

# COMMONWEALTH OF VIRGINIA

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## STATE CORPORATION COMMISSION

August 22, 2014

### VIA HAND DELIVERY

Hon. Joel H. Peck, Clerk  
State Corporation Commission  
c/o Document Control Center  
Tyler Building, First Floor  
1300 East Main Street  
Richmond, Virginia 23219

RE: *Application of Virginia Electric and Power Company, For approval and certification of electric transmission facilities for the Remington CT-Warrenton 230 kV Double Circuit Transmission Line, Vint Hill-Wheeler and Wheeler-Loudoun 230 kV Transmission Lines, 230 kV Vint Hill Switching Station, and 230 kV Wheeler Switching Station, Case No. PUE-2014-00025*

Dear Mr. Peck:

Please file the enclosed original and fifteen (15) copies of the Staff of the State Corporation Commission's "Motion for Order" with the other papers in the above-captioned case.

Thank you for your assistance in this regard.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Alisson P. Klaiber', written over a horizontal line.

Alisson P. Klaiber  
Attorney

APK:kam  
Enclosure

cc: Service List

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COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

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APPLICATION OF

VIRGINIA ELECTRIC AND POWER COMPANY

CASE NO. PUE-2014-00025

For approval and certification of electric transmission facilities for the Remington CT-Warrenton 230 kV Double Circuit Transmission Line, Vint Hill-Wheeler and Wheeler-Loudoun 230 kV Transmission Lines, 230 kV Vint Hill Switching Station, and 230 kV Wheeler Switching Station

**MOTION FOR ORDER**

The Staff of the State Corporation Commission ("Staff"), pursuant to Rule 110 of the Commission's Rules of Practice and Procedure,<sup>1</sup> for the reasons set forth below, hereby moves the State Corporation Commission ("Commission") to direct Virginia Electric and Power Company ("Dominion Virginia Power" or "Company") to: (1) conduct further study, in coordination with the Staff, to develop additional Option A Warrenton-Wheeler transmission alternatives; and (2) give notice to the public of a set of buildable Option A Warrenton-Wheeler alternatives.

I. INTRODUCTION

On March 31, 2014, Dominion Virginia Power filed with the Commission an application and supporting documents ("Application") for a certificate of public convenience and necessity for a Remington CT-Warrenton 230 kilovolt ("kV") double circuit transmission line, Vint Hill-Wheeler and Wheeler-Loudoun 230 kV transmission lines, 230 kV Vint Hill Switching

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<sup>1</sup> 5 VAC 5-20-110.

Station ("Vint Hill Station"), and 230 kV Wheeler Switching Station ("Wheeler Station") ("proposed Projects").<sup>2</sup>

The proposed Projects would: (i) replace the existing Remington CT-Warrenton single-circuit 230 kV line with a double-circuit line; (ii) construct a new Vint Hill Station; (iii) replace a portion of the existing Gainesville-Wheeler line at the Wheeler end with a double-circuit 230 kV line; (iv) extend one of those circuits on new right-of-way to the Vint Hill Station to form a Wheeler-Vint Hill circuit; (v) connect the other circuit to the remaining existing portion of the Wheeler-Gainesville 115 kV line (converted to 230 kV); and (iv) connect the Wheeler-Gainesville 115 kV line to the existing Gainesville-Loudoun 115 kV circuit (converted to 230 kV) to form a Wheeler-Loudoun 230 kV circuit.<sup>3</sup> The preliminary cost estimate for the proposed Projects is \$94.2 million.<sup>4</sup>

In its Application, the Company sets forth three transmission alternatives to the proposed Projects. The Company also states that as part of all the alternatives it considered, the Company would expand its existing Warrenton Substation and construct a new Wheeler Station adjacent to Northern Virginia Electric Cooperative's ("NOVEC's") existing Wheeler Substation.<sup>5</sup>

The first alternative to the proposed Projects, Option A, would construct a new approximately 9.0-mile 230 kV overhead single-circuit 230 kV line from existing Warrenton Station to the proposed Wheeler Station on all new right-of-way. As part of this alternative, the

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<sup>2</sup> The proposed Projects are referred to by the Company in its Application as Option C.

