

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 17-3550-INV

Investigation pursuant to 30 V.S.A. §§ 30 and 209 regarding the alleged failure of Vermont Gas Systems, Inc. to comply with the certificate of public good in Docket 7970 by burying the pipeline at less than required depth in New Haven, Vermont	
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Case No. 18-0395-PET

Notice of Probable Violations of Vermont Gas Systems, Inc. for certain aspects of the construction of the Addison natural gas pipeline	
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**VERMONT GAS SYSTEMS, INC.’S MOTION TO SET
DEADLINE FOR FILING PROPOSED SCHEDULE**

On March 19, 2021, the Department of Public Service (“Department”) filed a Motion to Stay Scheduling of the Penalty Proceeding and requested parties be permitted to submit proposed schedules two weeks after the issuance of the order on Vermont Gas Systems, Inc.’s (“VGS”) Motion for Interlocutory Review. The Vermont Public Utility Commission (“Commission”) issued an Order Granting the Department’s request on March 23, 2021. On April 30, 2021, the Commission issued an Order Denying VGS’s Motion for Interlocutory Review, but directed the hearing officer to reopen the evidentiary record and establish a schedule for the limited purpose of exploring the loading-standard issue.

Pursuant to the March 23, 2021 Order approving the Department’s requested motion, schedules for the penalty phase of this proceeding are due May 14, 2021. Through this Motion, VGS requests that parties be permitted until May 28, 2021 to submit proposed schedules for the remainder of this proceeding, including reopening the evidentiary hearing per the April 30, 2021 Order. Undersigned counsel is authorized to represent that Intervenors, VELCO, the Agency of

Natural Resources, and the Department have no objection to this request. In support of this request, VGS states the following:

1. The April 30, 2021 Order contemplates that the reopened evidentiary hearing will include testimony from VELCO, that would be subject to discovery, cross-examination, and rebuttal, as necessary. Order, p. 13 n. 19.
2. VGS expects that VELCO may need additional time and/or information (either from VGS or others) to address the questions raised in the Commission's April 30, 2021 Order.
3. An extension of the deadline to submit proposed schedules to May 28, 2021 will allow such proposals to be informed by VELCO's estimate of the time required to submit additional evidence in accordance with the Commission's April 30, 2021 Order.
4. As well, VGS hopes that with the additional time to prepare a schedule, it will be able to coordinate with all parties in this Case to file a joint proposed schedule for the remainder of this proceeding.

For all of the reasons set forth above, VGS respectfully requests that it be permitted until May 28, 2021 to submit a proposed schedule for the remainder of this Case.

DATED at Burlington, Vermont on this 11th day of May 2021.

VERMONT GAS SYSTEMS, INC.

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