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VIA ELECTRONIC DELIVERY

March 22, 2016

Cliona Mary Robb, Esq.
Michael J. Quinan, Esq.
James G. Ritter, Esq.
Christian Barton, LLP
909 East Main Street
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Richmond, Virginia 23219

**Application of Virginia Electric and Power Company for approval and certification of
electric facilities: Haymarket 230 kV Double Circuit Transmission Line
and 230-34.5 kV Haymarket Substation
Case No. PUE-2015-00107**

Dear Counsel:

Enclosed are the responses of Virginia Electric and Power Company to the Interrogatories and Requests for Production of Documents by Heritage (First Set) and (Second Set). The response to Heritage Set 2-1(e) is confidential and will be provided upon receipt of your signed Agreements to Adhere to the Protective Ruling issued in this case.

Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Charlotte P. McAfee for".

Charlotte P. McAfee
Senior Counsel

Enclosure

cc: William H. Chambliss, Esq.
Alisson P. Klaiber, Esq.
Andrea Macgill, Esq.
Mr. Neil Joshipura
Will Reisinger, Esq.
Vishwa Link, Esq.
Jennifer Valaika, Esq.

Virginia Electric and Power Company
Case No. PUE-2015-00107
Heritage
First Set

The following response to Instruction No. 5 of the First Set of Interrogatories and Requests for Production of Documents propounded by Heritage received on March 11, 2016, has been prepared under my supervision as it relates to legal matters.


Charlotte P. McAfee
Senior Counsel
Dominion Resources Services, Inc.

Instruction No. 5

In responding to each question in the attached interrogatories and requests for production of documents, provide information available from all corporate files of your company, of all affiliated companies, and of all companies over which your company exercises control or that exercise control over your company, as well as from all files of past and present board members, officers, and management-level employees of any such companies.

Objection:

Virginia Electric and Power Company (the “Company”) objects to this instruction on the grounds that it is overly broad, voluminous, and unduly burdensome. To provide information for each discovery request from “all corporate and individual files of the company” would require potentially an inordinate number of interviews to identify and locate all such files, followed by an enormous number of man-hours to review the contents of such files. These same objections also apply to “all corporate and individual files” of “all affiliated companies,” “all companies over which the company exercises control,” “all companies . . . that exercise control over the company,” and “all past and present board members, officers, and management-level employees of any such companies” – including persons having no past or present relationship to the Company.

The Company further objects to this instruction as unduly burdensome to the extent that it seeks to impose obligations beyond the scope of the Commission’s Rules of Practice and Procedure, 5 VAC 5-20-10, *et seq.*, and/or the Commission’s Rules Governing Utility Rate Applications and Annual Informational Filings, 20 VAC 5-201-10, *et seq.*

The Company further objects to this instruction to the extent that it seeks to discover any information that is protected from disclosure by the attorney-client privilege, work product doctrine, and/or other protections.

Virginia Electric and Power Company

Case No. PUE-2015-00107

Heritage

First Set

The following response to Definition 1 of the First Set of Interrogatories and Requests for Production of Documents propounded by Heritage received on March 11, 2016 has been prepared under my supervision as it relates to legal matters.



Charlotte P. McAfee

Senior Counsel

Dominion Resources Services, Inc.

Definition 1


“You,” “your,” and “Company” mean Dominion or any of its officers, directors, employees, attorneys, or agents.

Objection:

The Company objects to this definition to the extent that it seeks to discover information that is protected from disclosure by the attorney-client privilege, work product doctrine, and/or other protections.

Virginia Electric and Power Company
Case No. PUE-2015-00107
Heritage
First Set

The following response to Question No. 1 of the First Set of Interrogatories and Requests for Production of Documents propounded by Heritage received on March 11, 2016 has been prepared under my supervision.



Charlotte P. McAfee
Senior Counsel
Dominion Resources Services, Inc.

Question No. 1

Heritage adopts as their own all of the interrogatories, requests for production of documents, and other requests for data or information of all of the other parties and the Commission Staff, whether written or oral, formal or informal, in this case. Accordingly, provide a copy of each Company response, formal or informal, to each interrogatory, request for the production of documents, and other request for data or information propounded by every other party and the Commission Staff.

Response:

Copies of responses to all formal and informal interrogatories, requests for production of documents, and other requests for data made by a party to Virginia Electric and Power Company (the "Company") pursuant to 5 VAC 5-20-260 in this proceeding will be provided or otherwise made available to Heritage, except where the Company withholds such responses on the basis of privilege or other reasonable objections. Where the Company considers information contained in such responses to be confidential or extraordinarily sensitive, such responses may be provided to Heritage pursuant to the protections set forth in 5 VAC 5-20-170, the Hearing Examiner's Protective Ruling issued on March 15, 2016 in Case No. PUE-2015-00107, and any subsequent Protective Ruling that may be issued in this proceeding. Third-party proprietary information will be provided subject to any restrictions on use and/or disclosure imposed by the owner of the proprietary information.

On a continuing basis, for the period of this proceeding, the Company will provide copies of all responses provided to any party intervening in this docket by posting copies to an electronic discovery site (eRoom) established in this case (PUE-2015-00107).