<sup>3</sup> Application at 2-3.

<sup>4</sup> Appendix at 25, fn. 8. The Company states that this number is a preliminary cost estimate that does not include the detailed costs subsequently developed for the proposed Projects, or the costs to acquire NOVEC's Line #922, which is required for all options considered. However, it is used by the Company for comparative purposes. According to the Company, the preliminary cost estimate for the proposed Projects is within 4% of the detailed cost estimate of \$98.5 million set forth in section I.G.

<sup>5</sup> *Id.* at 10-12.

Company would also purchase NOVEC's 6-mile Wheeler-Gainesville 115 kV Line #922, convert it to 230 kV, and connect it to the Company's existing Gainesville-Loudoun 115 kV Line #124, which would be converted to 230 kV to create a Wheeler-Loudoun 230 kV circuit. This would create a Remington CT-Warrenton-Wheeler-Loudoun 230 kV network and would relieve the Gainesville Substation of its Line #922 load. Upon completion of the Remington CT-Warrenton-Wheeler-Loudoun network, the Company states that existing Line #2086 (Remington CT-Warrenton) would be reconducted to 1047 MVA to accommodate increased network flows.<sup>6</sup> The Company's preliminary cost estimate for Option A is approximately \$74.6 million, making it the least-cost solution of all the alternatives presented by the Company.<sup>7</sup>

However, while Dominion Virginia Power states that Option A was "initially estimated to be the *least cost solution* that resolved *all* of the identified issues,"<sup>8</sup> the Company did not select Option A because, according to Dominion Virginia Power, all five of the routes under evaluation were either encumbered by conservation easements or contained parcels owned by government entities.<sup>9</sup> Additionally, Dominion Virginia Power states that Option A involved crossing a number of cultural and historical resources and would come near a number of residences.<sup>10</sup> The

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<sup>6</sup> *Id.* at 25. The Company states that it is also aware of potential additional load coming into the Haymarket area that would likely be served from a tap on the Wheeler-Loudoun segment of Option A's Remington CT-Warrenton-Wheeler-Loudoun network and drive that network's load to nearly, or above, the 300 MW lost load threshold. The Company states that, to resolve this concern, it would need to construct a new 230 kV line between the proposed Vint Hill and Wheeler Stations, which is a component of the proposed Projects. *See id.* at 26. However, the Company states that it cannot project the timing of the need for such a Vint Hill-Wheeler line if Option A is constructed. *See* Company response to Staff Interrogatory Nos. 1-24, 1-25.

<sup>7</sup> Appendix at 25, fn. 8, *see* fn. 4, *supra*.

<sup>8</sup> Appendix at 25. Emphasis added.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.* at 25.

Company further states that "[Fauquier County] has indicated in conversation that a permanent overhead line is not compatible with [its] easements or property uses and they would be unwilling to allow a new overhead transmission line right-of-way easement across their easements or property."<sup>11</sup> Dominion Virginia Power asserts in its Application that without the ability to use condemnation as an assurance to securing the necessary right-of-way, the Company does not believe that it would be successful in meeting the required target date by constructing Option A.<sup>12</sup> Because of this concern, the Company dismissed Option A as a viable alternative.

The Company also analyzed a Warrenton to Wheeler Underground Option ("Underground Option"). This option would be identical to Option A but, rather than an overhead Warrenton-Wheeler 230 kV line, would construct a 230 kV underground line approximately 8.0 miles in length from Warrenton Substation to Wheeler Station, mainly adjacent to an existing gas transmission right-of-way.<sup>13</sup> There is no indication in the record that Fauquier County would oppose the Underground Option. The preliminary cost estimate for this alternative is approximately \$160.4 million.<sup>14</sup>

Dominion Virginia Power states that the Underground Option also resolved *all* of the identified issues, but the Company did not select the Underground Option because it was the most expensive option considered.<sup>15</sup> As such, Option A and the Underground Option were abandoned by the Company and thus were not included in the proposed notice to the public included in the Appendix to the Application.

