

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 VERMONT FUEL DEALER ASSOCIATION'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 Vermont Fuel Dealers Association ("VFDA"). Petitioner is filing one complete hard copy of its responses with the Public Service Board ("Board"), with two copies served on VFDA 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 VFDA 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.VFDA:VGS.3-1: With respect to the Rebuttal Testimony of Joel Bluestein, admit that methane's relatively short atmospheric lifetime, coupled with its potency as a greenhouse gas, makes its reduction a candidate for mitigating global warming over the near-term. If denied, identify and produce all information on which your denial is based.

A.VFDA:VGS.3-1: Admit, provided that reducing methane does not result in a net increase of life-cycle greenhouse gas emissions from other sources.

Person Responsible for Response: Joel Bluestein
Title: Senior Vice President, ICF International
Date: July 26, 2013

Q.VFDA:VGS.3-2: With respect to the Rebuttal Testimony of Joel Bluestein, admit that the United Nations' Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report: Climate Change 2007 (AR4) contains the latest science with respect to GHG potential for methane and N₂O. If denied, identify and produce all information on which your denial is based.

A.VFDA:VGS.3-2: Partially admit. This is the latest completed report by the IPCC but there are other ongoing scientific studies.

Person Responsible for Response: Joel Bluestein
Title: Senior Vice President, ICF International
Date: July 26, 2013

Q.VFDA:VGS.3-3: Identify and produce all data specific to the VGS system that deals in any way with the intent to incorporate biomethane in deliveries to Vermont customers.

A.VFDA:VGS.3-3: Objection, to the extent the request seeks information that is confidential, proprietary, and/or competitively sensitive information. Notwithstanding this objection, see **Attachment A.VFDA:VGS.3-3** (Vermont Gas Presentation: Meeting to Discuss Bio-Methane Project).

Person Responsible for Response: Eileen Simollardes
Title: Vice President, Supply and Regulatory Affairs, Vermont Gas Systems, Inc.
Date: July 26, 2013

Q.VFDA:VGS.3-4: Identify and produce all data and documents specific to biomethane production and delivery currently available to reach Vermont customers.

A.VFDA:VGS.3-4: Objection, to the extent the request seeks information that is confidential, proprietary, and/or competitively sensitive information. Notwithstanding this objection, there is no biomethane currently available. VGS is working with developers on future projects. See also A.VFDA:VGS.3-3.

Person Responsible for Response: Eileen Simollardes
Title: Vice President, Supply and Regulatory Affairs, Vermont Gas Systems, Inc.
Date: July 26, 2013

Q.VFDA:VGS.3-5: Identify and Produce all Documents and information on which your estimates on page 5, lines 13-15 is based "Our analysis determined that the life-cycle GHG emissions of CO₂ and methane from natural gas are 18% lower than for heating oil at the burner tip and 23% lower including the higher efficiency of a new natural gas furnace or boiler."

A.VFDA:VGS.3-5:

- ICF International Life-Cycle Greenhouse Gas Emissions Analysis Prepared for the Addison Natural Gas Project, Exhibit Petitioner Reb. JB-2;
- ICF International Life-Cycle Greenhouse Gas Emissions Analysis Prepared for the Addison Natural Gas Project - Spreadsheet Model, Exhibit Petitioner Reb. JB-3;
- ICF International Assessment of New York City Natural Gas Market and Life-Cycle Fuel Emissions, Exhibit Petitioner Reb. JB-5;
- National Energy Technology Laboratory: Role of Alternative Energy Sources Natural Gas Technology Assessment (6/2012), Exhibit Petitioner Reb. JB-8; and
- Exhibit Petitioner Reb. JB-7 (ICF Final Resource Analysis of Energy Use and Greenhouse Gas Emissions from Residential Boilers for Space Heating and Hot Water (Rev. 2/2009)).

Person Responsible for Response: Joel Bluestein
Title: Senior Vice President, ICF International
Date: July 26, 2013

Q.VFDA:VGS.3-6: Identify and Produce all Documents and information on which your calculations and conclusions in A7 are based.

A.VFDA:VGS.3-6:

- ICF Final Resource Analysis of Energy Use and Greenhouse Gas Emissions from Residential Boilers for Space Heating and Hot Water (Rev. 2/2009), Exhibit Petitioner Rebuttal JB-7;
- ICF International Life-Cycle Greenhouse Gas Emissions Analysis Prepared for the Addison Natural Gas Project, Exhibit Petitioner Reb. JB-2;
- ICF International Life-Cycle Greenhouse Gas Emissions Analysis Prepared for the Addison Natural Gas Project - Spreadsheet Model, Exhibit Petitioner Reb. JB-3;
- ICF International Assessment of New York City Natural Gas Market and Life-Cycle Fuel Emissions, Exhibit Petitioner Reb. JB-5; and
- National Energy Technology Laboratory: Role of Alternative Energy Sources Natural Gas Technology Assessment (6/2012), Exhibit Petitioner Reb. JB-8.

