Dominion Resources Services, Inc.

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VIA ELECTRONIC DELIVERY

April 14, 2016

Brian R. Greene, Esq. Eric J. Wallace, Esq. William T. Reisinger, Esq. GreeneHurlocker, PLC 1807 Libbie Avenue Richmond, Virginia 23226

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 Virginia Electric and Power Company's responses to the Second Set of Discovery of The Coalition to Protect Prince William County received on April 5, 2016. The response to Question No. 2-22 will be forthcoming.

The response to Question No. 2-1 is confidential and will be provided under separate cover.

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

Sincerely,

Charlotte P. McAfee Senior Counsel

Enclosure

cc: William H. Chambliss, Esq.

Alisson P. Klaiber, Esq.

Andrea Macgill, Esq.

Mr. Neil Joshipura

Cliona Mary Robb, Esq.

Michael J. Quinan, Esq.

James G. Ritter, Esq.

Vishwa Link, Esq.

Jennifer Valaika, Esq.

The following response to Question No. 2-2 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Charlotte P. McAfee

Senior Counsel

Dominion Resources Services Inc.

Question No. 2-2

Describe how the costs of the proposed project will be recovered and under what legal authority.

Response:

See the Company's response to Question No. 14 of the Staff's First Set.

The following response to Question No. 2-3 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Charlotte P. McAfee

Senior Counsel

Dominion Resources Services Inc.

Question No. 2-3

Is the customer for whom the transmission facilities are being constructed contributing to the transmission facility costs? If so, please explain how much. If not, please explain why. In answering, reference the relevant legal authority.

Response:

See the Company's response to Question No. 14 of the Staff's First Set.

The following response to Question No. 2-4 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Mark R. Gill

Consulting Engineer

Dominion Virginia Power

The following response to Question No. 2-4 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to legal matters.

Charlotte P. McAfee

Senior Counsel

Dominion Resources Services Inc.

Question No. 2-4

Please identify any prior Company projects where transmission infrastructure was constructed solely to serve one customer. In answering, please describe the financial contributions made by the customer(s) in each situation.

Response:

The Company objects to this request as overly broad and unduly burdensome to the extent it requests identification "any prior Company [transmission infrastructure] projects" constructed to serve one customer without limitation. The Company further objects to this request as vague to the extent "transmission infrastructure" is not defined. The Company also objects to the request

to the extent that it seeks information that is not relevant or reasonably calculated to lead to the admission of relevant evidence.

Notwithstanding and subject to the foregoing objections, the Company provides the following response.

See the Company's response to Question No. 13 of the Staff's First Set regarding system reliability impacts regardless of the number of customers associated with a given load level. See the Company's response to Question No. 14 of the Staff's First Set for a description of cost recovery for the Project.

The following response to Question No. 2-5 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Mark R. Gill

Consulting Engineer

Dominion Virginia Power

Jan R. E

The following response to Question No. 2-5 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to legal matters.

Charlotte P. McAfee

Senior Counsel

Dominion Resources Services, Inc.

Question No. 2-5

Please identify any prior Company transmission projects defined as "Supplemental Projects" pursuant to Schedule 6 of the PJM Operating Agreement.

Response:

The Company objects to this request as overly broad and unduly burdensome to the extent it requests identification of supplemental transmission projects proposed to PJM over the Company's eight-year membership in PJM and to the extent it seeks publicly-available information available from PJM and would require original work. The Company also objects to this request to the extent it seeks information that is not relevant or reasonably calculated to lead

to the admission of relevant evidence. Notwithstanding and subject to the foregoing objections, the Company provides the following response.

A list of transmission system upgrades that are part of PJM's Regional Transmission Expansion Planning ("RTEP") process and include Baseline upgrades, Network upgrades, and Supplemental projects in the PJM Region, including the Company's transmission projects, can be accessed and downloaded through PJM's "Transmission Construction Status" website at the following URL:

http://www.pjm.com/planning/rtep-upgrades-status/construct-status.aspx

The following response to Question No. 2-6 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Mark Gill

Consulting Engineer Dominion Virginia Power

The following response to Question No. 2-6 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to legal matters.

