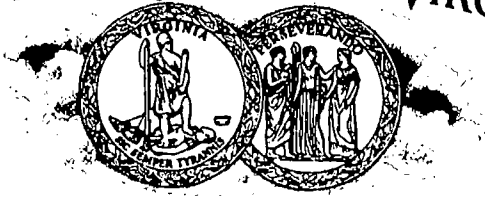


# COMMONWEALTH OF VIRGINIA

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## STATE CORPORATION COMMISSION

April 1, 2016

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

SCC-CLERK'S OFFICE  
DOCUMENT CONTROL CENTER  
2016 APR - 1 P 2:19

160410039

RE: *Application of Virginia Electric and Power Company, For approval and certification of electric transmission facilities: Remington-Gordonsville 230 kV Double Circuit Transmission Line, Case No. PUE-2015-00117*

Dear Mr. Peck:

Please file the enclosed original and fifteen (15) copies of the attached "Motion for Expedited Summary Ruling that the Proposed Remington-Pratts Alternative Should Not Continue as Part of this Proceeding" with the other papers in this proceeding.

Thank you for your prompt assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Alisson R. Klaiber".

Alisson R. Klaiber  
Attorney

APK:kam  
Enclosure

cc: Document Control Center  
Service List

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

APPLICATION OF

VIRGINIA ELECTRIC AND POWER COMPANY

CASE NO. PUE-2015-00117

For approval and certification of  
electric transmission facilities:  
Remington-Gordonsville 230 kV Double Circuit  
Transmission Line

MOTION FOR EXPEDITED SUMMARY RULING THAT THE  
PROPOSED REMINGTON-PRATTS ALTERNATIVE  
SHOULD NOT CONTINUE AS PART OF THIS PROCEEDING

Pursuant to Rule 110 of the Virginia State Corporation Commission's ("Commission's") Rules of Practice and Procedure, 5 VAC 5-20-10 *et seq.*, the Staff of the State Corporation Commission ("Staff") hereby moves for a summary and expedited ruling that the Remington-Pratts alternative proposed in this proceeding should be eliminated from further consideration herein. In support thereof, the Staff states as follows:

**Introduction**

On November 13, 2015, Virginia Electric and Power Company ("Dominion Virginia Power" or "Company") filed with the Commission an application ("Application") for a certificate of public convenience and necessity for the proposed Remington-Gordonsville 230 kilovolt ("kV") Double Circuit Transmission Line.

According to the Application, the Company proposes to: (a) construct, entirely along and primarily within existing right-of-way, approximately 38.2 miles of 230 kV Remington-Gordonsville Line #2153 in Fauquier, Culpeper, Orange, and Albemarle Counties between its existing Remington Substation in Fauquier County and existing Gordonsville Substation in Albemarle County ("Proposed Route"); and (b) construct and install associated

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230 kV facilities at Dominion Virginia Power's Gordonsville and Remington Substations (collectively, the "Project").<sup>1</sup> The proposed in-service date for the Project is June of 2019.<sup>2</sup>

Specifically, Dominion Virginia Power asserts that the Project is necessary for the Company to continue to provide reliable electric service to customers served from the Company's existing Gordonsville Substation and to address projected violations of North American Electric Reliability Corporation reliability standards that could lead to service interruptions or potentially damage electrical facilities in the area.<sup>3</sup> Any examination of the Application leaves no doubt but that this is the Company's preferred project.

As an alternative to the proposed Project, the Company proposes two variations of an electrical solution ("Remington-Pratts alternative") that would connect the existing Remington Substation to a new switching station in the vicinity of the existing Rappahannock Electric Cooperative's Pratts Delivery Point in Madison County, Virginia ("Pratts Station"). The Company states that the two alternative routes for this electrical solution would make use of the existing 115 kV corridor from Remington Substation for at least 17 miles and then would depart from the existing right-of-way to terminate at Pratts Station.<sup>4</sup>

On December 29, 2015, the Commission issued its Order for Notice and Hearing in this proceeding that, among other things, required the Company to publish notice of its Proposed Route and alternative routes, offered an opportunity for interested persons to comment or participate in this proceeding, and directed the Staff to investigate the Application.

