

Virginia State Corporation Commission eFiling CASE Document Cover Sheet

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Case Number (if already assigned)	PUE-2015-00107
Case Name (if known)	Application of Virginia Electric and Power Company For approval and certification of electric transmission Facilities: Haymarket 230K Double Circuit Transmission Line and 230-34.5 KV Haymarket Substation
Document Type	REPY
Document Description Summary	Somerset Crossing Reply to Motion for Expedited Consideration and Extension of Time and Motion for Extension of Time
Total Number of Pages	4
Submission ID	13327
eFiling Date Stamp	8/30/2017 12:25:57PM

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COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

APPLICATION OF

VIRGINIA ELECTRIC AND POWER COMPANY

CASE NO. PUE-2015-00107

For approval and certification of electric transmission
Facilities: Haymarket 230 kV Double Circuit
Transmission Line and 230-34.5 kV Haymarket Substation

**SOMERSET CROSSING HOMEOWNERS ASSOCIATION'S
REPLY TO MOTION FOR EXPEDITED CONSIDERATION AND EXTENSION OF TIME
AND MOTION FOR EXTENSION OF TIME**

COMES NOW, Somerset Crossing Homeowners Association ("Somerset" or "Association"), by counsel, and presents the following Reply in response the Coalition to Protect Prince William County's ("Coalition") "Motion" dated August 23, 2017.

The Coalition filed its Motion to allow for an extension of time from September 8, 2017 to November 7, 2017 for it to file a Reply to Virginia Electric and Power Company's ("Dominion") Response to Petitions for Rehearing or Reconsideration ("Dominion"). The Coalition's Motion was based on a need for it to have further discussions with a potential expert to allow it to adequately address new issues raised by Dominion in its Response. Moreover, Somerset also respectfully requests that the State Corporation Commission grant Somerset an extension of time until November 7, 2017 for it to file its Reply to Virginia Electric and Power Company's ("Dominion") Response to Petitions for Rehearing or Reconsideration. In support of its position, Somerset sets forth the following:

1. Somerset supports the Coalition's Motion and adopts the arguments set forth in numbered paragraphs 1-9 of the Coalition's Motion.

2. On July 13, 2017, Somerset filed its Motion for Rehearing or Reconsideration on the grounds that evidence before the commission failed to establish that the Carver Road Route will have: (1) less impact on local residences or achieve cost savings relative to other routes; or, (2) minimize adverse impact on the scenic assets, historic districts and environment of the area affected by the Carver Road Route. Somerset also challenged whether the evidence supported a finding of need when the purported need for the transmission line is driven by a single retail customer. Somerset also challenged the authority of the Commonwealth to take private property when the need for the transmission line is driven by a single retail customer.

3. On August 16, 2017, Dominion filed its Response to the Coalition's Motion for Rehearing or Reconsideration. Dominion's Response included new information attempting to rebut the Somerset's position that the evidence before the Commission failed to establish that there is and shall not be any additional load requirements.

4. 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 evidence that Somerset needs to review and rebut, which may require it to consult with an expert.

5. In light of the new information raised by Dominion's Response, which it failed to present during the evidentiary portion of this case when Mr. Potter's testimony was subject to cross-examination and which Somerset asserts is not supported by any other evidence, Somerset is compelled to consider whether it needs to obtain expert advice and opinions to rebut the Company's contentions. In order to address this need, Somerset is exploring possible experts who may have knowledge of the issues raised in Dominion's Response.

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

7. Accordingly, good cause has been shown by Somerset for the granting of an extension of

the deadline for filing its Reply to Dominion's Response.

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

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

Respectfully Submitted,

Somerset Crossing Homeowners Association, Inc.
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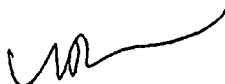
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