

**STATE OF VERMONT
PUBLIC SERVICE BOARD**

Docket No. 7970

Petition of Vermont Gas Systems, Inc. for 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

DISCOVERY REQUESTS TO
AGRIMARK INC./CABOT CREAMERY
BY
NATHAN B PALMER
of Monkton, Vermont
June 20, 2013

INTERROGATORIES AND REQUESTS TO PRODUCE

Ed Pcolar

1. On page 4, line 6-9 of your testimony, you state **“The Actual magnitude of future savings will, of course depend on the price spread between natural gas and the alternatives (fuel oil and propane) going forward, but we expect that spread to be significant enough in the foreseeable future to justify the switch in fuel sources.**

Where have you gotten your fuel price predictions or is this just a hunch? You state that you expect the savings to increase from exceeding \$1 million initially to **“\$3 million per year ...over time.”** Is this based on predicted fuel prices alone, or are there other factors?

2. Can we see figures as to how many more jobs were created in your Springfield plant once it was converted to “natural” gas?

3. Have farmers received more for their product as a result of the savings at other plants? If profits increase at the Middlebury plant, will dairy farmers receive more money for their milk?
4. On page 6, lines 3-7, you state, **“Environmental sustainability is very important to our business and its farmer-owners, as well as to the communities in which we operate and the customers who purchase our dairy products. We believe the ability to reduce costs while also reducing the air emissions footprint of the facility is a win-win for the farm family owners of our cooperative and for the communities and state of Vermont.”**

There have been studies in Pennsylvania indicating that gas drilling has a direct negative impact on dairy farm operations in those areas. How do those farms fit into the win/win equation you speak of?

<http://nyagainstfracking.org/an-open-letter-to-the-new-york-farm-bureau>

5. In your job creation analysis, have you included the truck driving job losses from less deliveries of fuel oil?
6. We have heard that you are threatening to leave Vermont if you don't receive “natural” gas service. If this happens, would you be relocating your plant to the Marcellus Shale region? (closer to the source of gas and all)
7. What would the economic impact be to your production facility if suddenly your water source became no longer potable?
8. Would you consider moving your plant to Dimock PA? (we have heard that area could use some economic stimulus and a plant such as yours would be a great boon for the region)