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<sup>11</sup> *Id.* at 70.

<sup>12</sup> *Id.* at 25.

<sup>13</sup> *Id.* at 26.

<sup>14</sup> *Id.*, see fn. 4 *supra*.

<sup>15</sup> Appendix at 26-27.

Dominion Virginia Power's third alternative, Option B, the Existing Corridor Rebuild Option, would: (i) replace the existing Remington CT-Warrenton single-circuit 230 kV line with a double-circuit line; (ii) replace the existing Gainesville-Wheeler single-circuit 115 kV line with a double-circuit 230 kV line; (iii) connect one of those circuits to Gainesville; and (iv) connect the other circuit to the existing 115 kV (converted to 230 kV) Gainesville-Loudoun circuit to form a Wheeler-Loudoun line. The preliminary cost estimate for this option is approximately \$84.9 million. The Company states that it did not select this alternative primarily because it was not considered to be as robust a solution as the Company's proposed Projects.<sup>16</sup>

On May 29, 2014, the Commission issued an Order for Notice and Hearing in this proceeding that, among other things, directed the Company to publish notice of the proposed and alternative routes for the proposed Projects. In addition, the Commission directed the Company to publish notice of the proposed routes for Option B, the Existing Corridor Rebuild Option. Option A and the Underground Option were not noticed by the Company, and as such, are not properly before the Commission in this proceeding.

## II. ARGUMENT

While the record reflects that Option A is both a superior electric alternative to the proposed Projects and is less expensive than the proposed Projects, this case thus far has dismissed any further consideration of Option A, based largely on Dominion Virginia Power's representation that Fauquier County, "indicated *in conversation* that a permanent overhead line is not compatible with [its] easements or property uses and they would be unwilling to allow a new overhead transmission line right-of-way easement across their easements or property."<sup>17</sup>

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<sup>16</sup> *Id.* at 27-28, *see* fn. 4, *supra*.

<sup>17</sup> Appendix at 70. Emphasis added.

Option A, as a potentially superior alternative to the proposed Projects, deserves further study in the context of this proceeding. As such, through this Motion, Staff moves for the Commission to direct the Company to: (1) conduct further study, in coordination with the Staff, to develop additional Option A Warrenton-Wheeler transmission alternatives; and (2) give notice to the public of a set of buildable Option A Warrenton-Wheeler alternatives.

**A. Option A is an Electrically Superior Alternative to the Proposed Projects**

As noted by the Company in a mailing to approximately 1,360 property owners in the area of the proposed Projects, Option A "is the most efficient and effective in resolving the electrical issues for all three substations . . . ." <sup>18</sup> Indeed, as reflected in the attached Affidavit of Staff witness Michael Martin, Option A provides a true independent second supply to Warrenton Substation. Specifically, the Warrenton-Wheeler line proposed as part of Option A would back up the Remington CT-Warrenton line, and vice-versa, thus assuring continued supply to Warrenton in the case of failure in either line. Further, Warrenton Substation would be supplied by two sources, Loudoun and Remington CT. The loss of either one of these sources would not lead to a loss of the Warrenton load. The same cannot be said for the proposed Projects, which would supply Warrenton Substation with two circuits, but from a single source. Moreover, as Staff witness Martin also attests, Option A establishes the 230 kV network power flow path: Remington CT-Warrenton-Wheeler-Loudoun. This power flow path is beneficial to the 230 kV system when other parts of the area 230 kV network are out of service. Further, the Remington area contains a total of over 1,000 megawatts of gas-fired generation at the Company's Remington Generating Station and Old Dominion Electric Cooperative's Marsh Run Generating Station. Option A's Remington CT-Warrenton-Wheeler-Loudoun power flow path could provide

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<sup>18</sup> *Id.* at 111, 126.

an alternate path for the output of this generation to flow from the Remington area to the growing loads to the north. In contrast, the proposed Projects do not offer this power flow path from the Remington area to growing loads in the north. As such, Option A is superior to the proposed Projects from a reliability standpoint.

