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November 14, 2023

**BY ELECTRONIC FILING**

Hon. Bernard J. Logan, Clerk  
State Corporation Commission  
Tyler Building, 1st Floor  
1300 East Main Street  
Richmond, VA 23219

**Re: Application of Virginia Electric and Power Company for Approval and Certification of Electric Transmission Facilities: Suffolk – Structure #246/94 230 kV Transmission Line #246 Virginia Rebuild Project – Case No. PUR-2023-00203.**

Dear Mr. Logan:

Please find enclosed for electronic filing in the above-captioned proceeding the application for approval of electric facilities on behalf of Virginia Electric and Power Company (the “Company”). This filing contains the Application, Appendix, Direct Testimony, and DEQ Supplement, including attachments.

As indicated in Section II.A.12.b of the Appendix, an electronic copy of the Virginia Department of Transportation “General Highway Map” for the City of Suffolk, as well as the digital geographic information system (“GIS”) map required by Va. Code § 56-46.1, which is Attachment II.A.2 to the Appendix, were provided via an e-room to the Commission’s Division of Public Utility Regulation.

If you have any questions or need further information, please feel free to contact us.

Sincerely,

Andrew J. Flavin



Timothy L. McHugh



Enclosures

cc: William H. Chambliss, Esq.  
Mr. David Essah (without enclosures)  
Mr. Neil Joshipura (without enclosures)  
Mr. Michael A. Cizenski (without enclosures)  
David J. DePippo, Esq.  
Annie C. Larson, Esq.  
Viktoriia De Las Casas, Esq.  
William H. Smith, Esq.  
John B. Sample, Esq.



**Dominion  
Energy®**

Application, Appendix,  
DEQ Supplement, Direct  
Testimony and Exhibits of  
Virginia Electric and Power  
Company

Before the State Corporation  
Commission of Virginia

Suffolk – Structure #246/94 230  
kV Transmission Line #246  
Virginia Rebuild Project

Application No. 329

Case No. PUR-2023-00203

Filed: November 14, 2023

Volume 1 of 2



COMMONWEALTH OF VIRGINIA  
BEFORE THE  
STATE CORPORATION COMMISSION

APPLICATION OF  
VIRGINIA ELECTRIC AND POWER COMPANY  
FOR APPROVAL AND CERTIFICATION  
OF ELECTRIC TRANSMISSION FACILITIES

Suffolk – Structure #246/94 230 kV Transmission Line #246  
Virginia Rebuild Project

Application No. 329

Case No. PUR-2023-00203

Filed: November 14, 2023

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

APPLICATION OF	)	
	)	
VIRGINIA ELECTRIC AND POWER	)	Case No. PUR-2023-00203
COMPANY	)	
	)	
For approval and certification of electric	)	
transmission facilities: Suffolk – Structure	)	
#246/94 230 kV Transmission Line #246	)	
Virginia Rebuild Project	)	

**APPLICATION OF VIRGINIA ELECTRIC AND POWER COMPANY  
FOR APPROVAL AND CERTIFICATION OF  
ELECTRIC TRANSMISSION FACILITIES:  
SUFFOLK – STRUCTURE #246/94 230 KV TRANSMISSION LINE #246  
VIRGINIA REBUILD PROJECT**

Pursuant to § 56-46.1 of the Code of Virginia (“Va. Code”) and the Utility Facilities Act, Va. Code §§ 56-265.1 *et seq.*, Virginia Electric and Power Company (“Dominion Energy Virginia” or the “Company”), by counsel, files with the State Corporation Commission of Virginia (the “Commission”) this application for approval and certification of electric transmission facilities (the “Application”). In support of its Application, Dominion Energy Virginia respectfully shows as follows:

1. Dominion Energy Virginia is a public service corporation organized under the laws of the Commonwealth of Virginia furnishing electric service to the public within its Virginia service territory. The Company also furnishes electric service to the public in portions of North Carolina. Dominion Energy Virginia's electric system—consisting of facilities for the generation, transmission, and distribution of electric energy—is interconnected with the electric systems of neighboring utilities and is a part of the interconnected network of electric systems serving the

continental United States. By reason of its operation in two states and its interconnections with other utilities, the Company is engaged in interstate commerce.

2. In order to perform its legal duty to furnish adequate and reliable electric service, Dominion Energy Virginia must, from time to time, replace existing transmission facilities or construct new transmission facilities in its system.

3. In this Application, in order to maintain the structural integrity and reliability of its transmission systems in compliance with the Company's mandatory electric transmission planning criteria ("Planning Criteria") and consistent with sound engineering judgment, Dominion Energy Virginia proposes the following rebuild project located within existing right-of-way or on Company-owned property in the City of Suffolk, Virginia:

- Rebuild, entirely within existing right-of-way or on Company-owned property, approximately 11.9 miles of the existing 230 kV Line #246 on single circuit wood structures, which runs from Structure #246/1C within the Company's existing Suffolk Substation to Structure #246/94 at the Virginia state line, and is located entirely within the City of Suffolk, Virginia; and
- Perform minor work at the existing Suffolk Substation, including upgrading circuit-breaker and line leads to 4000A and installing a new substation dead-end structure

(collectively, the "Virginia Rebuild Project").<sup>1</sup>

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<sup>1</sup> With this Application, the Company is seeking a certificate of public convenience and necessity ("CPCN" or "Certificate") from the Virginia State Corporation Commission ("Commission") for the rebuild of 11.9 miles of Line #246 located between the Suffolk Substation and the Virginia state line (*i.e.* from Structure #246/1C through Structure #246/94), which are entirely within the City of Suffolk, Virginia. The remaining approximately 32.4 miles of Line #246 that will be rebuilt is located entirely within North Carolina, extending from the Virginia state line, through the Company's existing Tunis and Ahoskie Substations, and concluding at the Company's existing Earleys Substation (the "North Carolina Rebuild Project") (together, the Virginia Rebuild Project and North Carolina Rebuild Project are referred to herein as the "VA-NC Rebuild Project"). The Company is not seeking approval of the North Carolina Rebuild Project herein or from the North Carolina Utilities Commission ("NCUC"). Pursuant to NCGS § 62-101(a), a certificate is required from the NCUC "to construct a new transmission line," not to rebuild an existing line. Further, NCGS § 62-101(c)(2) specifically provides that "[a] certificate is not required for construction of the following lines: . . . [t]he replacement or expansion of an existing line with a similar line in substantially the same location, or the rebuilding, upgrading, modifying, modernizing, or reconstructing of an existing line for the purpose of increasing capacity or widening an existing right-of-way[.]" Accordingly, because the North Carolina Rebuild Project proposes to rebuild existing Line #246 with a similar line in substantially the same location, NCUC approval of the North Carolina Rebuild Project is not required. To the extent that responses are provided within this Appendix, they should

4. The Company has developed a proactive plan to rebuild transmission lines that are comprised of wood pole structures that are experiencing maintenance and reliability issues, including cracked and decaying wood, ground line rot, and woodpecker damage. A majority of Line #246 was constructed in 1971 on wooden H-frame structures, which have been identified for rebuild based on the Company's assessment in accordance with the Company's Planning Criteria. Industry experience indicates that equipment life is approximately 35 to 55 years for wooden pole structures, approximately 40 to 60 years for conductor and connectors, and approximately 50 years for porcelain insulators. The proposed Virginia Rebuild Project will replace aging infrastructure that is at the end of its service life in order to comply with the Company's mandatory Planning Criteria, thereby enabling the Company to maintain the overall long-term reliability of its transmission system.

5. The total length of the existing right-of-way and Company-owned property to be used for the Virginia Rebuild Project is approximately 11.9 miles. No new rights-of-way are necessary. Given the availability of existing rights-of-way, the statutory preference to use existing rights-of-way, and the additional costs and environmental impacts that would be associated with the acquisition and construction of new rights-of-way, the Company did not consider any alternate routes requiring new rights-of-way for the Virginia Rebuild Project.

6. The desired in-service date for the Virginia Rebuild Project is December 31, 2028. The Company estimates it will take approximately 25 months for detailed engineering, materials, procurement, permitting, and construction of the VA-NC Rebuild Project after a final order from the Commission on the Virginia Rebuild Project. Accordingly, to support this estimated pre-

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be viewed as applicable only to the Virginia Rebuild Project, and not the North Carolina Rebuild Project or the VA-NC Rebuild Project, unless so specifically stated. Any such information related specifically to the North Carolina Rebuild Project or the VA-NC Rebuild Project should be viewed as informational only, and should not be considered as applicable for the approval being sought in this Application for a CPCN for the Virginia Rebuild Project.

construction activity timeline and construction plan, the Company respectfully requests a final order on the Virginia Rebuild Project by June 11, 2024. Should the Commission issue a final order by June 11, 2024, the Company estimates that construction of the VA-NC Rebuild Project should begin by April 2026, and be completed by December 31, 2028. This construction timeline will enable the Company to meet the targeted in-service date for the Virginia Rebuild Project. This schedule is contingent upon obtaining the necessary permits and outages. Dates may need to be adjusted based on permitting delays or design modifications to comply with additional agency requirements identified during the permitting application process, as well as the ability to schedule outages or unpredictable delays due to labor shortages and/or materials/supply issues based on other extensive project work ongoing in the vicinity of the Virginia Rebuild Project. In addition, the Company is actively monitoring the regulatory changes and requirements associated with the Northern long-eared bat (“NLEB”) and how it could potentially impact construction timing associated with time of year restrictions (“TOYRs”). The existing interim guidance from the U.S. Fish and Wildlife Service (“USFWS”) for the NLEB expires on March 31, 2024. The Company is also monitoring potential regulatory changes associated with the potential listing of the Tri-colored bat. On September 14, 2022, the Tri-colored bat was proposed to be listed as endangered, with an estimated announcement of a final decision within 12 months; however, as of the writing of this document, the listing has not been published in the Federal Register. Regulatory guidance on the Tri-colored bat will be available upon listing. The Little Brown Bat is currently under review for listing by USFWS, with a decision expected in 2024. The Company’s construction window described above may require adjustment based upon the regulatory guidance and potential TOYRs associated with these bat species.

7. The total estimated conceptual cost of the Virginia Rebuild Project is approximately \$38.9 million (in 2023 dollars), which includes approximately \$38.5 million for transmission-related work, and approximately \$400,000 for substation-related work (in 2023 dollars).

8. The proposed Virginia Rebuild Project will afford the best means of meeting the continuing need for reliable service while reasonably minimizing adverse impact on the scenic, environmental, and historic assets of the area.

9. Based on consultations with the Virginia Department of Environmental Quality (“DEQ”), the Company has developed a supplement (“DEQ Supplement”) containing information designed to facilitate review and analysis of the proposed facilities by the DEQ and other relevant agencies. The DEQ Supplement is attached to this Application.

10. Based on the Company’s experience, the advice of consultants, and a review of published studies by experts in the field, the Company believes that there is no causal link to harmful health or safety effects from electric and magnetic fields generated by the Company’s existing or proposed facilities. Section IV of the Appendix provides further details on Dominion Energy Virginia’s consideration of the health aspects of electric and magnetic fields.

11. Section V of the Appendix provides a proposed route description for public notice purposes and a list of federal, state, and local agencies and officials that the Company has notified or will notify about the Application.

12. In addition to the information provided in the Appendix and the DEQ Supplement, this Application is supported by the pre-filed direct testimony of Company Witnesses Jason Whitlow, Wesley Strunk, George Brimmer, and Hannah Hurst filed with this Application.

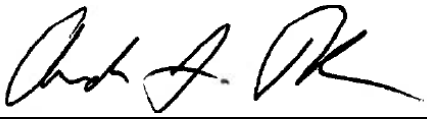
13. Because this Application seeks approval to rebuild an existing line entirely within existing right-of-way or Company-owned property, the Company respectfully requests, in the interest of judicial economy, that the Commission issue an Order for Notice and Comment setting

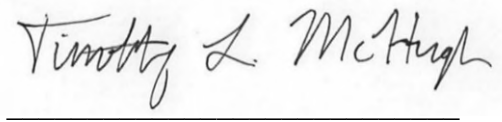
forth a procedural schedule in this proceeding without a scheduled evidentiary hearing, but with an opportunity for interested persons to request an evidentiary hearing if the issues raised cannot be addressed adequately without a hearing. An Order for Notice and Comment will still allow the Company, Commission Staff, and any interested parties that join the proceeding to develop a complete record without prejudice, as Commission Staff or any party may file with the Commission a request for hearing.

WHEREFORE, Dominion Energy Virginia respectfully requests that the Commission:

- a) direct that notice of this Application be given as required by Va. Code § 56-46.1;
- b) approve pursuant to Va. Code § 56-46.1 the construction of the Virginia Rebuild Project; and
- c) grant a certificate of public convenience and necessity for the Virginia Rebuild Project under the Utility Facilities Act, Va. Code §§ 56-265.1, *et seq.*, by June 11, 2024, if possible.

**VIRGINIA ELECTRIC AND POWER COMPANY**

By: 



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November 14, 2023



COMMONWEALTH OF VIRGINIA  
BEFORE THE  
STATE CORPORATION COMMISSION

APPLICATION OF  
VIRGINIA ELECTRIC AND POWER COMPANY  
FOR APPROVAL AND CERTIFICATION  
OF ELECTRIC FACILITIES

Suffolk – Structure #246/94 230 kV Transmission Line #246  
Virginia Rebuild Project

Application No. 329

Appendix

Containing Information in Response to  
“Guidelines for Transmission Line Applications Filed Under Title 56 of the Code of Virginia”

Case No. PUR-2023-00203

Filed: November 14, 2023

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## EXECUTIVE SUMMARY

In order to maintain the structural integrity and reliability of its transmission systems in compliance with the Company's mandatory electric transmission planning criteria ("Planning Criteria")<sup>1</sup> and consistent with sound engineering judgment, Virginia Electric and Power Company ("Dominion Energy Virginia" or the "Company") proposes to:

- (i) Rebuild, entirely within existing right-of-way or on Company-owned property, approximately 11.9 miles of the existing 230 kV Line #246 on single circuit wood structures, which runs from Structure #246/1C within the Company's existing Suffolk Substation to Structure #246/94 at the Virginia state line, and is located entirely within the City of Suffolk, Virginia; and
- (ii) Perform minor work at the existing Suffolk Substation, including upgrading circuit-breaker and line leads to 4000A and installing a new substation dead-end structure

(collectively, the "Virginia Rebuild Project").<sup>2</sup>

The Company has developed a proactive plan to rebuild transmission lines that are comprised of wood pole structures that are experiencing maintenance and reliability issues, including cracked and decaying wood, ground line rot, and woodpecker damage. A majority of Line #246 was constructed in 1971 on wooden H-frame structures, which have been identified for rebuild based on the Company's assessment in accordance with the Company's Planning Criteria. Industry experience indicates that equipment life is approximately 35 to 55 years for wooden pole

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<sup>1</sup> The Company's Transmission Planning Criteria (effective April 1, 2023) can be found in Attachment 1 of the Company's Facility Interconnection Requirements ("FIR") document, which is available online at <https://cdn-dominionenergy-prd-001.azureedge.net/-/media/pdfs/virginia/parallel-generation/facility-connection-requirements.pdf?la=en&rev=f280781e90cf47f69ea526c944c9c347&hash=82DD2567D0B033C47536134B8C4D5C5E>.

<sup>2</sup> With this Application, the Company is seeking a certificate of public convenience and necessity ("CPCN" or "Certificate") from the Virginia State Corporation Commission ("Commission") for the rebuild of 11.9 miles of Line #246 located between the Suffolk Substation and the Virginia state line (*i.e.* from Structure #246/1C through Structure #246/94), which are entirely within the City of Suffolk, Virginia. The remaining approximately 32.4 miles of Line #246 that will be rebuilt is located entirely within North Carolina, extending from the Virginia state line, through the Company's existing Tunis and Ahoskie Substations, and concluding at the Company's existing Earleys Substation (the "North Carolina Rebuild Project") (together, the Virginia Rebuild Project and North Carolina Rebuild Project are referred to herein as the "VA-NC Rebuild Project"). The Company is not seeking approval of the North Carolina Rebuild Project herein or from the North Carolina Utilities Commission ("NCUC"). Pursuant to NCGS § 62-101(a), a certificate is required from the NCUC "to construct a new transmission line," not to rebuild an existing line. Further, NCGS § 62-101(c)(2) specifically provides that "[a] certificate is not required for construction of the following lines:... [t]he replacement or expansion of an existing line with a similar line in substantially the same location, or the rebuilding, upgrading, modifying, modernizing, or reconstructing of an existing line for the purpose of increasing capacity or widening an existing right-of-way[.]" Accordingly, because the North Carolina Rebuild Project proposes to rebuild existing Line #246 with a similar line in substantially the same location, NCUC approval of the North Carolina Rebuild Project is not required. To the extent that responses are provided within this Appendix, they should be viewed as applicable only to the Virginia Rebuild Project, and not the North Carolina Rebuild Project or the VA-NC Rebuild Project, unless so specifically stated. Any such information related specifically to the North Carolina Rebuild Project or the VA-NC Rebuild Project should be viewed as informational only, and should not be considered as applicable for the approval being sought in this Application for a CPCN for the Virginia Rebuild Project.

structures, approximately 40 to 60 years for conductor and connectors, and approximately 50 years for porcelain insulators. The proposed Virginia Rebuild Project will replace aging infrastructure that is at the end of its service life in order to comply with the Company's mandatory Planning Criteria, thereby enabling the Company to maintain the overall long-term reliability of its transmission system.

