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VIA ELECTRONIC DELIVERY

June 8, 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 Third Set of Discovery of The Coalition to Protect Prince William County received on May 31, 2016.

The response to Question No. 3-2 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,

A handwritten signature in blue ink that reads "Valerie M. Chafee" with a small "for" written below it.

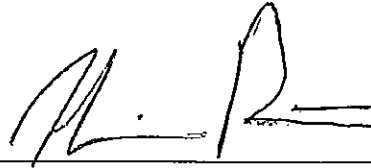
Charlotte P. McAfee
Senior Counsel

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.

Virginia Electric and Power Company
Case No. PUE-2015-00107
The Coalition to Protect Prince William County
Third Set

The following response to Question No. 3-1 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision as it pertains to distribution planning.



Harrison Potter
Engineer III
Virginia Electric and Power Company

The following response to Question No. 3-1 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision as it pertains to transmission planning.

Mark R. Gill
Consulting Engineer
Virginia Electric and Power Company

Question No. 3-1

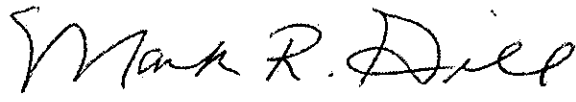
Reference the Company's response to Staff Set 1-14, which states that "it is important to note that the Project will serve Dominion Virginia Power load other than the Customer immediately and these proposed facilities may be extended in the future to serve other customers or load." Describe and quantify the "other" Dominion Virginia Power load that will be served by the Project immediately.

Virginia Electric and Power Company
Case No. PUE-2015-00107
The Coalition to Protect Prince William County
Third Set

The following response to Question No. 3-1 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision as it pertains to distribution planning.

Harrison Potter
Engineer III
Virginia Electric and Power Company

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Mark R. Gill
Consulting Engineer
Virginia Electric and Power Company

Question No. 3-1

Reference the Company's response to Staff Set 1-14, which states that "it is important to note that the Project will serve Dominion Virginia Power load other than the Customer immediately and these proposed facilities may be extended in the future to serve other customers or load." Describe and quantify the "other" Dominion Virginia Power load that will be served by the Project immediately.

Response:

Upon completion of Haymarket Substation, the Company will install an additional 34.5 kV Distribution Circuit ("DC") in Haymarket substation that will feed Company distribution customer's west of Route 15. The new DC will feed 456 customers including Haymarket Village Center and the Novant Health University of Virginia Haymarket Medical Center for a total of approximately 5.5 MVA. These initial plans, described in the Company's response to Question No. 20 of the Coalition's Second Set, are not meant to imply that the Company will not leverage Haymarket substation to serve customer's east of Route 15. Future load growth close to Gainesville substation may require the Company to serve customers near U.S. 29 from Haymarket substation, and Haymarket substation has room for an additional third transformer to support future load growth.

While the new DC will regularly serve all customers west of Route 15, upon operation of the substation, the Company will install two automated loop schemes or restoration schemes that will restore commercial and residential load (over 2,800 customers) currently being served by DC #379 and DC #695 in under two minutes during certain outage scenarios. These schemes will decrease outage duration per unplanned event and provide the Company operational flexibility.

See also the Company's response to Question No. 2-15 of the Coalition's Second Set.

Virginia Electric and Power Company
Case No. PUE-2015-00107
The Coalition to Protect Prince William County
Third Set

The following response to Question No. 3-3 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision as it pertains to distribution planning.



Harrison Potter
Engineer III
Virginia Electric and Power Company

Question No. 3-3

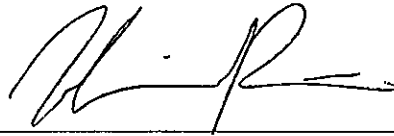
Reference the Company's response to Staff Set 1-14, which states that "[i]t is important to note that the Project will serve Dominion Virginia Power load other than the Customer immediately and these proposed facilities may be extended in the future to serve other customers or load." Is the Project necessary today to serve the "other load" referenced in this response?

Response:

See the Company's response to Question No. 2-16 of the Coalition's Second Set and Sections I.A and I.B of the Appendix.

Virginia Electric and Power Company
Case No. PUE-2015-00107
The Coalition to Protect Prince William County
Third Set

The following response to Question No. 3-4 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision.