Person Responsible for Response: Joel Bluestein
Title: Senior Vice President, ICF International
Date: July 26, 2013

Q.VFDA:VGS.3-7: Identify and Produce all Documents and data supporting your assumption that 100 year atmospheric lifetime correctly assesses the GHG impact of methane emissions in the near-term.

A.VFDA:VGS.3-7: My testimony does not limit the consideration of GHG impacts to "the near-term". Climate change is a long-term phenomenon. That said, the 100 year atmospheric lifetime is the standard value used for most assessments, including:

- The 2013 U.S. EPA Inventory of U.S. GHG Emissions, which is prepared according to protocols established by the Intergovernmental Panel on Climate Change and constitutes the official U.S. inventory provided to the UN Framework Convention on Climate Change (see **Attachment A.VFDA:VGS.3-7**).
- The U.S. EPA Mandatory GHG Reporting Rule (<http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=a8bd77a4d899d6d84ccb5b34e1d673c&rqn=div5&view=text&node=40:22.0.1.1.3&idno=40>);
- The Vermont Greenhouse Gas Emissions Inventory Update 1990-2009 (November 2012, Revised April 2013):
http://www.anr.state.vt.us/anr/climatechange/Pubs/Vermont%20GHG%20Emissions%20Inventory%20Update%201990-2009_REVISED_041213.pdf;
- Exhibit Petitioner Reb. JB-5 (ICF International Assessment of New York City Natural Gas Market and Life-Cycle Fuel Emissions); and
- Exhibit Petitioner Reb. JB-7 (ICF Final Resource Analysis of Energy Use and Greenhouse Gas Emissions from Residential Boilers for Space Heating and Hot Water (Rev. 2/2009)).

Person Responsible for Response: Joel Bluestein
Title: Senior Vice President, ICF International
Date: July 26, 2013

Q.VFDA:VGS.3-8: Identify and Produce all ICF studies assessing methane emissions from shale gas wells.

A.VFDA:VGS.3-8: Object to the extent that the request seeks confidential and/or proprietary information. Further, VFDA has not executed the protective agreement issued by the Board in this proceeding. Without waiving the objection, ICF provides the following public studies: **Attachments A.VFDA:VGS.3-8a** (Life Cycle Greenhouse Gas Emissions of Natural Gas, A Literature Review of Key Studies Comparing Emissions from Natural Gas and Coal, ICF, October 2012) and **b** (Comparing Life-Cycle Greenhouse Gas Emissions from Natural Gas and Coal, Worldwatch Institute, August 25, 2011) and Exhibit Petitioner Reb. JB-5.

Person Responsible for Response: Joel Bluestein
Title: Senior Vice President, ICF International
Date: July 26, 2013

Q.VFDA:VGS.3-9: Identify and Produce all ICF studies assessing Short-Lived Climate Pollutants including black carbon, tropospheric ozone, methane, and hydrofluorocarbons.

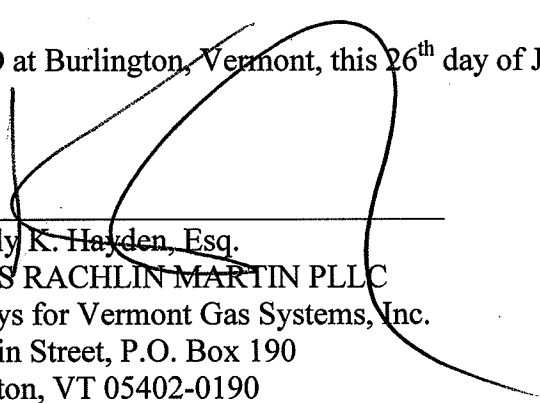
A.VFDA:VGS.3-9: I do not agree with the characterization of hydroflouorocarbons as short-lived climate pollutant, and object to the extent that the request seeks confidential and/or proprietary information. Further, VFDA has not executed the protective agreement issued by the Board in this proceeding. Without waiving the objection, ICF provides **Attachment**

A.VFDA:VGS.3-9 (Clean Air Task Force. Best Practices for Reduction of Methane and Black Carbon from Arctic Oil and Gas Production. July 12, 2012).

Person Responsible for Response: Joel Bluestein
Title: Senior Vice President, ICF International
Date: July 26, 2013

As to objections:

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



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