The total length of the existing right-of-way and Company-owned property to be used for the Virginia Rebuild Project is approximately 11.9 miles. Because the existing right-of-way and Company-owned property are adequate to construct the proposed Virginia Rebuild Project, no new rights-of-way are necessary. Given the availability of existing rights-of-way, the statutory preference to use existing rights-of-way, and the additional costs and environmental impacts that would be associated with the acquisition and construction of new rights-of-way, the Company did not consider any alternate routes requiring new rights-of-way for the Virginia Rebuild Project.

The total estimated conceptual cost of the Virginia Rebuild Project is approximately \$38.9 million (in 2023 dollars), which includes approximately \$38.5 million for transmission-related work, and approximately \$400,000 for substation-related work (in 2023 dollars).

The desired in-service date for the Virginia Rebuild Project is December 31, 2028. The Company estimates it will take approximately 25 months for detailed engineering, materials, procurement, permitting, and construction of the VA-NC Rebuild Project after a final order from the Commission on the Virginia Rebuild Project. Accordingly, to support this estimated pre-construction activity timeline and construction plan, the Company respectfully requests a final order on the Virginia Rebuild Project by June 11, 2024. Should the Commission issue a final order by June 11, 2024, the Company estimates that construction of the VA-NC Rebuild Project should begin by April 2026, and be completed by December 31, 2028. This construction timeline will enable the Company to meet the targeted in-service date for the Virginia Rebuild Project. This schedule is contingent upon obtaining the necessary permits and outages. Dates may need to be adjusted based on permitting delays or design modifications to comply with additional agency requirements identified during the permitting application process, as well as the ability to schedule outages or unpredictable delays due to labor shortages and/or materials/supply issues based on other extensive project work ongoing in the vicinity of the Virginia Rebuild Project.

In addition, the Company is actively monitoring the regulatory changes and requirements associated with the Northern long-eared bat ("NLEB") and how it could potentially impact construction timing associated with time of year restrictions ("TOYRs"). The existing interim guidance from the U.S. Fish and Wildlife Service ("USFWS") for the NLEB expires on March 31, 2024. The Company is also monitoring potential regulatory changes associated with the potential listing of the Tri-colored bat. On September 14, 2022, the Tri-colored bat was proposed to be listed as endangered, with an estimated announcement of a final decision within 12 months; however, as of the writing of this document, the listing has not been published in the Federal Register. Regulatory guidance on the Tri-colored bat will be available upon listing. The Little Brown Bat is currently under review for listing by USFWS, with a decision expected in 2024. The Company's construction window described above may require adjustment based upon the regulatory guidance and potential TOYRs associated with these bat species.

## **I. NECESSITY FOR THE PROPOSED PROJECT**

- A. State the primary justification for the proposed project (for example, the most critical contingency violation including the first year and season in which the violation occurs). In addition, identify each transmission planning standard(s) (of the Applicant, regional transmission organization (“RTO”), or North American Electric Reliability Corporation) projected to be violated absent construction of the facility.**

Response: The Virginia Rebuild Project is necessary to replace aging infrastructure that is at the end of its service life along an approximately 11.9-mile segment of 230 kV Line #246 in the City of Suffolk, Virginia. See Attachment I.A.1 for an overview map of the proposed Virginia Rebuild Project.

Dominion Energy Virginia’s transmission system is responsible for providing transmission service: (i) for redelivery to the Company’s retail customers; (ii) to Appalachian Power Company, Old Dominion Electric Cooperative, Northern Virginia Electric Cooperative, Central Virginia Electric Cooperative, and Virginia Municipal Electric Association for redelivery to their retail customers in Virginia; and (iii) to North Carolina Electric Membership Corporation and North Carolina Eastern Municipal Power Agency for redelivery to their retail customers in North Carolina (collectively, the “Dominion Energy Zone” or the “Dom Zone”).

Dominion Energy Virginia is part of PJM Interconnection, LLC (“PJM”), the regional transmission organization that provides service to a large portion of the eastern United States. PJM currently is responsible for ensuring the reliability of, and coordinating the movement of, electricity through all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia, and the District of Columbia. This service area has a population of approximately 65 million and on August 2, 2006, set a record high of 166,929 megawatts (“MW”) for summer peak demand, of which Dominion Energy Virginia’s load portion was approximately 19,256 MW serving 2.4 million customers. On August 9, 2022, the Company set a record high of 21,156 MW for summer peak demand. On December 24, 2022, the Company set a winter and all-time record demand of 22,189 MW. Based on the 2023 PJM load forecast, the Dominion Energy Zone is expected to grow with average growth rates of 5.0% summer and 4.8% winter over the next 10 years compared to the PJM average of 0.8% and 1.0% over the same period for the summer and winter, respectively.

Dominion Energy Virginia is also part of the Eastern Interconnection transmission grid, meaning its transmission system is interconnected, directly or indirectly, with all of the other transmission systems in the United States and Canada between the Rocky Mountains and the Atlantic Coast, except for Quebec and most of Texas. All of the transmission systems in the Eastern Interconnection are dependent on each other for moving bulk power through the transmission system and for reliability support. Dominion Energy Virginia’s service to its customers is

extremely reliant on a robust and reliable regional transmission system.

North American Electric Reliability Corporation (“NERC”) has been designated by the Federal Energy Regulatory Commission (“FERC”) as the electric reliability organization for the United States. Accordingly, NERC requires that the planning authority and transmission planner develop planning criteria to ensure compliance with NERC Reliability Standards. Mandatory NERC Reliability Standards require that a transmission owner (“TO”) develop facility interconnection requirements that identify load and generation interconnection minimum requirements for a TO’s transmission system, as well as the TO’s reliability criteria.<sup>3</sup>

Federally mandated NERC Reliability Standards constitute minimum criteria with which all public utilities must comply as components of the interstate electric transmission system. Moreover, the Energy Policy Act of 2005 mandates that electric utilities follow these NERC Reliability Standards and imposes fines for noncompliance of approximately \$1.3 million per day per violation.

PJM’s Regional Transmission Expansion Plan (“RTEP”) is the culmination of an annual transmission planning process, approved by FERC, which includes extensive analysis of the electric transmission system to determine any needed improvements.<sup>4</sup> PJM’s annual RTEP is based on the effective criteria in place at the time of the analyses, including applicable standards and criteria of NERC, PJM, and local reliability planning criteria, among others.<sup>5</sup> Projects identified through the RTEP process are developed by the TO in coordination with PJM, and are presented at the Transmission Expansion Advisory Committee (“TEAC”) meetings prior to inclusion in the RTEP that is then presented for approval by the PJM Board of Managers (the “PJM Board”). PJM’s generation deliverability test for reliability analysis ensures the transmission system is capable of delivering the aggregate system generating capacity at peak load with all firm transmission service modeled. Generation deliverability is a critical system condition test that is part of the PJM reliability standards and, thus, also is required to be satisfied by NERC Reliability Standards.

Outcomes of the RTEP process include three types of transmission system upgrades or projects: (i) baseline upgrades are those that resolve a system reliability criteria violation, which can include planning criteria from NERC, Reliability-First Corporation, SERC Reliability Corporation, PJM, and TOs; (ii) network upgrades are new or upgraded facilities required primarily to eliminate reliability criteria

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<sup>3</sup> See FAC-001-3 (R1, R3) (effective April 1, 2021), which can be found at <https://cdn-dominionenergy-prd-001.azureedge.net/-/media/pdfs/virginia/parallel-generation/facility-interconnection-requirements-signed.pdf>.

<sup>4</sup> PJM Manual 14B (effective July 1, 2021) focuses on the RTEP process and can be found at <https://www.pjm.com/-/media/documents/manuals/m14b.ashx>.

<sup>5</sup> See PJM Manual 14B, Attachment D: PJM Reliability Planning Criteria.

violations caused by proposed generation, merchant transmission, or long-term firm transmission service requests; (iii) supplemental projects are projects initiated by the TO in order to interconnect new customer load, address degraded equipment performance, improve operational flexibility and efficiency, and increase infrastructure resilience. While supplemental projects are included in the RTEP, and the PJM Board administers stakeholder review of supplemental projects as part of the RTEP process, the PJM Board does not actually approve such projects. See Section I.J for a discussion of the PJM process as it relates to the Virginia Rebuild Project.

The Company has developed a proactive plan to rebuild transmission lines that are comprised of wood pole structures that are experiencing maintenance and reliability issues, including cracked and decaying wood, ground line rot, and woodpecker damage. Under the broader VA-NC Rebuild Project, the Company proposes to wreck and rebuild approximately 44.3 miles of existing Line #246 in existing right-of-way or on Company-owned property between the Company's existing Suffolk Substation in Virginia and Earleys Substation in North Carolina. The Virginia Rebuild Project proposes to rebuild approximately 11.9 miles out of the 44.3 miles, located entirely in the City of Suffolk, Virginia. The majority of Line #246 was constructed in 1971 on wooden H-frames, which have been identified through field inspections to be showing significant deterioration. Deterioration of the wood poles includes significant cracks, rot/decay, and woodpecker damage.

Section C.2.9 of the Company's Planning Criteria addresses electric transmission infrastructure approaching its end of life:<sup>6</sup>

Electric transmission infrastructure reaches its end of life as a result of many factors. Some factors such as extreme weather and environmental conditions can *shorten* infrastructure life, while others such as maintenance activities can *lengthen* its life. Once end of life is recognized, in order to ensure continued reliability of the transmission grid, a decision must be made regarding the best way to address this end-of-life asset.

For this criterion, "end of life" is defined as the point at which infrastructure is at risk of failure, and continued maintenance and/or refurbishment of the infrastructure is no longer a valid option to extend the life of the facilities consistent with Good Utility Practice and Dominion Energy Transmission Planning Criteria. The infrastructure to be evaluated under this end-of-life criteria are all transmission lines at 500 kV and above.

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<sup>6</sup> See *supra*, n. 1.

The decision point of this criterion is based on satisfying two metrics:

- 1) Facility is nearing, or has already passed, its end of life, and*
- 2) Continued operation risks negatively impacting reliability of the transmission system.*

For facilities that satisfy both of these metrics, this criterion mandates either replacing these facilities with in-kind infrastructure that meets current Dominion standards or employing an alternative solution to ensure the Dominion transmission system satisfies all applicable reliability criteria.

Effective March 24, 2020, the Company updated its Planning Criteria so that infrastructure to be evaluated under end of life criteria changed from “all transmission lines at 69 kV and above” to “all regional transmission lines operated at 500 kV and above.” The remaining transmission lines between 100 kV and 500 kV are evaluated under the Company’s Attachment M-3 End-of-Life Planning Criteria. The latest version of this criteria was presented at the December 14, 2022 PJM Sub-Regional RTEP meeting. See Attachment I.A.2 for updated slides presented by the Company at that meeting. As discussed in Attachment I.A.2, end of life projects between 100 kV and 500 kV are classified as supplemental projects. The process, however, for determining that an asset has reached its end of life remains the same; therefore, the Company continues to use the criteria evaluation process outlined in Section C.2.9 of the Planning Criteria.

The Virginia Rebuild Project will rebuild 11.9 miles of Line # 246, which has been identified for rebuild based on Dominion Energy Virginia’s assessment in accordance with the Company’s Planning Criteria and consistent with sound engineering judgment.

- 1) Facility is nearing, or has already passed, its end of life*

In regard to the first metric of the Company’s Planning Criteria addressing end of life, the wooden structures supporting the 11.9-mile segment of Line #246 proposed to be rebuilt are experiencing cracks, rot, and woodpecker damage. Out of the 95 wooden pole structures supporting Line #246 in Virginia, approximately 75% (56 pole structures) are currently in poor condition in need of replacement in the near term. Of those 56 pole structures, 5 structures have severe rot/decay, 2 structures are severely cracked, and 14 structures show woodpecker damage. Based on the wood pole assessment, a complete rebuild is recommended because the condition and age of these structures indicates that they have reached the end of their life.

In addition to the wood structures, industry guidelines indicate equipment life for conductor and connectors are 40-60 years, and porcelain insulators are 50 years.



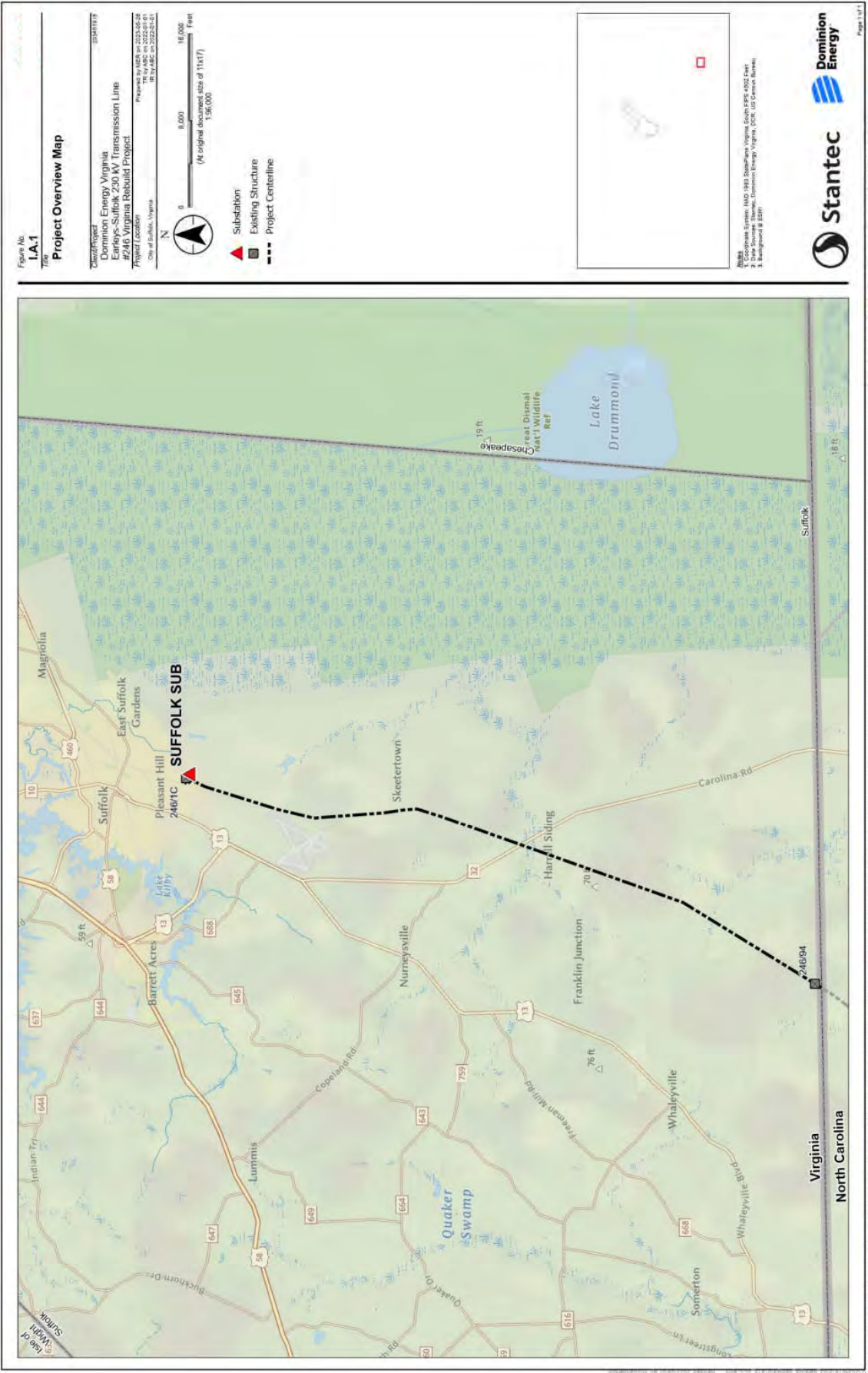
The combination of deteriorating condition and age indicate that these structures and line equipment have reached their end of life.

*2) Continued operation risks negatively impacting reliability of the transmission system*

Regarding the second metric of the Company's Planning Criteria addressing end of life, Line #246 provides direct delivery to one industrial load customer served out of the Company's Nucor Substation, located in North Carolina. Should Line #246 be out of service, one industrial customer would be left unserved. See Section I.C for additional details. The Company is unable to provide reliable transmission service to this customer unless it addresses the critical structural deficiencies identified in the Virginia Rebuild Project.

