



McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, VA 23219-3916
Phone: 804.775.1000
Fax: 804.775.1061
www.mcguirewoods.com

Elaine S. Ryan
Direct: 804.775.1090
eryan@mcguirewoods.com

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PUBLIC VERSION

June 4, 2024

BY HAND DELIVERY

Bernard Logan, Clerk
State Corporation Commission
Document Control Center
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Richmond, Virginia 23219

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Application of Virginia Electric and Power Company, For approval to amend certificates of public convenience and necessity for the Brunswick and Greensville County Power Stations to construct and operate an LNG Storage Facility pursuant to § 56-580 D of the Code of Virginia
Case No. PUR-2024-00096

Dear Mr. Logan:

Please find enclosed for filing, an original and one copy of the **PUBLIC VERSION** of Virginia Electric and Power Company's *Application, Direct Testimony, Exhibits, and Schedules* in the above-captioned proceeding. An extraordinarily sensitive version of the Application is also being filed under seal under separate cover.

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

Highest regards,

/s/ Elaine S. Ryan

Elaine S. Ryan

Enclosures

- cc: William H. Chambliss, Esq.
- C. Meade Browder, Jr., Esq.
- Paul E. Pfeffer, Esq.
- Lisa R. Crabtree, Esq.
- Timothy D. Patterson, Esq.
- Nicole M. Allaband, Esq.



**Application, Direct
Testimony, Exhibits
and Schedules of
Virginia Electric and
Power Company**

**Before the State Corporation
Commission of Virginia**

**For approval to amend certificates
of public convenience and
necessity for the Brunswick and
Greensville County Power Stations
to construct and operate an LNG
Storage Facility pursuant to § 56-
580 D of the Code of Virginia**

**Volume 1 of 2
PUBLIC VERSION**

Case No. PUR-2024-00096

Filed: June 4, 2024

Application of Virginia Electric and Power Company, For approval to amend certificates of public convenience and necessity for the Brunswick and Greensville County Power Stations to construct and operate an LNG Storage Facility pursuant to § 56-580 D of the Code of Virginia
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COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

APPLICATION OF)	
)	
VIRGINIA ELECTRIC AND POWER COMPANY)	Case No. PUR-2024-00096
)	
For approval to amend certificates of public convenience)	
and necessity for the Brunswick and Greensville County)	
Power Stations to construct and operate an LNG Storage)	
Facility pursuant to § 56-580 D of the Code of Virginia)	

**APPLICATION OF VIRGINIA ELECTRIC AND POWER COMPANY
AND REQUEST FOR LIMITED WAIVER**

Virginia Electric and Power Company (“Dominion Energy Virginia” or the “Company”), by counsel, hereby files with the State Corporation Commission of Virginia (the “Commission”) its application (the “Application”) to amend the certificates of public convenience and necessity (“CPCNs”) for the Brunswick County Power Station (“Brunswick”) and the Greensville County Power Station (“Greensville;” collectively, the “Stations”) to construct and operate a liquified natural gas (“LNG”) production, storage, and regasification facility (“LNG Storage Facility” or “Project”) and related transmission facilities¹ adjacent to the Greensville County Power Station pursuant to § 56-580 D of the Code of Virginia (“Va. Code”) and the State Corporation Commission of Virginia’s (the “Commission”) Filing Requirements in Support of Applications for Authority to Construct and Operate an Electric Generating Facility (the “Generation Rules”), 20 VAC 5-302-10 *et seq.* The LNG Storage Facility will be constructed on a parcel located in Brunswick and Greensville Counties and will serve as a backup fuel source for the Company’s Stations to support their operations and improve the reliability of the Company’s fleet.

¹ Based on the scope of the transmission facilities for the Project, the Company asserts these are “ordinary extensions or improvements in the usual course of business” under Va. Code § 56-265.2 such that a CPCN is not required.

Currently, the Company recovers the costs of Brunswick and Greenville through two rate adjustment clauses (“RAC”), Riders BW and GV, respectively. Simultaneously with this filing, the Company has filed a separate petition for approval of a new RAC, designated Rider GEN, to consolidate its existing Riders B, BW, GV, US-2, US-3, and US-4 pursuant to Va. Code §§ 56-585.1 A 6 and A 7.² Because the LNG Storage Facility will serve as a backup fuel source for Brunswick and Greenville, it is appropriate to recover the costs of the Project with the costs of the Stations. Therefore, the Company is seeking approval to amend the CPCNs for Brunswick and Greenville to construct and operate the Project in this proceeding, and is seeking to recover the costs of the LNG Storage Facility through Rider GEN in the separate proceeding.

