



December 11, 2018

VIA E-Mail and Federal Express

Greg Corso, PE
Executive Vice President
CHA Consulting, Inc.
575 Broadway
Suite 301
Albany, NY 12207

Gcorso@chacompanies.com

Dear Greg:

As you may be aware, interveners in an on-going proceeding have made inquiries to our Vermont Public Utility Commission ("PUC") regarding the engineering documentation standards applied to the Addison Natural Gas Project ("ANGP"). The allegations raised by the interveners have asked the PUC to investigate matters related to the following:

1. Did CHA prepare specifications, drawings, plans, construction documents, and/or engineering surveys utilizing Vermont licensed Professional Engineer(s)?
2. Do Vermont laws and regulations, specifically 26 V.S.A., chapter 20 and the Vermont Board of Professional Engineering rules, require that the engineering work prepared by CHA for the ANGP be completed by a responsible Vermont licensed Professional Engineer who either prepares or independently reviews and then affixes his or her signature and seal to such documents?

I have included with this letter the interveners' allegations, together with our initial response and the response of the Vermont Department of Public Service, a Vermont utility regulator.

To our knowledge, CHA, in providing VGS with engineering services pursuant to our contract with you, did not provide us with any ANGP documents or plans that were sealed by a Vermont-licensed Professional Engineer.

We seek to explain to the PUC how the ANGP engineering work and plans prepared for VGS by CHA conform to applicable laws and regulations, and how CHA satisfied the provisions in our contract regarding legal compliance -- particularly Section 19.3 -- Quality, Section 19.6-Compliance with Legal Requirements, and CHA's representations in the Statement of Work comprising the bid documents incorporated into the contract. A list of any Vermont-licensed professional engineers assigned to ANGP would also be helpful. Your information and reasoned explanation will assist us in resolving this matter.

Our team has previously raised this issue with Jason Gorman and have reached out to CHA counsel, Nikki Dames for additional discussion. To-date we have not received a response to our inquiries.

I would appreciate your prompt reply, no later than December 20, 2018.

Thank you.

Regards,

A handwritten signature in black ink, appearing to read 'DRM', written in a cursive style.

Don Rendall
President and CEO

Cc: John St. Hilaire
Eileen Simollardes



December 28, 2018

Via Federal Express

Don Rendall
President and CEO
Vermont Gas Systems
85 Swift Street
South Burlington, Vermont 05403
DRendall@vermontgas.com

Re: Request Related to Addison Natural Gas Project Drawings

Dear Mr. Rendall:

We are in receipt of your letter dated December 11, 2018. Please rest assured that all of the instruments of service provided by Clough, Harbour & Associates, LLP ("CHA") in connection with the Addison Natural Gas Project were prepared under the responsible charge of an engineer licensed in Vermont – namely, Michael E. Hollowood (civil, license number 018.0097764), Joseph J. Thomson (mechanical, license number 018.0090983) and James B. Fuller (electrical, license number 018.0009337).

Enclosed, please find the drawings issued for construction sealed and signed by Mr. Hollowood, Mr. Thomson and Mr. Fuller.

If you have any additional questions or would like to discuss this matter further, please do not hesitate to contact me at (518) 453-8222 or by e-mail at gcorso@chacompanies.com.

Very truly yours,

A handwritten signature in black ink that reads "Gregory S. Corso".

Gregory S. Corso
Executive Vice President

Enclosures

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January 22, 2019

Via Federal Express

Don Rendall
President and CEO
Vermont Gas Systems
85 Swift Street
South Burlington, Vermont 05403
DRendall@vermontgas.com

Re: Request Related to Addison Natural Gas Project Modification Bulletins

Dear Mr. Rendall:

Enclosed please find the modification bulletins issued for the Addison Natural Gas Project construction, sealed and signed by Vermont-licensed engineer Michael E. Hollowood. As indicated in my last letter, these and all other instruments of service provided by Clough, Harbour & Associates, LLP ("CHA") in connection with this project were prepared under the responsible charge of an engineer licensed in Vermont.

If you have any additional questions or would like to discuss this matter further, please do not hesitate to contact me at (518) 453-8222 or by e-mail at gcorso@chacompanies.com.

Very truly yours,

A handwritten signature in black ink that reads 'Gregory S. Corso'.

Gregory S. Corso
Executive Vice President

Enclosures

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November 6, 2019

Don Rendall
President and CEO
Vermont Gas Systems
85 Swift Street
South Burlington, Vermont 05403
DRendall@vermontgas.com

**Re: *Review of Liebert Engineering, Incorporated Letter dated September 12, 2019
Addison Natural Gas Project***

Dear Mr. Rendall:

We are in receipt of the attached Liebert Engineering, Incorporated (Liebert) letter dated September 12, 2019, referencing Addison Natural Gas Project Safety and Regulatory Compliance. Clough, Harbour & Associates, LLP (CHA) provides the following response to the opinions expressed in the letter.

As an initial matter, Liebert does not question the integrity of the engineering of the Addison Natural Gas Project (ANGP) or opine that CHA's services did not meet the applicable standard of care, nor does the letter reference any specific technical standards or sources for quality assurance requirements. Contrary to Liebert's assertions, at all times, as set forth in more detail below, CHA's plans were prepared under the supervision of a Vermont-licensed engineer and in accordance with professional standards.

James J. Colantonio was the Vermont-licensed engineer overseeing the preparation of CHA's plans for the ANGP until October 2013. Liebert incorrectly asserts that Michael E. Hollowood could not have been CHA's engineer in responsible charge for the ANGP, since this role did, in fact, transition from Mr. Colantonio to Mr. Hollowood in October 2013. More specifically, the Issued for Construction (IFC) plans for ANGP were prepared under the responsible charge of engineers licensed in the relevant disciplines in the State of Vermont – namely, Michael E. Hollowood (civil, license number 018.0097764), Joseph J. Thomson (mechanical, license number 018.0090983) and James B. Fuller (electrical, license number 018.0009337). These licensed engineers were actively engaged during the development of the IFC plans and directly supervised the design. In December 2018, at the request of VGS, CHA provided copies of the original IFC plans previously issued to VGS, including mechanical and electrical plans, signed and sealed by the above-referenced engineers.

Prior to the commencement of construction, CHA provided VGS with final plans clearly labeled as IFC (an indication that the plans were suitable for construction), enabling VGS to establish a Quality Assurance Plan. CHA remained engineer of record throughout the ANGP, but VGS (not CHA) was responsible for the construction of the ANGP, the associated construction documentation (including a Quality Assurance Plan) and construction management.

The above responses confirm that the conclusions included in the Liebert letter relating to CHA's deliverables are without merit. If you have any additional questions or would like to discuss this matter further, please do not hesitate to contact me at (518) 453-8222 or by e-mail at gcorso@chacompanies.com.

Very truly yours,

A handwritten signature in black ink that reads "Gregory S. Corso".

Gregory S. Corso
Executive Vice President

/jrf

Attachment

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