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August 3, 2018

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Joel H. Peck, Clerk
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State Corporation Commission
1300 East Main Street
Tyler Building – 1st Floor
Richmond, Virginia 23219

*Petition of Virginia Electric and Power Company
For a prudency determination with respect to the Coastal Virginia Offshore Wind Project
pursuant to § 56-585.1:4 F of the Code of Virginia
Case No. PUR-2018-00121*

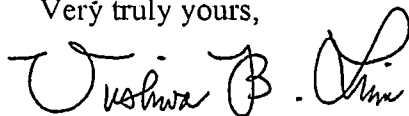
Dear Mr. Peck:

Please find enclosed for filing in the above-captioned proceeding an unbound original and one (1) bound copy of the **Public** version of the petition for a prudency determination with respect to the Coastal Virginia Offshore Wind Project pursuant to § 56-585.1:4 F of the Code of Virginia ("Petition") on behalf of Virginia Electric and Power Company (the "Company").

The Company is contemporaneously filing under seal with the Commission under separate cover an Extraordinarily Sensitive and Confidential version of the Petition. A Motion for Entry of a Protective Order and Additional Protective Treatment for Extraordinarily Sensitive Information is also being filed under separate cover in this proceeding.

Please do not hesitate to call if you have any questions in regard to the enclosed.

Very truly yours,



Vishwa B. Link

Enclosures

cc: William H. Chambliss, Esq. (w/o enclosures)
Lisa S. Booth, Esq.
David J. DePippo, Esq.

180819102



**Dominion
Energy®**

**Petition, DEQ Supplement,
Direct Testimony and
Exhibits of
Virginia Electric and
Power Company**

**Before the State Corporation
Commission of Virginia**

For a prudency determination with
respect to the Coastal Virginia
Offshore Wind Project pursuant to
§ 56-585.1:4 F of the Code of
Virginia

Case No. PUR-2018-00121

Filed: August 3, 2018

**PUBLIC VERSION
Volume 1 of 1**

*Petition of Virginia Electric and Power Company
For a prudency determination with respect to the Coastal Virginia Offshore Wind Project
pursuant to § 56-585.1:4 F of the Code of Virginia
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130810102

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DEQ Supplement

1894
Edition

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

PETITION OF)
)
VIRGINIA ELECTRIC AND POWER COMPANY)
)
For a prudency determination with respect to the)
Coastal Virginia Offshore Wind Project pursuant to)
§ 56-585.1:4 F of the Code of Virginia)

Case No. PUR-2018-00121

**PETITION OF VIRGINIA ELECTRIC AND POWER COMPANY
FOR A PRUDENCY DETERMINATION WITH RESPECT TO THE
COASTAL VIRGINIA OFFSHORE WIND PROJECT**

The United States of America and the Commonwealth of Virginia (“Commonwealth”) support the development of renewable wind facilities off of the Commonwealth’s shores. For nearly a decade the United States Bureau of Ocean Energy Management (“BOEM”), in connection the Commonwealth’s Department of Mines, Minerals and Energy (“DMME”), among other federal, state, and private actors, including the Virginia Offshore Wind Development Authority and Virginia Electric and Power Company (“Dominion Energy Virginia” or the “Company”), have worked to investigate and create offshore research and commercial leasing areas in the Atlantic Ocean east of Virginia Beach, Virginia. These collaborators envision the leasing areas supporting a demonstration project of two offshore wind generation facilities in the near term, followed by a large utility scale offshore wind farm to serve customers in the Commonwealth, and others in the Company’s service territory, from renewable energy sources, and to diversify further the energy generation resources in the Commonwealth. Consistent with, and in furtherance of, these important goals, the General Assembly created the Virginia Offshore Wind Development Authority to facilitate this work and the development of the necessary supporting energy infrastructure in the Hampton Roads area. The General Assembly further determined that the development, construction, and operation of an offshore

