment that includes a moisture analyzer, chromatograph, and periodic hydrogen sulfide sampling.

A.PSD:VGS.3-2(15)(c): See A.PSD:VGS.3-2(15)(a).

- d. Use cleaning pigs and sample accumulated liquids. Use inhibitors when corrosive gas or liquids are present.

A.PSD:VGS.3-2(15)(d): Agree.

- e. Address deleterious gas stream constituents as follows:
 - i. Limit carbon dioxide to 3 percent by volume;
 - ii. Allow no free water and otherwise limit water to seven pounds per million cubic feet of gas; and
 - iii. Limit hydrogen sulfide to 1.0 grain per hundred cubic feet (16 ppm) of gas, where the hydrogen sulfide is greater than 0.5 grain per hundred cubic feet (8 ppm) of gas, implement a pigging and inhibitor injection program to address deleterious gas stream constituents, including follow-up sampling and quality testing of liquids at receipt points.

A.PSD:VGS.3-2(15)(e): See A.PSD:VGS.3-2(15)(a).

- f. Review the program at least quarterly based on the gas stream experience and implement adjustments to monitor for, and mitigate the presence of, deleterious gas stream constituents.

A.PSD:VGS.3-2(15)(f): See A.PSD:VGS.3-2(15)(a).

Person Responsible for Response: Jean-Marc Teixeira
Title: President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

16. Controlling interference that can impact external corrosion

- a. Within six months after placing the new pipeline segment in service, address any interference currents on the pipeline segment.

A.PSD:VGS.3-2(16)(a): VGS will address interference currents within one year.

- b. To address interference currents, perform the following:
 - i. Conduct an interference survey to detect the presence and level of any electrical current that could impact external corrosion where interference is suspected;
 - ii. Analyze the results of the survey; and
 - iii. Take any remedial action needed within 6 months after completing the survey to protect the pipeline segment from deleterious current

A.PSD:VGS.3-2(16)(b):

- i. Agree.
- ii. Agree.
- iii. VGS will take any remedial action needed within twelve months of completing the survey.

Person Responsible for Response: Jean-Marc Teixeira
Title: Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

17. Confirming external corrosion control through indirect assessment

- a. Within six months after placing the cathodic protection of a new pipeline segment in operation, assess the adequacy of the cathodic protection through an indirect method such as close-interval survey, and the integrity of the coating using direct current voltage gradient (DCVG) or alternating current voltage gradient (ACVG).

A.PSD:VGS.3-2(17)(a): VGS will conduct these surveys within one year.

- b. Remediate any construction damaged coating with a voltage drop classified as moderate or severe (IR drop greater than 35% for DCVG or 50 dB μ v for ACVG) under section 4 of NACE RP-0502-2002 (incorporated by reference, see § 192.7).

A.PSD:VGS.3-2(17)(b): Agree.

- c. Within six months after completing the baseline internal inspection required under paragraph (19), integrate the results of the indirect assessment required under paragraph (17)(a) of this section with the results of the baseline internal inspection and take any needed remedial actions.

A.PSD:VGS.3-2(17)(c): VGS agrees to take remedial action within twelve months of the ILI results.

Person Responsible for Response: Jean-Marc Teixeira
Title: Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

18. Controlling external corrosion through cathodic protection

- a. If an annual test station reading indicates cathodic protection below the level of protection required in subpart I of 49 CFR 192, complete remedial action within six months of the failed reading; and

A.PSD:VGS.3-2(18)(a): Agree.

- b. After remedial action to address a failed reading, confirm restoration of adequate corrosion control by a close interval survey on either side of the affected test station to the next test station unless the reason for the failed reading is determined to be a rectifier connection or power input problem that can be remediated and otherwise verified.

A.PSD:VGS.3-2(18)(b): Consistent with current VGS practice, VGS will use appropriate monitoring techniques to assure that the remedial action is effective.

Person Responsible for Response: Jean-Marc Teixeira
Title: Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

19. Conducting a baseline assessment of integrity

- a. Except as provided in paragraph (19)(b), perform a baseline internal inspection of the entire pipeline segment as follows:
 - i. Assess using a geometry tool after the initial hydrostatic test and backfill and after placing the new pipeline segment in service; and
 - ii. Assess using a high resolution magnetic flux tool within one year after placing the new pipeline segment in service.

A.PSD:VGS.3-2(19)(a):

- i. Agree.
 - ii. VGS will conduct an in-line inspection within 3 years.
- b. If headers, mainline valve by-passes, compressor station piping, meter station piping, or other short portion of a pipeline segment cannot accommodate a geometry tool and a high resolution magnetic flux tool, use direct assessment (per § 192.925, § 192.927 and/or § 192.929) or pressure testing (per subpart J of this part) to assess that portion.

A.PSD:VGS.3-2(19)(b): Agree.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

20. Conducting periodic assessments of integrity

- a. As previously agreed upon, perform in line inspections on the transmission piping every 7 years after the initial assessment using a high resolution magnetic flux tool as a minimum.

A.PSD:VGS.3-2(20)(a): Agree.

Person Responsible for Response: John Heintz; Jean-Marc Teixeira
Title: Project Manager; Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

21. Emergency Plans

- a. Periodically but no longer than once per calendar year, conduct an emergency drill involving all of the local, regional, and state emergency responders (police, fire, emergency preparedness officials), and other utilities in a training exercise.

A.PSD:VGS.3-2(21)(a): Consistent with current practice, VGS agrees to offer natural gas safety and emergency response training to all emergency responders to all communities along the Project route. VGS will continue to participate in state-sponsored emergency exercise as requested.

- b. Provide feedback and lessons learned to all attendees to each annual emergency drill which includes but is not limited to: communication issues; response times; response functions; resources deployed; and any other issue that hampered or slowed down the response to the emergency.

A.PSD:VGS.3-2(21)(b): See A.PSD:VGS.3-2(21)(a).

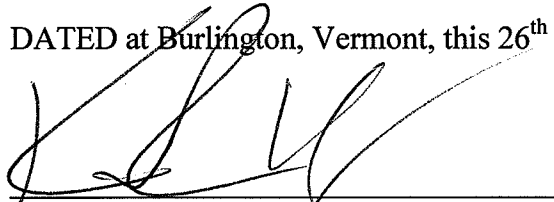
- c. Based on the feedback of the annual emergency drill, update the emergency plan and provide copies to all local, regional and state emergency responders and emergency preparedness officials along with affected utilities.

A.PSD:VGS.3-2(21)(c): VGS reviews and updates its operating and emergency response procedures in accordance with 49 CFR Part 192.605 (at intervals not exceeding 15 months, but at least once each calendar year).

Person Responsible for Response: Jean-Marc Teixeira
Title: Vice President of Operations, Vermont Gas Systems, Inc.
Date: July 26, 2013

As to objections:

DATED at Burlington, Vermont, this 26th day of July, 2013.



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