**B. An Option A Overhead Connection Would Save Ratepayers Money**

Not only would Option A provide superior reliability to the proposed Projects, but as noted by the Company in its Application, ". . . this alternative was [] estimated to be the least cost solution that resolved all of the identified issues."<sup>19</sup> Specifically, in a comparison of preliminary cost estimates, Option A would cost approximately \$74.6 million, or approximately \$20 million less, than the \$94.2 million the Company expects to spend for the proposed Projects.<sup>20</sup> As such, an Option A overhead route, presents the best solution for ratepayers from both a reliability and cost standpoint. It is uncontested that Option A, apart from its purported routing constraints, is a superior alternative to the proposed Projects.

**C. The Record With Respect to Option A's Alleged Routing Constraints**

Notwithstanding the benefits of Option A, Dominion Virginia Power dismissed consideration of Option A in its Application on the representation that Fauquier County "indicated in conversation that a permanent overhead line is not compatible with [its] easements or property uses and they would be unwilling to allow a new overhead transmission line right-of-way easement across their easements or property."<sup>21</sup> In Staff's view, an electrically superior and less costly alternative should not be dismissed from consideration on such scanty "evidence."

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<sup>19</sup> *Id.* at 25.

<sup>20</sup> *Id.*

<sup>21</sup> *Id.* at 70.



**D. Dominion Virginia Power Should be Directed to Further Study Option A in Coordination with Staff.**

Even if (i) Fauquier County's consent to an easement was necessary to construct every possible Warrenton-Wheeler alternative; and (ii) the County were to withhold granting such easement to one, or all, of the routes presented by the Company for Option A,<sup>22</sup> Staff has reviewed the Company's proposed routes for Option A and has identified potential route adjustments that should be further investigated in coordination with the Company. For example, as reflected in the attached Affidavit of Wayne McCoy, by shortening the length of the Underground Option and combining it with portions of one or more overhead line alternatives, a hybrid line route might be developed from Warrenton Substation to Wheeler Station at a cost less than total undergrounding and with the attributes of having limited or no impact to visually sensitive areas.<sup>23</sup> Other unobjectionable (from the County's perspective) overhead alternatives may be possible as well. At the very least, the feasibility of routing a line between Warrenton Substation and Wheeler Station should be studied in this proceeding. As such, the Staff respectfully requests that the Commission direct the Company to conduct further study, in coordination with the Staff, of additional Option A Warrenton-Wheeler alternatives.

**E. Dominion Virginia Power Should be Directed to Notice Proposed Routes For Option A.**

Virginia law requires a new route for new facilities under consideration by the Commission to be noticed prior to approval. Because Option A has not been noticed in this proceeding, the Commission cannot approve Option A, or any variation thereof, even if

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<sup>22</sup> Neither of these facts is demonstrated in the record.

<sup>23</sup> Dominion Virginia Power explicitly stated that the hybrid route the Company considered "was not examined or assessed in detail." See Company response to Staff Interrogatory No. 1-21.

Option A proves to be the superior alternative. As such, Option A is not properly before the Commission for consideration in this proceeding.

Specifically, § 56-265.2 of the Code of Virginia ("Code") states:

[I]t shall be unlawful for any public utility to construct, enlarge or acquire, by lease or otherwise, any facilities for use in public utility service, except ordinary extensions or improvements in the usual course of business, without first having obtained a certificate from the Commission that the public convenience and necessity require the exercise of such right or privilege. Any certificate required by this section shall be issued by the Commission only after opportunity for a hearing and after due notice to interested parties. The certificate for overhead electrical transmission lines of 138 kilovolts or more shall be issued by the Commission only after compliance with the provisions of § 56-46.1.

