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Subject: Intervenor's March 1 filing in case (17-3550 INV)
Date: Tuesday, March 13, 2018 2:35:52 PM

Dear Ms Whitney:

I've read the Intervenor's March 1 filing in PUC case (17-3550 INV), seeking to broaden the Commission's investigation into probable and potentially catastrophic violations of the Certificate of Public Good (CPG) for the Vermont Gas Systems (VGS) Addison County Gas Pipeline. The information the motion is based on comes entirely from records of the Vermont Department of Public Service (DPS) and Vermont Gas Systems. As the motion suggests and the information shows, it is more than likely that Vermont Gas Systems failed to meet the safety requirements of the CPG.

This is alarming in itself. Equally alarming is that DPS apparently was aware of many of VGS's failures to comply with the standards required by the CPG and itself failed to persist in holding VGS to the conditions set by the CPG. This raises serious questions about the ability of DPS to carry out its responsibilities as well as still more troubling questions about the Department's possible negligence in coping with — or its complicity with— VGS's sub-grade work and quality assurance in constructing the pipeline.

It's clear that the safety and environmental issues raised by the intervenors are serious and well-founded enough to justify the broadening of the investigation their motion seeks. These issues also bear on the integrity and truthfulness of both VGS and DPS and their ability and willingness to perform in a way that protects the safety of the people of Vermont. It seems to me that what's also in question is whether the PUC itself takes seriously the requirements and conditions it sets in granting CPGs or whether in this case the conditions were simply a verbal wash to help push through the CPG in the face of widespread public opposition to the VGS pipeline project. How the PUC deals with the evidence and arguments brought to its attention by the intervenor's motion will also test the Commission's integrity.

Because of the seriousness of all these issues, I urge the Commission to take no further action on either of the open cases involving the Vermont Gas Systems pipeline until the broad scope of investigation requested by the intervenor's in their March 1 motion is complete. The two open cases bear on DPS's Notice of Probable Violation (18-0395-PET) and on the CPG for the Monkton gate station (17-4909-PET).

Thank you,

Geoffrey Gardner

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