In support of this Application, the Company states as follow:

I. 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 certificated service territory. The Company also supplies electric service to non-jurisdictional customers in Virginia and to the public in portions of North Carolina. The Company is engaged in the business of generating, transmitting, distributing, and selling electric power and energy to the public for compensation. 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. Exhibit 1 provides further information on Dominion Energy Virginia.

² See *Petition of Virginia Electric and Power Company, For approval of a rate adjustment clause, designated Rider GEN, under § 56-585.1 A 6 of the Code of Virginia and the consolidation of Riders B, BW, GV, US-2, US-3, and US-4 pursuant to § 56-585.1 A 7 of the Code of Virginia*, Case No. PUR-2024-00097 (filed June 4, 2024).

2. The Company's post office address is:

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

3. The names, addresses, and telephone numbers of the attorneys for the Company are:

Paul E. Pfeffer
Lisa R. Crabtree
Dominion Energy Services, Inc.
120 Tredegar Street
Richmond, Virginia 23219
(804) 787-5607 (PEP)
(804) 819-2612 (LRC)

Elaine S. Ryan
Timothy D. Patterson
Nicole M. Allaband
McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, Virginia 23219-3916
(804) 775-1090 (ESR)
(804) 775-1069 (TDP)
(804) 775-4364 (NMA)

II. BRUNSWICK AND GREENSVILLE COUNTY POWER STATIONS

4. The Brunswick County Power Station is a 1,358 megawatt ("MW") natural gas-fired combined-cycle electric generating facility located in Brunswick County, Virginia. The Commission issued CPCN No. ET-198 for the construction and operation of Brunswick on August 2, 2013.³ Brunswick entered commercial operations in April 2016.

³ Application of Virginia Electric and Power Company, For approval and certification of the proposed Brunswick County Power Station electric generation and related transmission facilities under §§ 56-580 D, 56-265.2 and 56-46.1 of the Code of Virginia and for approval of a rate adjustment clause, designated Rider BW, under § 56-585.1 A 6 of the Code of Virginia, Case No. PUE-2012-00128, Final Order (Aug. 2, 2013).

5. The Greenville County Power Station is a 1,588 MW natural gas-fired combined-cycle electric generating facility located in Greenville County, Virginia. The Commission issued CPCN No. ET-204 for the construction and operation of Greenville on March 29, 2016.⁴ Greenville entered commercial operations in December 2018.

6. Transcontinental Gas Pipe Line Company LLC (“Transco”) operates the pipeline system that delivers natural gas to both Stations. The Federal Energy Regulatory Commission (“FERC”) authorized Transco to construct and operate the approximately 7.3-mile Brunswick Lateral to serve the Brunswick County Power Station in 2014.⁵ The Brunswick Lateral extends from Transco’s South Virginia Lateral in Brunswick County, Virginia. Three years later, FERC authorized Transco to construct and operate the approximately 4.3-mile Greenville Lateral.⁶ The Greenville Lateral extends from milepost 5.2 on Transco’s Brunswick Lateral to the Greenville County Power Station in Greenville County, Virginia. Company Witness Dale E. Hinson provides additional details on how the Stations are currently fueled.

III. CPCN AMENDMENTS AND APPROVAL TO CONSTRUCT AND OPERATE THE LNG STORAGE FACILITY

7. The Company is proposing the LNG Storage Facility because it is needed to maintain an onsite, safe, and reliable fuel source for the Brunswick County and Greenville County Power Stations in the event of severe weather, cyberattacks, natural disasters, or other interruptions that disrupt the Company’s primary natural gas supply. Brunswick and Greenville will be the sole end-use consumers of natural gas from the Project. The Project will provide

⁴ *Application of Virginia Electric and Power Company, For approval and certification of the proposed Greenville County Power Station electric generation and related transmission facilities under §§ 56-580 D, 56-265.2 and 56-46.1 of the Code of Virginia and for approval of a rate adjustment clause, designated Rider GV, under § 56-585.1 A 6 of the Code of Virginia* Case No. PUE-2015-00075, Final Order (Mar. 29, 2016).

⁵ *Transcon. Gas Pipe Line Co.*, Docket No. CP13-30-000, 145 FERC ¶ 61,152, Order Issuing Certificate (Nov. 21, 2013).

