

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 MICHAEL HURLBURT'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 Michael Hurlburt ("Hurlburt"). Petitioner is filing one complete hard copy of its responses with the Public Service Board ("Board"), with two copies served on Michael Hurlburt 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 Hurlburt 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.Hurlburt:VGS.2-1: Where is Vermont Gas in the process of getting a license to build the pipeline from the Federal Energy Regulatory Commission?

A.Hurlburt:VGS.2-1: This project does not require a license or approval from the Federal Energy Regulatory Commission.

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

Q.Hurlburt:VGS.2-2: Enclosed, please find an old article from the Burlington Free Press regarding the Champlain Pipeline Project. Was Vermont Gas the Vermont company that was party to this project? If the answer is yes, are there any plans of re-opening a similar project to this in the future?

A.Hurlburt:VGS.2-2: Vermont Gas, through its then-parent company, Northern New England Gas Corporation, was an investor in the Champlain Pipeline project. In addition Vermont Gas was working to develop natural gas service in Vermont from the Champlain Pipeline. The Champlain project was intended to bring natural gas supplies to Boston markets. This project is bringing natural gas service to Vermonters.

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

Q.Hurlburt:VGS.2-3: Regarding the proposed route for the pipeline along Old Stage Road in Monkton. Is Vermont Gas willing to negotiate with Velco to install the pipeline in the Velco Corridor along Old Stage Road? If the answer is no please produce documentation to show why.

A.Hurlburt:VGS.2-3: Vermont Gas is not attempting to install the pipeline in the VELCO corridor at this location due to the presence of a stream feature, sideslope, and the assumed presence of rock based on a visual inspection of the area, all of which makes the location impracticable from a constructability perspective.

Person Responsible for Response: John Heintz
Title: Project Manager
Date: July 26, 2013

Q.Hurlburt:VGS.2-4: Is Vermont Gas willing to reduce the width of the proposed corridor to stay within the Velco corridor If the answer is no, please produce documentation to show why this is not possible.

A.Hurlburt:VGS.2-4: The question is difficult to answer in that it does not specify a location. Assuming the location referenced is the portion of the Project discussed in question 2-3, VGS is not proposing to collocate with the VELCO corridor for the reasons stated in the previous response.

Person Responsible for Response: John Heintz
Title: Project Manager
Date: July 26, 2013

Q.Hurlburt:VGS.2-5: Whereas sometimes drainage ditches are made with the use of dynamite, would eight feet be a good depth to protect the gas pipeline from any damage?

A.Hurlburt:VGS.2-5: Objection; the question is ambiguous. Without waiving the objection, the depth that VGS is proposing to bury the pipeline is adequate to protect the pipe. Any excavation activity, including blasting with dynamite, near buried utility infrastructure is required to comply with Vermont's Underground Utility Damage Prevention System.

Person Responsible for Response: John Heintz
Title: Project Manager
Date: July 26, 2013

Q.Hurlburt:VGS.2-6: Where the pipeline goes through the ash/maple swamp in New Haven, would it be possible to install the pipe by pulling it through a ditch using a technique similar to a boring procedure, thus reducing the impact of heavy equipment and eliminating the need to cut trees to widen the corridor which is only needed for construction purposes? Where the answer should be yes, please describe the means and procedure.

A.Hurlburt:VGS.2-6: There are a variety of ways to install a gas pipeline. We evaluate those alternatives and their applicability to a specific area, the resource impacts and cost and propose what we think represents the most practicable alternative. The construction techniques proposed for this area represent the results of this evaluation.

Person Responsible for Response: John Heintz
Title: Project Manager
Date: July 26, 2013

Q.Hurlburt:VGS.2-7: Where 2013 weather patterns for Addison County are on the wet side, when is Vermont Gas projecting the driest summer months to be for the pipeline installation in low lying seasonally wet areas?

A.Hurlburt:VGS.2-7: The Erosion Prevention and Sediment Control plan includes appropriate Best Management Practices ("BMPs") to protect water quality regardless of whether wet or dry weather conditions are occurring. Included as one of these BMPs is the use of swamp mats to cross wetland areas, which is intended to prevent rutting of these areas.

Person Responsible for Response: Jeffrey A. Nelson
Title: Director of Energy and Environmental Services, Vanasse Hangen Brustlin, Inc.
Date: July 26, 2013

Q.Hurlburt:VGS.2-8: Is Vermont Gas willing to write into its easement contract the inclusion that only one twelve inch pipeline be allowed in its easement corridor and that the only substance that the pipeline will convey is natural gas?

A.Hurlburt:VGS.2-8: Yes.

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

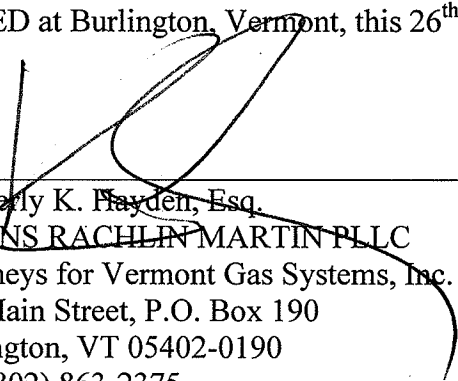
Q.Hurlburt:VGS.2-9: Is Vermont Gas willing to commit that no radioactive gas or substance will be allowed to pass through its pipeline?

A.Hurlburt:VGS.2-9: Refer to A.Hurlburt:VGS.2-8.

Person Responsible for Response: Eileen Simollardes
Title: Vice President, Supply and Regulatory Affairs, 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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