Section 56-46.1 of the Code states:

[N]o electrical transmission line of 138 kilovolts or more shall be constructed unless the State Corporation Commission shall, after at least 30 days' advance notice by (i) publication in a newspaper or newspapers of general circulation in the counties and municipalities through which the line is proposed to be built, (ii) written notice to the governing body of each such county and municipality, and (iii) causing to be sent a copy of the notice by first class mail to all owners of property within the route of the proposed line, as indicated on the map or sketch of the route filed with the Commission, which requirement shall be satisfied by mailing the notice to such persons at such addresses as are indicated in the land books maintained by the commissioner of revenue, director of finance or treasurer of the county or municipality, approve such line. Such notices shall include a written description of the proposed route the line is to follow, as well as a map or sketch of the route including a digital geographic information system (GIS) map provided by the public utility showing the location of the proposed route.

Accordingly, for Option A, or any variation thereof, to be properly before the Commission in this proceeding, the above statutory requirements must be satisfied. Only the proposed Projects and the Existing Corridor Rebuild Option have been so noticed and are properly before the Commission at this time.

Yet, Option A, or a variation thereof, could be a viable and potentially superior alternative to the proposed Projects. Because the Company has failed to include adequate evidence in the record that connecting Warrenton and Wheeler is impossible and because further study of this potentially superior alternative is necessary to provide the Commission with a complete record in the context of this proceeding, Staff respectfully requests that the Commission require Dominion Virginia Power to notice Option A. Without such notice, pursuant to § 56-46.1 and 265.2 of the Code, the Commission cannot approve Option A, or any variation thereof, even if the Commission were to determine that these options are superior to the proposed Projects.

### III. CONCLUSION

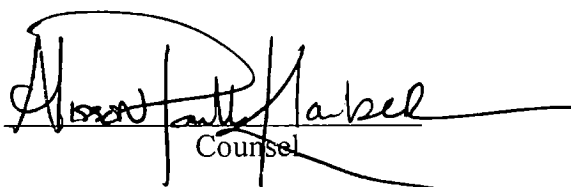
As Staff attests and as Dominion Virginia Power represents in its own Application, Option A is electrically superior to the proposed Project and has the potential save ratepayers more than \$20 million based on preliminary cost estimates. Option A should not be summarily dismissed from the Commission's consideration due to alleged routing constraints that are not adequately supported in the record. Rather, Option A should be fully considered by the Commission in the context of this proceeding. For these reasons, Staff respectfully requests that the Commission require Dominion Virginia Power to: (1) conduct further study, in coordination with the Staff, to develop additional Option A Warrenton-Wheeler transmission alternatives; and (2) give notice to the public of a set of buildable Option A Warrenton-Wheeler alternatives.

In connection with this request, Staff also moves for the Commission to continue the procedural schedule in this case to give the Company sufficient time to study Option A in coordination with Staff; notice Option A; and supplement the record with alternative routes for

Option A that may be developed. Additional time should also be given to allow interested persons the opportunity to comment or participate in this proceeding as it relates to Option A.

Respectfully submitted,

THE STAFF OF THE STATE  
CORPORATION COMMISSION

By   
Counsel

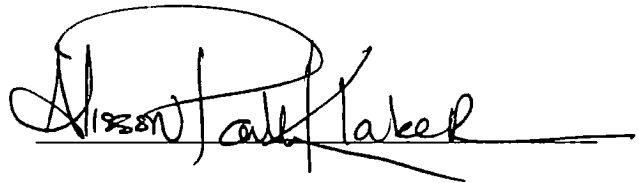
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Dated: August 22, 2014

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of August, 2014, a true copy of the foregoing "Motion for Order" was electronically mailed, and mailed, postage prepaid, to: Lisa S. Booth, Esquire, and Charlotte P. McAfee, Esquire, Dominion Resources Services, Inc., 120 Tredegar Street, Richmond, Virginia 23219; Vishwa B. Link, Esquire, and Jennifer D. Valaika, Esquire, McGuireWoods LLP, One James Center, 901 East Cary Street, Richmond, Virginia 23219-4030; D. Alexy, Partner, Morris Farm LLP, 14458 Broadwinged Drive, Gainesville, Virginia 20155; Diana E. Norris, Esquire, and Robert G. Marmet, Esquire, Piedmont Environmental Council, P.O. Box 460, Warrenton, Virginia 20188; and C. Meade Browder, Jr., Senior Assistant Attorney General, Office of the Attorney General, Division of Consumer Counsel, 900 East Main Street, Second Floor, Richmond, Virginia 23219.