Charlotte P. McAfee

Senior Counse

Dominion Resources Services Inc.

Question No. 2-6

Reference the Company's answer to Coalition Set 2-3. Please explain whether the customer's contribution, if any, would be different under any of the alternative scenarios being considered in this case.

Response:

See the Company's response to Question No. 14 of the Staff's First Set. The Company would use the same cost recovery method described in that response for any of the transmission alternatives being considered.

The following response to Question No. 2-7 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

regory E. Mathe

Electric Transmission Projects

Marketing Manager

Dominion Virginia Power

Question No. 2-7

Provide the transcript from the January 12, 2015, town hall meeting attended by Dominion and held in Haymarket, Virginia.

Response:

See Attachment Coalition Set 2-7.

The Company notes that the Legislative Town Hall Meeting was not a Dominion Virginia Power event, and further notes that the individuals who attended and/or participated in this town hall event hosted by Delegate Bob Marshall may not have been aware that their remarks were transcribed or that such transcribed comments could be provided to parties to this legal proceeding. The speakers were not provided an opportunity to review the transcribed comments provided as Attachment Coalition Set 2-7.

The following response to Question No. 2-8 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Gregory E. Mathe

Electric Transmission Projects Marketing Manager

Dominion Virginia Power

The following response to Question No. 2-8 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to legal matters.

Charlotte P. McAfee

Senior Counsel

Dominion Resources Services Inc.

Question No. 2-8

Provide the transcript from the January 15, 2015, open house held by Dominion at the Battlefield High School in Haymarket, Virginia.

Response:

The Company objects to this request on the grounds that it is not relevant and not reasonably calculated to lead to the admission of relevant evidence. Notwithstanding and subject to the foregoing objection, see Attachment Coalition Set 2-8. Specific property owner information has been redacted from Attachment Coalition Set 2-8 for relevance to protect the identified individuals.

The Company further notes that the individuals who attended and/or participated in the public open house event were not made aware that their identities or transcribed comments could be provided to parties to this legal proceeding, nor were they provided an opportunity to review the transcribed comments.

The following response to Question No. 2-9 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to legal matters.

Senior Counsel

Dominion Resources Services Inc.

Question No. 2-9

Provide all documents and information (including agendas, attendees, meeting notes, copies of presentations, etc.) related the Company's September, 2013, marketing trip to Seattle, Washington, which was also attended by the Prince William County Board of Supervisors.

Response:

The Company objects to this request to the extent that it seeks information that is not relevant or reasonably calculated to lead to the admission of relevant information.

The following response to Question No. 2-10 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to block load additions.

Mark Gill

Consulting Engineer Dominion Virginia Power

The following response to Question No. 2-10 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to legal matters.

Charlotte P. McAfee

Senior Counsel

Dominion Resources Services Inc.

Question No. 2-10

Provide the details and locations of any other potential data center locations in Prince William County, or any adjacent counties, of which the Company is currently aware.

Response:

The Company objects to this request to the extent that it seeks information that is not relevant or reasonably calculated to lead to the admission of relevant information. In addition, the Company objects to this request to the extent it seeks confidential customer information. The Company further objects to this request to the extent that it seeks publicly-available information and would require original work.

Notwithstanding and subject to the foregoing objections, the Company provides the following response.

The economic development websites for Prince William and surrounding counties (Loudoun, Stafford, Fauquier, and Fairfax) provide details and locations of potential data center locations as described below, however, as evidenced by the developments driving the Company's proposed Haymarket project in Prince William County and Poland Road project in Loudoun County, any location that is properly zoned for "data center use" is a potential data center location.

The Prince William County Department of Economic Development maintains a list of key development sites within Prince William County, organized by industry with site highlights and features, at the following website: http://www.pwcecondev.org/key-development-sites.

Loudoun County Economic Development offers a downloadable file of "a few of our most prominent data center sites" at the following website: https://biz.loudoun.gov/index.aspx?nid=115.

