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August 21, 2017

Mr. Joel H. Peck, Clerk State Corporation Commission Document Control Center 1300 East Main Street Richmond, Virginia 23219

RE: 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 <u>SCC Case No. PUE-2015-00107</u>

Dear Mr. Peck:

Please file the enclosed Motion for Expedited Consideration and Extension of Time submitted by the Coalition to Protect Prince William County.

Sincerely,

. haron E. Pandak

Enclosure: as stated

cc: Wendy A. Alexander, Esq. Lisa S. Booth, Esq.
C. Meade Browder, Jr., Esq. Kristen Buck, Esq.
Michael J. Coughlin, Esq. Lisa R. Crabtree, Esq.
David J. DePippo, Esq.
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Todd A. Sinkins, Esq.

## COMMONWEALTH OF VIRGINIA

## STATE CORPORATION COMMISSION

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#### APPLICATION OF

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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 Case No. PUE-2015-00107

## **MOTION FOR EXPEDITED CONSIDERATION AND EXTENSION OF TIME**

COMES NOW, the Coalition to Protect Prince William County (the "Coalition"), by counsel, and in accordance with the provisions of 5 VAC 5-20-230, respectfully presents this Motion for Expedited Consideration and Extension of Time to Reply to Virginia Electric and Power Company's ("Dominion" or "Company") Response to Petitions for Rehearing or Reconsideration ("Response"). The Coalition requests the State Corporation Commission ("Commission") extend its current Reply deadline from September 8, 2017, by 60 days, to November 7, 2017. This request is needed to allow the Coalition time for further discussion with a potential expert who is providing input on new issues raised in Dominion's Response. In support of this Motion, the Coalition states as follows:

1. On July 12, 2017, the Coalition filed its Motion for Rehearing or Reconsideration on the grounds that Dominion's customer admitted that its block load electric services requirement does not currently exist and may not exist in the future. The Coalition also raised grounds regarding the taking of private property when the need for the transmission line is driven by a single retail customer. 2. On August 16, 2017, Dominion filed its Response to the Coalition's Motion for Rehearing or Reconsideration. The Company's Response included new information attempting to rebut the Coalition's position that there is not and may not be any additional load requirements.

3. In particular, Dominion introduced the affidavit of Harrison S. Potter, an engineer employed by Dominion, stating that the current circuits are near capacity and that new facilities and equipment are necessary. It is this new information the Coalition seeks to rebut, and can only do so with expert assistance.

4. In light of the new information raised by Dominion's Response, which the Coalition asserts is incorrect, a need has arisen for the Coalition to obtain expert advice and opinions to rebut the Company's contentions. In order to address this need, the Coalition has approached a potential expert knowledgeable on the issues raised in Dominion's Response.

5. Under 5 VAC 5-20-230, the Commission is authorized to grant, in its discretion, an extension of time for filing a document.

6. The potential expert has indicated he will provide input to the Coalition on specific contentions and issues raised in Mr. Potter's affidavit, specifically the percentage of use of the existing circuits servicing the area.

7. Unfortunately, the Coalition's potential expert has a scheduling conflict and will be unavailable to assist for at least 10 days. This unavailability prevents the Coalition from adequately formulating a Reply to the new issues raised in Dominion's Response.

8. Accordingly, good cause has been shown by the Coalition for the granting of an extension of the deadline for filing its Reply to Dominion's Response.

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9. Expedited consideration of this Motion is warranted because, without an extension, the Coalition's Reply will be due on September 8, 2017.

WHEREFORE, the Coalition respectfully requests that the Commission issue an expedited ruling that extends the Coalition's Reply deadline from September 8, 2017 to November 7, 2017, and all other and further relief as appropriate.

Respectfully submitted,

THE COALITION TO PROTECT PRINCE WILLIAM COUNTY

By Counsel:

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Counsel for The Coalition to Protect Prince William County

# **CERTIFICATE OF SERVICE**

I hereby certify that on this  $21^{\text{gf}}$  day of August 2017, a true and accurate copy of the foregoing filed in Case No. PUE-2015-00107 was mailed first class, postage pre-paid, to the following:

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