The Company submitted the VA-NC Rebuild Project proposal, which includes the Virginia Rebuild Project, as a supplemental project to the PJM RTEP process in August 2023 to address the end-of-life criteria. The Company anticipates submitting additional proposal for the Virginia Rebuild Project to the PJM RTEP process in December 2023. No additional reliability studies were required by PJM in support of the need for the proposed Virginia Rebuild Project because service to the customers fed from the Company's Nucor Substation would cease absent the Virginia Rebuild Project. See Section I.J.

In summary, the proposed Virginia Rebuild Project will replace aging infrastructure at the end of its service life in compliance with the Company's mandatory Planning Criteria and consistent with sound engineering judgment, thereby enabling the Company to maintain the overall long-term reliability of its transmission system, as well as to provide important system reliability benefits to the Company's entire network.



# Dominion Energy

PJM Southern Sub-Regional RTEP Meeting

Planning Assumptions

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SRRTEP South – Dominion Assumptions 12/14/2022



# Planning Criteria and Assumptions

- PJM Assumptions Apply
- All analysis and solutions must satisfy
  - NERC TPL standards
  - PJM Planning Criteria in Attachment D & G of PJM Manual 14B
  - [Dominion Energy's Facility Interconnection Requirements](#)
    - Requirements to connect to Dominion's Transmission system
    - Attachment 1 – Dominion's FERC Form 715 Planning Criteria
    - Attachment 3 – Generation Interconnection Protection Requirements
    - Attachment 4 – Generator Ride-Through Requirements
    - Supplemental Project Drivers as Described Below
- PJM and Dominion validate each other's study results to ensure solutions resolve specific need and create no other harm to system
- Proposed solutions are presented
  - TEAC for facilities 230 kV and above
  - Southern Sub-regional for facilities below 230 kV

# Power Flow Modeling Assumptions

- Dominion uses PJM RTEP developed power flow models for 5 year and intermediate year assessments
- For situations where a PJM RTEP model is not available, Dominion will create a specific case using a PJM RTEP case
- Dominion at times may also utilize a MMWG series power flow case
- Loads used in all power flow cases will be modeled consistent with the 2023 PJM Load Forecast Report
- Generation retirements modeled as outlined in the PJM's Generation Retirement Process
  - Dominion may also consider future generation retirements consistent with the VA/NC Integrated Resource Plan

# Dominion Energy's FERC Form 715

## End of Life Planning Criteria

- Infrastructure to be evaluated under this end-of-life criteria are all regional transmission lines operated at 500 kV and above
- The decision point of this criterion is based on satisfying two metrics:
  - 1) Facility is nearing, or has already passed, its end of life, and
  - 2) Continued operation risks negatively impacting reliability of the transmission system, including our ability to serve local load.
- Projects approved by PJM under this criteria are classified as baseline
- Detailed discussion on the End of Life criteria can be found in Attachment 1, section C.2.9 of [Dominion Energy's Facility Interconnection Requirements](#) document
- All other asset management of transmission infrastructure is covered by the M-3 Supplemental process
- The Appendix lists transmission lines expected to be evaluated using the FERC Form No. 715 End of Life criteria in the 2023 RTEP cycle

# Supplemental Project Drivers





# Summary of Supplemental Project Drivers

## I. Customer Service

- Service to new and existing customers. Interconnect new customer load. Address distribution load growth, customer outage exposure, equipment loading

## II. Equipment Material Condition, Performance and Risk

- Degraded equipment performance, material condition, obsolescence, equipment failure, employee and public safety and environmental impact
- Substation Assets, Transmission Line Assets, Transmission Transformers

## III. Operational Flexibility and Efficiency

- Optimizing system configuration, equipment duty cycles and restoration capability, minimize outages

## IV. Infrastructure Resilience

- Improve system ability to anticipate, absorb, adapt to, and/or rapidly recover from a potentially disruptive event, including severe weather, geo-magnetic disturbances, electromagnetic pulses, physical and cyber security challenges, critical infrastructure reduction.

## V. Other

- Meet objectives not included in other definitions



# I. Customer Service

- Service to new and existing customers. Interconnect new customer load. Address distribution load growth, customer outage exposure, equipment loading

# Customer Service Considerations

## Project Drivers typically include:

- New Load Delivery Points (DP)
- Upgrades or modifications to existing Load Delivery Points(DP)
- Other customer requests

## **II. Equipment Material Condition, Performance and Risk**

- Degraded equipment performance, material condition, obsolescence, equipment failure, employee and public safety and environmental impact
- Substation Assets, Transmission Line Assets, Transmission Transformers

# Equipment Material Condition, Performance and Risk

- End of Life
  - Transmission Lines operated at or above 100 kV and below 500 kV
  - Transformers with high-side operated at or above 100 kV
- Other Asset Management
 

*Types of equipment assessed include but not limited to:*

  - Transmission Lines below 100 kV
  - Line Components (not part of EOL Criteria)
  - Transformers below 100 kV
  - Breakers
  - Circuit Switchers
  - Reactors
  - Capbanks
  - Wave Traps
  - Relaying
  - Switches
  - Bus Work, Leads
  - FACTS Devices

# Equipment Material Condition, Performance and Risk

## Project Drivers

- EOL and Asset Management projects include the replacement, modification, upgrade or addition of transmission equipment for the following purposes:
  - Replacement of equipment due to eminent failure
  - Safety concerns
  - Compliance (internal and external)
  - Reliability
  - Operating Flexibility
  - Obsolescence
  - Other

## Dominion Energy's Attachment M-3 End of Life Planning Criteria for Transmission Lines

- Infrastructure to be evaluated under this end-of-life criteria are all transmission lines operated at or above 100kV and below 500 kV
- Projects must satisfy the following two decision point metrics:
  - 1) Facility is nearing, or has already passed, its end of life, and
  - 2) Continued operation risks negatively impacting reliability of the transmission system, including our ability to serve local load.
- Projects will be classified as supplemental

# Transmission Line Facilities

## Project Development Process

- All project requests and inputs are reviewed
- Records of inspections, component failures, refurbishments/repairs, tower loading studies, COR-TEN corrosion studies and other relevant information are reviewed
- Field sampling and inspections are performed
- Perform analysis to determine condition of individual lines and a ranking to support remediation

# Transmission Line Components

## Project Development Process

- Industry typical “expected” service life are considered:
  - Steel structures 40 to 60 years
  - Conductors 60 years
  - Connectors 40 to 60 years
  - Insulators (Porcelain/Glass) 50 years+ (Polymer) 30 years
  - Fiber 30 years
  - Wood 55 years with maintenance
- However, the actual service life is dependent upon many variables and ongoing inspection to evaluate condition is the best determinant of end of service life.



## Dominion Energy's Attachment M-3 End of Life Planning Criteria for Transformers

- Infrastructure to be evaluated under this end-of-life criteria are transmission transformers, high side operated at or above 100kV
- Transformer Health Assessment Program (THA)

500 kV Transformer Failure in 2000



230 kV Transformer Failure in 2001



# Transmission Transformer THA Overview

- For Transmission Transformers, Dominion uses a Transformer Health Assessment (THA) approach to prioritize replacement
- A proven systematic approach to calculating transformer health and risk
- Not just about age – several condition-based parameters are considered
- Supports possible additional maintenance, online monitoring, proactive replacements

# Transmission Transformer THA Overview

## Parameters Considered for Proactive Replacement:

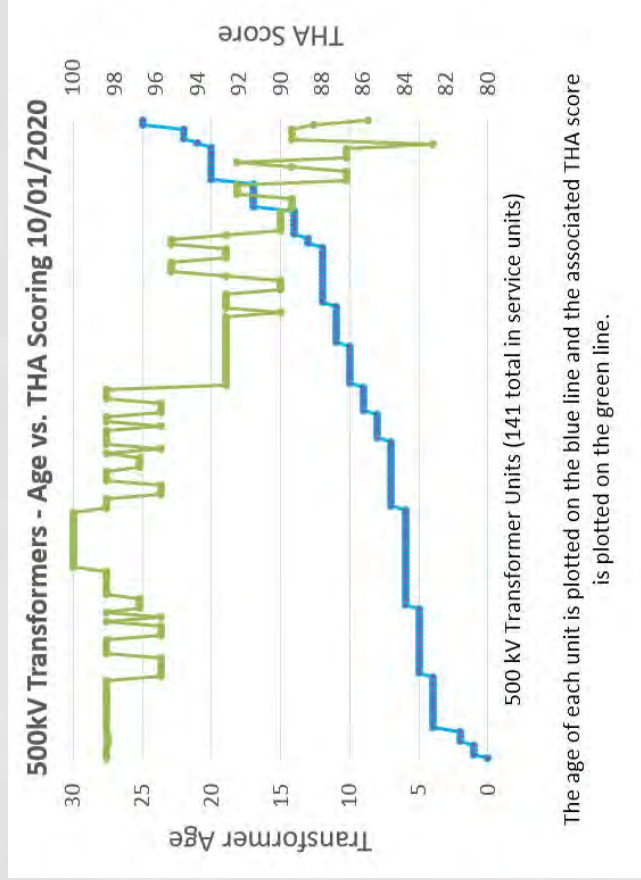
- THA score less than 80
- Maintenance history/environmental risk
- Previous transformer failures of same manufacturer
- Previous failures and remanufacturing history
- Dissolved Gas-in-Oil Analysis (DGA) trends

# THA Condition-Based Parameter Weighting

Parameter	Weight for 500 kV TxS	Weight for 230 kV TxS
Dissolved Gas-in-Oil Analysis	25%	25%
Winding Power Factor	20%	15%
LTC Design	-	15%
Age	10%	10%
BIL Ratings	10%	10%
Loading	5%	-
Oil Acidity	5%	-
Moisture in Oil/Insulation	5%	5%
Bushing Power Factor	5%	5%
Tertiary Design/Presence	5%	5%
Bushing Type/Age	5%	5%
Fault Exposure	5%	5%

# Example Scoring of Age Parameter

Age	Score
0 - 10 years	10
10 - 30 years	7
30 - 40 years	4
40 - 45 years	1
45 - 50 years	-5
50 - 55 years	-10
> 55 years	-15



# Other Asset Management

## Project Development Process

### Other Transmission Line and Transformer Projects (below 100kV)

- Projects are evaluated using the same process as EOL

### Substation Projects

- Projects are prioritized based on many different factors including:
  - Project Type
  - Likelihood and consequence of failure
  - Completing work in conjunction with other planned capital improvement work or scheduled maintenance activities and outages
  - Project cost
- Projects are assigned to a project manager and the conceptual team for detailed review and estimating
- Planning reviews projects to ensure they do not conflict with long term plans prior to submittal to PJM through the M-3 Planning process



# Other Asset Management

## Project Development Process

- All project requests and inputs are reviewed
- Compliance projects (time based) are identified and documented.  
These typically include:
  - Wave Traps – 25 years
  - CCVT's - 25 years
  - Batteries – 20 years
  - Battery Chargers – 20 years
  - Nuclear (Switchyard and one terminal away) – 20 years
- A high-level scope and cost estimate is developed

### III. Operational Flexibility and Efficiency

- Optimizing system configuration, equipment duty cycles and restoration capability, minimize outages



# Operational Flexibility and Efficiency

## Considerations

### Project Drivers typically include:

- Operational flexibility issues identified by Dominion's SOC and/or field operations
- Reoccurring thermal, voltage, or stability issues identified by System Operations in real time but not captured in planning studies
- Projects related to ability to safely and reliably operate the transmission system
- Provide flexibility and improvement to serve customer load
- Adherence to Facility Interconnection Requirements
- Other

## IV. Infrastructure Resilience

- Improve system ability to anticipate, absorb, adapt to, and/or rapidly recover from a potentially disruptive event, including severe weather, geomagnetic disturbances, physical and cyber security challenges, critical infrastructure reduction

# Infrastructure Resilience

## Considerations

### Project Drivers typically include:

- Hardening for severe weather
- GMD (geo-magnetic disturbances)
- EMP (electromagnetic pulses)
- Physical and Cyber security challenges
- Reduction of Critical Infrastructure
- Rapid Restoration of Services (mobiles, spares, etc.)
- Adherence to Facility Interconnection Requirements

## V. Other

- Meet objectives not included in other definitions

# Other Planning Considerations

Project Drivers typically include:

- Unique situations that drive “needs” not covered in other objectives
- Adhere to Good Utility Practice
- Maintain system reliability

# Questions?



Appendix A:  
Transmission lines expected to be evaluated using  
Dominion Energy’s FERC Form 715 End of Life criteria in  
2023 RTEP cycle

Line A	Line B	Line Section	Line A kV	Line B kV	Line A Year	Line B Year
579		Septa – Yadkin	500		1975	
588		Fentress – Yadkin	500		1975	

Note: This list covers lines to be evaluated under Dominion’s End of Life criteria during the 2023 planning cycle. The evaluation could lead to some of these facilities being delayed, cancelled or removed from consideration as well as other facilities added.



**I. NECESSITY FOR THE PROPOSED PROJECT**

- B. Detail the engineering justifications for the proposed project (for example, provide narrative to support whether the proposed project is necessary to upgrade or replace an existing facility, to significantly increase system reliability, to connect a new generating station to the Applicant's system, etc.). Describe any known future project(s), including but not limited to generation, transmission, delivery point or retail customer projects, that require the proposed project to be constructed. Verify that the planning studies used to justify the need for the proposed project considered all other generation and transmission facilities impacting the affected load area, including generation and transmission facilities that have not yet been placed into service. Provide a list of those facilities that are not yet in service.**

Response: [1] Engineering Justification for the Project

See Section I.A of the Appendix.

[2] Known Future Projects

There are no known future projects that require the Virginia Rebuild Project to be constructed. The Virginia Rebuild Project is required by the Company's end-of-life criteria as described in Section I.A.

[3] Planning Studies

Not applicable.

[4] Facilities List

Not applicable.



## **I. NECESSITY FOR THE PROPOSED PROJECT**

- C. Describe the present system and detail how the proposed project will effectively satisfy present and projected future electrical load demand requirements. Provide pertinent load growth data (at least five years of historical summer and winter peak demands and ten years of projected summer and winter peak loads where applicable). Provide all assumptions inherent within the projected data and describe why the existing system cannot adequately serve the needs of the Applicant (if that is the case). Indicate the date by which the existing system is projected to be inadequate.**

Response: Attachment I.G.1 shows the portion of the Company's transmission system in the area of the VA-NC Rebuild Project. The existing Line #246 is part of the Company's 230 kV network, which supports the delivery of electric generation to retail and wholesale customers. These lines support the network in the southern Virginia and North Carolina area.

The tables in Attachment I.C.1 provide 10 years of historical system peak loads for the Company's Carolina and Suffolk Load Area. The tables in Attachment I.C.1 also provide the anticipated summer and winter peak loads from 2023 to 2032 for this area. The projected loads in Attachment I.C.1 represent the Company's forecasted peaks based on actual load and the PJM 2023 Load Forecast and demonstrate stable load demand in the area. Over the period from 2023 to 2032, the summer peak electrical demand for this area is projected to vary between approximately 315 MW to 760 MW, and the winter peak electrical demand for this area is projected to vary between approximately 287 MW to 861 MW.

As discussed in Section I.A., Line #246 provides direct delivery to one load customer served out of Nucor Substation, which is located in North Carolina. Should Line #246 be out of service, this industrial customer would be left unserved.

The Company's Suffolk Substation, which is located at the Virginia end of Line #246, is an important hub in the transmission system. The substation interconnects three 500 kV lines and steps power down to 230 kV and 115 kV levels. At the North Carolina end of Line # 246 is Earleys Substation, which is also an important hub in the transmission system. This substation interconnects a solar farm. The solar farm is a capacity resource to PJM with 53.6 MW capacity and 80 MW energy.

The existing Line #246 cannot adequately serve the needs of the Company and its customer because of aging infrastructure, as discussed in Section I.A. The Company has created a plan to address its end-of-life facilities, setting target completion dates for end-of-life projects based on the condition of the facilities, the Company's resources, and the need to schedule outages. The desired in-service date for completion of the Virginia Rebuild Project is December 31, 2028.

Completing the Virginia Rebuild Project will support Dominion Energy Virginia's

continued reliable electric service to retail and wholesale customers and will support the future overall growth and system generation capability in the area.

