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**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 Denar Antelo filed on behalf of FST Properties, L.L.C., 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  
DENAR ANTELO ON BEHALF OF  
FST PROPERTIES, L.L.C.

The purpose of my testimony is to present the effects of the various routes proposed by Dominion Virginia Power on property owned by FST Properties, L.L.C. as well as the feasibility of the FST Route Variation proposed by FST Properties, L.L.C.

- The Proposed Route and the I-66 Hybrid Alternative would negatively impact the commercial development potential of the property owned by FST Properties, L.L.C.
- The FST Route Variation can avoid impacting the property owned by FST Properties, L.L.C., and is just as feasible as the Proposed Route and the I-66 Hybrid Alternative from a civil engineering and land development standpoint.

WITNESS TESTIMONY  
OF  
DENAR ANTELO, P.E.  
ON BEHALF OF  
FST PROPERTIES, L.L.C.  
BEFORE THE  
STATE CORPORATION COMMISSION OF VIRGINIA  
CASE NO. PUE-2015-00107

1 Q. What is your name, what licenses do you hold, and where do you work?

2 A. My name is Denar Antelo, and I am a professional engineer licensed in the  
3 Commonwealth of Virginia. I am the Director of Engineering at The Engineering  
4 Groupe Inc., a full-service civil engineering firm located in Woodbridge, Virginia.

5 Q. How long have you held your engineering license and what type of projects do you work  
6 on?

7 A. I have been licensed as a professional engineer in Virginia since 2004. I work primarily  
8 on land development projects in Prince William County, and the land planning and  
9 ancillary projects that arise from the development of land.

10 Q. Why were you engaged by FST Properties, L.L.C. ("FST") and its attorneys in this  
11 transmission line case?

12 A. I was asked to perform a study of the impact of the Proposed Route on the development  
13 potential for the property owned by FST, which is identified as Prince William County  
14 GPIN 7298-51-5890, which has a physical address of 15405 John Marshall Highway,  
15 Haymarket, VA 20169-2706 (the "FST Property" or the "Property").

16 Q. How did you undertake that study?

17 A. First, I reviewed the existing zoning of the FST Property and the Prince William County  
18 Zoning Ordinance, and developed a "pre-take", or pre-easement layout of the site. The  
19 Property is zoned M-2, so it can have a variety of uses, but in order to compare the "pre-

take” potential of the site to the “post-take” potential, we made some assumptions that we applied to both scenarios. We assumed that the Property would remain zoned M-2, which may not be the case, we assumed the existing 9,600 s.f. building remained, and we assumed that the remaining buildings would be four story office buildings.

Attached to my testimony as **Exhibit 1** is the “pre-take” layout of the FST Property I developed.

It is my opinion that prior to the imposition of a 100-foot easement on the Property, and illustrated as Exhibit 1, FST could construct and provide adequate parking for approximately 82,000 s.f. of additional development. FST may need to provide stormwater management on-site, and in order to preserve this density some facilities may need to be underground, but there is nothing extraordinary about this Property that would frustrate its development potential. The floor-to-area ratio (FAR) permitted in the M-2 district is 0.50 and this development would achieve a FAR of 0.49.

Second, I applied these same assumptions to a potential layout of the Property—M-2 zoning, existing building remains—but then added in the 100-foot wide easement that would be imposed if the Proposed Route is approved as currently contemplated.

Attached as **Exhibit 2** is the “post-take” layout of the FST Property which imposes the 100-foot easement on the Property.

Q. What is your opinion of the impact of the Proposed Route on the FST Property?

A. It is my opinion that the Proposed Route will have a significant impact on the Property’s development potential for several reasons. First, the 100-foot wide easement associated with the Proposed Route will reduce the development envelope for the Property, and certainly the location of any buildings. Also, it is worth pointing out that a 4 story office

43 building is a fairly tall building for western Prince William County, but even if you  
44 reduced the height of all of the buildings before and after the easement to one story, the  
45 result would be the same—you would have less land available for the construction of a  
46 building. After the easement is imposed, the total building area is 49,600 s.f. and the  
47 FAR is reduced to 0.26. Given the size of the easement and its location along the  
48 frontage, it is my opinion that the easement reduces the development potential, in terms  
49 of building area, of the Property in half.

50 Second, in my opinion and based on my experience with other developers and end users,  
51 the Property is less attractive for many users because any building must be set back at  
52 least 100 feet from the Property's Route 55 frontage. Retail users, some office users,  
53 some flex users and some industrial users prefer to be visible from major roads—  
54 visibility is a form of advertising; those types of users may not be interested in this site  
55 with the easement present.

56 Third, it is also my opinion that retail users will not be interested in this Property if  
57 overhead transmission lines are constructed along the Property's frontage. This is not  
58 only because of the lack of visibility from Route 55, but also because of the presence of  
59 the lines on the Property and the visual impact to the site.

60 Q. Would the I-66 Hybrid Alternative also have an impact on the development options for  
61 the Property?

62 A. Yes, but to a lesser extent. We did not create layouts depicting the impact of this route  
63 because we were most concerned with the impact of the Proposed Route and also wanted  
64 to demonstrate that an alternative route could be developed.

65 Q. Did you assist in preparing the FST Route Variation that accompanied the Motion FST  
66 filed requesting consideration of a variation of the Proposed Route and the I-66 Hybrid  
67 Alternative?

68 A. Yes, the exhibit that accompanied that Motion, which is attached here as **Exhibit 3**, was  
69 created under my supervision.

70 Q. What steps did you take to develop the FST Route Variation?

71 A. First I looked at aerial imagery and it struck me that the FST Property could be avoided  
72 by placing the transmission lines on property operated as an existing data center, the  
73 COPT DC-11, LLC property, and on property owned by what we understand to be an  
74 affiliate of Amazon, VADATA, Inc. But I wanted to make sure that there were no  
75 obstacles to the placement of the transmission lines on the properties to the east and south  
76 of the FST Property. I visited the FST Property and I viewed the FST Route Variation  
77 location from the FST Property and the adjacent roadways. I saw no obvious  
78 environmental features or topographic challenges that would impede the placement of  
79 poles at the necessary intervals to accommodate the FST Route Variation, nor did I  
80 observe any features that would impede the use of the FST Route Variation for the I-66  
81 Hybrid Alternative.

82 Q. Have you come to any conclusions regarding the FST Route Variation?

83 A. Yes. It is my opinion that the FST Route Variation is just as feasible as the Proposed  
84 Route and the I-66 Hybrid Route from a civil engineering and land development  
85 standpoint, with a caveat being that I did not investigate the condition of the soil in this  
86 area. However, Dominion could easily take soil samples to determine whether it would

87 have to undertake any extraordinary measures to install poles within the FST Route  
88 Variation. I understand that there may be additional costs because of the type of pole  
89 structures that would be required for the FST Route Variation, and I note that there are  
90 angled pole structures in other locations within Prince William County.

### **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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