wind demonstration project is in the public interest.¹

In light of the forgoing, Dominion Energy Virginia hereby petitions the State Corporation Commission of Virginia (the “Commission”) for a prudency determination pursuant to § 56-585.1:4 F of the Code of Virginia (“Va. Code” or “Code”)² and other associated approvals, as needed, with respect to proposed offshore wind generation facilities consisting of two 6 megawatt (“MW”) (nominal) Wind Turbine Generators (“WTGs”) located approximately 27 statute miles (about 24 nautical miles)³ off the coast of Virginia Beach in federal waters and its related generation and distribution interconnection facilities (“CVOW Interconnect Facilities”), which include a smaller subset of generation interconnection facilities that are located entirely within the Commonwealth of Virginia (the “Virginia Interconnect Facilities”) (collectively, the WTGs and CVOW Interconnect Facilities, inclusive of the Virginia Interconnect Facilities, are the “Coastal Virginia Offshore Wind Project” or “CVOW Project” or “Project”).

In support of its Petition, the Company respectfully states the following:

GENERAL INFORMATION

1. Dominion Energy Virginia is a public service corporation organized under the laws of the Commonwealth of Virginia furnishing electric service to the public within its Virginia service territory. The Company also furnishes electric service to the public in portions of North Carolina. Dominion Energy Virginia’s electric system—consisting of facilities for the generation, transmission, and distribution of electric energy—is interconnected with the electric systems of neighboring utilities and is part of the interconnected network of electric systems serving the continental United States. By reason of its operation in two states and its

¹ *Infra* ¶¶ 14-18.

² See Senate Bill 966, enacted as Chapter 296 of the 2018 Virginia Acts of Assembly (enacted March 9, 2018; effective July 1, 2018) (“Senate Bill 966”).

³ For purposes of this Petition, all miles are noted hereinafter as approximate statute miles.

interconnections with other utilities, the Company is engaged in interstate commerce.

2. The Company is also a public utility under the Federal Power Act, and certain of its operations are subject to the jurisdiction of the Federal Energy Regulatory Commission. The Company is an operating subsidiary of Dominion Energy, Inc. (“DEI”).

3. The Company’s name and post office address are:

Virginia Electric and Power Company
120 Tredegar Street
Richmond, Virginia 23219

4. The names, post office addresses and telephone numbers of the attorneys for the Company are:

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5. The reliable operation, maintenance, expansion, and modernization of its electric transmission system are among the highest priorities for the Company. In addition to obligations under state law, the Company must comply with federal reliability standards, as well as standards mandated by the Company’s membership in PJM Interconnection, L.L.C. (“PJM”). The

Company continually evaluates and analyzes its existing transmission and distribution system and identifies facilities in need of improvement. The Company also receives a number of requests annually from customers that result in the need for new or supplemental interconnection facilities due to various circumstances, such as economic development or expansion, which the Company strives to accommodate in a timely manner to meet the customer's request.

CVOW PROJECT OVERVIEW

6. The CVOW Project consists of two 6 MW (nominal) WTGs located approximately 27 statute miles off the coast of Virginia Beach in federal waters and its related CVOW Interconnect Facilities. The CVOW Project will be located on a research lease provided by BOEM and held by the Virginia DMME, next to the commercial Virginia Wind Energy Area ("VWEA"). The proximity of the research lease site to the commercial VWEA is critical for gaining experience in permitting, design, installation, and operations that will directly inform the evaluation and deployment of a much larger commercial wind project in the future.