Loads taken from 2023-2038 MW / MVAR Load Projection Spreadsheet  
 Highlighted cells used in application

Attachment I.C.1

#### Forecast Load MW

	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	MAX	MIN
Carolina Area - <b>Summer</b>	672	676	676	676	676	676	676	676	676	676	<b>676</b>	<b>672</b>
Suffolk Area - <b>Summer</b>	395	395	398	398	398	398	398	398	398	398	<b>398</b>	<b>395</b>
Carolina Area - <b>Winter</b>	709	709	713	713	713	713	713	713	713	713	<b>713</b>	<b>709</b>
Suffolk Area - <b>Winter</b>	407	409	409	409	409	409	409	409	409	409	<b>409</b>	<b>407</b>

#### Historic Load MW

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	MAX	MIN
Carolina Area - <b>Summer</b>	711	729	720	760	760	696	470	640	621	657	<b>760</b>	<b>470</b>
Suffolk Area - <b>Summer</b>	315	322	348	356	360	349	368	378	370	376	<b>378</b>	<b>315</b>
Carolina Area - <b>Winter</b>	838	861	755	768	843	597	613	633	710	707	<b>861</b>	<b>597</b>
Suffolk Area - <b>Winter</b>	412	442	372	381	451	337	287	345	370	403	<b>451</b>	<b>287</b>

	MAX	MIN
Peak Load Historic and Projected <b>(Summer)</b>	<b>760</b>	<b>315</b>
Peak Load Historic and Projected <b>(Winter)</b>	<b>861</b>	<b>287</b>

**I. NECESSITY FOR THE PROPOSED PROJECT**

- D. If power flow modeling indicates that the existing system is, or will at some future time be, inadequate under certain contingency situations, provide a list of all these contingencies and the associated violations. Describe the critical contingencies including the affected elements and the year and season when the violation(s) is first noted in the planning studies. Provide the applicable computer screenshots of single-line diagrams from power flow simulations depicting the circuits and substations experiencing thermal overloads and voltage violations during the critical contingencies described above.**

Response: Not applicable.

## I. NECESSITY FOR THE PROPOSED PROJECT

- E. Describe the feasible project alternatives, if any, considered for meeting the identified need including any associated studies conducted by the Applicant or analysis provided to the RTO. Explain why each alternative was rejected.

Response: Feasible Project Alternatives

No feasible alternatives have been submitted to PJM. As stated in Section I.A, not rebuilding 11.9 miles of 230 kV transmission Line #246 which runs from Structure #246/1C within the Company's existing Suffolk Substation to Structure #246/94 results in not serving one industrial load direct-connect customer in North Carolina.

Pursuant to the Commission's November 26, 2013, Order entered in Case No. PUE-2012-00029, and its November 1, 2018, Final Order entered in Case No. PUR-2018-00075 ("2018 Final Order"), the Company is required to provide an analysis of demand-side resources ("DSM") as incorporated into the Company's planning studies. DSM is the broad term that includes both energy efficiency ("EE") and demand response ("DR"). In this case, the Company has identified a need for the Virginia Rebuild Project based on the need to replace aging infrastructure at the end of its service life in order to comply with the Company's mandatory Planning Criteria and consistent with sound engineering judgment, thereby enabling the Company to maintain the overall long-term reliability of its transmission system.<sup>7</sup> Notwithstanding, when performing an analysis based on PJM's 50/50 load forecast, there is no adjustment in load for DR programs because PJM only dispatches DR when the system is under stress (*i.e.*, a system emergency). Accordingly, while existing DSM is considered to the extent the load forecast accounts for it, DR that has been bid previously into PJM's capacity market is not a factor in this particular Application because of the identified need for the Virginia Rebuild Project. Based on these considerations, the evaluation of the Virginia Rebuild Project demonstrated that despite accounting for DSM consistent with PJM's methods, the Virginia Rebuild Project is necessary.

Incremental DSM also will not absolve the need for the Virginia Rebuild Project. As reflected in Attachment I.C.1, the peak load area for this Virginia Rebuild Project (historic and projected) ranges from 287 MW to 861 MW (summer and winter). By way of comparison, statewide, the Company achieved demand savings of 264.8 MW (net) / 404.8 MW (gross) from its DSM Programs in 2022.

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<sup>7</sup> While the PJM load forecast does not directly incorporate DR, its load forecast incorporates variables derived from Itron that reflect EE by modeling the stock of end-use equipment and its usages. Further, because PJM's load forecast considers the historical non-coincident peak ("NCP") for each load serving entity ("LSE") within PJM, it reflects the actual load reductions achieved by DSM programs to the extent an LSE has used DSM to reduce its NCPs.

**I. NECESSITY FOR THE PROPOSED PROJECT**

- F. Describe any lines or facilities that will be removed, replaced, or taken out of service upon completion of the proposed project, including the number of circuits and normal and emergency ratings of the facilities.**

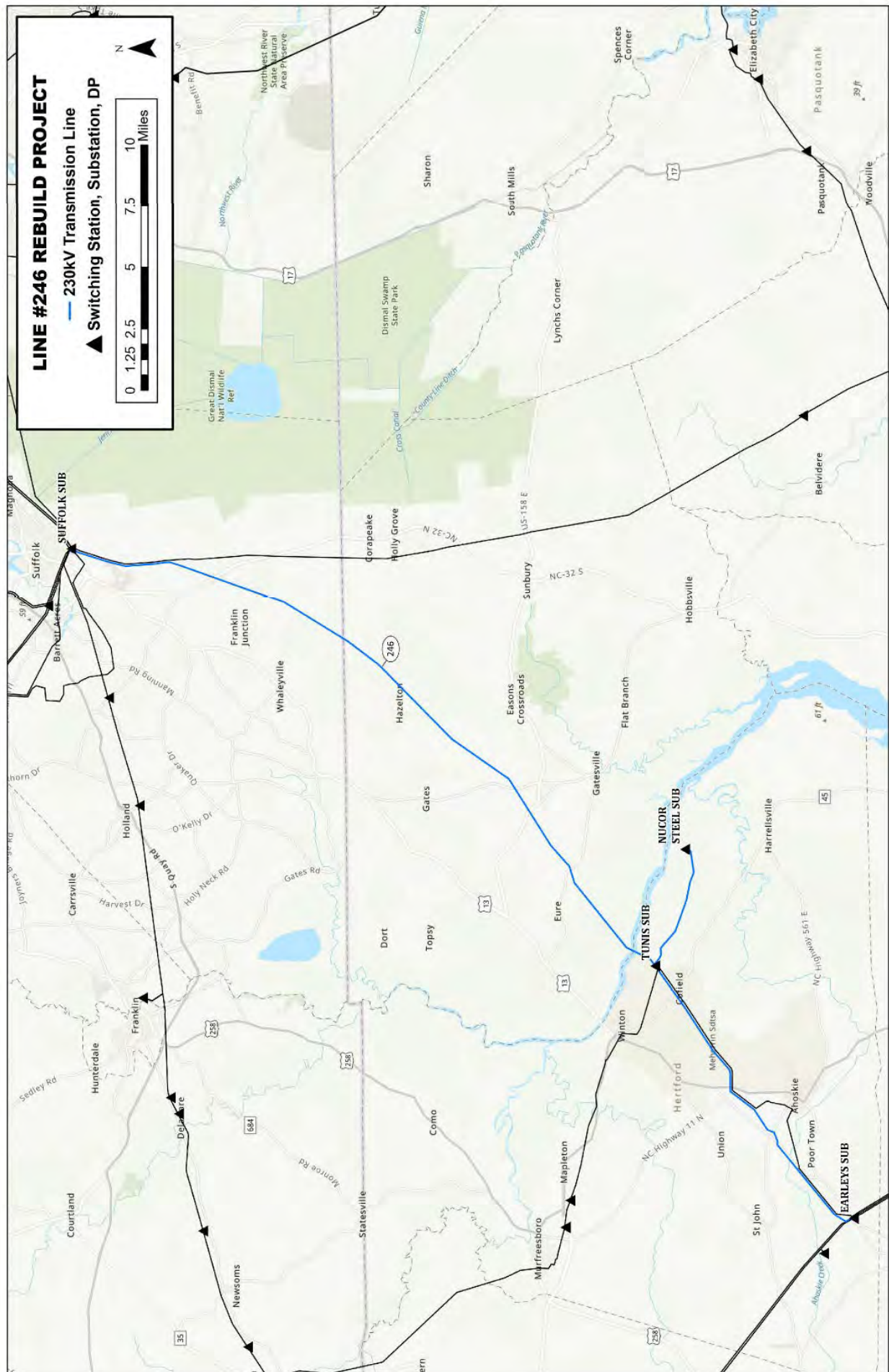
Response: The Virginia Rebuild Project includes the removal and replacement of existing facilities on existing Line #246, as described below. There will be no lines permanently taken out of service as part of the proposed Virginia Rebuild Project.

The Company proposes to replace one steel H-frame structure and 95 wooden H-frame structures with weathered steel H-frames, and one concrete substation structure with one galvanized steel substation structure.

**I. NECESSITY FOR THE PROPOSED PROJECT**

- G. Provide a system map, in color and of suitable scale, showing the location and voltage of the Applicant's transmission lines, substations, generating facilities, etc., that would affect or be affected by the new transmission line and are relevant to the necessity for the proposed line. Clearly label on this map all points referenced in the necessity statement.**

Response: See Attachment I.G.1.





## **I. NECESSITY FOR THE PROPOSED PROJECT**

### **H. Provide the desired in-service date of the proposed project and the estimated construction time.**

Response: The desired in-service date for the proposed Virginia Rebuild Project is December 31, 2028.

The Company estimates that it will take approximately 25 months for detailed engineering, materials procurement, permitting, real estate, and construction of the VA-NC Rebuild Project after a final order from the Commission on the Virginia Rebuild Project. Accordingly, to support this estimated construction timeline and construction plan, the Company respectfully requests a final order by June 11, 2024. Should the Commission issue a final order by June 11, 2024, the Company estimates that construction of the VA-NC Rebuild Project should begin by April 2026, and be completed by December 31, 2028. This construction timeline will enable the Company to meet the targeted in-service date for the Virginia Rebuild Project. This schedule is contingent upon obtaining the necessary permits and outages. Dates may need to be adjusted based on permitting delays or design modifications to comply with additional agency requirements identified during the permitting application process, as well as the ability to schedule outages or unpredictable delays due to labor shortages and/or materials/supply. In addition, the Company is actively monitoring the regulatory changes and requirements associated with the Northern long-eared bat (“NLEB”) and how it could potentially impact construction timing associated with time of year restrictions (“TOYRs”). The existing interim guidance from the U.S. Fish and Wildlife Service (“USFWS”) for the NLEB expires on March 31, 2024. The Company is also monitoring potential regulatory changes associated with the potential listing of the Tri-colored bat and Little Brown Bat. On September 14, 2022, the Tri-colored bat was proposed to be listed as endangered, with an estimated announcement of a final decision within 12 months; however, as of the writing of this document the listing has not been published in the Federal Register. Regulatory guidance on the Tri-colored bat will be available upon listing. The Little Brown Bat is currently under review for listing by USFWS, with a decision expected in 2024. The Company’s construction window described above may require adjustment based upon the regulatory guidance and potential TOYRs associated with these two bat species.

## **I. NECESSITY FOR THE PROPOSED PROJECT**

- I. Provide the estimated total cost of the project as well as total transmission-related costs and total substation-related costs. Provide the total estimated cost for each feasible alternative considered. Identify and describe the cost classification (e.g. “conceptual cost,” “detailed cost,” etc.) for each cost provided.**

Response: The total estimated conceptual cost of the Virginia Rebuild Project is approximately \$38.9 million (in 2023 dollars), which includes approximately \$38.5 million for transmission-related work and approximately \$400,000 for substation-related work (in 2023 dollars).

The total estimated conceptual cost of the VA-NC Rebuild Project is approximately \$150 million (in 2023 dollars), which includes estimated costs associated with the North Carolina Rebuild Project.

**I. NECESSITY FOR THE PROPOSED PROJECT**

- J. If the proposed project has been approved by the RTO, provide the line number, regional transmission expansion plan number, cost responsibility assignments, and cost allocation methodology. State whether the proposed project is considered to be a baseline or supplemental project.**

Response: The Company submitted the VA-NC Rebuild Project proposal as a supplemental project to the PJM RTEP process in August 2023 and plans to submit additional information in December 2023 to address the end-of-life criteria. Attachment I.J.1 contains the relevant slides presented at the August 2023 PJM TEAC meeting, and Attachment I.J.2 contains the relevant slides that the Company plans to present at the December 2023 PJM TEAC meeting.

No additional reliability studies were required by PJM in support of the need for the proposed VA-NC Rebuild Project because service to the customer fed from Dominion Energy North Carolina's Nucor Substation would be dropped absent the proposed VA-NC Rebuild Project. The proposed VA-NC Rebuild Project is expected to be incorporated into PJM's RTEP process as a supplemental project.

The VA-NC Rebuild Project will be 100% cost allocated to the DOM Zone.

Dominion Transmission Zone: Supplemental  
Equipment Material Condition, Performance and Risk

**Need Number:** DOM-2023-0044

**Process Stage:** Need Meeting 08/08/2023

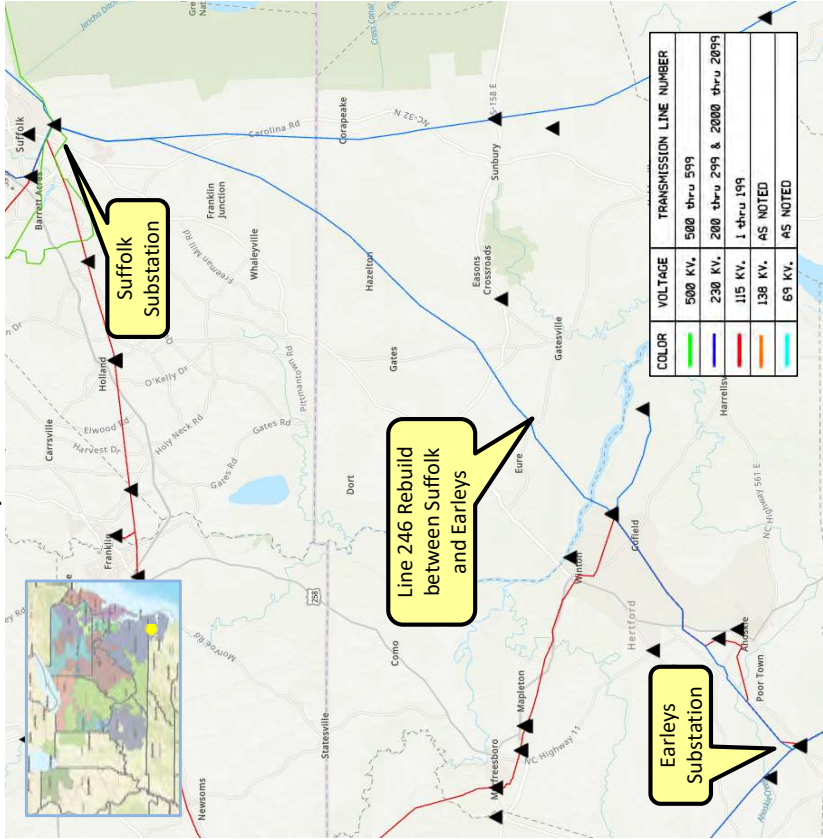
**Project Driver:** Equipment Material Condition, Performance Risk

**Specific Assumption References:**

See details on Equipment Material Condition, Performance and Risk in Dominion’s Planning Assumptions presented in December 2022.

**Problem Statement:**

- Dominion Energy has identified a need to replace approximately 44.3 miles of 230kV Line #246 (Suffolk to Earleys) to new 230kV standards based on the Company’s End of Life criteria.
- Line #246 was constructed on primarily wood H-frame structures in 1971, with many in need of replacement due to deterioration.
  - Industry guidelines indicate equipment life for steel structures is 40-60 years, wood structures is 35-55 years, conductor and connectors are 40-60 years, and porcelain insulators are 50 years.
  - Line #246 provides service to Nucor substation with approximately 36.7MW of load



TEAC – Dominion Supplemental 08/08/2023



Dominion Transmission Zone: Supplemental  
230kV Line 246 – EOL Rebuild

**Need Number:** DOM-2023-0044

**Process Stage:** Solution Meeting 12/05/2023

**Proposed Solution:** Rebuild approximately 44.3 miles of Line 246 between Earleys and Suffolk to current 230kV standards. The normal rating of the line conductor will be 1573 MVA.

**Estimated Project Cost:** \$150M

**Alternatives Considered:**

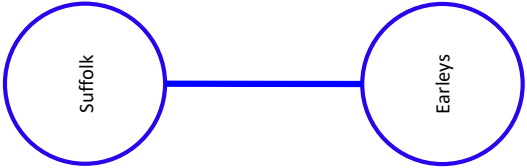
No feasible alternatives, End-of-Life

Line 246 is the only transmission supply to Nucor Steel. Permanent load loss for removal of this line is estimated at 36.7MW.

**Project In-service Date:** 12/31/2028

**Project Status:** Conceptual

**Model:** 2027 RTEP



**I. NECESSITY FOR THE PROPOSED PROJECT**

- K. If the need for the proposed project is due in part to reliability issues and the proposed project is a rebuild of an existing transmission line(s), provide five years of outage history for the line(s), including for each outage the cause, duration and number of customers affected. Include a summary of the average annual number and duration of outages. Provide the average annual number and duration of outages on all Applicant circuits of the same voltage, as well as the total number of such circuits. In addition to outage history, provide five years of maintenance history on the line(s) to be rebuilt including a description of the work performed as well as the cost to complete the maintenance. Describe any system work already undertaken to address this outage history.**

Response: Not applicable. The need for the Virginia Rebuild Project is not driven by outage history, but rather by the need to replace transmission infrastructure approaching its end of life. See Section I.A of this Appendix.