Harrison Potter
Engineer III
Virginia Electric and Power Company

Question No. 3-4

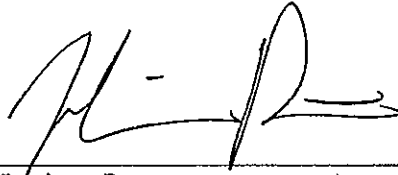
The Company has stated that the initial load for the facility is approximately 80MVA. What percentage of that load is dedicated to the customer?

Response:

See the Company's response to Question No. 3-2 of the Coalition's Third Set.

Virginia Electric and Power Company
Case No. PUE-2015-00107
The Coalition to Protect Prince William County
Third Set

The following response to Question No. 3-5 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision.

A handwritten signature in black ink, appearing to read 'H. Potter', written over a horizontal line.

Harrison Potter
Engineer III
Virginia Electric and Power Company

Question No. 3-5

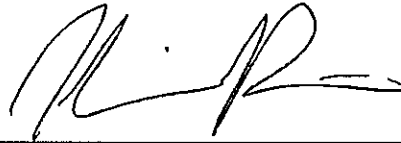
The Company has stated that growth is expected to grow to over “100 MVA by 2019.” Is this anticipated growth attributable to additional demand from the customer? If not, please explain the anticipated source of this additional 20 MVA of demand.

Response:

The Customer’s demand combined with load growth west of Route 15 is forecasted to exceed 100 MVA by 2019. See the Company’s response to Question No. 3-2 of the Coalition’s Third Set.

Virginia Electric and Power Company
Case No. PUE-2015-00107
The Coalition to Protect Prince William County
Third Set

The following response to Question No. 3-6 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision.



Harrison Potter
Engineer III
Virginia Electric and Power Company

Question No. 3-6

The Company has stated that the initial plan is to have two transformers, and then add a third transformer in the future. Will that additional transformer be used to serve the customer as well?

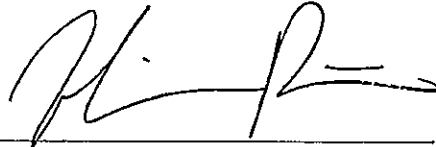
Response:

The third transformer would be installed for a number of reasons:

- (1) New load growth in the Haymarket Load Area requires additional transformer capacity;
- (2) The Company is no longer able to support the contingency loss of either of the Haymarket Substation 84 MVA 230-34.5 kV transformers from off-site bridging circuits; and/or
- (3) Other operational reasons deemed necessary to ensure reliable service for the Haymarket Load Area.

Virginia Electric and Power Company
Case No. PUE-2015-00107
The Coalition to Protect Prince William County
Third Set

The following response to Question No. 3-7 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision.



Harrison Potter
Engineer III
Virginia Electric and Power Company

Question No. 3-7

Reference the distribution line reinforcements to the existing distribution lines along Washington Street in the Town of Haymarket, which terminate at the customer's location. Please explain whether this expansion was undertaken to serve the customer and, if so, whether and how much the customer contributed to the construction costs.

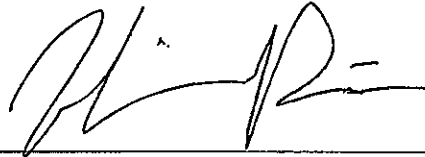
Response:

The distribution line reinforcements were installed to meet the Customer's load requirements prior to the energization of the proposed Haymarket Substation.

See the Company's response to Question No. 14 of the Staff's First Set and Confidential Attachment Staff Set 1-14(2).

Virginia Electric and Power Company
Case No. PUE-2015-00107
The Coalition to Protect Prince William County
Third Set

The following response to Question No. 3-8 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision as it pertains to distribution planning.



Harrison Potter
Engineer III
Virginia Electric and Power Company

The following response to Question No. 3-8 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision as it pertains to transmission planning.

Mark R. Gill
Consulting Engineer
Virginia Electric and Power Company

Question No. 3-8

Reference the Company's response to Coalition Set 2-20, which states that the Haymarket substation will support load growth west of Route 15. Does the Company believe there is the potential for any significant load growth west of Route 15? If so, provide any studies, load forecasts, or other justification to support this position.

Response:


See the Company's response to Question No. 3-1 of the Coalition's Third Set regarding the proposed Haymarket Substation's Load Area on both sides of Route 15.

Virginia Electric and Power Company
Case No. PUE-2015-00107
The Coalition to Protect Prince William County
Third Set

The following response to Question No. 3-8 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision as it pertains to distribution planning.

Harrison Potter
Engineer III
Virginia Electric and Power Company

The following response to Question No. 3-8 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision as it pertains to transmission planning.