A handwritten signature in black ink, appearing to read "Alison Hall Baker". The signature is written in a cursive style with a large loop at the top and a long horizontal stroke at the bottom.

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

APPLICATION OF

VIRGINIA ELECTRIC AND POWER COMPANY

CASE NO. PUE-2014-00025

For approval and certification of electric transmission facilities for the Remington CT-Warrenton 230 kV Double Circuit Transmission Line, Vint Hill-Wheeler and Wheeler-Loudoun 230 kV Transmission Lines, 230 kV Vint Hill Switching Station, and 230 kV Wheeler Switching Station

AFFIDAVIT OF MICHAEL W. MARTIN IN SUPPORT OF  
STAFF MOTION FOR ORDER

THE UNDERSIGNED, Michael W. Martin, of Richmond, Virginia, having been duly sworn on oath before a Notary Public, states the following:

1. I am a Principal Utilities Engineer in the Commission’s Division of Energy Regulation. I am a registered Professional Engineer in Virginia and hold a Bachelor’s degree in electrical engineering and a Master’s degree in Electric Power Engineering. I have worked at the State Corporation Commission for 21 years, and for the last 12 years have been responsible for analyzing transmission line applications, and preparing and presenting Staff testimony in those cases. My testimonies have included both electrical analysis as well as routing analysis. In this case, I will prepare and present the Staff’s analysis of need and the relative electrical performance of alternatives.

I have read the Company’s Application and have assisted in preparing the 100 data request questions that have been submitted to the Company. The majority of the questions are concerned with the need for the proposed Projects and development of alternative solutions.

2. The Company states that construction of an Option A solution, which includes a new Warrenton-Wheeler 230 kV line and a new Wheeler-Loudoun 230 kV circuit (achieved through reconfiguration and voltage conversion of two existing 115 kV circuits) would both be the best and least-cost solution. However, the Company believes that an Option A solution is likely unbuildable, at least by the need date of 2017, due to anticipated difficulties in obtaining right-of-way. However, if there is a possibility that a buildable route can be found for a Warrenton-Wheeler line (which possibility is discussed in the affidavit of Staff witness Wayne McCoy), I believe that Option A deserves close examination and consideration because of its electrical superiority and potential cost advantage.

The electrical advantages of Option A can be grouped into two categories, described below.

### 3. Option A's Benefits to Warrenton Substation

The Company's proposed Projects include the replacement of the existing single-circuit 230 kV line from Remington CT to Warrenton with a double-circuit line. This line replacement project would not truly network Warrenton. A true networking would provide Warrenton with a second circuit built on a different pole line to a different source. Rather, the Company's proposal provides a second circuit to Warrenton built on the same pole line as the first circuit, and from the same source, Remington CT. While adding a parallel circuit on the same pole line to Warrenton would be helpful in improving Warrenton reliability by maintaining continuous supply to Warrenton in the case of one circuit's failure, it would not provide as much reliability as adding a second circuit on another pole line from another source.

Option A, in contrast, provides a true independent second supply to Warrenton. The Warrenton-Wheeler line would back up the Remington CT-Warrenton line, and vice-versa, thus assuring continued supply to Warrenton in the case of failure in either circuit, and also in the case of failure of a pole in either line, or a loss of either source, Loudoun or Remington CT.