**I. NECESSITY FOR THE PROPOSED PROJECT**

- L. If the need for the proposed project is due in part to deterioration of structures and associated equipment, provide representative photographs and inspection records detailing their condition.**

Response: The proposed Virginia Rebuild Project will replace aging infrastructure that is at the end of its service life.

See Attachment I.L.1 for representative photographs of the deterioration of the wood poles supporting Line #246 that have been identified for rebuild and Attachment I.L.2 for the wood pole inspection reports detailing the condition of those representative structures.

**Summary:**

Located between Suffolk and Earlys Substations, line #246 is at its end of service life. Approximately 75% of the line currently consists of wooden h-frame structures in need of repair from an operational and reliability perspective. Most of the hardware, insulators, and conductors were installed in 1971 and is approximately 50 years old.

**EOL Project:**

Currently, rebuild project 993045 is established and has a target completion date of the 8/31/2028.

**Right-of-ways:**

Line #246 passes through vast areas of farmland, wetlands, major water-crossings, and states routes. A rebuild should explore any right-of-way challenges.

**Mainline (Virginia Portion)**

~200' Shared ROW with Line #247 between Strs. 1 – 10

~180' Shared ROW with Line #247 between Strs. 10 – 39

~120' ROW between Strs. 39 – 95 (VA State Line)

**Virginia Asset Information:**

Line #246 is comprised mostly of wood structures. All the 95 wooden structures located in the state of Virginia are of 1971 vintage. The rest of the Virginia portion of the line comprises of one (1) concrete structure, two (2) galvanized steel structures, and one (1) weathering steel pole structure. The line was constructed using 2-545.6 ACAR (24/7) and 3#6 ALWD shield wire that is approximately 50 years old. Porcelain and hardware are also 1971 vintage.

**Operation History:**

The 246 line has experienced 25-line operations in the past 15 yrs. two (2) of which led to extensive outages for repairs.

<b>Short Desc.</b>	<b># Events</b>	<b>Long Desc.</b>
Avian Disturbance	15	Bird Streamer/Bird Contact
Line Equipment Failure	2	1 Conductor Sleeve, 1 Failed Static
Weather	4	3 Lightning, 1 Extreme Wind
Unknown	4	Unknown After Exhaustive Patrol

*Summary of 15 yr. Operational History***Maintenance (Virginia Portion):**

wPole inspections have shown the wooden/concrete poles are approaching their end-of-life. There are a total of twenty-one (21) structure-related open notifications in the state of Virginia (approximately %25 of structures). Of those twenty-one (21) outstanding maintenances notifications five (5) structures were reported as severe rot/decay, two (2) experiencing severe cracking, fourteen (14) woodpecker damage.

**Remediation Work Done in 2023**

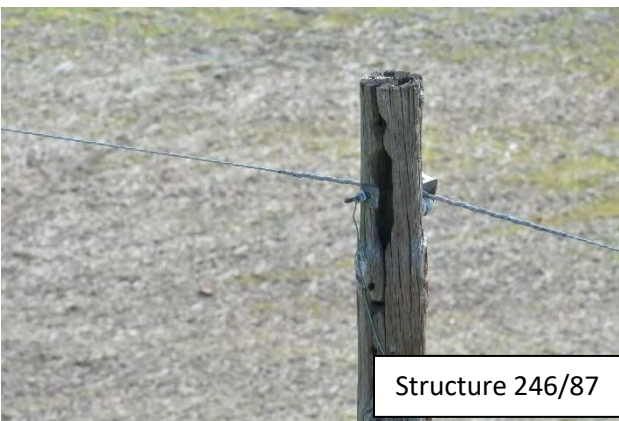
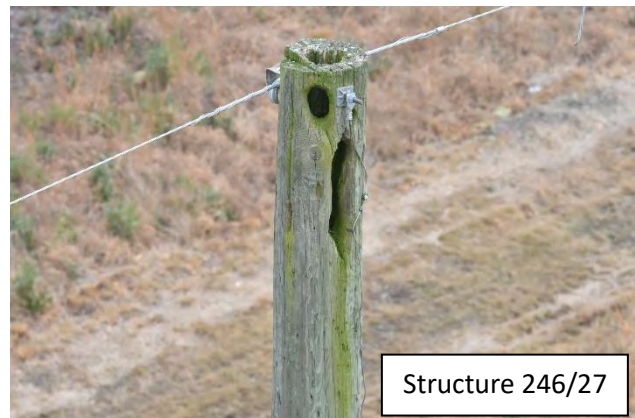
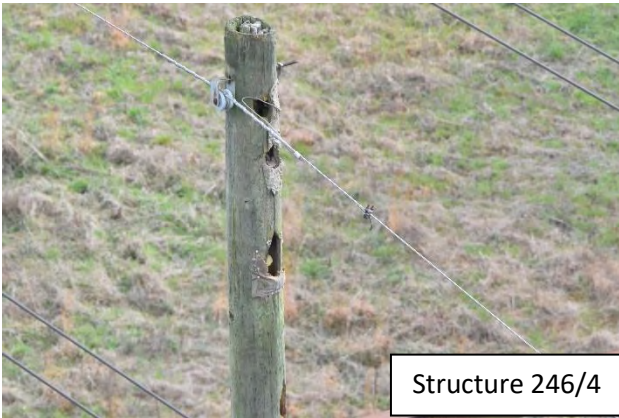
Strs. 4, 5, 15, 21, 22, 24, 27, 31, 35, 36, 37, 49, 55, 59, 60, 61, 69, 70, 71, 87



Hardware Corrosion:

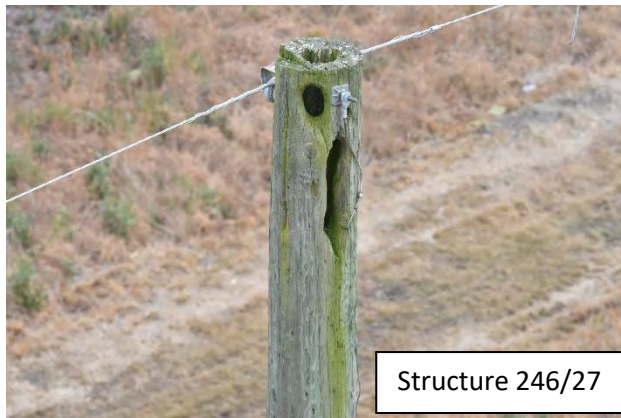


Woodpecker Damage:

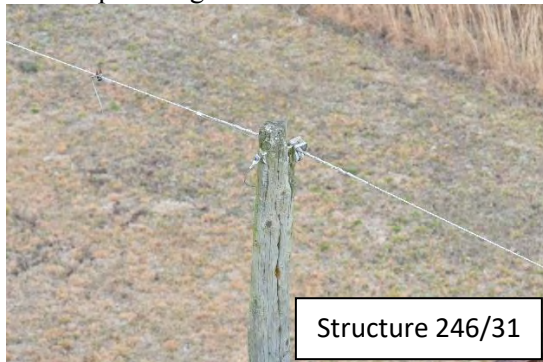




Rot/Decay:



Pole Top Damage:



OUTSTANDING NOTIFICATIONS - LINE 246				
LINE/STR	CAUSE GROUP	CAUSE CODE	CAUSE TEXT	NOTIF. DATE
246/2	Wood Pole	Str- C=Cracked,S=Split,CH=Chipped	3 pole str. Middle pole is rotting at gr	1/19/2021
246/5	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/6	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/7	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/9	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/11	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/12	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/13	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/14	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/15	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/16	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/17	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/18	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/19	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/20	Wood Pole	WP Dmg-AC=AbovCA,BC=BeloCA,BG=BetwnGy	AC	8/12/2013
246/20	Wood Pole	WP Damage-MI=Minor, MA=Major	MI	8/12/2013
246/20	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/21	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/21	Wood Pole	Rot/Decay-Location/Type=	Right pole is rotting at base at ground	1/20/2021
246/22	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/23	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/24	Wood Pole	WP Dmg-AC=AbovCA,BC=BeloCA,BG=BetwnGy	ALL OVER	8/12/2013
246/24	Wood Pole	WP Damage-MI=Minor, MA=Major	MA (Various locations on both str)	8/12/2013
246/24	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/25	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/26	Wood Pole	WP Dmg-AC=AbovCA,BC=BeloCA,BG=BetwnGy	AC	8/12/2013
246/26	Wood Pole	WP Damage-MI=Minor, MA=Major	MI	8/12/2013
246/26	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/27 Pending Removal	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/27 Pending Removal	Wood Pole	R/R(RP=Replace,RE=Repair) Severity=	RP per W. Gatlin	2/4/2013
246/27 Pending Removal	Wood Pole	Rot/Decay-Location/Type=	Top of Pole is rotting	1/20/2021
246/27 Pending Removal	Wood Pole	R/R(RP=Replace,RE=Repair) Severity=	RP per W. Gatlin	1/20/2021
246/28	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/30	Static Wire	Static Wire Other=	Loose Shield Wire anchor plates	12/6/2011
246/30	Static Wire	Wire Position L,M,R,T,B	R	12/6/2011
246/30	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/31	Wood Pole	Pole Position=	Left	6/5/2014
246/31	Wood Pole	WP Damage-MI=Minor, MA=Major	Small - 6	6/5/2014
246/31	Wood Pole	Rot/Decay-Location/Type=	Shell rot depth .08in	6/5/2014
246/31	Wood Pole	Pole Position=	Right	6/5/2014
246/31	Wood Pole	Rot/Decay-Location/Type=	Med - 1	6/5/2014
246/31	Wood Pole	Rot/Decay-Location/Type=	Shell rot depth .16in	6/5/2014
246/31	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/32	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/33	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/34	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/35	Wood Pole	WP Dmg-AC=AbovCA,BC=BeloCA,BG=BetwnGy	AC	8/13/2013
246/35	Wood Pole	WP Damage-MI=Minor, MA=Major	MI	8/13/2013
246/35			Says top is cracking near static	8/13/2013
246/35	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/36	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/36	Static Wire	Static Wire Other=	Broken	3/29/2017
246/37 Pending Removal	Conductor	Damaged	broke	12/6/2011
246/37 Pending Removal	Conductor	Wire Position L,M,R,T,B	R	12/6/2011
246/37 Pending Removal	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/37 Pending Removal	Wood Pole	R/R(RP=Replace,RE=Repair) Severity=	RP per W. Gatlin	2/4/2013
246/39	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/40	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/41	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/42	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/43	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/44	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/45	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/46	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Replace	2/4/2013
246/47	Wood Pole	Str Number-M=Missing,F=Faded,A=Aerial	Missing	1/25/2018
246/54	Wood Pole	WP Dmg-AC=AbovCA,BC=BeloCA,BG=BetwnGy	AC	8/7/2013
246/54	Wood Pole	WP Damage-MI=Minor, MA=Major	MI	8/7/2013
246/55	Wood Pole	WP Dmg-AC=AbovCA,BC=BeloCA,BG=BetwnGy	AC	8/7/2013
246/55	Wood Pole	WP Damage-MI=Minor, MA=Major	MA	8/7/2013
246/59	Wood Pole	Str- C=Cracked,S=Split,CH=Chipped	Top of pole deteriorating severely.	1/27/2021
246/60 Pending Removal	Wood Pole	WP Damage-MI=Minor, MA=Major	MA	1/27/2021
246/60 Pending Removal	Wood Pole	WP Dmg-AC=AbovCA,BC=BeloCA,BG=BetwnGy	AC. Right at Static	1/27/2021
246/60 Pending Removal	Wood Pole	R/R(RP=Replace,RE=Repair) Severity=	RP per W. Gatlin	1/27/2021

246/61	Wood Pole	WP Dmg-AC=AbovCA,BC=BeloCA,BG=BetwnGy	AC/BC	8/7/2013
246/61	Wood Pole	WP Damage-MI=Minor, MA=Major	MI	8/7/2013
246/64	Wood Pole	Str- C=Cracked,S=Split,CH=Chipped	Top of pole decaying.	1/27/2021
246/66 Pending Removal	Wood Pole	WP Damage-MI=Minor, MA=Major	MA	1/27/2021
246/66 Pending Removal	Wood Pole	WP Dmg-AC=AbovCA,BC=BeloCA,BG=BetwnGy	AC. Right at static bolt.	1/27/2021
246/66 Pending Removal	Wood Pole	R/R(RP=Replace,RE=Repair) Severity=	RP per W. Gatlin	1/27/2021
246/81	Wood Pole	Str Number-M=Missing,F=Faded,A=Aerial	M	1/31/2018
246/83	Wood Pole	Str Number-M=Missing,F=Faded,A=Aerial	M	1/31/2018
246/84	Wood Pole	Pole Position=	L	5/9/2017
246/84	Wood Pole	WP Damage-MI=Minor, MA=Major		5/9/2017
246/87 Pending Removal	Wood Pole	Shelf Gain-RP=Repair,RE=Rpair	Wood Pole-Shelf Gain-RP=Repair,RE=Rpair	2/2/2021
246/87 Pending Removal	Wood Pole	WP Damage-MI=Minor, MA=Major	Ma top at static	2/2/2021
246/87 Pending Removal	Wood Pole	R/R(RP=Replace,RE=Repair) Severity=	RP per W. Gatlin	2/2/2021
246/88 Pending Removal	Wood Pole	WP Damage-MI=Minor, MA=Major	at static through bolt	1/16/2016
246/88 Pending Removal	Wood Pole	R/R(RP=Replace,RE=Repair) Severity=	RP per W. Gatlin	1/16/2016
246/88 Pending Removal	Wood Pole	Pole Other=	Pole Cracked	2/6/2017
246/88 Pending Removal	Wood Pole	Rot/Decay-Location/Type=	Top	2/6/2017
246/88 Pending Removal			From notif.# 11625666	2/6/2017
246/88 Pending Removal	Wood Pole	R/R(RP=Replace,RE=Repair) Severity=	RP per W. Gatlin	2/6/2017

**I. NECESSITY FOR THE PROPOSED PROJECT**

**M. In addition to the other information required by these guidelines, applications for approval to construct facilities and transmission lines interconnecting a Non-Utility Generator (“NUG”) and a utility shall include the following information:**

- 1. The full name of the NUG as it appears in its contract with the utility and the dates of initial contract and any amendments;**
- 2. A description of the arrangements for financing the facilities, including information on the allocation of costs between the utility and the NUG;**
- 3. a. For Qualifying Facilities (“QFs”) certificated by Federal Energy Regulatory Commission (“FERC”) order, provide the QF or docket number, the dates of all certification or recertification orders, and the citation to FERC Reports, if available;**  
**b. For self-certificated QFs, provide a copy of the notice filed with FERC;**
- 4. Provide the project number and project name used by FERC in licensing hydroelectric projects; also provide the dates of all orders and citations to FERC Reports, if available; and**
- 5. If the name provided in 1 above differs from the name provided in 3 above, give a full explanation.**

Response: Not applicable.

**I. NECESSITY FOR THE PROPOSED PROJECT**

- N. Describe the proposed and existing generating sources, distribution circuits or load centers planned to be served by all new substations, switching stations and other ground facilities associated with the proposed project.**

Response: Not applicable.

## **II. DESCRIPTION OF THE PROPOSED PROJECT**

### **A. Right-of-way (“ROW”)**

#### **1. Provide the length of the proposed corridor and viable alternatives.**

Response: The total length of the existing right-of-way for the Virginia Rebuild Project is approximately 11.9 miles from Structure #246/1C within the Company’s existing Suffolk Substation to Structure #246/94 at the Virginia state line. The right-of-way is located entirely within the City of Suffolk, Virginia.

No alternative routes are proposed for the Virginia Rebuild Project. See Section II.A.9 of the Appendix for an explanation of the Company’s route selection process.