The Stafford Economic Development Authority maintains a list of data center opportunities at the following website: http://www.gostaffordva.com/real-estate-development-areas/data-center-initiative/, including a Dominion Virginia Power "Certified site" at Quantico Corporate Center.

Fauquier County Department of Economic Development maintains a list of available space and land at the following website: http://www.fauquierbusiness.com/available-space-and-land/.

The Fairfax County Economic Development Authority website, http://www.fairfaxcountyeda.org/, does not contain a readily accessible list of available sites, however, the Virginia Economic Development Partnership's website, http://www.yesvirginia.org/, provides a search of available properties throughout the Commonwealth.

The following response to Question No. 2-11 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to block load additions.

Mark Gill

Consulting Engineer Dominion Virginia Power

The following response to Question No. 2-11 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to legal matters.

Charlotte P. McAfee

Senior Counsel

Dominion Resources Services Inc.

Question No. 2-11

Describe and identify all potential transmission projects located in Prince William County, or any adjacent counties, of which the Company is currently aware.

Response:

The Company objects to this request as overly broad, vague and unduly burdensome to the extent it requests information on "all potential transmission projects" located in five counties that include service territories of multiple incumbent electric utilities. The Company further objects to this request to the extent that it seeks information that is not relevant or reasonably calculated to lead to the admission of relevant information.

Notwithstanding and subject to the foregoing objections, the Company is not aware of any planned transmission projects that impact the proposed Project from an electrical perspective except the Gainesville-Wheeler-Vint Hill network recently approved by the Commission in Case No. PUE-2014-00025.

See the Company's response to Question No. 2-5 of the Coalition's Second Set.

The following response to Question No. 2-12 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Harrison Potter Engineer III

Virginia Power and Electric Company

Question No. 2-12

Does the Company contend that increased demand for electricity in Haymarket, Virginia, is a reason why the construction of the project is necessary? If so, explain how and provide information to support this position.

Response:

As outlined in the Company's Application and Appendix, the primary driver for the proposed Project is to provide service requested by a retail electric service customer in Prince William County.

The proposed Project is also intended to maintain service for the overall growth in the area. An existing data center in the vicinity of the proposed Haymarket Substation is currently expanding its load, with a total projected increase of approximately 40 MVA split between Distribution Circuits #379 and #695.

The following response to Question No. 2-13 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Mark R. Gill

Consulting Engineer

Dominion Virginia Power

The following response to Question No. 2-13 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to legal matters.

Charlotte P. McAfee

Senior Counsel

Dominion Resources Services Inc.

Question No. 2-13

Reference page 2 of the Application, which references NERC reliability standards. Provide and explain the referenced NERC reliability standards and explain why these standards require the construction of the project.

Response:

The Company objects to this request to the extent it mischaracterizes the content of the Application filed by the Company in this matter. Page 2 of the Application specifically states that the electric facilities proposed in this application are "necessary so that Dominion Virginia Power can provide services requested by a retail electric service customer (the "Customer") for a new data center campus in Prince William County, Virginia and maintain reliable electric service to its customers in the area in accordance with mandatory North American Reliability

Corporation ("NERC") Reliability Standards for transmission facilities and the Company's planning criteria.

There is not a NERC reliability criteria violation driving the construction of the Project. However, as described in Appendix Section I.A, page 3, the Project is being constructed as a double circuit loop, instead of a single circuit tap, to comply with Section C.2.6 of the Company's Transmission Planning Criteria which limits loading on a radial feed in excess of 100 MW without an alternate transmission supply. NERC Reliability Standard FAC-001 requires the Company to establish facility connection and performance requirements. NERC Reliability Standard FAC-002 requires the Company to meet its facility connection and performance requirements. The Company maintains NERC-compliant "Facility Connection Requirements," which include the Company's Transmission Planning Criteria.

See Attachments Coalition Set 2-13(1) and (2) for copies of the referenced NERC Reliability Standards.