Mark R. Gill
Consulting Engineer
Virginia Electric and Power Company

Question No. 3-8

Reference the Company's response to Coalition Set 2-20, which states that the Haymarket substation will support load growth west of Route 15. Does the Company believe there is the potential for any significant load growth west of Route 15? If so, provide any studies, load forecasts, or other justification to support this position.

Response:

See the Company's response to Question No. 3-1 of the Coalition's Third Set regarding the proposed Haymarket Substation's Load Area on both sides of Route 15.

Please see the Company's response to Staff Set 1-5 where it states that the three distribution circuits feeding the Customer's Campus from Gainesville Substation will "remain in place after the Project is constructed" and that "the circuits will be used to serve existing Dominion Virginia Power customer load, future load growth, and reliability support for all customers in the Haymarket Load Area, including the Haymarket data center campus."

The Company is keenly aware of the "significant" load growth that is occurring in the area west of Route 15, as evidenced by the existing data center that is presently ramping-up and the three new data center buildings being proposed that are the subject of the Company's Application in this case. Referencing the Prince William County 2008 Comprehensive Plan, Long Range Land Use Plan Map (the "Map"), published January 1, 2016, it can be seen that land use classification for the parcels being developed for these data centers is "Regional Employment Center" which falls under the "Urban" area designation. According to the Long-Range Land Use section of the aforementioned Comprehensive Plan, "The Urban Areas are either already the most intensely developed portions of Prince William County, or those areas planned for intensive development in the future." Additionally, the land adjacent to the data center parcels and further west of Route 15 (parcels totaling approximately 110 acres) is identified on the Map with a land use classification of "Community Employment Center" which falls under the "Suburban Area" designation, with at least approximately 55 acres zoned as "Planned Business District" which has data centers as one of its by-right uses. Indeed, taking a broader view of the area west of Route 15, both north and south of the Route 55/I-66 corridors, shows that there is already "significant" development with land use classifications of "Residential Planned Community," "Suburban Residential Medium," "Suburban Residential Low," and "Semi-Rural Residential."

In addition to serving any potential load growth in the Haymarket load area, the Company will also gain the ability to use the Haymarket Substation to to serve load east of Route 15 which would effectively "relieve" Gainesville Substation and keep its load from approaching 300 MW as remaining parcels are built-out. This "relief" would be accomplished as described in Section I.B of the Appendix at page 10, where it states that, "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." As load east of Route 15 continues to grow, the Haymarket circuits would be used as described above to balance the loading between the Gainesville and Haymarket Substations.

In addition, NOVEC, the other service provider in this area, may have other needs for increased transmission capacity.

See the Company's response to Question No. 2-10 of the Coalition's Second Set regarding other potential data center locations.

Virginia Electric and Power Company
Case No. PUE-2015-00107
The Coalition to Protect Prince William County
Third Set

The following response to Question No. 3-9 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision.



Mark R. Gill
Consulting Engineer
Virginia Electric and Power Company

The following response to Question No. 3-9 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision.



Harrison Potter
Engineer III
Virginia Electric and Power Company

Question No. 3-9

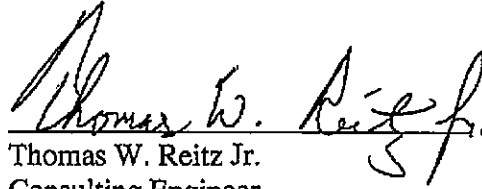
Reference the Company's response to Coalition Set 2-20, which states that the Haymarket substation will support load growth west of Route 15. Is the Company aware that the Prince William County Board of Supervisors has designated the area west of Route 15 as a "Rural Area" where development is limited so as to maintain the rural character of this portion of the County? If so, provide any studies, load forecasts, or other justification to the Company's belief that significant load growth could occur west of Route 15 in Prince William County.

Response:

See the Company's response to Question No. 3-8 of the Coalition's Third Set.

Virginia Electric and Power Company
Case No. PUE-2015-00107
The Coalition to Protect Prince William County
Third Set

The following response to Question No. 3-10 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision.


Thomas W. Reitz Jr.
Consulting Engineer

Dominion Technical Solutions, Inc.

Question No. 3-10

Reference the Company's response to Heritage Set 2-1, which estimates the cost for the Hybrid Alternative Underground Portion to be approximately \$96 million.

- a) Please explain the basis for this estimate, including a description of the materials and labor costs used.
- b) How many miles of buried line does this cost estimate correspond to?
- c) Please provide examples of any other transmission line burial projects of which the Company is aware that support this cost estimate.