## II. DESCRIPTION OF THE PROPOSED PROJECT

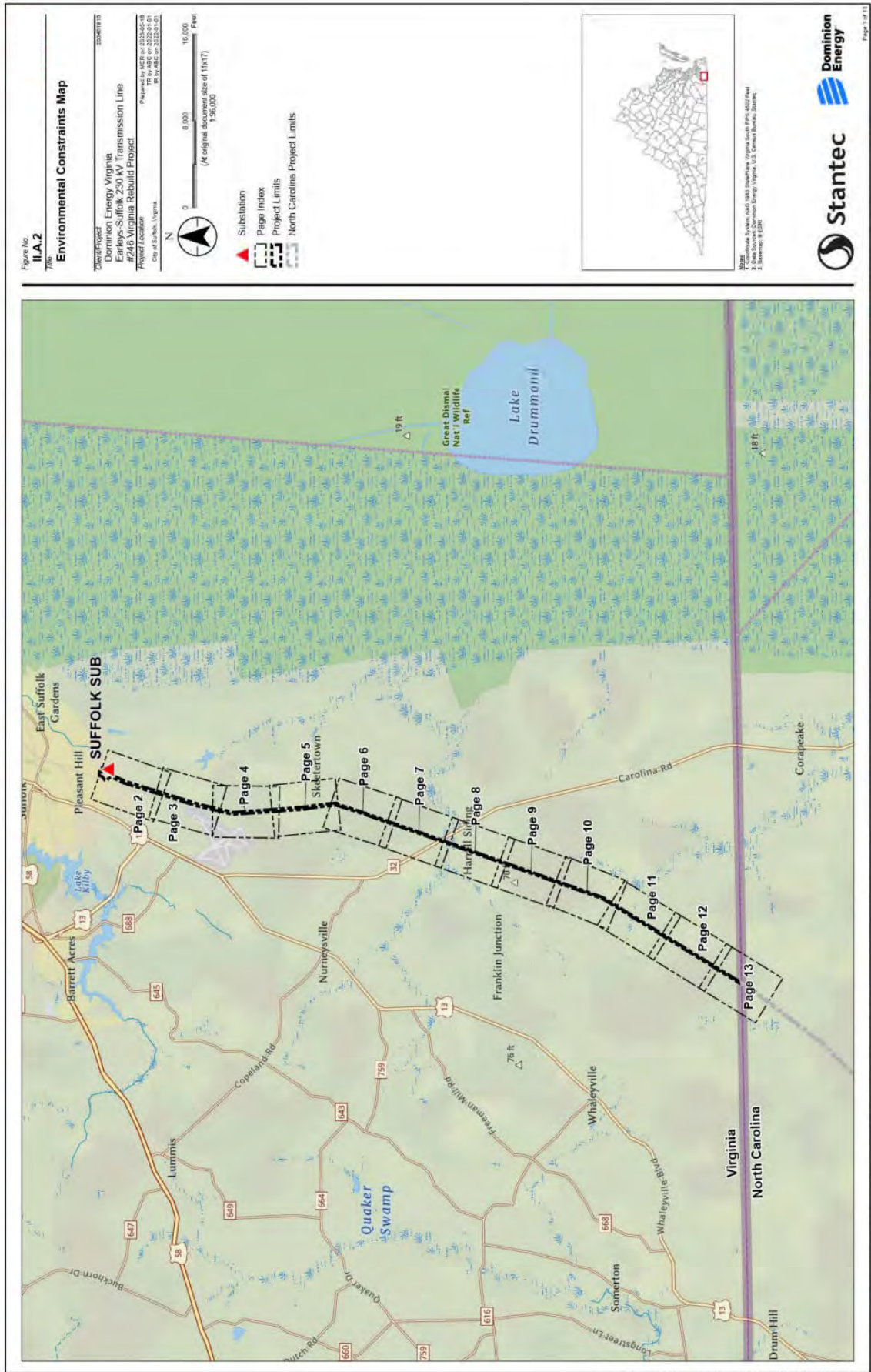
### A. Right-of-way (“ROW”)

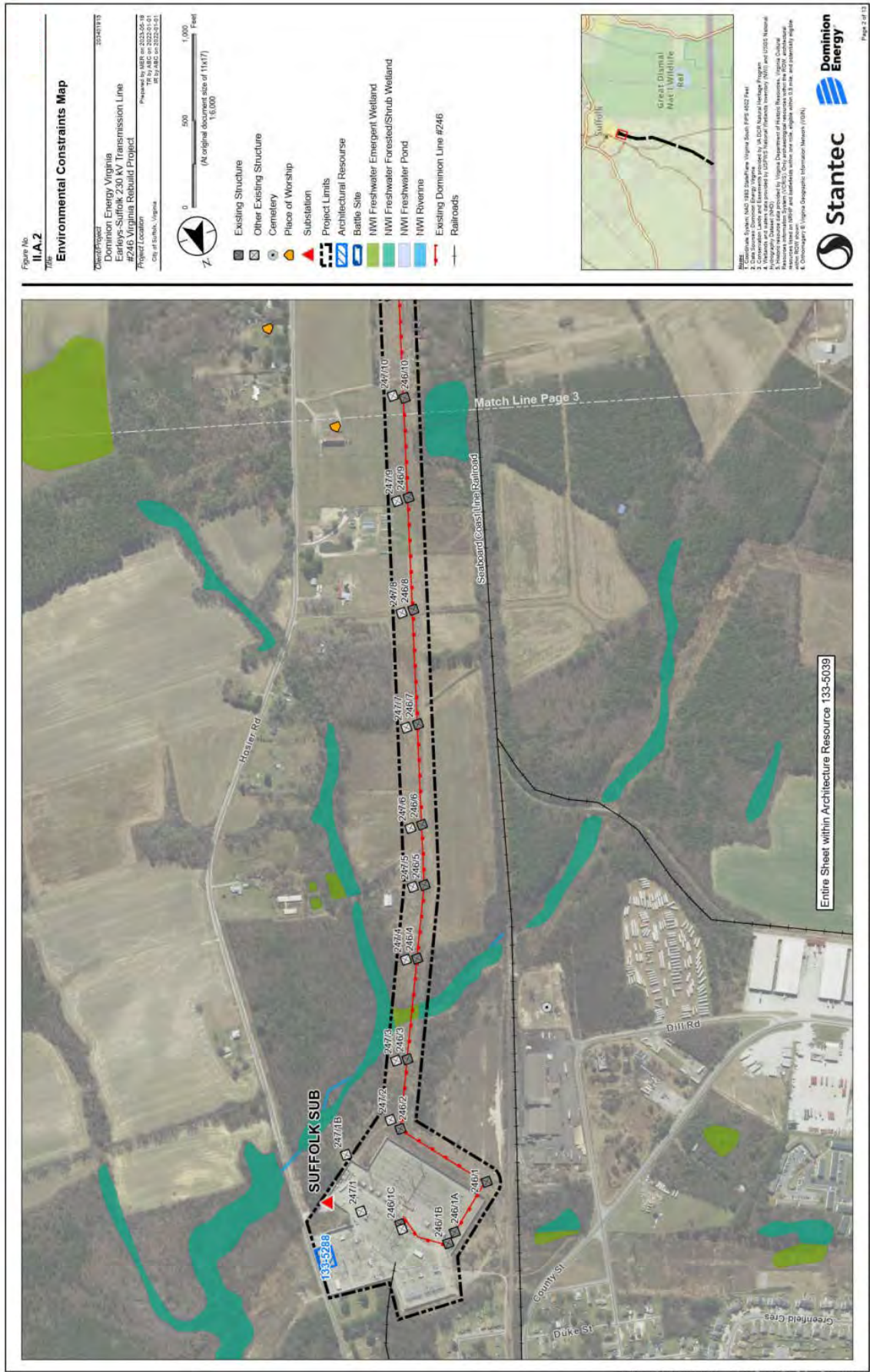
2. **Provide color maps of suitable scale (including both general location mapping and more detailed GIS-based constraints mapping) showing the route of the proposed line and its relation to: the facilities of other public utilities that could influence the route selection, highways, streets, parks and recreational areas, scenic and historic areas, open space and conservation easements, schools, convalescent centers, churches, hospitals, burial grounds/cemeteries, airports and other notable structures close to the proposed project. Indicate the existing linear utility facilities that the line is proposed to parallel, such as electric transmission lines, natural gas transmission lines, pipelines, highways, and railroads. Indicate any existing transmission ROW sections that are to be quitclaimed or otherwise relinquished. Additionally, identify the manner in which the Applicant will make available to interested persons, including state and local governmental entities, the digital GIS shape file for the route of the proposed line.**

Response: See Attachment II.A.2, which includes existing linear utilities paralleled by the existing transmission line corridor. The Virginia Rebuild Project is located within existing transmission line right-of-way, which collocates and parallels Line #247 for approximately four miles. No portion of the right-of-way is proposed to be quitclaimed or relinquished.

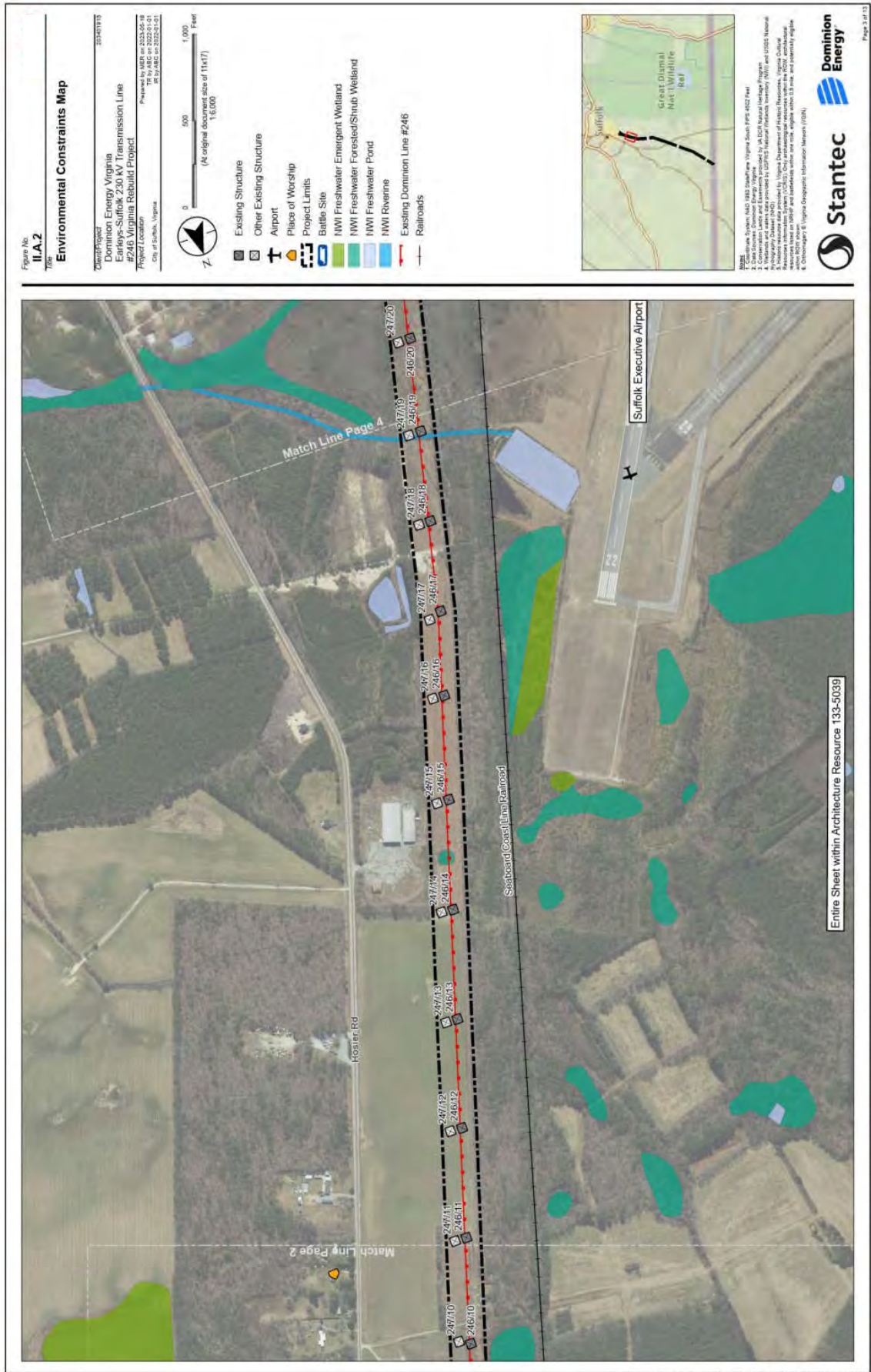
The Company will make a digital Geographic Information Systems (“GIS”) shape file available to interested persons upon request to counsel for the Company.