The following response to Question No. 2-14 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Mark R. Gill

Consulting Engineer

Dominion Virginia Power

Tan R. Dul

Question No. 2-14

Reference Attachment III.B.1 to the Application, which includes an informational pamphlet stating that the project will "help strengthen the electrical grid." Please explain how the project will "strengthen the electrical grid".

Response:

To clarify, Attachment III.B.1 to the Appendix is a July 31, 2014 letter to residents in the vicinity of the Project, which invites the community to attend an upcoming Open House to learn more about and provide input on the Project. That letter enclosed a fact sheet with additional information on the Project, including the statement that the Project will "help strengthen the electrical grid and improve overall reliability for the community...."

In addition to interconnecting the Customer's load reliably and in accordance with the Company's requirements, the Project will strengthen the electrical grid (transmission network) by converting the existing 115 kV Gainesville to Loudoun Line #124 to 230 kV operation, as described in Appendix Section I.A, page 2. Additionally, see the Company's response to Ouestion No. 6 of the Staff's First Set.

The following response to Question No. 2-15 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Mark R. Gill

Consulting Engineer Dominion Virginia Power

The following response to Question No. 2-15 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Harrison Potter
Engineer III
Virginia Power and Electric Company

Question No. 2-15

Reference page 2 of the Direct Testimony of Mark R. Gill, which states that the project is necessary to "maintain reliable service for the overall growth in the area." Please explain what additional "growth," apart from the customer's demand, this statement refers to.

Response:

Appendix Attachment I.B.1 provides the historical and projected loads for circuits served out of the Gainesville Substation, which includes approximately 4.0 MVA additional non-data center growth on Distribution Circuits #378, #379, and #695, from 2014 to 2024. See also the

The following response to Question No. 2-15 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Mark R. Gill Consulting Engineer Dominion Virginia Power

The following response to Question No. 2-15 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Harrison Potter

Engineer III

Virginia Power and Electric Company

Question No. 2-15

Reference page 2 of the Direct Testimony of Mark R. Gill, which states that the project is necessary to "maintain reliable service for the overall growth in the area." Please explain what additional "growth," apart from the customer's demand, this statement refers to.

Response:

Appendix Attachment I.B.1 provides the historical and projected loads for circuits served out of the Gainesville Substation, which includes approximately 4.0 MVA additional non-data center growth on Distribution Circuits #378, #379, and #695, from 2014 to 2024. See also the

Company's response to Question No. 2-12 of the Coalition's Second Set regarding an additional 40 MVA attributable to an existing data center.

The following response to Question No. 2-16 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Mark R. Gill

Consulting Engineer

Dominion Virginia Power

Question No. 2-16

Reference page 10 of the Direct Testimony of Mark R. Gill, which states that "[t]he Project is needed to assure reliability of the transmission and distribution systems in the local area." Would the project be needed to assure reliability of the transmission and distribution systems in the local area if not for the new demand attributable to the customer's data center?

Response:

As stated in the Company's response to Question No. 2-13 of the Coalition's Second Set, there is not a NERC reliability criteria violation driving the construction of the Project. Without the request to serve the proposed Haymarket Substation, the Company did not have plans to construct a 230 kV line into the Haymarket Load Area.

The following response to Question No. 2-17 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Mark R. Gill Consulting Engineer Dominion Virginia Power

The following response to Question No. 2-17 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Harrison Potter Engineer III Virginia Power and Electric Company

Question No. 2-17

Reference Attachment III.B.1 to the Application, which includes an informational pamphlet stating that the project will "improve overall reliability for the community." Please explain how the project will "improve overall reliability for the community" and provide any studies quantifying the expected reliability improvements.

Response:

To clarify, Attachment III.B.1 to the Appendix is a July 31, 2014 letter to residents in the vicinity of the Project, which invites the community to attend an upcoming Open House to learn more

The following response to Question No. 2-17 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Mark R. Gill Consulting Engineer Dominion Virginia Power

The following response to Question No. 2-17 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Harrison Potter

Engineer III

Virginia Power and Electric Company

Question No. 2-17

Reference Attachment III.B.1 to the Application, which includes an informational pamphlet stating that the project will "improve overall reliability for the community." Please explain how the project will "improve overall reliability for the community" and provide any studies quantifying the expected reliability improvements.