7. The size of the CVOW Project allows the Company to electrically interconnect at 34.5 kV (*i.e.*, distribution level), thereby alleviating the need for a transmission level interconnection, saving both time relative to the schedule and costs to the customer. The CVOW Interconnect Facilities begin with a 34.5 kV alternating current ("AC") submarine cable that interconnects the two WTGs to one another ("Inter-Array Cable"), and also to an approximately 27-mile long, 34.5 kV AC submarine distribution cable ("Export Cable"), which then connects to an onshore transition point located on Camp Pendleton State Military Reservation ("Camp Pendleton") at an interface cabinet ("Beach Cabinet")⁴ in Virginia Beach, Virginia. From the Beach Cabinet, a 34.5 kV underground cable ("Onshore Interconnection Cable") continues

⁴ While referred to as a Beach Cabinet, this small cabinet actually will be located in an existing parking lot on Camp Pendleton. The Beach Cabinet is also referred to as a Switch Cabinet, because it switches installation of the underground line from underwater construction to on-land construction.

onshore for approximately 1.2 miles, terminating at an Interconnection Station, where switches, auxiliary equipment, and a metering cabinet will be installed.

8. The Virginia Interconnect Facilities are a smaller subset of the CVOW Interconnect Facilities, which are located entirely within the Commonwealth. Starting from the Virginia jurisdictional line demarcating state-owned submerged lands, the Virginia Interconnect Facilities include approximately 3.6 miles of Export Cable, the Beach Cabinet, the approximately 1.2-mile Onshore Interconnection Cable, and the Interconnection Station.⁵

9. In January 2018, the Company executed an engineering, procurement, and construction (“EPC”) agreement with Ørsted (formerly Dong Energy), a company based in Denmark with North American headquarters in Boston, Massachusetts. Ørsted owns 22 offshore wind farms in Europe and Asia and has installed 3,800 megawatts of offshore wind to date in Denmark, Germany, the Netherlands, and the United Kingdom, with plans to reach 7,400 MW by 2020. Ørsted offers significant experience in engineering, manufacturing, construction and supply chain management to the CVOW Project. In June 2018, the Company executed an EPC agreement with L.E. Myers for the onshore portion of the Project. Teamed with Mott MacDonald engineers, L.E. Myers was awarded the onshore EPC contract based on their combined experience with similar projects.

⁵ From the Interconnection Station, the Project will interconnect with the Company’s existing distribution system via a new 34.5 kV underground line, approximately one-quarter mile in length, to a new terminal pole on nearby existing distribution Circuit (“Cir.”) 421, which terminates with the Company’s existing Birdneck Substation, where relays inside the existing control house at the substation will be replaced in order to ensure Cir. 421 has proper protection to accept reverse flow from the wind turbine generators onto the Company’s system (collectively, the “Distribution Grid Facilities”). There is nothing unusual regarding the cost, materials or construction of the Distribution Grid Facilities that would distinguish them from the approximately 24,000 miles of underground 34.5 kV lines already installed on the Company’s system (about 42% of the existing approximately 58,000 miles of lines rated 34.5 kV). Therefore, the Company considers the Distribution Grid Facilities as ordinary extensions or improvements in the usual course of business pursuant to Va. Code § 56-265.2 that do not require Commission approval. However, out of an abundance of caution and in order to receive all approvals that may be deemed to be necessary by the Commission through this proceeding, the Company is including the route of the Distribution Grid Facilities for notice purposes.

10. The current schedule for the CVOW Project contemplates operations commencing in December 2020. The Company must pursue the CVOW Project now if it is to be ready in time to inform on the viability of pursuing a larger offshore wind project in the future. Specifically, the experience gained from permitting, constructing and operating the CVOW Project and the expected continued cost per MW-hour reductions achieved through larger turbine sizing, innovations, project scalability, and supply chain development, will all inform the viability of developing a large-scale offshore wind facility. The Project's planned timeline would provide several years of valuable data on turbine operation and performance prior to potential deployment of a larger commercial wind project in the adjacent VWEA, which the Company could deploy as early as 2024, if economic. Thus, this timeline fits with the Company's projected need for additional renewable resources between 2020 and 2030.

11. The total cost estimate for the CVOW Project, including the CVOW Interconnect Facilities, is approximately \$300 million, excluding financing costs. The EPC agreements with Ørsted and L.E. Myers fix approximately 87% of the total \$300 million cost estimate. The Company will include CVOW costs in its base rate cost of service for recovery through its rates for generation and distribution services. If necessary, the Company may designate the costs for customer credit reinvestment offset pursuant to Va. Code § 56-585.1 A 8.