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<sup>1</sup> Application at 2.

<sup>2</sup> *Id.*

<sup>3</sup> *Id.* at 2-3.

<sup>4</sup> *Id.* at 4.

Pursuant to the Commission's Order for Notice and Hearing, the Company published notice of its Application, several participants filed notices of participation, and the Staff began its investigation of Dominion Virginia Power's Application.

Upon investigation, Staff discovered that the proposed Remington-Pratts alternative is procedurally unique in that it does not, in and of itself, constitute an electrical solution of the loading problems in the area. Rather, it relies upon a rebuild of FirstEnergy's facilities by FirstEnergy such that construction, by different entities of different lines (one of which is not now and may never be before the Commission) is necessary to constitute a viable electrical solution.

Dominion Virginia Power has explicitly stated it does not prefer to complete its portion of this piecemeal solution. FirstEnergy is not a participant to this proceeding, not subject to the Commission's jurisdiction in this proceeding, and has in no way represented or assured the Commission that its half of this alternative would be built. In this way, the Remington-Pratts alternative currently before the Commission in the instant case is electrically deficient. As such, Staff cannot and does not support the Remington-Pratts alternative.

In fact, there is no support at all for the Remington-Pratts alternative in this proceeding. Several respondents have expressed great concern about the Remington-Pratts alternative and staunchly opposed this alternative in their notices of participation.

Given the status of the Remington-Pratts alternative as electrically deficient, as well as the lack of any support in this proceeding for this alternative as more fully discussed below, the Commission should issue an expedited summary ruling that the Remington-Pratts alternative should be eliminated from further consideration in this proceeding.

## **I. The Remington-Pratts Alternative is Procedurally Unique.**

Dominion Virginia Power's current Application is procedurally unique because the proposed Remington-Pratts alternative requires the rebuild of facilities that do not belong to the Company by an entity other than the Company. Specifically, Dominion Virginia Power states that "[the Remington-Pratts alternative] would require the rebuild of existing single circuit 115 kV line as a single circuit 230 kV line between Gordonsville to Pratts; these facilities are *currently owned by FirstEnergy and are not proposed to be rebuilt by [the Company].*" (emphasis added).<sup>5</sup> Thus, the Remington-Pratts alternative relies on the rebuild of facilities belonging to FirstEnergy by FirstEnergy.

FirstEnergy is an entity that is not a party to this proceeding, not subject to the Commission's jurisdiction in this case, and who has not agreed with Dominion Virginia Power or in any way represented that they would agree to rebuild the *required* component of the Remington-Pratts alternative. Even if the Commission were to approve this alternative, the Commission could not compel FirstEnergy to rebuild the components necessary to complete the Remington-Pratts alternative. While this makes this proposed alternative rather unique as compared to alternatives typically considered in transmission cases, it also means that the Commission has no assurance that this necessary component of the identified alternative, if approved, would be built. Without this assurance, the identified Remington-Pratts alternative should not be seriously considered as an alternative to the proposed Project.

## **II. The Remington-Pratts Alternative is Electrically Deficient.**

Dominion Virginia Power represents that in 2014, the PJM Interconnection, LLC network analysis identified several network violations projected to occur in 2019 that produced

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<sup>5</sup> Environmental Routing Study at 4.

thermal overloading and low voltage violations. Dominion Virginia Power also identified a stress case violation of its Transmission Planning Criteria for 2018.<sup>6</sup> The failure to address the identified projected violations, according to Dominion Virginia Power, could lead to service interruptions or potentially damage the Company's, FirstEnergy's, Rappahannock Electric Cooperative's, and Central Virginia Electric Cooperative's electrical facilities in the area, negatively impacting electric service to the region.<sup>7</sup>

The Project, according to Dominion Virginia Power, would address these identified needs and also would provide increased reliability, accommodate potential long term growth and provide for the orderly development of a robust area transmission network.<sup>8</sup> In addition, the proposed Project would address replacement of aging infrastructure of Line #11 between Somerset and Oak Green Junction.<sup>9</sup>

The Remington-Pratts alternative, on the other hand, fails to address the identified need unless all required components of the Remington-Pratts alternative are built.<sup>10</sup> Specifically, the Company asserts that the Remington-Pratts alternative would *require* the rebuild of FirstEnergy's existing 115 kV line for 230 kV operation over the 17 mile length between existing Gordonsville Substation in Albermarle County and Pratts Station in Madison County, crossing Orange County.<sup>11</sup> There is no proposal before the Commission to rebuild any of these facilities.