⁶ *Transcon. Gas Pipe Line Co.*, Docket No. CP15-118-000, 156 FERC ¶ 61,022, Order Issuing Certificate (July 7, 2016).

approximately 2 billion cubic feet of LNG storage capacity, approximately 15 million standard cubic feet per day (“mmscfd”) of liquefaction capacity, and approximately 500 mmscfd of regasification capacity. The Project will include the construction of pretreatment, liquefaction, storage, and vaporization facilities, as well as station yard pipeline facilities to receive the gas at the Project and re-deliver the regasified LNG. The Project will be located on an approximately 25-acre parcel owned by the Company almost entirely within Brunswick County and adjacent to the Greenville County Power Station. The Company anticipates that the LNG Storage Facility will commence operations during the fourth quarter of 2027.

8. The Project will be fueled using the existing interstate Transco pipeline segment that serves both Stations.⁷ Virginia Power Services Energy Corp., Inc. is entering into a contractual arrangement with Transco for the ability to isolate the existing pipeline segment, upstream of both Station locations, from the remainder of Transco’s system. During periods when Transco cannot meet its firm delivery obligations to both Stations, supply is restricted, or other events like cyberattacks, Transco’s pipeline segment can be isolated to allow the LNG Storage Facility to supply backup fuel to both Stations.

9. There will be limited electric transmission work required to support the LNG Storage Facility. The Company will build a new 115 kilovolt (“kV”) line, tapping existing right-of-way north of the proposed Project site, to feed a new Mecklenburg Electric Cooperative substation delivery point. Additionally, three existing 500 kV structures will be relocated entirely within Company-owned property.⁸

⁷ See *Virginia Elec. & Power Co.*, Docket No. CP23-468-000, 185 FERC ¶ 61,131, Order on Petition for Declaratory Order (Nov. 16, 2023) (granting the Company’s petition for a declaratory order that the LNG Storage Facility would be exempt from FERC’s jurisdiction).

⁸ See *supra* n.1.

10. As described in the direct testimony of Company Witnesses Jeffrey G. Miscikowski, Dale E. Hinson, William A. Coyle, and Katya Kuleshova, the LNG Storage Facility is needed to ensure the continued reliable operation of Brunswick and Greenville, which are crucial components of the Company's generation fleet. Together the Stations generate enough electricity to power over 700,000 homes. A full tank would be able to keep both Stations operating at full load for approximately four days, or would keep one Station operating at full load for approximately eight days. Lower load configurations would prolong the supply and Stations' operations.

11. The LNG Storage Facility will be used when the pipeline is unable to meet firm natural gas delivery requirements and also during events like Winter Storm Elliott when intra-day gas was unavailable. Additionally, the Project could be used during times when pipeline delivery pressures drop such that the Company would need to derate the Stations to avoid potential turbine damage and/or a unit tripping offline. Finally, the Project can be used during PJM Interconnection, L.L.C. ("PJM") capacity emergencies. As explained by Company Witnesses Coyle and Hinson, Winter Storm Elliott is a perfect example of when the LNG Storage Facility would be useful to ensure continued reliable operations and potentially save customers money.

12. The Stations currently provide a significant portion of customers' energy and capacity needs. Expected load growth, unit retirements, and renewable energy policy initiatives in Virginia and throughout PJM, increase the need for reliable, dispatchable generation. The Project will strengthen the reliability of the electric grid, provide onsite backup fuel, and aid in reducing the reliance on a single real-time fuel source.

13. Ensuring the Stations continued reliable operation will provide a tremendous benefit to customers. The Company considered four key factors in selecting a backup fuel source for the Stations, including feasibility, reliability effects, cost, and complementarity with other supply solutions. Ultimately, the Company chose the onsite LNG Storage Facility as it offered numerous benefits over alternatives considered. As Company Witness Miscikowski explains, LNG has operating characteristics identical to natural gas and thus its use would not require additional equipment modifications for the combustion turbine. The turbines would maintain a similar heat rate, would not be derated with operation on LNG as they would operating on fuel oil, and would not need additional water utilities to support combustion. Further, the emissions from the Stations would stay the same, eliminating the need for a major permit modification. In addition, unlike a secondary gas pipeline, the LNG will be stored on-site, lowering the risks associated with reliability and a system-wide pipeline disruption scenario. Finally, the Project will bring significant economic benefits to Brunswick and Greenville Counties through construction and operation.

14. The LNG Storage will have minimal environmental impacts. In order to facilitate review and analysis by the Commission, Virginia Department of Environmental Quality (“DEQ”), and other relevant agencies, the Company has developed a supplement (“DEQ Supplement”) containing the information and analysis responsive to 20 VAC 5-302-20(12) in the Generation Rules. The DEQ Supplement demonstrates that the Company will reasonably minimize impacts on the environment from the Project in accordance with Va. Code § 56-46.1.

15. The Company considered the potential environmental justice impacts of the Project by completing an environmental justice assessment, and the Company is and will continue community outreach as needed for the Project. Company Witness Kathryn E.

