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**WALSH COLUCCI
LUBELEY & WALSH PC**

May 10, 2016

Via Electronic Filing

Joel H. Peck, Clerk
Document Control
State Corporation Commission
1300 E. Main St., Tyler Bldg., 1st Fl.
Richmond, Virginia 23219

Re: Case NO. PUE-2015-00107

**Application of Virginia Electric and Power Company
For approval and certification of electric transmission facilities:
Haymarket 230 kV Double Circuit Transmission Line and
230-34.5 kV Haymarket Substation**

Dear Mr. Peck:

Enclosed please find the Witness Testimony of Arthur Fuccillo filed on behalf of Southview 66, LLC, which has been filed and served electronically.

Please do not hesitate to call me if you have any questions or comments.

Thank you very much for your assistance.

Very truly yours,

WALSH, COLUCCI, LUBELEY & WALSH, P.C.

Michael J. Coughlin

Enclosures

Cc: Certificate of Service

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CASE NO. PUE-2015-00107
SUMMARY OF TESTIMONY OF
ARTHUR N. FUCCILLO ON BEHALF OF
SOUTHVIEW 66, LLC

The purpose of my testimony is to present the effects of the various routes proposed by Dominion Virginia Power on property owned by Southview 66, LLC as well as Southview 66, LLC's position on the various routes.

- The Railroad, Carver and Madison Alternatives would negatively impact the commercial development potential, and possible residential development of the property owned by Southview 66, LLC.
- If the I-66 Hybrid Alternative would significantly impair the development concept plans for the Southview 66, LLC property.
- The Proposed Route would have a negative impact to other property owners and the need is being created by one user which does not justify construction.

Southview 66, LLC asks that the Hearing Examiner's report recommend denial of all routes, and it requests that the Commission follow such a recommendation.

WITNESS TESTIMONY
OF
ARTHUR N. FUCCILLO
ON BEHALF OF
SOUTHVIEW 66, LLC
BEFORE THE
STATE CORPORATION COMMISSION OF VIRGINIA
CASE NO. PUE-2015-00107

1 Q. Mr. Fuccillo, please state your full name and your position with Southview 66, LLC
2 (“Southview 66”).

3 A. My name is Arthur Fuccillo, and I am the Executive Vice President of Lerner Enterprises.
4 Lerner Enterprises is the owner and sole member of Southview 66, and I am the
5 authorized representative of Southview 66 in this case.

6 Q. What property does Southview 66 own that is impacted by certain routes proposed by
7 Dominion in this matter?

8 A. Southview 66 is the owner of approximately 110 acres consisting of two properties (the
9 “Property”) located in the southwest quadrant of the Interstate 66/Route 29 interchange in
10 the Gainesville Magisterial District of Prince William County (the “County”). The
11 Property is more particularly identified as GPIN 7397-65-0196, with a mailing address of
12 14300 John Marshall Highway (“Parcel One”), and GPIN 7397-75-7977, with a mailing
13 address of 13714 Daves Store Lane (“Parcel Two”), both in Gainesville, Virginia 20155.
14 Attached as **Exhibit 1** is an aerial depicting the Property and identifying Parcel One and
15 Parcel Two.

16 Q. Which routes impact the Property?

17 A. The I-66 Hybrid Alternative would run along the Property’s northern property line along
18 the I-66 frontage, and the proposed switching station would consume most of Parcel

Two. The Railroad Alternative, Carver Alternative and the Madison Alternative also impact Parcel Two.

Q. Does Southview 66 object to any of the routes?

A. Yes, Southview 66 objects to the Railroad, Carver and Madison Alternatives. Having overhead power lines on or along the border of the Property will negatively impact the viability of the Property for the type of high density commercial development envisioned by the Comprehensive Plan for the land.

Q. What is Southview 66's position on the I-66 Hybrid Alternative?

A. Southview 66 would prefer that its Property not be impacted at all by the project, and believes that a transmission line designed to serve one user and property owner is not an appropriate reason for Southview 66 and the County to suffer a loss of economic value at given the Property's premier location as a gateway into the Gainesville market.

Q. What are the development plans for the Property?

A. The Property is designated on the Prince William County Comprehensive Plan as Regional Commercial Center (RCC), and the Comprehensive Plan contemplates high density commercial development on the Property of over one million square feet. The Property represents one of the last large tracts of land available for development in the area of the I-66/Route 29 interchange. Lerner Enterprises has been very patient with its development plans for the Property since the last zoning approval in 1997.

However, shortly before the announcement of this Dominion transmission line project, Lerner Enterprises retained Urban Engineering and Polleo Group to assist in the creation of development concepts. We have been in discussions with major retail partners and one development option includes an outdoor outlet mall concept. Lerner Enterprises is

also contemplating a mix of uses including retail and residential to balance the traffic impact of solely a commercial development on the property. The possibility of residential development on the site is another reason Southview 66 and Lerner Enterprises prefer the denial of the overhead Railroad, Carver and Madison Alternatives.

Attached as **Exhibit 2** is one of the concept plans, which depicts a hotel in the area of the switching station proposed with the I-66 Hybrid Alternative and buildings within the area of the proposed underground lines. This exhibit also overlays the routes that impact the Property on the concept plan.

Q. How would the Railroad, Carver and Madison Alternatives impact this development concept?

A. These routes would impair the visibility into the Property from Route 29 and the ramps associated with the I-66/Route 29 interchange. Additionally, they would likely eliminate the possibility of constructing a hotel on Parcel 2.

Q. How would the I-66 Hybrid Alternative impact this development concept?

A. It would not only eliminate the hotel site, but also all of the retail spaces planned along I-66. There would be a significant loss of building area that could not be replaced elsewhere on the Property.

