

Telephone Number (804) 371-9671 Facsimile Number (804) 371-9240 Facsimile Number (804) 371-9549

## STATE CORPORATION COMMISSION

December 19, 2017

David J. DePippo, Esquire Dominion Energy Services, Inc. 120 Tredegar Street Richmond, Virginia 23219

> Application of Virginia Electric and Power Company, For approval and RE: certification of electric transmission facilities: Haymarket 230 kV Double Circuit Transmission Line and 230-34.5 kV Haymarket Substation, Case No. PUE-2015-00107

Dear Mr. DePippo:

P.O. Box 1197

Richmond, Virginia 23218-1197

Enclosed please find "Interrogatories and Requests for Production of Documents by the Staff of the State Corporation Commission (Sixth Set)." Please provide the response to these interrogatories within seven (7) business days of their receipt. If you have any questions about the interrogatories, please contact me at (804) 371-9671.

Thank you for your prompt assistance.

Sincerely,

Margel

Andrea B. Macgill Associate General Counsel

ABM:jpr Enclosure

cc: Document Control Center

### COMMONWEALTH OF VIRGINIA

## BEFORE THE

## 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

# INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS BY THE STAFF OF THE STATE CORPORATION COMMISSION (SIXTH SET)

Pursuant to Rule 260 of the Commission's Rules of Practice and Procedure, 5 VAC 5-20-260, and Ordering Paragraph (16) of the Commission's Order for Notice and Hearing dated December 11, 2015, the Staff of the State Corporation Commission ("Staff") requests that Virginia Electric and Power Company ("Dominion Virginia Power" or "Company") answer the interrogatories and produce the documents as indicated below within seven (7) business days of receipt of these interrogatories.

### INSTRUCTIONS AND DEFINITIONS

(1) These requests should be regarded by you as continuing. Please provide updated responses as any additional information becomes available.

(2) If you assert that any document related to any matter addressed in any question in the attached interrogatories and requests for production of documents has been destroyed and thus is not available, please state the following: Identify by full name, official title, and address(es), any person involved in ordering the destruction of the document; when the document was destroyed; why the document was destroyed; and provide all documents relating to the order or act of such destruction or other reason for non-availability. If you assert that the destruction occurred pursuant to a document destruction program, please identify and produce a copy of the guideline, policy, or manual describing the document destruction program and

provide and identify copies of any document, or identify any communication relating to the document that you are not providing.

(3) In responding to each question in the attached interrogatories and requests for production of documents, please provide information available from all corporate and individual files of the Company, as well as from all past and present board members, officers, and management level employees of the Company.

(4) In the Company's response to any of the questions contained in the attached interrogatories and requests for production of documents that requires any calculations, analysis, assumptions or studies, please provide and identify copies of such calculations, analysis, assumptions or studies.

(5) In responding to any of the questions in the attached interrogatories and requests for production of documents, please provide the name and title of the corporate officer who has the responsibility for the subject matter addressed therein.

(6) With respect to any document or information related to any matter addressed in any question in the attached interrogatories and requests for document production, if the document is not in your possession, but you know or believe that it exists, you are requested to identify and indicate to the best of your ability the present or last known location of the document and its custodian.

(7) For each response made to Staff interrogatories or document requests, please identify by name the person making the response, pursuant to 5 VAC 5-20-260.

(8) The Company is requested to provide one copy of its responses to these interrogatories and requests to each of the following:

William H. Chambliss
 Alisson P. Klaiber
 Andrea B. Macgill
 Office of General Counsel
 State Corporation Commission
 P.O. Box 1197
 Richmond, Virginia 23218

 Neil P. Joshipura Division of Public Utility Regulation State Corporation Commission P.O. Box 1197 Richmond, Virginia 23218

(9) "Describe" when referring to an act, occurrence, transaction, statement, standard, request, conduct, communication, instance or aspect of any event (hereafter "act"), is defined to require that you set forth a description of the substance of the event or events constituting such act, the persons having knowledge of such act and all documents referring or relating to such act.

(10) "Document" is defined to include any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, microfiche, pictures, data processing cards or discs, computer tapes and other computergenerated and stored information or data base, work papers, calendars, minutes of meetings or any other writings or graphic matter, including (a) copies containing marginal notes; (b) all notations affixed with paper clips, staples, post-it notes, etc., or placed in such proximity to the requested documents for the purpose of conveying a relationship to such documents; or (c) variations of any of the foregoing, now or previously in your possession.

(11) When used with respect to information, "identify" means to state the information requested.

(12) For each document or other requested information asserted to be privileged or otherwise excludable from discovery, identify the document or information and the basis, citing legal authority, for such claim of privilege or other ground for exclusion.

(13) Whenever the Company is requested to give specific information, such as a date or a figure, and the Company cannot give the exact information, the Company must provide its best estimate thereof.

## INTERROGATORIES AND DOCUMENT REQUESTS

(44) A total of four data center buildings have been discussed throughout the proceeding — an existing, operational data center building (Building 0) located adjacent to the Haymarket Campus, and three proposed data center buildings within the Haymarket Campus (Buildings 1, 2, and 3). According to the Company's Response to Petitions for Rehearing or Reconsideration, dated August 16, 2017, Building 1 has been constructed and is now operational. For Buildings 0 and 1, please provide the following information:

- (a) The projected loads, in terms of megavolt-amperes ("MVA"), when fully operational, and the anticipated dates of maximum operation.
- (b) The current MVA loading and ramp schedule for each building.