MacCormick provides additional details regarding the Company's environmental justice analysis.

16. The Application, direct testimonies, and DEQ Supplement demonstrate that the Company has the technical and financial fitness to construct, operate, and maintain the proposed Project, and the Company has satisfied the requirements of Va. Code §§ 56-580 D and 56-46.1 to obtain amendments for the Brunswick and Greensville CPCNs. The LNG Storage Facility will have no material adverse impact upon the reliability of electric service provided by any regulated public utility, and is required by the public convenience and necessity. Further, the Project is in the public interest.

IV. PRE-FILED DIRECT TESTIMONY

17. The Company's Application is supported by the pre-filed direct testimony of Company Witnesses Jeffrey G. Miscikowski, William A. Coyle, Dale E. Hinson, Katya Kuleshova, Jason P. Ericson, and Kathryn E. MacCormick. Each witness includes a one-page summary with his or her testimony.

V. COMPLIANCE WITH THE GENERATION RULES

18. To facilitate its request for amended CPCNs, the Company has provided information responsive to the Generation Rules. While the Company is seeking approval to construct and operate a back-up fuel source, and not a new generating facility, it is providing this information to assist the Commission's review. The Company acknowledges that some information may not be necessary or applicable to an application to amend existing CPCNs.

19. Exhibit 1 attached to this Application includes a table showing where in the Application the Company has provided the information responsive to the Generation Rules and the sponsoring witness.

VI. REQUEST FOR PARTIAL LIMITED WAIVER

20. The Company for good cause shown, respectfully requests that the Commission waive, in part, the requirements of Rule 150 of the Commission's Rules of Practice and Procedure, which requires the Company to file an original and 15 copies of its application.⁹ In support of its Application, the Company is providing documentation supporting the costs of the Project. The supporting documentation is voluminous and, often, not easily viewed in hard copy (*i.e.*, paper) format. Accordingly, the Company seeks waiver of the requirement to file multiple hard copies of this information. Instead, the Company proposes to file one hard copy of this supporting documentation accompanied by three compact discs ("CDs") with this documentation in electronic format. The Company will then make this supporting documentation available in electronic format to Staff and any other future case participant via an electronic discovery site ("eRoom") established for this proceeding contemporaneously with the filing of the Petition, with immediate access available to Staff. This request for waiver is consistent with the Commission's recent orders granting similar limited waivers.¹⁰

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

21. The Company's Application and accompanying schedules contain confidential and extraordinarily sensitive information as designated. Because portions of the Company's filing contain such confidential and extraordinarily sensitive information, in compliance with Rule 10 of the Generation Rules and Rule 170 of the Commission's Rules of Practice and

⁹ 5 VAC 5-20-150.

¹⁰ *Petition of Virginia Electric and Power Company, For approval of its 2023 RPS Development Plan under § 56-585.5 D 5 of the Code of Virginia and related requests*, Case No. PUR-2023-00142, Order on Waiver Requests (Aug. 29, 2023).

Procedure, this Application is accompanied by a contemporaneously-filed Motion for Entry of a Protective Order and Additional Protective Treatment, including a Proposed Protective Order.

VIII. CONCLUSION

WHEREFORE, Dominion Energy Virginia respectfully requests that the Commission:

(1) Direct that notice of the Application be given, including the notice map of the Project site provided in Schedule 4 of the pre-filed direct testimony of Company Witness Miscikowski;

(2) Schedule this matter for hearing;

(3) Amend the certificates of public convenience and necessity for the Company's existing Brunswick County and Greensville County Power Stations and approve the construction and operation of the proposed LNG Storage Facility under Va. Code § 56-580 D;

(4) Grant the Company's request for a limited partial waiver of the filing requirements as described above; and

(5) Grant such other and further relief as it deems just and proper.

Respectfully submitted,

VIRGINIA ELECTRIC AND POWER COMPANY

By: Elaine S. Ryan

Paul E. Pfeffer
Lisa R. Crabtree
Dominion Energy Services, Inc.
120 Tredegar Street
Richmond, Virginia 23219
(804) 787-5607 (PEP)
(804) 819-2612 (LRC)
paul.e.pfeffer@dominionenergy.com
lisa.r.crabtree@dominionenergy.com

Elaine S. Ryan
Timothy D. Patterson

Nicole M. Allaband
McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, Virginia 23219-3916
(804) 775-1090 (ESR)
(804) 775-1069 (TDP)
(804) 775-4364 (NMA)
eryan@mcguirewoods.com
tpatterson@mcguirewoods.com
nallaband@mcguirewoods.com

Counsel for Virginia Electric and Power Company

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