Response:

- a. See the cost table provided in the Company's response to Question No. 2-1(a), (c) and (d) of Heritage's Second Set.

The underground transmission estimate includes the construction of two separate 230 kV underground transmission lines. Each line will have a duct bank approximately 4.5 feet wide by 2.5 feet tall. Both will be installed at a minimum depth of 3.5 feet to the top of the duct bank. Spoils are hauled away and replaced with fluidized thermal backfill (FTB™). Each duct bank will contain eight, eight-inch PVC conduits and four, two-inch PVC conduits. Each circuit requires two cables per phase of 3500 kcmil XLPE cable. One circuit contains six power cables. A total of twelve power cables will be installed. Four bonding cables and fiber communication cables are required. Eighteen splice vaults are required. The installation includes multiple road borings under I-66 and Route 15, rock excavation and trench dewatering for both lines.

- b. The cost estimate corresponds to two (2) 230 kV underground circuits each approximately 3.1 miles in length for total distance of approximately 6.2 miles.
- c. The Company used the Pleasant View to Hamilton Line because it was constructed in an open area in combination with the Radnor Heights XLPE project because it was the latest project installed using XLPE cables. Also, the Company reached out to contractors who specialize in underground transmission construction to help prepare this estimate.

Virginia Electric and Power Company
Case No. PUE-2015-00107
The Coalition to Protect Prince William County
Third Set

The following response to Question No. 3-11 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision.



Patrick A. Haworth
Senior Key Account Manager II
Virginia Electric and Power Company

Question No. 3-11

Reference the Company's response to Staff Set 4-39 regarding pre-certification criteria.

- a) Provide the referenced Timmons Group certification report and determination for the Haymarket campus.
- b) Explain the significance of the certification criteria; whether site certification is a requirement for siting a data center; and the consequences of a site failing a certification review.
- c) Explain why the Haymarket campus site failed certification.
- d) Did the Company have any communications with the customer regarding the site's failure of the certification criteria? If so, please describe and provide any correspondence related to such communications.
- e) After the customer chose the location, did the Company explain to the customer that the proposed location was not ideal because it lacked access to infrastructure, such as existing electric facilities? If so, please describe and provide any correspondence related to such communications.

Response:

- a) The Haymarket site was not considered for site certification.
- b) The certification criteria are factors that would be used to evaluate whether a site is suitable for a data center location. The requirements may vary by data center operator, but the factors cover areas such as infrastructure (power, water/sewer, fiber, transportation access), site characteristics (size, ownership, geotechnical considerations, zoning), and risk factors (natural and man-made disasters). Site certification is not a requirement for siting a data center. It is a

Company program designed to identify sites in diverse areas of the Company's service territory that may be suitable for data center operations. It does not attempt to identify every site in the Company's service territory that could be suitable for a data center.

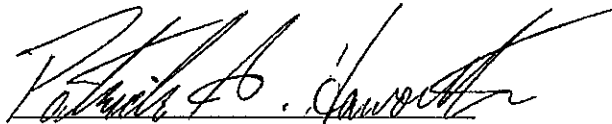
c) The Haymarket site was not considered for certification.

d) No. See also the Company's response to subpart (e) below.

e) Dominion Virginia Power is legally obligated to serve a customer's request for electricity, regardless of proximity to existing electric infrastructure, and with the understanding that every such request carries its own unique complexities. After the Customer selected its site, it provided Dominion Virginia Power with information outlining their electric requirements. Meetings were then held to develop a plan to meet the Customer's request as is done for any other service request.

Virginia Electric and Power Company
Case No. PUE-2015-00107
The Coalition to Protect Prince William County
Third Set

The following response to Question No. 3-12 of the Third Set of Interrogatories and Requests for Production of Documents Propounded by the Coalition to Protect Prince William County received on May 31, 2016 has been prepared under my supervision.



Patrick A. Haworth
Senior Key Account Manager II
Virginia Electric and Power Company

Question No. 3-12

Has the Company had any communications with the customer regarding the cost of the electric facilities? If so, did the Company ever tell the customer that the customer would be responsible only for the expenses related to the distribution assets? Please describe any such conversations and provide any related correspondence.

Response:

The Company has discussed costs with the Customer and has billed the Customer for distribution infrastructure that has been installed or is currently under construction. The Company has not communicated with the Customer that Section XXII of the Company's retail General Terms and Conditions would be applicable to the transmission portion of the Project, whether overhead or underground.

The Customer has been made aware of the recommendations set forth in the Commission Staff Report.