Q. What is Southview 66's position on Dominion's Proposed Route?

A. Although this route avoids any impact on the Southview 66 Property and consequently would help our site, we are hesitant to state that we support it because we recognize that it has an impact to other property owners whose development rights we support.

63 Q. What relief is Southview 66 requesting in this case?

64 A. Southview 66 requests that the Hearing Examiner recommend disapproval of all routes as
65 there is no need for the proposed transmission line, and we request that the Commission
66 follow the Hearing Examiner's recommendation. The need is being created by one user,
67 and one user alone cannot justify the construction of 230 kV transmission lines through
68 an area where such transmission lines are in direct conflict with existing and planned
69 uses.

CERTIFICATE OF SERVICE

I hereby certify that on May 10, 2016, I e-filed the foregoing with the State Corporation Commission and a true and accurate copy of the foregoing was e-mailed to the following:

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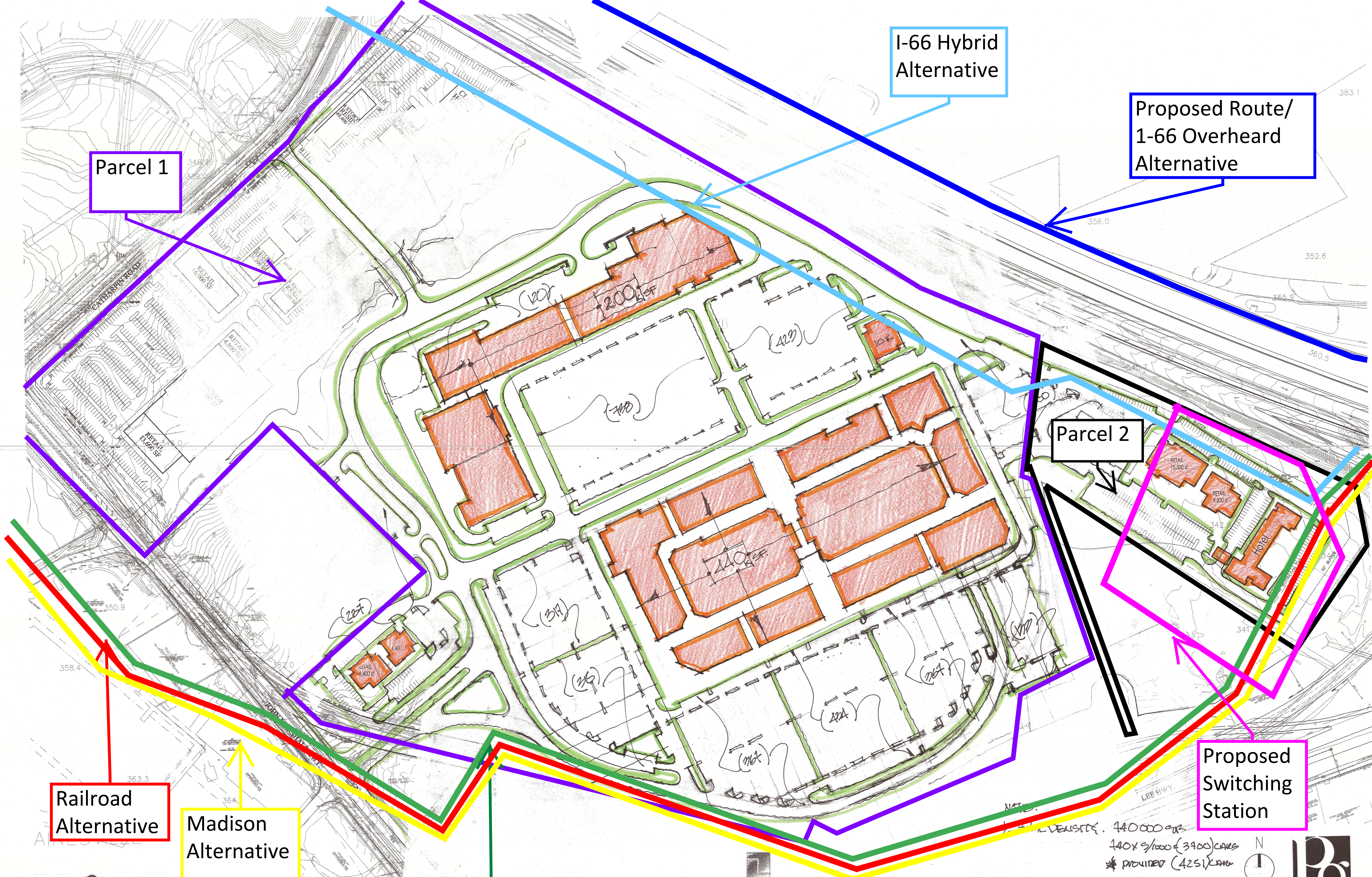


Counsel

Parcel 1 - PWC GPIN 7397-65-0196, 14300 John Marshall Highway, Gainesville, Virginia 20155

Parcel 2 - PWC GPIN 7397-75-7977, 13714 Daves Store Lane, Gainesville, Virginia 20155





Railroad
Alternative

Madison
Alternative

Carver
Alternative

I-66 Hybrid
Alternative

Proposed Route/
1-66 Overheard
Alternative

Parcel 2

Proposed
Switching
Station

*The Grove
at Gainesville*
Gainesville, Virginia

LERNER ENTERPRISES

CONCEPT - SITE PLAN
1" = 100'-0"



Southview 66, LLC
Arthur Fuccillo
Exhibit 2