### 4. Option A's Benefits to the Area Transmission System

The Company's proposed Projects replace the existing single-circuit 230 kV line from Remington CT to Warrenton with a double-circuit line. Since both 230 kV circuits dead-end at Warrenton, there is no strengthening of the area transmission network over the existing situation of having the one circuit dead-end at Warrenton.

Option A, in contrast, strengthens the area transmission network by establishing the new 230 kV network power flow path Remington CT-Warrenton-Wheeler-Loudoun. This added power flow path could be beneficial when other parts of the area's 230 kV transmission network are out of service.

In addition, the Remington area contains over 1000 MW of gas-fired generation at the Company's Remington Generating Station and Old Dominion Electric Cooperative's Marsh Run Generating Station. Option A's Remington CT-Warrenton-Wheeler-Loudoun power flow path could provide an alternate path for the output of this generation to flow from the Remington area to the growing loads to the north.

5. For the reasons set forth above, the Option A routing alternatives, and any additional derived variations thereon, should be afforded the close examination provided by inclusion in the instant case for the purpose of determining if there are buildable routes for a Warrenton-Wheeler 230 kV transmission line, which line would provide superior long-term electrical benefits, and potential cost savings.

This Affidavit is being presented in connection with the Staff of the State Corporation Commission's Motion for Order in the captioned Application. I am familiar with the nature of an oath and with the penalties as provided by the laws of the Commonwealth of Virginia for falsely swearing to statements made in an instrument of this nature,

*Michael W. Martin*

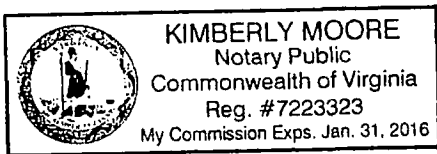
Michael W. Martin  
Principal Utilities Engineer

State of Virginia

City of: Richmond

On this 2nd day of August 2014, before me, personally appeared Michael W. Martin, personally known to me, who acknowledged and executed this Affidavit before me for the purposes therein contained.

In Witness Whereof, I hereunto set my hand and official seal.



*[Handwritten signature]*



COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

APPLICATION OF

VIRGINIA ELECTRIC AND POWER COMPANY

CASE NO. PUE-2014-00025

For approval and certification of electric transmission facilities for the Remington CT-Warrenton 230 kV Double Circuit Transmission Line, Vint Hill-Wheeler and Wheeler-Loudoun 230 kV Transmission Lines, 230 kV Vint Hill Switching Station, and 230 kV Wheeler Switching Station

AFFIDAVIT OF WAYNE D. MCCOY IN SUPPORT OF  
STATE CORPORATION COMMISSION STAFF MOTION FOR ORDER

**THE UNDERSIGNED, Wayne D. McCoy, Virginia Beach, Virginia having been duly sworn on oath before a Notary Public, states the following:**

1. My name is Wayne D. McCoy, President of Mid Atlantic Environmental L.L.C. I have been an Environmental Consultant for more than twenty five years. My main area of practice is in Environmental Assessment and Wetlands Science and Permitting. I have served the Virginia State Corporation Commission as an environmental reviewer on several transmission line cases. My first case was the Wyoming – Cloverdale Case. As a result of my work, I suggested that a new corridor should be studied. New studies were ordered by the Hearing Examiner and the final alignment was certificated to Jacksons Ferry. I reviewed the Trans-Allegheny Interstate Line Company (TrAILCo) Project for the Commission, which was constructed. This was followed by the Potomac-Appalachian Transmission Highline (PATH) Project. I reviewed both PATH I and PATH II. Ultimately, PATH was opposed by the Commission Staff; PJM also removed its support, and PATH was withdrawn. Lastly, I reviewed the Surry – Skiffes Creek Application on behalf of the Staff. This was a controversial case that balanced impacts to historical assets and human interests with impacts to natural resources.
2. I have reviewed the Application for the Warrenton-Wheeler-Gainesville 230 kV Projects, and performed site visits and appropriate studies. Dominion has advanced three Options. Option A connects Warrenton with Wheeler Substations with a new single-