Response:

To clarify, Attachment III.B.1 to the Appendix is a July 31, 2014 letter to residents in the vicinity of the Project, which invites the community to attend an upcoming Open House to learn more

about and provide input on the Project. That letter enclosed a fact sheet with additional information on the Project, including the statement that the Project will "help strengthen the electrical grid and improve overall reliability for the community...."

As explained in Section I.B to the Appendix, on page 10, "Haymarket Substation will serve Haymarket area customer load in addition to the Customer's load. This arrangement will enhance the reliability for customers in the area for two distinct reasons. First, with additional capacity, the Company has greater opportunity to switch load to other available circuits in the event of an outage on any given circuit which can result in faster restoration times. Second, by constructing new distribution circuits into the load area from the proposed Haymarket Substation, the length of certain circuits serving proximate customers from Gainesville Substation is reduced from approximately six miles to less than one mile."

The following response to Question No. 2-18 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Wilson Velazquez, PE Supervisor Substation Engineering Dominion Technical Solutions, Inc.

Question No. 2-18

Provide the design specifications related to the substations that may be constructed under each proposed alternative.

Response:

The proposed Haymarket Substation would have the same design specifications and layout for all overhead alternative routes. The Company will use its standard designs and typical drawings, which comply with National Electrical Safety Code and National Electrical Code, and follow Institute of Electrical and Electronics Engineers ("IEEE") guidelines. See Section II.C of the Appendix.

The following response to Question No. 2-19 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to block load additions.

Mark Gill

Consulting Engineer Dominion Virginia Power

The following response to Question No. 2-19 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to legal matters.

Charlotte P. McAfee

Senior Counsel

Dominion Resources Services Inc.

Question No. 2-19

Provide maps showing the location of all existing 230kV transmission lines and substation facilities within Dominion's service territory.

Response:

The Company objects to this request as overly broad to the extent it requests the locations of all 230 kV transmission lines and substation facilities in the Company's system. The Company further objects to this request to the extent that it seeks information, including Critical Energy Infrastructure Information subject to Federal Energy Regulatory Commission protections set

forth in Title 18 of the Code of Federal Regulations, Part 388.113, that is not relevant or reasonably calculated to lead to the admission of relevant information.

Notwithstanding and subject to the foregoing objections, see Appendix Attachment I.E.1 for a map of the existing electrical facilities in the vicinity of the Project.

The following response to Question No. 2-20 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision.

Harrison Potter Engineer III

Virginia Power and Electric Company

Question No. 2-20

Are there plans to serve other customers from the project substation, or will the substation only serve the customer described in the Company's application? Please explain.

Response:

As stated in Section I.B of the Appendix, on page 10, "Haymarket Substation will serve Haymarket area customer load in addition to the Customer's load." The Company's current plan is to serve all customers west of Route 15 from the Haymarket Substation. As load growth continues in the area, the Company will have capacity in Haymarket Substation to add additional circuits as necessary.

The following response to Question No. 2-21 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to distribution planning.

Harrison Potter Engineer III

Virginia Power and Electric Company

The following response to Question No. 21 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to substation engineering.

Wilson Velazquez, PE Supervisor Substation Engineering Dominion Technical Solutions, Inc.

Question No. 2-21

Is the substation being designed and constructed in a way that it can service other distribution clients in the future? Please explain.

Response:

Yes.

See the Company's response to Question No. 2-20 of the Coalition's Second Set.

The following response to Question No. 2-21 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to distribution planning.

Harrison Potter
Engineer III
Virginia Power and Electric Company

The following response to Question No. 21 of the Second Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on April 5, 2016 has been prepared under my supervision as it pertains to substation engineering.

Wilson Velazquez, PE Supervisor Substation Engineering Dominion Technical Solutions, Inc.

Question No. 2-21

Is the substation being designed and constructed in a way that it can service other distribution clients in the future? Please explain.

Response:

Yes.

See the Company's response to Question No. 2-20 of the Coalition's Second Set.