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VIA ELECTRONIC DELIVERY

April 19, 2016

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**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 (Third Set) received on April 8, 2016.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Charlotte McAfee", is written over the typed name and title.

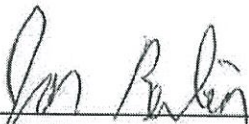
Charlotte P. McAfee
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Enclosure

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

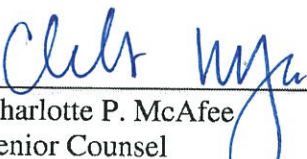
Virginia Electric and Power Company
Case No. PUE-2015-00107
Heritage
Third Set

The following response to Question No. 3-1 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by Heritage received on April 8, 2016 has been prepared under my supervision.



Jon Berkin
Routing Specialist
Natural Resource Group, LLC

The following response to Question No. 3-1 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by Heritage received on April 8, 2016 has been prepared under my supervision as it pertains to legal matters.



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

Question No. Heritage 3-1

When responding to Heritage 3-1, please refer to the description of the Railroad Alternative shown in Table 5-2 on page 87 of the *Haymarket Substation and 230 kV Transmission Line Project Environmental Routing Study* dated November 2015 and included with the Application. The disadvantages listed for the Railroad Alternative include “crosses greatest amount of permanently protected open space” and “crosses a Prince William County-designated Open Space and Trail Easement.”

- a. Does the “permanently protected open space” consist only of the Open Space and Trail Easement?
- b. If the answer to a. is “no,” explain in detail what else is included in the permanently protected open space.
- c. Explain in detail why Dominion considers the Open Space and Trail Easement and, as applicable, any other permanently protected open space, to be a disadvantage.

- d. Explain in detail who owns or controls the Open Space and Trail Easement and, if applicable, any other permanently protected open space to be a disadvantage.
- e. Explain in detail whether Dominion would consider the Railroad Alternative to be feasible if the Open Space and Trail Easement and, as applicable, any other permanently protected open space, were not in place.
- f. Explain in detail whether Dominion would consider the Railroad Alternative to be its preferred route if the Open Space and Trail Easement and, as applicable, any other permanently protected open space, were not in place.

Response:

a. No. See Attachment Heritage Set 3-1(a). The Railroad Alternative Route crosses 0.8 mile of two, largely overlapping, open space easements: a Protected Open Space Easement (blue stripes) and an Open Space and Trail Easement (yellow stripes). The two easements are located between the Greenhill Crossing and Somerset Crossing Developments.

b. See the Company's response to subpart (a) above. Prince William County has designated areas within its Comprehensive Plan as protected open space. The Comprehensive Plan defines protected open space as: "Land that is protected from development with perpetual conservation or open space easement or fee ownership, held by federal, state, or local government or nonprofit organization for natural resource, forestry, agriculture, wildlife, recreation, historic, cultural, or open space use, or to sustain water quality and living resources values." Protected open space is "protected in perpetuity by a binding legal instrument that is recorded in the land records of Prince William County." The instrument may be a preservation easement, permanent restrictive covenant for conservation, or an equivalent legal tool providing protection. Generally these protected open spaces fall into one of the following categories: (1) county-owned land; (2) state or federal parks, forests, or wildlife preserves; (3) land designated as a Resource Protection Area ("RPA") under the Chesapeake Bay Preservation Area; or (4) land protected by easements (Prince William County, 2007). The Protected Open Space Easement, designated under the Virginia Conservation Easement Act (VCEA; enacted in 1988) and crossed by the Railroad Alternative Route, consists of land set aside to maintain open areas associated with development of the Somerset Crossing residential neighborhood Homeowners Association. Under the VCEA, conservation easements held by private, non-governmental entities do not have protective covenants like those provided in the Open Space Land Act (see below).