12. The CVOW Project is prudent. In addition to promoting and fulfilling the important public policy goals articulated by the General Assembly, and the actions of the Commonwealth's agencies and actors for nearly a decade, it is a reasonable step to develop, operate, and study a new renewable energy generating asset. The work of the General Assembly, BOEM, and DMME, among others, along with current market forces and demands demonstrate that it is necessary to develop and rely more heavily on renewable energy sources, and to

diversify the overall energy mix. The CVOW Project is an important step in that process. In addition, the CVOW Project will be built under terms and conditions that are commercially reasonable for a small-scale offshore wind demonstration project. The CVOW Project provides a prudent pathway to facilitate a significant new renewable resource for the benefit of customers and the Commonwealth, which could include significant economic benefits to the region.

13. In addition, the Company used a stakeholder process to evaluate and confirm the Project scope and commercial approaches to the CVOW Project. In early 2017, the Company went into discussions with Ørsted on the Project. This further commercial process led to significant reductions in project cost and risk. The Company continues to prudently evaluate and assess market conditions and the domestic supply chain for a larger deployment of offshore wind that will allow for more cost reductions.

POLICY SUPPORT AND STANDARD FOR APPROVAL

14. In 2010, the General Assembly passed legislation under Title 67, Chapter 12, of the Code of Virginia to create the Virginia Offshore Wind Development Authority to help facilitate offshore wind energy development in the Commonwealth.⁶

15. During its 2018 legislative session, the General Assembly passed Senate Bill 966,⁷ which became effective on July 1, 2018, and which further amended and reenacted Va. Code § 56-585.1. In relevant part, the new legislation emphasizes that “[c]onstruction, purchasing, or leasing activities for [n]ew utility-owned and utility-operated . . . facilities utilizing energy derived from offshore wind with an aggregate capacity of not more than 16

⁶ While the Company plans for the CVOW Project to be in base rates, as discussed above, the Commonwealth also promotes the development of offshore wind projects by providing the opportunity for an enhanced rate of return for such projects. *See* Va. Code § 56-585.1 A 6.

⁷ *See supra* note 2.

megawatts, are in the public interest.”⁸ The legislation further directs in Va. Code § 56-585.1 A

6 that:

To the extent that a utility elects to recover the costs of any such new generation facility or facilities through its rates for generation and distribution services and does not petition and receive approval from the Commission for recovery of such costs through a rate adjustment clause described in clause (ii), the Commission shall, upon the request of the utility in a triennial review proceeding, provide for a customer credit reinvestment offset, as applicable, pursuant to subdivision 8 d with respect to all costs deemed reasonable and prudent by the Commission in a proceeding pursuant to subsection D of § 56-580 or in a triennial review proceeding.

16. Senate Bill 966 also added a new section to the Code, titled “Development of solar and wind generation capacity in the Commonwealth,” codified at Va. Code § 56-585.1:4.

Subsection (F) of that section provides that a utility,

may elect to petition the Commission, outside of a triennial review proceeding conducted pursuant to § 56-585.1, at any time for a prudency determination with respect to the construction or purchase by the utility of one or more solar or wind generation facilities located in the Commonwealth or off the Commonwealth’s Atlantic Shoreline The Commission’s final order regarding any such petition shall be entered by the Commission not more than three months after the date of the filing of such petition.

17. The General Assembly again confirmed that the construction of such a facility is in the public interest, stating in new Va. Code § 56-585.1:4 A that,

Prior to January 1, 2024, (i) the construction . . . by a public utility of one or more . . . wind generation facilities located in the Commonwealth or off the Commonwealth’s Atlantic shoreline, each having a rated capacity of at least one megawatt and having in the aggregate a rated capacity that does not exceed 5,000 megawatts . . . is in the public interest, and the Commission shall so

⁸ This new legislation specifically focuses on an offshore wind project that is in the nature of a “new test or demonstration project for a utility-owned and utility-operated” offshore wind generating facility. See Va. Code § 56-585.1 A 6.

find if required to make a finding regarding whether such construction ... is in the public interest.