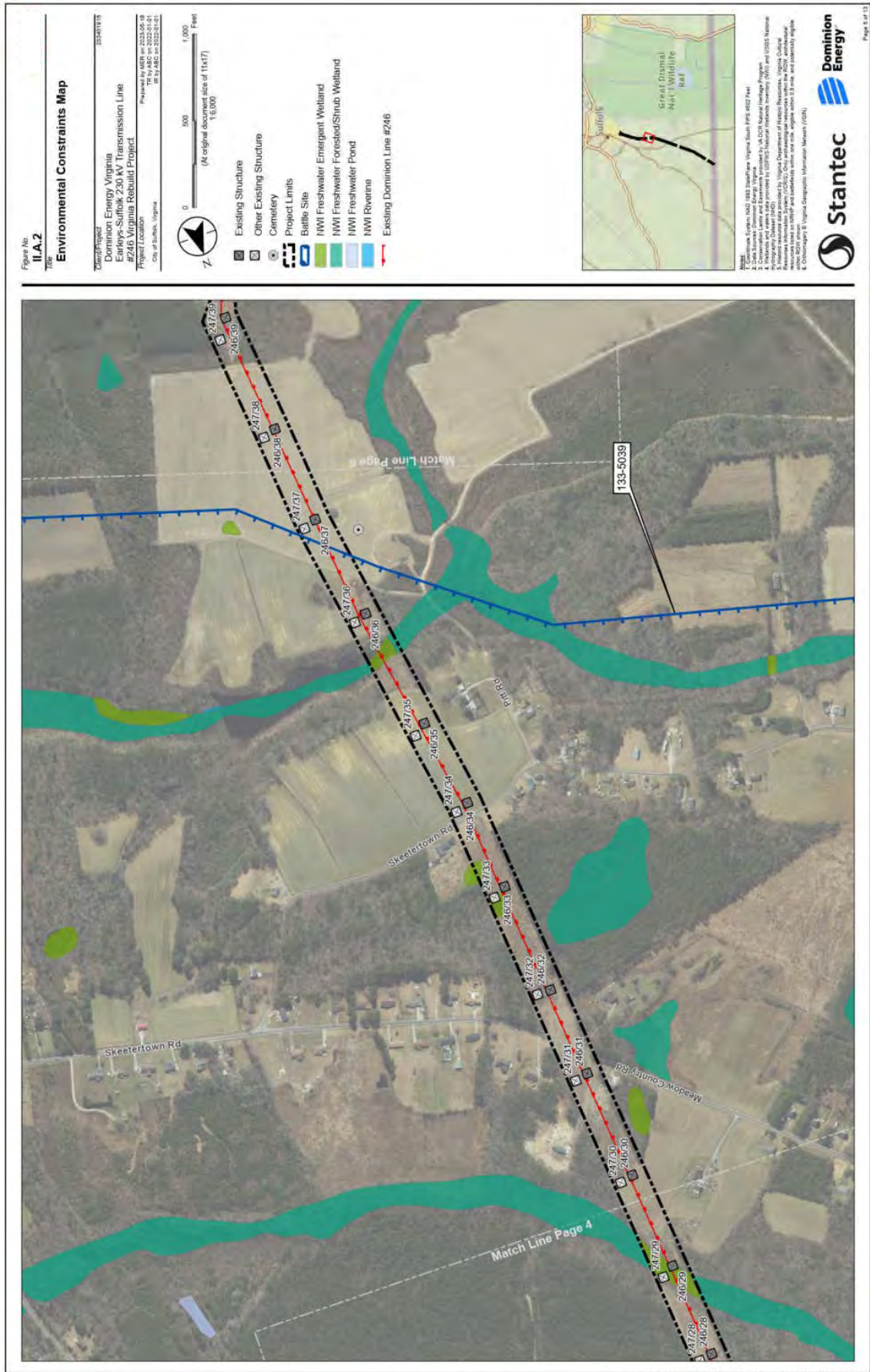


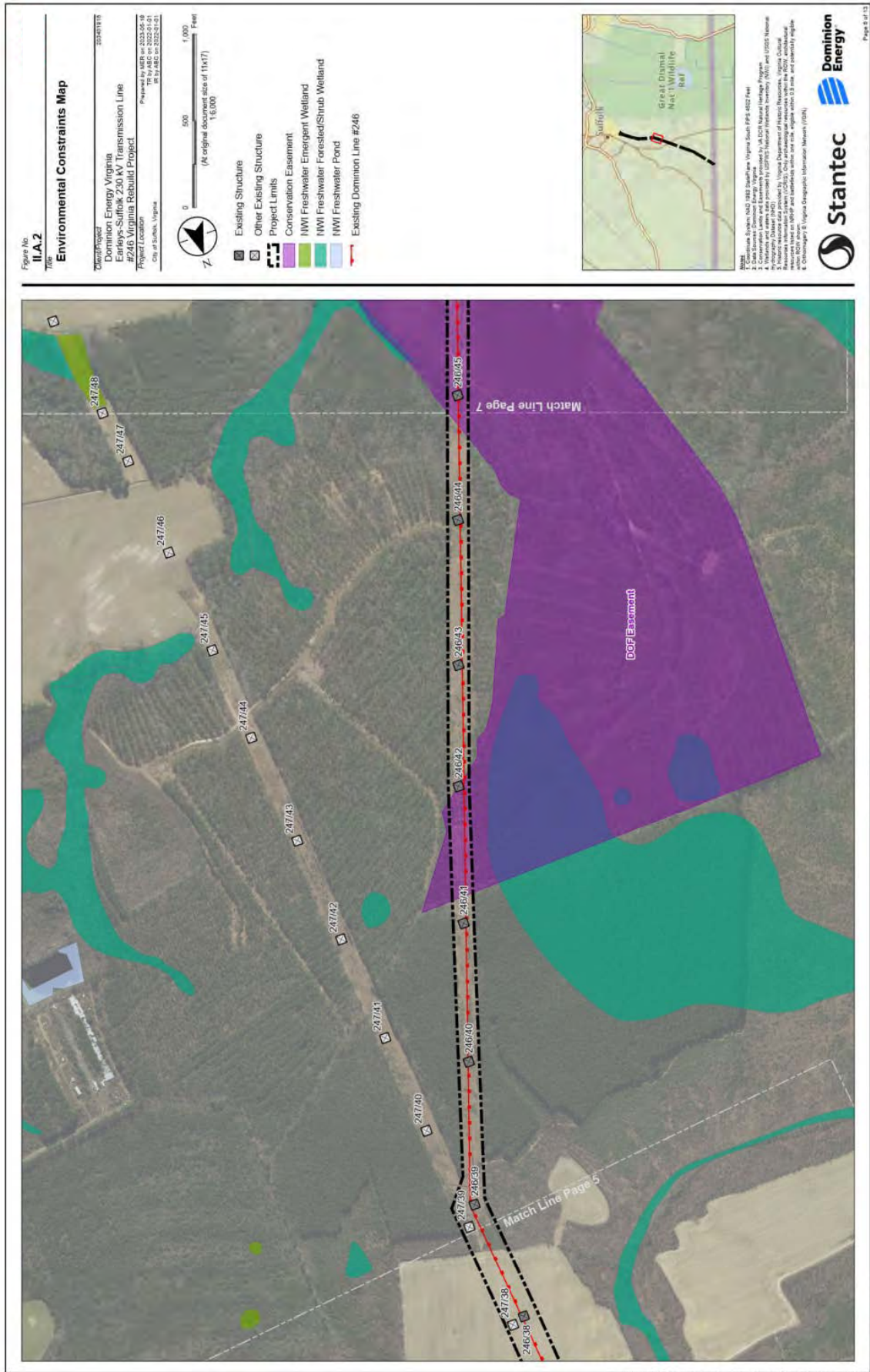




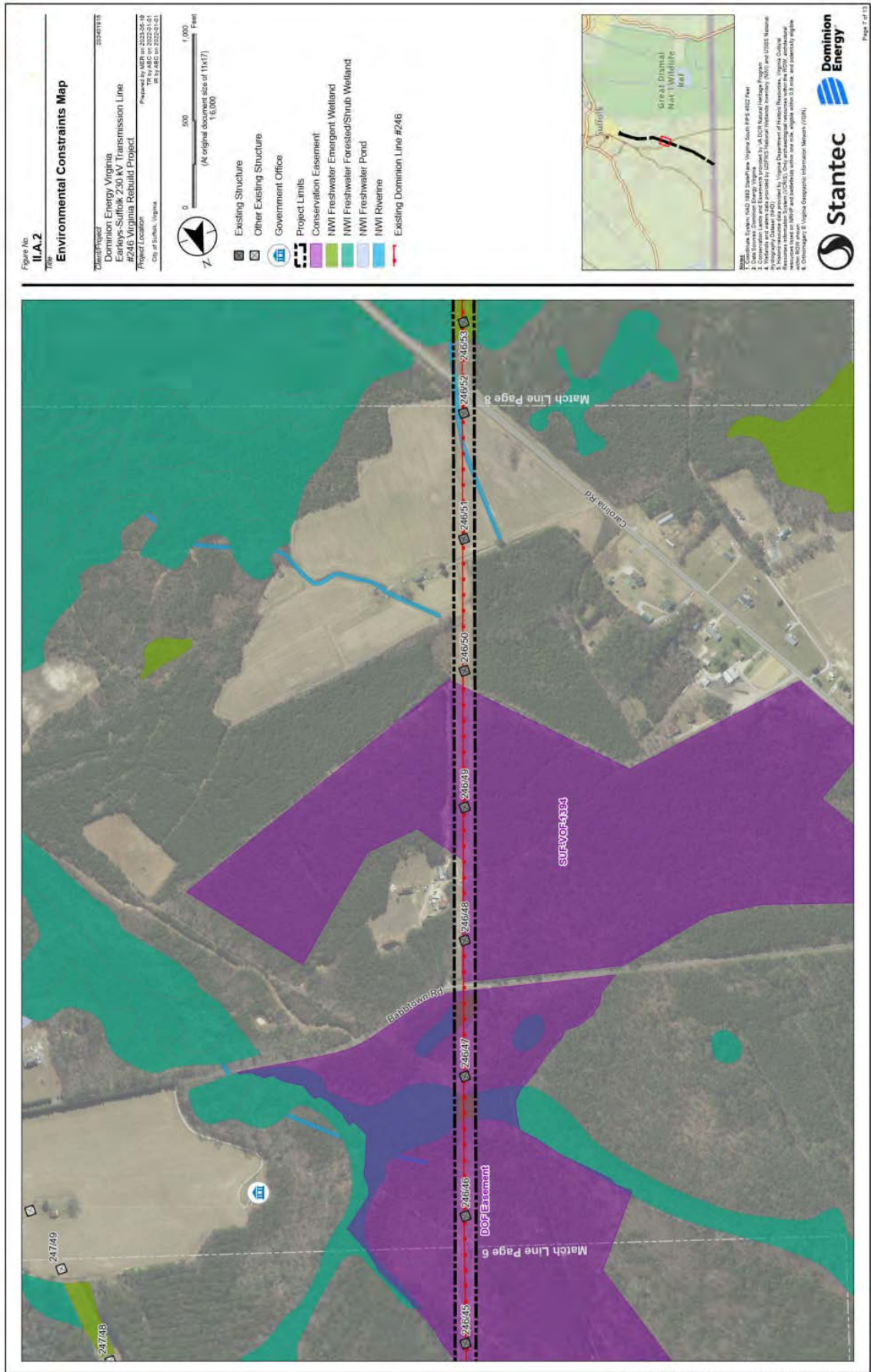


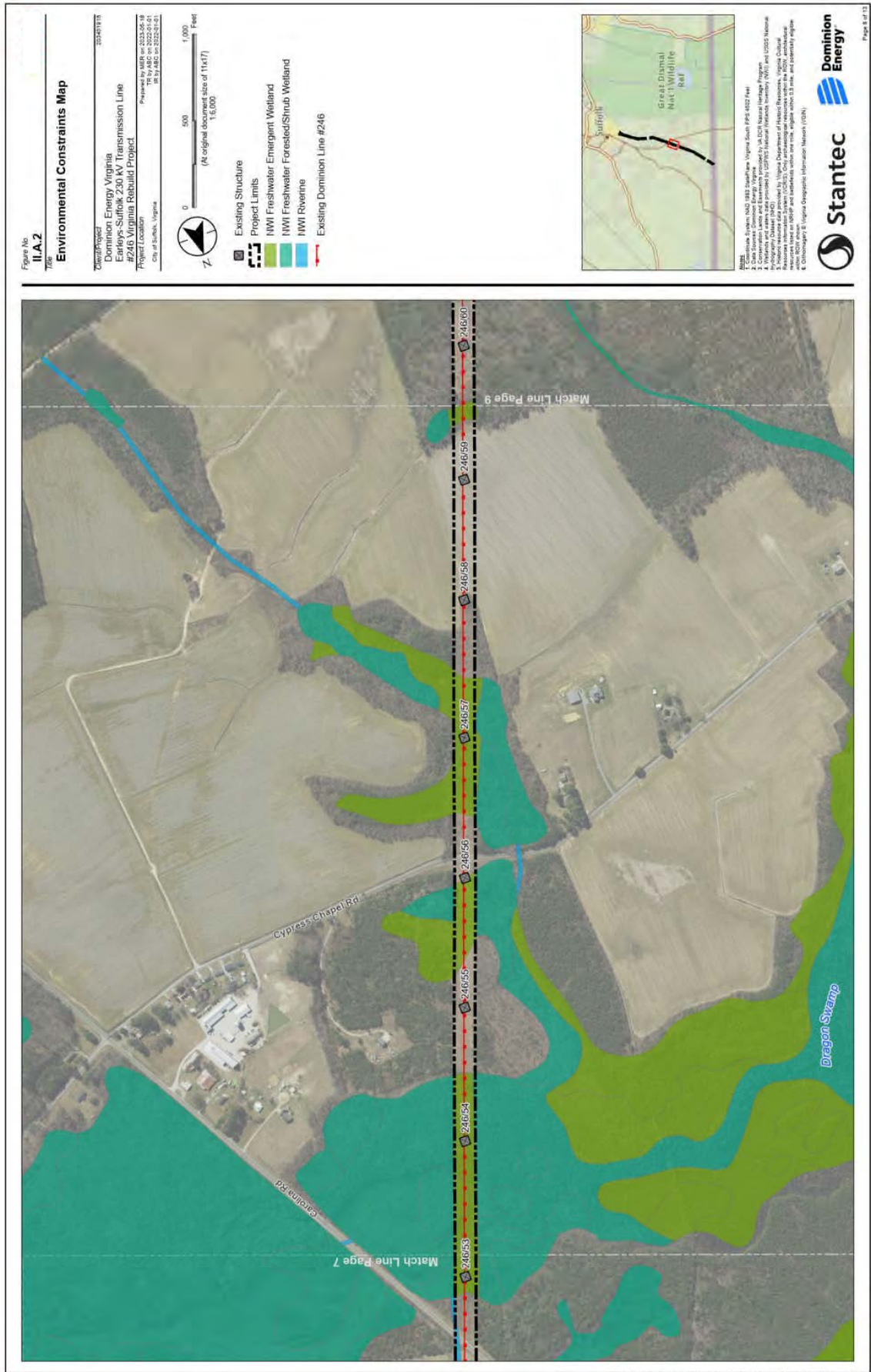






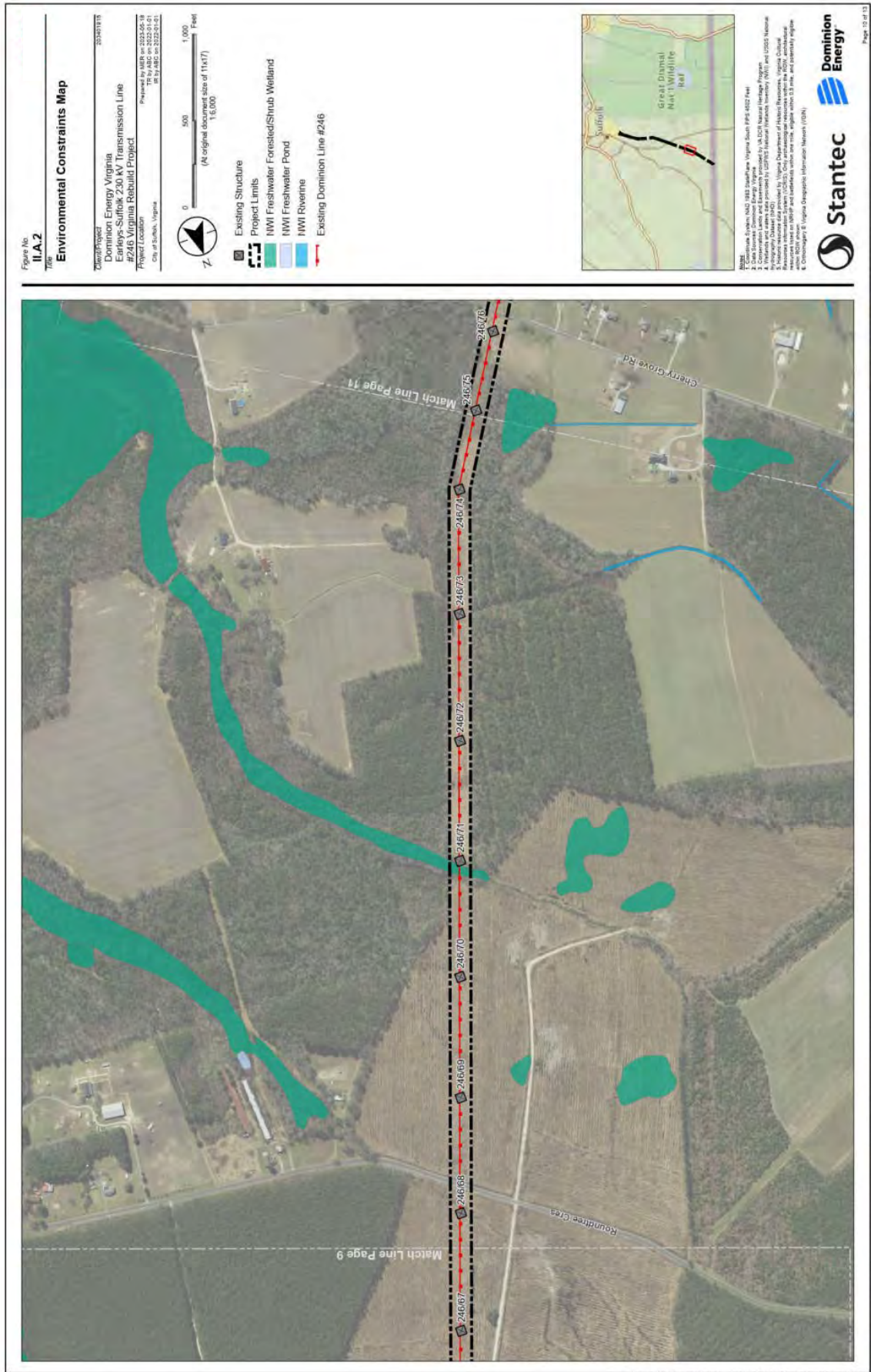






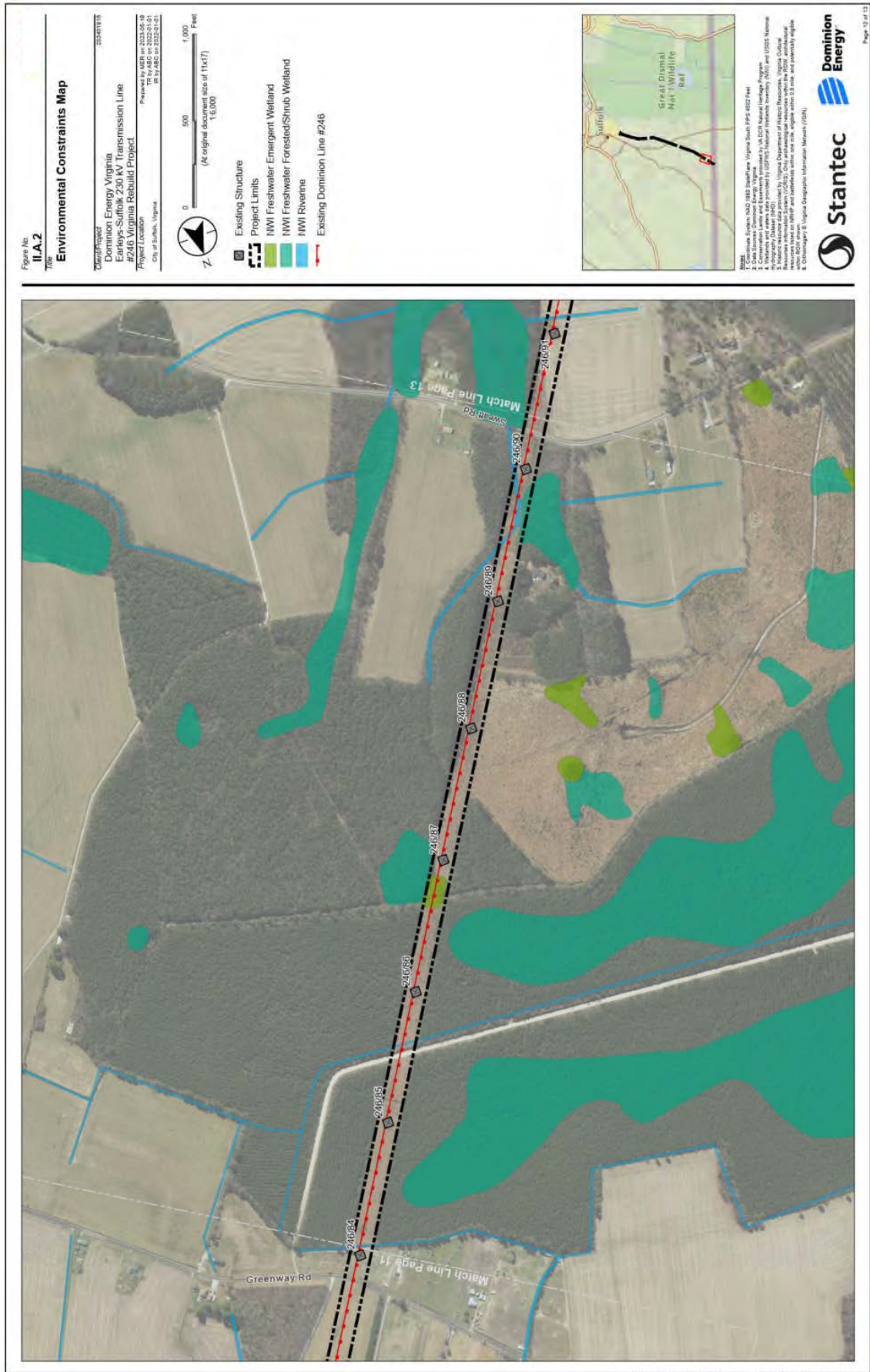




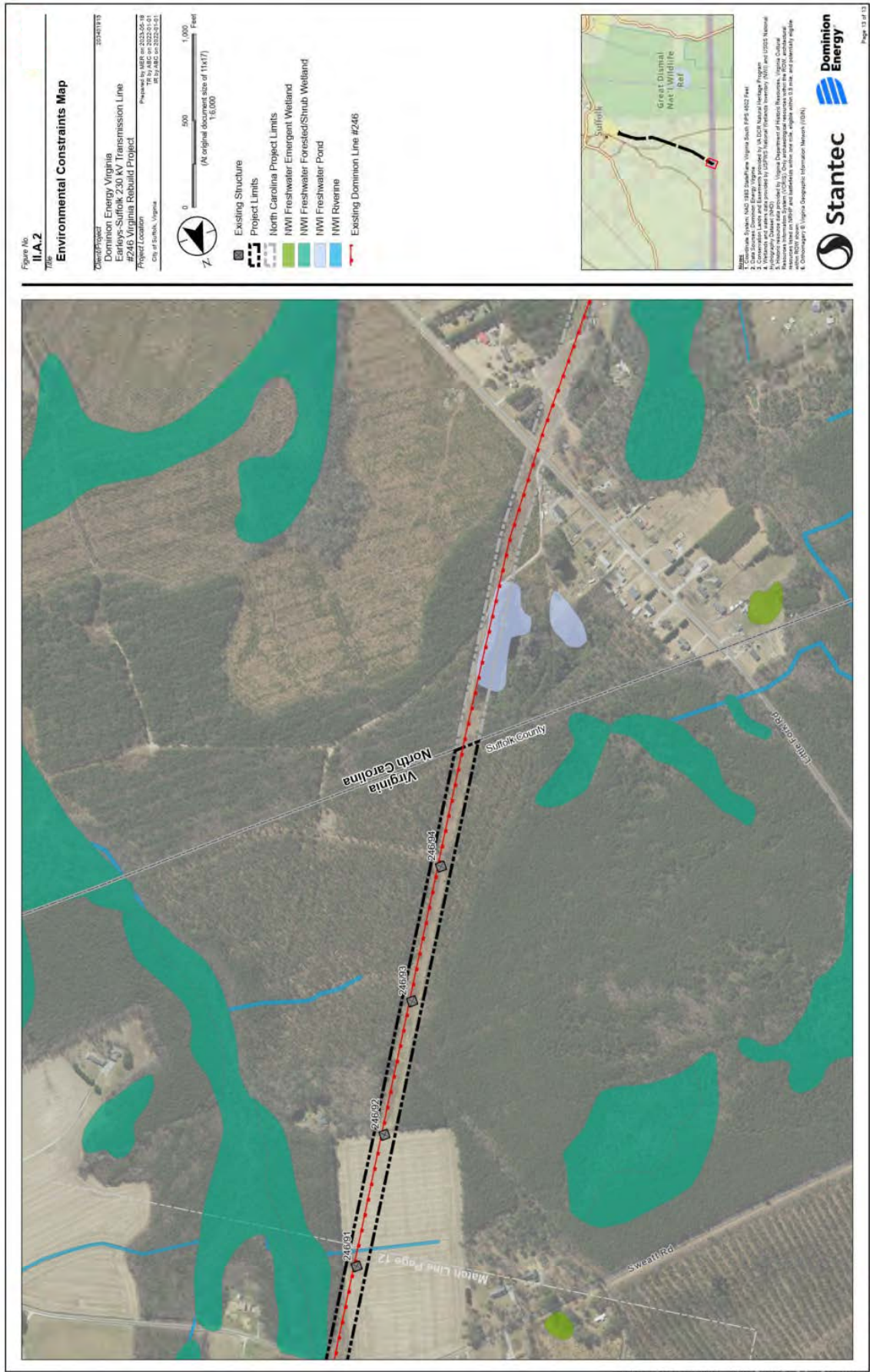












## **II. DESCRIPTION OF THE PROPOSED PROJECT**

### **A. Right-of-way (“ROW”)**

- 3. Provide a separate color map of a suitable scale showing all the Applicant’s transmission line ROWs, either existing or proposed, in the vicinity of the proposed project.**

Response: See Attachment I.G.1.

## **II. DESCRIPTION OF THE PROPOSED PROJECT**

### **A. Right-of-way (“ROW”)**

- 4. To the extent the proposed route is not entirely within existing ROW, explain why existing ROW cannot adequately service the needs of the Applicant.**

Response: Not applicable. The Virginia Rebuild Project is located within existing rights-of-way or on Company-owned property and no additional rights-of-way are needed.

## **II. DESCRIPTION OF THE PROPOSED PROJECT**

### **A. Right-of-way (“ROW”)**

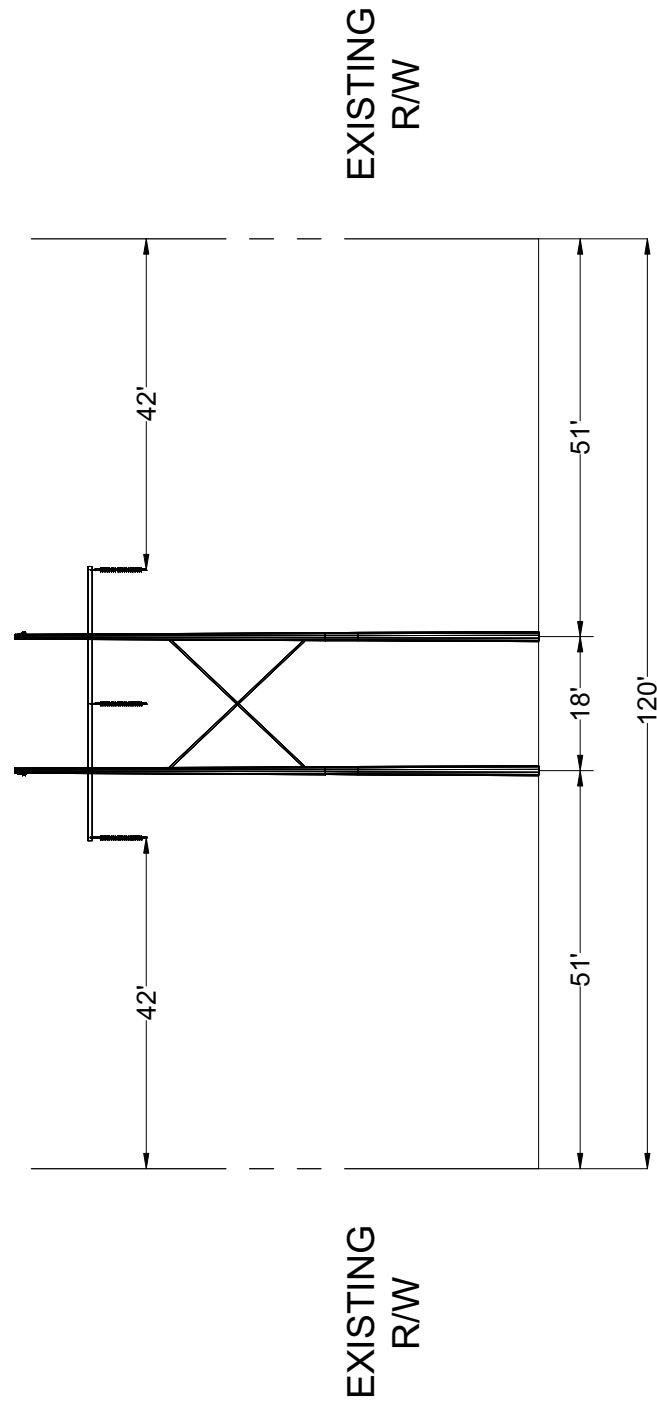
- 5. Provide drawings of the ROW cross section showing typical transmission line structure placements referenced to the edge of the ROW. These drawings should include:**