The Open Space and Trail Easement, an easement designated under the Open Space Land Act, was a gift from the Somerset Crossing Homeowners Association to Prince William County in December 2014 (see Attachment Heritage Set 3-1(b)). The Open Space Easement was intended to protect woodlands and wetlands along North Fork Broad Run. The Open Space and Trail Easement did not replace the existing Protected Open Space Easement, but rather is a new easement in addition to, and largely overlapping with, the Protected Open Space Easement.

c. Protected open space easements require careful consideration before inclusion for transmission line routing given their overall intent to provide for protection of open areas from future development in order to preserve their natural character. Therefore, as a matter of course, whenever possible Dominion Virginia Power tries to avoid crossing Protected Open Space

easements with new transmission lines. In addition, depending of the type of easement in question, Dominion Virginia Power might first have to obtain permission from local or county governments or other easement-holding authorities to cross a protected open space easement. While Dominion Virginia Power could have crossed the Protected Open Space Easement when it was controlled by the Somerset County Homeowners Association, this is not the case for the Open Space and Trail Easement. The Open Space and Trail Easement that was gifted to Prince William County from the Somerset Crossing Homeowners Association provides an additional level of protection to the area under the easement by requiring not only a utility easement from Somerset Crossing Homeowners Association, but also from Prince William County. Eminent domain authority, when available, does not extend to county-owned or county-managed lands, such as lands covered by the Open Space and Trail Easement. Therefore, unless Prince William County agreed to allow a utility easement through the Open Space and Trail Easement, the segment of the Railroad Alternative Route that currently crosses that easement could not be constructed.

d. The Open Space and Trail Easement along the Railroad Alternative Route was granted to Prince William County by the Somerset Crossing Homeowners Association for the “purpose of conserving and preserving undisturbed the natural vegetation, topography, habitat and other natural features now existing on and across the Property of Owner.” The land subject to the easement includes the following restrictions: “No use shall be made of, nor shall any improvements be made within, the open-space easement area without prior written authorization of the County,” and “All existing vegetation in the open-space easement shall be preserved and protected and no clearing or grading shall be permitted...without prior written approval of the appropriate County agency or department.” Therefore, the easement area, although still owned by Somerset Crossing Homeowners Association, is controlled by Prince William County.

e. The Company objects to this request to the extent it seeks a legal conclusion.

Notwithstanding and subject to the foregoing objection, see Section II.A.7 of the Appendix, page 48, regarding the inclusion of the Railroad Alternative Route and the Company’s routing analysis. In the absence of the Open Space and Trail Easement, which is designated under the Open Space Land Act and retains the protective covenants of the local public body, in this case, Prince William County, Dominion Virginia Power would consider the Railroad Alternative Route feasible for routing purposes. Conversely, the Protected Open Space Easement is held by a private, non-governmental entity which does not have the protective procedures in place and is subject to eminent domain, thus not precluding Dominion Virginia Power’s ability to obtain the right-of-way to construct this route.

f. See Section II.A.7 of the Appendix, page 48, regarding the inclusion of the Railroad Alternative Route and the Company’s routing analysis.

In the absence of the Open Space and Trail Easement, the Railroad Alternative Route would warrant renewed consideration by Dominion Virginia Power. As noted in Table 1 below (a reproduction of a portion of Table 5-2 from the Routing Study), there are disadvantages associated with the Railroad Alternative Route compared to the Company’s Proposed Route (I-66 Overhead): the Railroad Alternative Route is 0.7 mile longer, crosses more private parcels (43

versus 36), requires more greenfield (*i.e.*, not adjacent to existing infrastructure) right-of-way (1.2 versus 0.5 mile), crosses a greater extent of wetland (20.8 versus 5.9 acres), crosses more waterbodies (10 versus 5), crosses a greater amount of Virginia Department of Forestry High Conservation Value Land (1.2 versus 0.1 acre), has a greater impact to RPAs (0.9 versus 0.0 acre), crosses a greater amount of forested land (38.2 versus 31.3 acres), crosses a larger number of existing subdivisions/homeowner associations (8 versus 3), and crosses a greater amount of Prince William County historic high sensitivity areas (0.9 versus 0.0 mile). The Railroad Alternative Route offers the following advantages compared to the Proposed Route (I-66 Overhead): the Railroad Alternative Route crosses more industrial-zoned lands (0.8 versus 0.4 mile), requires less length within limited-access right-of-way maintained by the Virginia Department of Transportation (“VDOT”) (1.5 versus 3.2 miles), and has no residences within 200 feet of the route. In summary and subject to additional study, while the Railroad Alternative Route may have a greater cumulative impact on wetlands and natural resources, it would have the advantage of having less direct impact on residences as there are no residences within 200 feet of this route.