And reconfirming in new Va. Code § 56-585.1:4 E that,

Construction, purchasing, or leasing activities for a test or demonstration project for a new utility-owned and utility-operated generating facility or facilities utilizing energy derived from offshore wind with an aggregate capacity of not more than 16 megawatts are in the public interest.

18. The CVOW Project, which is an offshore wind project located in waters off the Commonwealth's Atlantic shoreline, is consistent with and supported by this legislative enactment. Additionally, the Company's Petition is supported further by Senate Bill 966, which provides for expedited review of the Commission's prudency determination, and finds that the CVOW Project is in the public interest.

19. While Va. Code § 56-585.1:4 F provides for a prudency determination as to construction of certain wind generation facilities, there is no requirement within that specific statute directing the utility to seek a certificate of public convenience and necessity ("CPCN") or any other type of approval for the electric facilities related to such a wind generation facility. Further, it is the Company's position that the Virginia Interconnect Facilities described in the Petition are ordinary extensions or improvements in the usual course of business under Va. Code § 56-265.2 and, therefore, do not require approval from the Commission (referred to generally as the "usual course exception").

20. Specifically, Va. Code § 56-265.2 A 1 provides:

[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. (Emphasis added.)

21. Va. Code § 56-46.1 A provides:

In order to avoid duplication of governmental activities, any valid permit or approval required for an electric generating plant and associated facilities issued or granted by a federal, state or local governmental entity charged by law with responsibility for issuing permits or approvals regulating environmental impact and mitigation of adverse environmental impact or for other specific public interest issues such as building codes, transportation plans, and public safety, whether such permit or approval is granted prior to or after the Commission's decision, shall be deemed to satisfy the requirements of this section with respect to all matters that (i) are governed by the permit or approval or (ii) are within the authority of, and were considered by, the governmental entity in issuing such permit or approval, and the Commission shall impose no additional conditions with respect to such matters.

22. Further, Va. Code § 56-46.1 J provides:

Approval under this section shall not be required for any transmission line for which a certificate of public convenience and necessity is not required pursuant to subdivision A of § 56-265.2.

23. Under the plain language of these statutes, if a project falls within the usual course exception under Va. Code § 56-265.2 A 1, neither a CPCN nor approval under Va. Code § 56-46.1 is required.

24. There is nothing unusual regarding the cost, materials or construction of the Virginia Interconnect Facilities that would distinguish them from the approximately 24,000 miles of underground 34.5 kV lines already installed on the Company's system (about 42% of the existing approximately 58,000 miles of lines rated 34.5 kV). Many of these underground lines go under water resources (*e.g.*, rivers, lakes, bays, and harbors). It also is important to note that the owner of the property impacted by the placement of the Virginia Interconnect Facilities (*i.e.*, the Commonwealth) has consented thereto, and worked closely with the Company regarding the

routing and installation thereof.⁹ Therefore, the Company considers the Virginia Interconnect Facilities as ordinary extensions or improvements in the usual course of business pursuant to Va. Code § 56-265.2 that do not require Commission approval.