(45) For any unconstructed buildings on the Haymarket Campus, please provide the

following information:

- (a) The permitting status for each building, for all necessary federal, state and local permits.
- (b) The construction status for each building, including the anticipated completion date for each building.
- (c) The projected load, in terms of MVA, for each building when fully operational, including an updated load ramp schedule for each building.
- (d) Copies of all communication between the Company and VADATA, Inc., including legal counsel or other agents or representatives of VADATA, Inc., related to electric service to the Haymarket Campus, including, but not limited to, the projected need dates for each building, dated on and after June 22, 2016.
- (46) Please provide an updated in-service date for the proposed Project, taking into

account delays in permitting and construction.

(47) Please provide an update and current status of any anticipated new loads within the Haymarket load area, including, but not limited to, the Home Depot and Carter's Mill residential development mentioned by Company witness Potter in the Company's Response to Petitions for Rehearing or Reconsideration, dated August 16, 2017. Specifically, provide the load projections, in terms of MVA, and expected schedule for energization of each load.

(48) Please provide an update of the Northern Virginia Electric Cooperative's interest in co-locating a delivery point within the proposed Haymarket Substation. Please provide the status of any plans by any entity other than the Company to locate a delivery point within or near the proposed Haymarket Substation.

(49) According to the Application, there are three 34.5 kV distribution circuits ("DC") serving the Haymarket load area: DC#378, DC#379, and DC#695. Attachment I.B.2 to the Appendix of the Application shows the historical and projected loads for these three 34.5 kV DCs. Provide separate, updated tables that incorporate any anticipated new loads (*e.g.*, Carter's Mill) on these three circuits, and identify when each circuit is projected to experience an overload condition for the following two scenarios:

- (a) Buildings 2 and 3 are never placed into service;
- (b) Buildings 2 and 3 are placed into service by the Company's updated in-service date.

(50) Please describe the feasibility of uprating the existing DC#379 currently rated at 36 MVA to match the 54 MVA capacity of DC#378. Provide the advantages and disadvantages of using this uprated circuit to serve the Haymarket load area, including the existing operational data center buildings (Buildings 0 and 1) and any new, projected non-data center loads only (*i.e.*, excluding Buildings 2 and 3).

(51) Please describe the feasibility of adding an additional distribution circuit to the Haymarket load area from the Gainesville Substation to serve as an alternate feed to the currently operational data center buildings. Include the cost, reliability, constructability, and

environmental impacts of this alternative. If this additional distribution circuit is feasible, would that allow the Company to operate a "switch-before-restore" method for the currently operational data center buildings?

(52) Please provide a description of all routes and variations the Company deems constructible. For each route the Company considers constructible, provide a map of the route along with the proposed variations (*e.g.*, I-66 Overhead route with the updated Jordan Lane and FST Optimization route variations).

(53) Please provide any correspondence between the Company and Prince William County related to the Walmart Variation.

Respectfully submitted,

THE STAFF OF THE STATE CORPORATION COMMISSION

Margel By Under Counsel

William H. Chambliss, General Counsel
Alisson P. Klaiber, Associate General Counsel
Andrea B. Macgill, Associate General Counsel
e-mail: <u>William.Chambliss@scc.virginia.gov</u> <u>Alisson.Klaiber@scc.virginia.gov</u> <u>Andrea.Macgill@scc.virginia.gov</u>
Office of General Counsel
State Corporation Commission
P.O. Box 1197
Richmond, Virginia 23218
Telephone: (804) 371-9671
Telefax: (804) 371-9240

Dated: December 19, 2017

### CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of December, 2017, a true copy of the foregoing "Interrogatories and Requests for the Production of Documents by the Staff of the State Corporation Commission (Sixth Set)" was electronically mailed and mailed, postage prepaid, to: David J. DePippo, Esquire, Dominion Energy Services, Inc., 120 Tredegar Street, Richmond, Virginia 23219; Vishwa B. Link, Esquire, and Lisa R. Crabtree, Esquire, McGuireWoods LLP, Gateway Plaza, 800 E. Canal Street, Richmond, Virginia 23219; James T. Bacon, Esquire, Allred, Bacon, Halfhill & Young, P.C., 11350 Random Hill Road, Suite 700, Fairfax, Virginia 22030; Todd A. Sinkins, Esquire, Kristen Buck, Esquire, and Courtney B. Harden, Esquire, Rees Broome, PC, 1900 Gallows Road, Suite 700, Tysons Corner, Virginia 22182; John A. Pirko, Esquire, LeClairRyan, 4201 Dominion Boulevard, Suite 200, Glen Allen, Virginia 23060; Sharon E. Pandak, Esquire, and Zachary C. Packard, Esquire, Greehan Taves & Pandak PLLC, 4004 Genesee Place, Suite 201, Woodbridge, Virginia 22192; and C. Meade Browder, Jr., Senior Assistant Attorney General, Division of Consumer Counsel, Office of the Attorney General, 202 N. 9th Street, 8th Floor, Richmond, Virginia 23219-3424.

Under Straggle