

**Exhibit VGS-AG-113**

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Investigation pursuant to 30 V.S.A. §§ 30 and )  
209 regarding the alleged failure of Vermont )  
Gas Systems, Inc. to comply with the certificate ) Case No. 17-3550-INV  
of public good in Docket 7970 by burying the )  
pipeline at less than required depth in New )  
Haven, Vermont )

Notice of Probable Violations of Vermont Gas )  
Systems, Inc. for certain aspects of the ) Case No. 18-0395-PET  
construction of the Addison natural gas pipeline )

**PREFILED DIRECT REBUTTAL TESTIMONY  
OF BRIAN CONNAUGHTON ON BEHALF OF  
VERMONT ELECTRIC POWER COMPANY, INC.  
AND VERMONT TRANSCO LLC**

November 1, 2021

**Summary of Testimony**

Mr. Connaughton of VELCO responds to the Prefiled Direct Testimony of Intervenors' witness Gregory Liebert filed on September 10, 2021 and "corrected" on October 4, 2021.

1 **Q1. Please state your name and occupation.**

2 A1. My name is Brian Connaughton. I am employed by Vermont Electric Power Company, Inc.  
3 and Vermont Transco LLC (together, “VELCO”) as the Director of Transmission Services.

4 **Q2. Have you previously submitted testimony in this proceeding?**

5 A2. Yes, I previously provided prefiled direct testimony on July 23, 2021 on behalf of VELCO in  
6 Case Nos. 17-3550-INV and 18-0395-PET.

7 **Q3. What is the purpose of your rebuttal testimony?**

8 A3. The purpose of my rebuttal testimony is to respond to certain aspects of the prefiled  
9 testimony of Greg Liebert dated September 10, 2021 (“corrected” October 4, 2021) filed on  
10 behalf of the Intervenors.

11 **Q4. What new documents did you review and/or consider in preparation of your rebuttal**  
12 **testimony that were not previously identified in your direct testimony or related**  
13 **discovery responses?**

14 A4. I reviewed, in whole or in part, the following documents:

- 15 1. Mr. Liebert’s prefiled testimony dated September 10, 2021 (and related exhibits) and  
16 his “corrected” testimony dated October 4, 2021.
- 17 2. Prefiled testimony of John St. Hilaire and Carlos Chaves (and related exhibits),  
18 submitted on behalf of Vermont Gas, dated September 10, 2021.
- 19 3. Intervenors’ Responses to VGS R1 Discovery dated October 8, 2021.
- 20 4. Transcripts of the deposition of Mr. Liebert, conducted on October 12 and 20,  
21 2021.

1           5. Exhibits used during Mr. Liebert's deposition.

2   **Q5. Mr. Liebert, in response to Question 11 of his testimony, discusses “the relevance of**  
3   **less than 3-foot depth cover to AC mitigation.” Please discuss any response you have**  
4   **to this testimony.**

5   A5. I understand that VGS has retained an engineer to review the AC mitigation and cathodic  
6   protection design to evaluate the relevance of the depth of pipe to the design. An adequate  
7   protection system ensures the integrity of VGS' asset and is part of the VELCO/VGS  
8   CO&M agreement (*Exhibit VELCO-BC-3*) in which VGS has agreed to maintain and  
9   utilize a proper AC mitigation and cathodic protection system. I expect that VGS will  
10   perform a review of the design and make any necessary adjustments as agreed to in the  
11   CO&M agreement.

12   **Q6. Mr. Liebert also states, with respect to VELCO's transmission lines within the ROW,**  
13   **that “[a] higher voltage line will present greater risk to the pipeline.” Please discuss**  
14   **any response you have to this testimony.**

15   A6. The VGS project accounts for the possibility of a future 345kV line alongside the existing  
16   115kV lines (the VGS route extends along several 115kV line segments) in two primary  
17   ways. First, the gas line is largely sited alongside the western edge of the existing electric  
18   transmission line right-of-way (ROW), with limited areas on the eastern side of the ROW,  
19   which were acceptable to VELCO. This siting will allow for the future easterly expansion of  
20   the ROW to house a new electric transmission line and reduces the amount of future siting  
21   challenges such as the placement of new transmission structures, guy wire assemblies, and  
22   access routes that could conflict with the pipeline. Secondly, the VGS/VELCO

1 Memorandum of Agreement (“MOA”) dated June 13, 2013, previously provided as Exhibit  
2 16 to Exhibit VGS-JSH-2 in this proceeding, requires VGS to account for the additional AC  
3 mitigation and cathodic protection that may be needed for a potential 345kV or other  
4 electrical transmission line. See sections 1 and 3 of the MOA. This requirement also  
5 obligates VGS to bear the costs of any additional AC mitigation and cathodic protections in  
6 a manner that does not hinder, delay, or interrupt construction of the 345kV buildout and  
7 which does not increase VELCO’s 345kV build-out costs. The MOA provides as follows:

8 3. VGS Design to Account for Potential VELCO 345 kV Build-Out. The VGS  
9 Project Plans account for a potential 345 kV future build-out of the VELCO electric  
10 transmission system. The Parties are engaging in an iterative process of  
11 informational exchanges and design review to develop a mutually acceptable design  
12 for CP. The Parties have targeted June 30, 2013 as a completion date for the CP  
13 design, but acknowledge that the CP design may require more time and agree to  
14 continue to work in good faith towards finalizing the CP design. Further, the Parties  
15 mutually agree that while VGS will design the Project Plans to incorporate CP for a  
16 potential future 345 kV build-out, the initial Project build may not, in VGS' sole  
17 discretion, include this additional CP at the time the Project is constructed, provided  
18 however that: VGS will install CP associated with a future 345 kV build-out if/when  
19 such VELCO build-out occurs; said CP will be permitted by and paid for by VGS;  
20 and further provided that VGS will install said CP in a timeframe and manner that  
21 does not materially delay, hinder, or interrupt construction of the 345 kV build out  
22 and which does not increase VELCO's 345 kV build-out costs.

23  
24 VGS/VELCO MOA at 2.

25 I believe that these measures address the risks identified by VELCO as well as the  
26 risks referenced by Mr. Liebert.

27 **Q7. Does that conclude your testimony at this time?**

28 A7. Yes, it does.