25. To the extent the Commission determines that the Virginia Interconnect Facilities are not ordinary extensions or improvements in the usual course of business, and a CPCN is required, the Direct Testimony, Schedules and DEQ Supplement sponsored by Messrs. Mark D. Mitchell and Jason D. Williams provide information to support approval and certification of the Virginia Interconnect Facilities pursuant to Va. Code § 56-46.1 and Va. Code §§ 56-265.1 *et seq.* (the “Utility Facilities Act”).¹⁰ Importantly, the route of the Virginia Interconnect Facilities has been evaluated and approved by state and federal agencies. Specifically, between the Virginia jurisdictional line and the Beach Cabinet, the route, placement, installation, and operation of the 34.5 kV Export Cable has been approved by BOEM, the Commonwealth, the U.S. Army Corps of Engineers, and the Virginia Marine Resources Commission. Onshore from the Beach Cabinet to the Interconnection Station, the route, placement, installation, and operation of the Onshore Interconnection Facilities has been evaluated and the Company is awaiting approval by the Commonwealth as owner/operator of Camp Pendleton. The preliminary proposed route of the onshore Virginia Interconnect Facilities at Camp Pendleton also was evaluated by BOEM in its 2016 approval of the CVOW Project, and currently is being evaluated for final approval by that agency as discussed by Company Witnesses Mitchell and Williams.

26. Code § 56-46.1 A directs the Commission to avoid duplication of governmental activities in the context of facilities associated with generation facilities with respect to, among

⁹ Further, and as discussed below, the placement and routing of the Virginia Interconnect Facilities has been evaluated and approved by a number of federal and state agencies.

¹⁰ By choosing to include this information in its Petition, the Company does not concede that a CPCN, or any additional approval by the Commission, is required for the Virginia Interconnect Facilities.

other things, reviewing and regulating the environmental impacts (and mitigation) related to such facilities, as well as public interest considerations. Instead, the Commission is to treat any permit or approval as satisfying the requirements of § 56-46.1. The Virginia Interconnect Facilities are facilities associated with generation facilities and other interconnection facilities approved by numerous federal and state agencies. As such, the Commission's duty to ensure that the effects of the Virginia Interconnect Facilities on the environment are minimized under § 56-46.1 is satisfied by the CVOW Project's federal and state approvals regarding the siting, route, placement, installation, and operation of those facilities.

SUPPORTING TESTIMONY

27. In support of this Petition, Dominion Energy Virginia presents herewith the pre-filed direct testimony and exhibits of the following witnesses:

- Mark D. Mitchell – provides background and an overview of the CVOW Project; explains the legislative and policy support for the Project; describes the need for and benefits of the Project; details the Project components, construction plans and costs; provides an overview of the Virginia Interconnect Facilities; and introduces the other witnesses.
- Ted Fasca – addresses the forecasted need for and benefits of the CVOW Project, presents the economic modeling and resource planning analysis supporting the Project, and discusses some of the additional benefits the Project is expected to provide the Company's customers.
- Jason E. Williams – provides an overview of the status of future carbon regulation and discusses how it pertains to the CVOW Project, and provides an overview of the environmental permitting completed for the CVOW Project.

REQUEST FOR CONFIDENTIAL TREATMENT AND ADDITIONAL PROTECTIVE TREATMENT OF EXTRAORDINARILY SENSITIVE INFORMATION

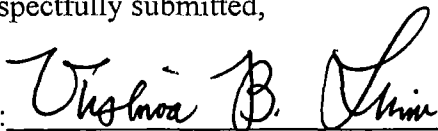
28. The Company's Petition contains, at points so designated, confidential and extraordinarily sensitive information. The Company is filing this confidential and extraordinarily sensitive information under seal and subject to the Company's Motion for Protective Order and Additional Protective Treatment filed coincident with this Petition.

Because portions of the Company's Petition contains such confidential and extraordinarily sensitive information, in compliance with Rule 170 of the Procedural Rules, this filing is accompanied by a separate Motion for Protective Order and Additional Protective Treatment, including a form of Proposed Protective Order, filed by the Company under separate cover but contemporaneously with this Petition.

CONCLUSION

WHEREFORE, for the reasons requested above, Dominion Energy Virginia respectfully requests that the Commission issue an Order (1) finding that the construction of the Coastal Virginia Offshore Wind Project, including the Virginia Interconnect Facilities, is prudent, (2) granting a CPCN for the Virginia Interconnect Facilities, if required, and (3) granting any such other approvals as deemed appropriate and necessary.

Respectfully submitted,

By: 
Counsel

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August 3, 2018

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