circuit 230 kV transmission line on (potentially all) new right-of-way; converts the existing Wheeler-Gainesville and Gainesville-Loudoun 115 kV circuits to 230 kV and connects them at Gainesville to form a Wheeler-Loudoun 230 kV circuit. Option B replaces the existing Remington CT-Warrenton single-circuit 230 kV line with a double-circuit line; replaces the existing Gainesville-Wheeler single-circuit 115 kV line with a double-circuit 230 kV line; connects one of those circuits to Gainesville; connects the other circuit to the existing 115 kV (converted to 230 kV) Gainesville-Loudoun circuit to form a Wheeler-Loudoun circuit. Option C includes the Remington CT-Warrenton line replacement; replaces a portion of the existing Gainesville-Wheeler line at the Wheeler end with double-circuit 230 kV line; extends one of those circuits on new right-of-way to a new Vint Hill Switching Station to form a Wheeler-Vint Hill circuit; connects the other circuit to the remaining existing portion of the Wheeler-Gainesville 115 kV line (converted to 230 kV) and connects that to the existing Gainesville-Loudoun 115 kV circuit (converted to 230 kV) to form a Wheeler-Loudoun 230 kV circuit. The Company states that Option C built on routing alternative C-1.1c is their preferred alternative, and the only alternative that they support. They indicate no support for Option A and state that they could find no buildable routes for connecting Warrenton to Wheeler.

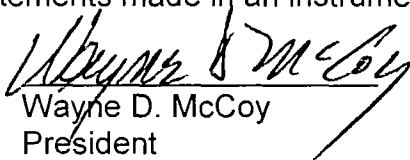
3. In alignment with the SCC Staff's position, it appears to me that Option A is more electrically robust, provides better long-term reliability, and is less expensive than Option B or Option C. This seems to be supported by the Company in response to the Staff's First Set of Interrogatories. However, based on my analysis of the Application and interrogatory responses, and field work, I find that Option A may very well be buildable. The Company states that Fauquier County will not grant easements allowing a line to traverse any county-owned property. However, the Application provides no supporting documentation of any such specific discussions with Fauquier County. It appears to me that Option A-2/3 has a minimal impact on Fauquier County-owned land, and on just one parcel, School Board Property on Rogues Road.
4. Another Option A alignment is that of an underground line. The Company presents route A-5 as its sole underground alignment between Warrenton and Wheeler. This route largely follows a natural gas pipe line, which may lead to a longer-than-necessary underground alignment. It appears to Staff that there may be an opportunity to shorten the length of underground line construction through the construction of a hybrid line,

which is a combination of overhead and underground line segments. By reducing the length of underground construction, a hybrid line might reduce total cost, compared to a 100% underground configuration. A hybrid line might be used to avoid visual impacts to lands that are visually sensitive, such as battlefield areas.

5. The original offering that was submitted for public review indicated that Option A was the preferred route, based upon its electrical reliability. Subsequently, the Company withdrew its support for this Option. I believe that the electrical and cost benefits of Option A in combination with the potential for identifying a buildable route with reasonable impacts, indicate that Option A should be given further study. I believe that additional Option A routing studies should be performed by the Company and submitted for review and, in particular, that Option A-2/3 should be given more study and coordination with the local government and interested parties. Further, I believe that a hybrid line Option should be further studied and submitted for review.

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

This Affidavit is being presented in connection with the Staff of the State Corporation Commission's Motion for Order in the captioned Application. I am familiar with the nature of an oath and with the penalties as provided by the laws of the Commonwealth of Virginia for falsely swearing to statements made in an instrument of this nature,

  
Wayne D. McCoy  
President  
MidAtlantic Environmental, LLC

State of: Virginia  
County of: Richmond

On this 21st day of August 2014, before me, personally appeared Wayne McCoy, personally known to me, who acknowledged and executed this Affidavit before me for the purposes therein contained.

In Witness Whereof, I hereunto set my hand and official seal.

