



August 5, 2002

Mr. William F. Stephens  
 Director, State Corporation Commission  
 Division of Energy Regulation  
 1301 East Main Street  
 Richmond, VA 23219

AUG 05 2002  
 OF ENERGY

**RE: Energy Infrastructure Information Study (SB 684)**

Dear Mr. Stephens:

The Municipal Electric Power Association of Virginia represents the municipally-owned electric utilities in the Commonwealth. The utility operated by Virginia Tech is also a member of our association. We are pleased to offer comments we hope will be useful to the SB 684 study of the feasibility, effectiveness and value of collecting certain energy infrastructure information.

In general, we believe that most, if not all of the information identified in the legislation, is already available from public sources. In the case of the municipalities, a great deal of information is reported annually to the U.S. Department of Energy's Energy Information Administration (EIA). For your information, I am attaching a printout from the EIA's web site that lists their filing forms and the information they compile.

Paragraph A of SB 684 relates to certain electric generation information. The municipally owned electric systems in Virginia do not own or operate any base-load generation. The municipalities purchase approximately 98 percent of their power. A few have hydro units that are run subject to water availability and some own fossil-fueled peaking generation units, all of which are very small – less than 25 megawatts. None of these units are used to serve load on the grid, they are used to reduce the municipal purchases from other utilities and are all located behind the wholesale delivery meters. The operational data relating to these units is already available directly from the EIA and can be downloaded from the Internet. If such information is deemed important to the Commission, we would prefer that the SCC obtain it from the EIA and avoid duplication of efforts by the municipal electric systems in reporting.

Paragraph B of SB 684 relates to transmission system data. Virginia's municipalities are transmission dependent utilities and own no transmission that is a part of the transmission grid in the state. The municipalities do not have their own control areas; their systems are located within the control areas of the transmission-owning utilities. The information has been and is available from the control area utilities and once the operation of transmission is transferred to an RTO, the information will be available from the RTO. The control area utilities for the

Bedford	Danville	Harrisonburg	Richlands
Blackstone	Elkton	Manassas	Salem
Bristol	Franklin	Martinsville	VPI & SU
Culpeper	Front Royal	Radford	Wakefield

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municipal electric utilities are: Dominion Virginia Power – Blackstone, Culpeper, Elkton, Franklin, Harrisonburg, Manassas and Wakefield; American Electric Power - Bedford, Danville, Martinsville, Radford, Richlands, Salem and VPI&SU; Allegheny Power System - Front Royal; and the Tennessee Valley Authority - Bristol.

And finally, as you are aware, Section 58.1-2600 of the Code of Virginia exempts from the definition of electric supplier “any person owning or operating facilities with a designated capacity of twenty-five megawatts or less.” We believe such a threshold would also be appropriate in this instance as well.

We hope these comments are useful in the study deliberations.

Sincerely

A handwritten signature in cursive script that reads "Allen Todd".

Allen P. Todd  
President, MEPAV