



State of Vermont

ANR Office of Planning & Legal Affairs

1 National Life Drive, Davis 2

Montpelier, VT 05602-3901

[phone] 802-595-2585

Agency of Natural Resources

June 21, 2013

By electronic mail
Sandra Levine, Esq.
Conservation Law Foundation
15 East State Street-suite 4
Montpelier, VT 05602

Re: **Vermont Gas Systems, Inc. – Addison County**
Docket No. 7970-Information Requests on Conservation Law Foundation

Dear Sandy:

On behalf of the Agency of Natural Resources, enclosed please find *ANR's First Set of Information Requests on Conservation Law Foundation* in the above-referenced matter.

Please contact me if you have any questions. Thank you for your assistance with this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Judith L. Dillon".

Judith L. Dillon

Enclosure

cc: Service List
Susan Hudson (PSB)

**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 mainline in Addison County,)
together with three new gate stations in)
Williston, New Haven, and Middlebury,)
Vermont)

Docket No. 7970

ANR’s First Set of Information Requests on Conservation Law Foundation

The Agency of Natural Resources (“Agency” or “ANR”) by undersigned counsel, hereby serves the following Second Set of Information Requests upon Petitioner Vermont Gas Systems, Inc. in accordance with Public Service Board Rule 2.214 and V.R.C.P. 33, 34, and 36 and requests that Petitioner answer the requests in accordance with V.R.C.P. 33, 34, and 36 and deliver its answers and all requested documents and materials to the Agency’s offices as soon as possible but in no case later than July 12, 2013. Petitioner is requested to provide a copy of its answers in electronic format, that is, Word or other format readable by the Agency. Please produce two copies of your responses.

INSTRUCTIONS AND DEFINITIONS

1. Reproduce the request being responded to before the response. Provide two complete hard copies of your responses and an electronic copy on disk. Provide two complete copies of all documents produced. All spreadsheets and computer data should also be provided on disk.
2. Responses to any and all Agency requests that are contained herein or that may be filed later should be supplied to the Agency as soon as they become available to Conservation Law Foundation. That is, Conservation Law Foundation should not hold answers to any requests for which it does have responsive data, documents, etc., until responses to any or all other requests are compiled.
3. The response to each request should be made under oath by a person competent to testify concerning the response and all documents and exhibits produced as part of the response. With respect to each request, please state (1) the name(s) and title(s) of the person or persons responsible for preparing the response; and (2) the administrative unit which maintains the records being produced or maintains the data from which the answer was prepared; and (3) the date on which each question was answered.
4. Where information requested is not available in the precise form described in the question or is not available for all years (or other periods or classifications) indicated in a series of years (or other periods or classifications), please provide all information with respect to the subject matter of the question that can be identified in CONSERVATION LAW FOUNDATION work papers and files or that is otherwise available.
5. These requests shall be deemed continuing. CONSERVATION LAW FOUNDATION is directed to change, supplement and correct its answers to conform to all information as it becomes available, including the substitution of actual data for estimated data. Responses to requests for information covering a period not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available.

6. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.
7. Some of the Agency's requests may make particular reference to a portion of a filing in this matter. Notwithstanding this specific direction, these items should be understood to seek discovery of all information available to CONSERVATION LAW FOUNDATION that is responsive to the questions stated.
8. "Identify," when used in connection with natural person(s) or legal entities, shall mean the full name and current business address of the person or entity.
9. "Document," as used herein, shall be construed as broadly as possible to include any and all means and media, by which information can be recorded, transmitted, stored, retrieved or memorialized in any form, and shall also include all drafts, versions or copies which differ in any respect from the original. The term specifically includes and is not limited to written communications such as letters and e-mails.
10. Documents produced pursuant to these requests shall be organized and labeled in correspondence with the paragraph number to which they are alleged to respond. With respect to each document produced by CONSERVATION LAW FOUNDATION, identify the person who prepared the document and the date on which the document was prepared.
11. If in response to any request for information, the responding party asserts attorney client privilege, attorney work product, or any other privilege, please provide in addition to the basis of the privilege the date of the allegedly privileged communication(s), the identity of all persons who were party to the allegedly privileged communication(s) or who received photocopies of such communication(s), and the subject matter of the allegedly privileged communication.
12. If any request to admit is responded to by a denial or an objection, explain in detail the reason for such denial or objection.

13. If any interrogatory or request is objected to in whole or in part, please describe the complete legal and factual basis for the objection, and respond to all parts of the interrogatory or request to the extent it is not objected to. If an objection is interposed as to any requested documents, please identify the document by author, title, date and recipient(s), and generally describe the nature and subject matter of the document as well as the complete legal and factual basis for the objection.

14. "Project" "project site" "project area" means the proposed Vermont Gas pipeline proposed and described in Petitioner's filings in this docket.

15. "You" or "Your" refers to Conservation Law Foundation.

16. "Petitioner" refers to Vermont Gas Systems, Inc., and any of its agents, employees, or consultants working on its behalf in connection with the above captioned matter.

17. The Agency reserves the right to submit additional information requests to Petitioner.

INTERROGATORIES AND REQUESTS TO PRODUCE

1. Please identify the person responsible for responding to each interrogatory and identify any person who assisted in providing the response. For each person identified who has not previously been identified in responses to ANR, please provide a curriculum vitae or resume indicating that person's employment, education and work experience history.

E. Stanton

2. CLF-EAS-7 presents "methane densities" and provides a high of 113 lb. /MCF and a Low of 42 lb. /MCF.
 - a. Please explain in detail how the high and low were determined.
 - b. Please produce the technical references or documents from which the high and low densities were derived.

REQUESTS TO PRODUCE

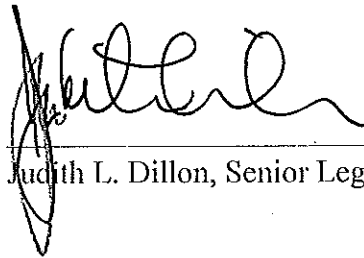
1. Please produce all documents referenced, referred to, or relied upon in responding to

these information requests.

DATED at Montpelier, Vermont this 21st day of June, 2013

VERMONT AGENCY OF NATURAL RESOURCES

BY:

A handwritten signature in black ink, appearing to read "Judith L. Dillon", written over a horizontal line.

Judith L. Dillon, Senior Legal Counsel