

**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

CRAIG HEINDEL'S RESPONSE TO

PETITIONER'S DISCOVERY

REQUESTS ON BEHALF OF

NATHAN PALMER

July 12, 2013

Q.PET:Palmer.1-33 Are you or have you ever been employed by any company engaged in the design, construction or operation of a natural gas pipeline? Identify each such position, the dates held.

A. PET:Palmer.1.33. The company of which I was a previous part-owner, Heindel & Noyes, Inc. (H&N), provided some environmental evaluations to Rock-Tenn, Inc. regarding the route of their proposed single-user natural gas pipeline from Highgate Center, VT to Rock-Tenn's facility in Sheldon Springs, VT, in 1997 through 2001. The other owner of H&N, Jeff Noyes, was involved in this project; I had no involvement with it, and I do not remember anything about this project. I have not been involved in the design, construction or operation of any natural gas pipelines.

Q.PET:Palmer.1.34 Identify and describe your education, training and experience in the area of natural gas transmission system design, construction and operation. Please be specific with reference to natural gas transmission.

A.PET:Palmer.1.34. I have no direct experience specifically with the design, construction or operations of natural gas pipelines.

Q.PET.Palmer:1.35 Describe in detail all investigation performed by you to prepare your testimony and form the opinions stated in your testimony including, but not limited to, all project plans and testimony submitted by Petitioner in this proceeding or in response to discovery in this proceeding. Produce all documents relating to same not already submitted by Petitioner.

A.PET:Palmer.1-35. These details are provided in my previous pre-filed testimony.

Q.PET.Palmer:1-36 What assumptions have you made regarding construction specifications for the project? Explain the basis for these assumptions and produce all documents relating to same.

A. PET:Palmer:1-36. I assumed that VGS's contractor would excavate a trench into which the gas pipeline would be installed. I assumed that the route of the gas pipeline would be as indicated on the site plan that the Palmers showed me.

Q.PET:Palmer.1-37 With respect to your testimony at A5, provide a map showing the locations that you walked on March 31, 2013, depicting all features noted, including "the large slope", locations of groundwater observations, locations of saturated ground surface conditions. Produce any documents relating to your site investigation.

A.PET:Palmer.1-37. Mr. Palmer tells me that he has provided you with a map showing where the water will enter his property. He has not authorized the expense it would require for me to prepare the map that you have requested.

Q.PET:Palmer.1-38 With respect to your testimony at A6, identify and produce all documents that support your statement at lines 4-7. Explain the basis for your statement. Identify the construction specifications for all utility installations included in these documents.

A.PET:Palmer.1-38. Explained in A6.

Q.PET:Palmer.1-39 With respect to your testimony at A6, identify and produce all documents that support your statement at lines 7-12. Explain the basis for your statement.

A.PET:Palmer.1-39 See A.38.

Q.PET:Palmer.1-40 With respect to your testimony at A7, explain the basis for the statement at lines 16-17.

A.PET:Palmer.1-40 See A.38.

Q.PET:Palmer.1-41 Describe the basis for the statement made at A8 of your testimony and identify and produce all supporting documents relating to same.

A.PET:Palmer.1-41 A8 is based on my experience; see my resume. Mr. Palmer has not authorized the expense it would require for me to more fully answer this question.

Q.PET:Palmer.1-42 With respect to your testimony at A9, identify and produce all documents that support your statement at lines 1-4. Explain the basis for your statement.

A.PET:Palmer.1-42 Adequately explained in A9.

Q. PET:Palmer.1-43 With respect to your testimony at A9, identify and produce all documents regarding the location, design and operational characteristics of the existing tile drainage system on the Norris property that you relied upon in forming your opinion support your statement at lines 8-12.

A.PET:Palmer.1-43 As A9 states, Mr. Palmer described where the drainage pipes are located, and I trust his word. As part of its due diligence and pipeline designs, I assume that VGS knows the details of the existing tile drainage system on the Norris farm. Please provide Mr. Palmer with those details, so I can assist him by evaluating those details.