TABLE 1

**Haymarket Substation and 230 kV Transmission Line Project
Summary of the Advantages and Disadvantages of the Proposed Route (I-66 Overhead)
and Railroad Alternative Route**

Advantages	Disadvantages
<p>Proposed Route (Overhead I-66)</p> <ul style="list-style-type: none"> • Shorter route • Does not cross the Rural Crescent • Greater amount of collocation (90%) • Less forested land (acres) crossed • Less wetland impacts (acres) • Crosses fewer private parcels • Does not cross any Prince William County historic high sensitivity areas 	<ul style="list-style-type: none"> • Greater number of townhome/condo buildings within 100 feet • Greater number of single family homes within 100 feet • Would be required to relocate line if additional I-66 expansions are needed
<p>Railroad Alternative Route</p> <ul style="list-style-type: none"> • Crosses more industrial zoned land • No residences located within 200 feet • Shorter length within VDOT Limited Access Right-of-Way 	<ul style="list-style-type: none"> • Longer route • Crosses more private parcels • Has less collocation opportunities (requires more greenfield right-of-way) • Crosses greater number of existing subdivisions/HOAs • Greater amount of wetland impacts (acres) • Greater number of waterbody crossings • Greater amount (acres) of VDOF High Forest Conservation lands crossed

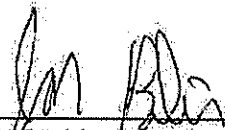
TABLE 1

**Haymarket Substation and 230 kV Transmission Line Project
Summary of the Advantages and Disadvantages of the Proposed Route (I-66 Overhead)
and Railroad Alternative Route**

Advantages	Disadvantages
	<ul style="list-style-type: none"> • Crosses greater amount (acres) of RPA • Crosses a greater amount of Prince William County historic high sensitivity areas

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

The following response to Question No. 3-2 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by Heritage received on April 8, 2016 has been prepared under my supervision.



Jon Berkin
Routing Specialist
Natural Resource Group, LLC

Question No. Heritage 3-2

Regarding the Proposed Route described on page 71 of the *Appendix Containing Information in Response to "Guidelines of Minimum Requirements for Transmission Line Application,"* explain in detail:

- a. whether the Preferred Route is generally on the north side of I-66 rather than on the south side of I-66;
- b. why the Preferred Route is generally on one side of I-66 instead of being on the other side of I-66;
- c. to what extent would the Preferred Route be impacted by sound walls for I- 66 or by future expansion of I-66.

Response:

- a. See the description of the Proposed Route in Section II.A.1 of the Appendix, page 31. The Proposed Route (I-66 Overhead) traverses the north side of the I-66 corridor for approximately 75% of its length, from a point near Prince William Parkway on the east to a point just west of Old Carolina Road.
- b. During the preliminary route alternative identification phase of the Project, Dominion Virginia Power evaluated both the north and south sides of I-66 for potential routes. This evaluation identified the presence of several key constraints on the south side of I-66 that were not present on the north side of the highway, primarily county-owned land associated with Tyler Elementary School and multiple residences abutting the VDOT right-of-way boundary. In particular, given VDOT's I-66 expansion plans (now mostly completed), sufficient room did not

exist for a utility easement on the south side of I-66 without having residences within the easement or without requiring an easement across county-owned property.

c. Dominion Virginia Power coordinated closely with VDOT on the design of the Project route alternatives along I-66 since first identifying the I-66 corridor as an alternative route in late 2014. In the intervening time, VDOT shared with the Company its plans for I-66 expansion and sound wall locations, including the subsequent modification to these plans. Dominion Virginia Power was able to take those plans into consideration when developing the Proposed Route and I-66 Hybrid Alternative Route in order to make the design of the routes compatible with the expansion plans for I-66. The Proposed Route would be constructed outside of the area required by VDOT for expansion, as well as outside and north of the new sound wall. If the transmission line were sited within the VDOT right-of-way on the interstate side (south side) of the sound wall, although it could be approved by VDOT, would increase construction timing substantially due to restrictions imposed by VDOT, including lane closure requirements and time-of-day timing limitations for construction activities.