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14092 0225

Case Number (if already assigned) PUE-2014-00025

Case Name (if known) 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

Document Type CMMT

Document Description Summary Comment of The Piedmont Environmental Council on Staff Motion for Order

Total Number of Pages 4

Submission ID 8600

eFiling Date Stamp 9/19/2014 2:39:18PM

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION
AT RICHMOND

APPLICATION OF

PUE-2014-00025

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

RESPONSE TO MOTION

BACKGROUND

On March 31, 2014 Virginia Electric and Power Company (“Dominion” or the “Company”) filed an Application for permission to build electric transmission facilities. This Application sought approval for a Remington CT – Warrenton 230 kV Double Circuit Transmission Line, Vint Hill – Wheeler and Wheeler – Loudoun 230 kV Transmission Lines, a 230 kV Vint Hill Switching Station, and a 230 kV Wheeler Switching Station. In support of this Application Dominion filed an Application, Appendix, DEQ Supplement, Direct Testimony and Exhibits.

On May 29, 2014 the State Corporation Commission (the “Commission”) issued its Order for Notice and Hearing and, among other things, directed the Staff of the State Corporation Commission (the “Staff”) to “investigate the Application” and to “file with the Clerk of the

Commission an original and fifteen (15) copies of testimony and exhibits concerning the Application...”

On August 22, 2014 Staff filed a Motion for Order (the “Motion”) requesting that the Commission order the Applicant, 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.”

COMMENTS

Respondent Piedmont Environmental Council (“PEC”) takes no position at this time as to whether the Company’s Application has adequately demonstrated a need for these facilities nor, if a need is established, which of the alternative routes most reasonably minimizes the adverse impact on the scenic assets, historic districts and the environment of area concerned. PEC does have concerns about the process which is contemplated by this Motion.

The Commission, or on its behalf the Hearing Examiner, certainly has the power to direct that the Applicant provide additional information to assist it in reaching a decision. In order to provide a complete and accurate report to the Commission the Hearing Examiner should have the most complete and up-to-date information available made a part of the record.

Dominion filed a multi-volume application with considerable discussion of several different routes and variations on those routes. This testimony, the DEQ supplement and the supporting exhibits, though not yet sponsored by witnesses and admitted as evidence, are filed

with the Commission and taken together are the "Application" that Staff was ordered to investigate.

What is unusual about this Motion is that it requests that the additional evidence be adduced "in coordination with" one of the parties to this proceeding.

On its face the Motion would require the Company to develop a route in coordination with the Staff. This is much more than investigating an existing Application. At the very least Staff is asking to sit beside the Company as it re-examines its already filed testimony and exhibits. This Motion would seem to be requesting that Staff become a sort of co-sponsor of any new routing proposal that might emerge from this hybrid Staff-Company option. The Motion requests that Staff be granted authority beyond that which the Commission granted to Staff by the August 22nd Order.

With its own internal resources and the ability to hire outside engineering witnesses, it would appear that the most appropriate manner for staff to fulfill its mandate from the Commission is by submitting its own testimony and by engaging in cross-examination of Company witnesses. If through that testimony Staff can develop a superior route or show that the proposed routes do not meet the statutory requirements, those matters should be presented at an evidentiary hearing. Instead it appears that Staff has reached a conclusion about which route is superior and is requesting that Dominion agree with its analysis at this preliminary point in these proceedings. Instead of presenting evidentiary matters by way of Affidavits, the Staff concerns should be presented through pre-filed testimony subject to appropriate cross examination at the appropriate time.

CONCLUSION

Staff's Motion for Order should be denied.

Dated this 19th day of September, 2014.

Respectfully Submitted,

The Piedmont Environmental Council

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