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<sup>6</sup> Appendix at 3.

<sup>7</sup> *Id.* at 4.

<sup>8</sup> *Id.*

<sup>9</sup> *Id.* at 17.

<sup>10</sup> *Id.* at 32. Dominion Virginia Power represents that the Remington-Pratts alternative also would not address replacement of the aging infrastructure of Line #11 between Somerset and Oak Green Junction. *See id.*

<sup>11</sup> *Id.*; Environmental Routing Study at 4.

**III. There is No Support for the Remington-Pratts Alternative in this Proceeding.**

There is no support at all for the Remington-Pratts alternative in this proceeding. The Company is clear in its Application and supporting materials that it requests approval of the proposed Project along the Proposed Route between Remington and Gordonsville, not the Remington-Pratts alternative. The Staff, given the results of its investigation thus far, likewise does not support the Remington-Pratts alternative because, as discussed above, it is electrically deficient. No respondent has come forward to support the alternative either.

In fact, the Company and the following respondents have authorized the Staff to state herein that they *support* the instant summary ruling requested by the Motion: Mr. Herbert P. Putz, Phd.; Mr. David Taylor; Ms. Charlotte E. Chumlea; Mr. Stephen B. Carpenter; OMC Alliance; Amcarwill Limited Partnership; Mr. William J. Davis, Jr.; Mr. Michael Mosko, Jr.; Orange County; and Madison County. Respondents Mr. Jeffry A. Tillery and Mr. William W. Sandford, "approve" of the instant Motion and find the instant Motion to be "agreeable," respectively. The following respondents have authorized the Staff to state herein that they do not oppose the instant summary ruling requested by the Motion: Piedmont Environmental Council; Old Dominion Electric Cooperative; Board of Supervisors of Culpeper County; and Tombstone Limited Partnership. As such, all respondents are either in favor or do not oppose the summary ruling requested by the instant Motion.

**Conclusion**

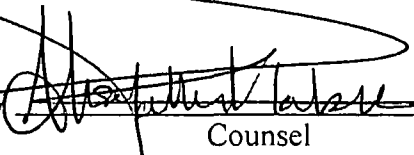
The Remington-Pratts alternative is procedurally unique in that it does not constitute, in and of itself, a needed facility, absent work performed on facilities owned by FirstEnergy but that FirstEnergy has not proposed to perform. Without the FirstEnergy rebuild of its own facilities, the Remington-Pratts alternative is electrically deficient because it fails to complete the

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loop between Pratts Station and Gordonsville Substation. Finally, not one participant to this proceeding supports the Remington-Pratts alternative. Given this unique status, Staff respectfully moves for a summary and expedited ruling that the Remington-Pratts alternative is not electrically viable without participation by FirstEnergy and should not be further considered in this proceeding.

Respectfully submitted,

THE STAFF OF THE STATE CORPORATION COMMISSION

By   
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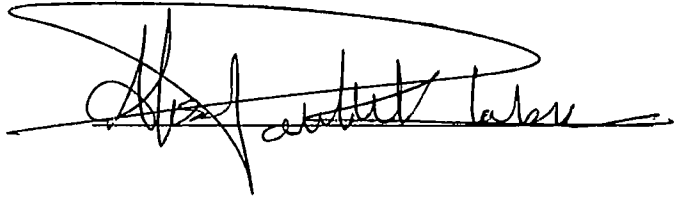
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Dated: April 1, 2016



CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of April, 2016, a true copy of the foregoing "Motion for Expedited Summary Ruling that the Proposed Remington-Pratts Alternative Should Not Continue as Part of this Proceeding" was electronically mailed and mailed, postage prepaid, to all parties listed on the attached Service List.

A handwritten signature in black ink, appearing to read "A. J. [unclear] [unclear]", is written over a horizontal line. A large, loopy flourish is drawn above the signature.



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