Dominion Resources Services, Inc.

Law Department

120 Tredegar St. Richmond, VA 23219

dom.com

Charlotte P. McAfee Senior Counsel

Direct: (804) 819-2277; Facsimile: (804) 819-2183

Email: charlotte.p.mcafee@dom.com

## VIA ELECTRONIC DELIVERY

April 26, 2016

Todd Sinkins, Esq. Courtney B. Harden, Esq. Rees Broome, PC 1900 Gallows Road, Suite 700 Tysons Corner, Virginia 22182

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 Somerset Crossing Homeowners Association (First Set) received on April 15, 2016.

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 Will Reisinger, Esq. Cliona Mary Robb, Esq. Michael J. Quinan, Esq. James G. Ritter, Esq.

Vishwa Link, Esq. Jennifer Valaika, Esq.

## Virginia Electric and Power Company Case No. PUE-2015-00107 Somerset Crossing Homeowners Association, Inc. First Set

The following response to Question No. 1 of the First Set of Interrogatories and Requests for Production of Documents propounded by Somerset Crossing Homeowners Association, Inc. received on April 15, 2016 has been prepared under my supervision.

Charlotte P. McAfee

Senior Counsel

Dominion Resources Services, Inc.

#### Question No. 1

Somerset adopts as its 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 Somerset Crossing Homeowners Association, Inc. ("Somerset"), 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 Somerset pursuant to the protections set forth in 5 VAC 5-20-170 and subject to those protections set forth in the Hearing Examiner's Protective Ruling issued on March 15, 2016 in Case No. PUE-2015-00107. 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).

# Virginia Electric and Power Company Case No. PUE-2015-00107 Somerset Crossing Homeowners Association First Set

The following response to Question No. 2 of the First Set of Interrogatories and Requests for Production of Documents propounded by Somerset Crossing Homeowners Association received on April 15, 2016 has been prepared under my supervision.

Charlotte P. McAfee

Senior Counsel

Dominion Resources Services, Inc.

## Question No. 2

Please provide any revised responses to all formal or informal interrogatories or data requests made by any party to this proceeding when that revised response is provided to you.

## Response:

For purposes of this request, the Company assumes that Somerset is referring to any revised responses to discovery that are provided to other parties to this proceeding *by* the Company.

Subject to the foregoing interpretation, on a continuing basis for the period of this proceeding, the Company will provide copies of all revised, corrected or supplemental 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).