

RESPONSE: None. My testimony was limited to the lack of Seal and Signature by a Vermont Licensed Engineer with appropriate experience and knowledge.

Q.VGS.INTERVENORS.1-25: Please refer to the Liebert Testimony at Page 10 and 11. Other than his opinion about licensed professional engineers, has Mr. Liebert analyzed whether the AC mitigation on the ANGP works?

RESPONSE: No. This was not the intent of my review.

Q.VGS.INTERVENORS.1-26: Please refer to the Liebert Testimony at Page 11, stating “A 345 kV line will increase the risk of stray current damaging the ANGP.”

- a. Is this Mr. Liebert's professional opinion as a Vermont-licensed engineer?
- b. Please identify and describe in detail all the facts, data, circumstances, and assumptions Mr. Liebert relied upon in forming this opinion.
- c. Please produce all documents (including communications and calculations) that Mr. Liebert relied upon in forming this opinion.
- d. Please identify and produce all documents Mr. Liebert reviewed or relied upon in forming his answer to Question 14.

RESPONSE:

a-d. Yes. This is my opinion as a forensic engineer after reviewing findings in The INGAA Foundation, Inc.; Criteria for Pipelines Co-Existing with Electric Power Lines; The INGAA Foundation Final Report No. 2015-04. Higher voltages and currents increase induced AC voltage from Electromagnetic Induction.

Q.VGS.INTERVENORS.1-27: Admit that Mr. Liebert has never performed any work as a licensed engineer on a natural gas pipeline. If denied, explain the basis for your denial in detail.

RESPONSE: Admit

Q.VGS.INTERVENORS.1-28: Admit that Mr. Liebert is not qualified to design an AC mitigation plan. If denied, explain the basis for your denial in detail.

RESPONSE: Admit

Q.VGS.INTERVENORS.1-29: Admit that Mr. Liebert has never conducted any surface loading calculations for a natural gas pipeline prior to preparing the Liebert Testimony in this case. If denied, explain the basis for your denial in detail.

RESPONSE: Admit

Q.VGS.INTERVENORS.1-30: Admit that Mr. Liebert is not qualified to provide an opinion about appropriate soil classifications. If denied, explain the basis for your denial in detail.

RESPONSE: Denied. I am not qualified to classify soils or test soils. However, I am qualified to apply know soil conditions to equations and analysis involving different designs that require specific soil conditions.

Q.VGS.INTERVENORS.1-31: Admit that Mr. Liebert does not know whether a 345 kV line will be proposed or approved in the VELCO right of way in New Haven. If denied, explain the basis for your denial in detail.

RESPONSE: Admit.

Q.VGS.INTERVENORS.1-32: Admit that 49 C.F.R. 192.111 requires a design factor of 0.50 to be used in the design formula in 49 C.F.R. § 192.105.

RESPONSE: Admit. For Location Class 3, for MAOP.

Q.VGS.INTERVENORS.1-33: Admit that the design formula set forth in 49 C.F.R. § 192.105 is not a design formula for calculating the surface loading on a natural gas pipeline.

RESPONSE: Admit.

DATED at Charlotte, Vermont, this 8th day of October 2021.

As to objections:


James A. Dumont, Esq.

Gregory Liebert, PE