  - a. ROW width for each cross section drawing;**
  - b. Lateral distance between the conductors and edge of ROW;**
  - c. Existing utility facilities on the ROW; and**
  - d. For lines being rebuilt in existing ROW, provide all of the above (i) as it currently exists, and (ii) as it will exist at the conclusion of the proposed project.**

Response: See Attachments II.A.5.a through II.A.5.d.



**SUFFOLK - EARLEYS, LINE #246**  
**EXISTING CONFIGURATION**

**EXISTING 230kV  
 CIRCUIT  
 LINE #246**



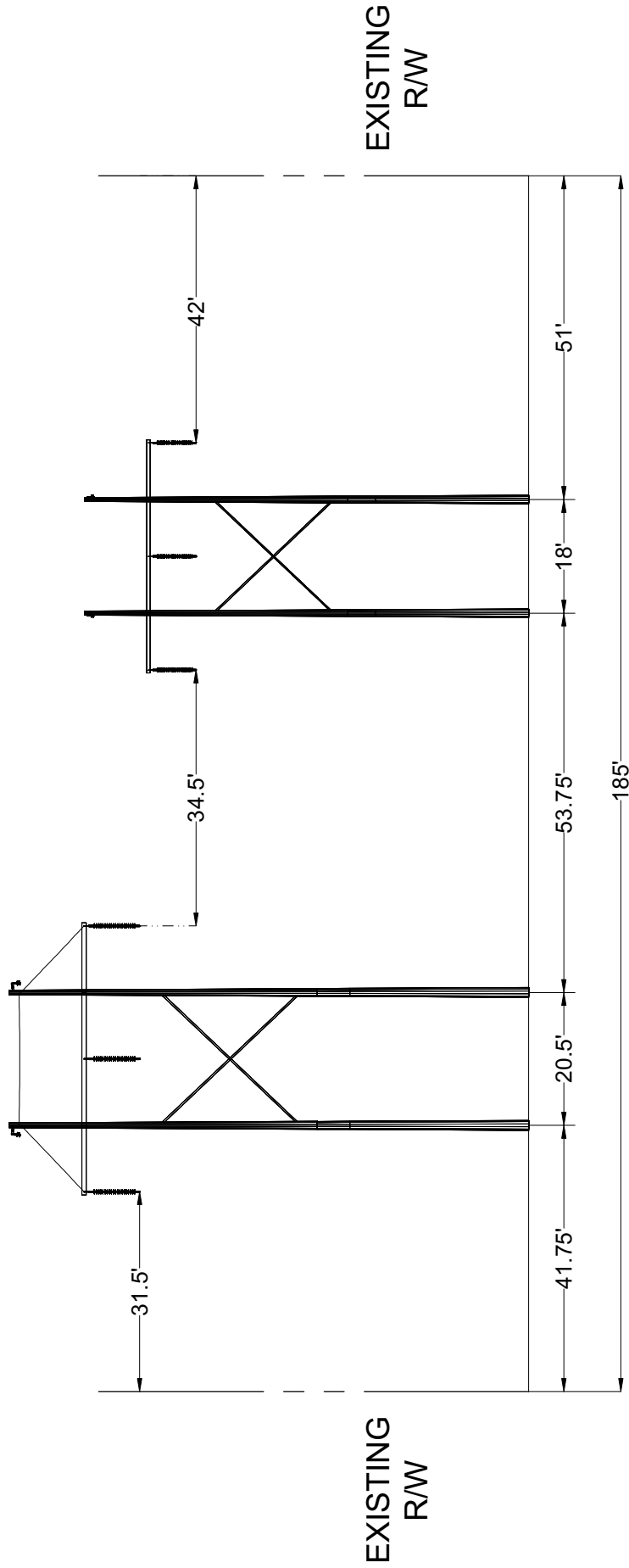
**TYPICAL RIGHT OF WAY LOOKING TOWARD EARLEYS FROM STR #246/39 TO STR #246/94**

**NOTE: INFORMATION CONTAINED ON DRAWING IS CONSIDERED PRELIMINARY IN NATURE AND SUBJECT TO CHANGE BASED ON FINAL DESIGN.**

SUFFOLK - EARLEYS, LINE #246  
EXISTING CONFIGURATION

EXISTING 230kV  
CIRCUIT  
LINE #247

EXISTING 230kV  
CIRCUIT  
LINE #246

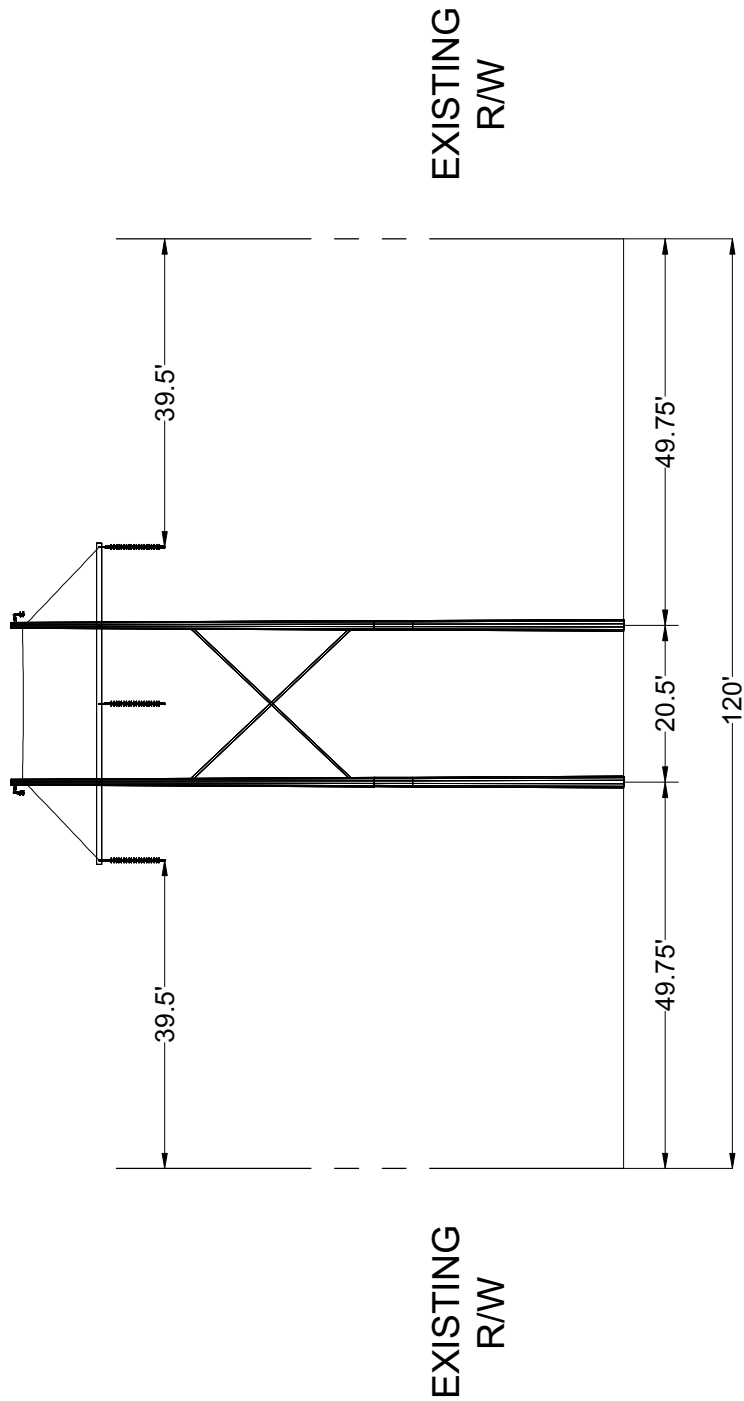


TYPICAL RIGHT OF WAY LOOKING TOWARD EARLEYS FROM SUFFOLK TO STR. #246/39

NOTE: INFORMATION CONTAINED ON DRAWING IS CONSIDERED PRELIMINARY IN NATURE AND SUBJECT TO CHANGE BASED ON FINAL DESIGN.

SUFFOLK - EARLEYS, LINE #246  
PROPOSED CONFIGURATION

PROPOSED 230kV  
CIRCUIT  
LINE #246



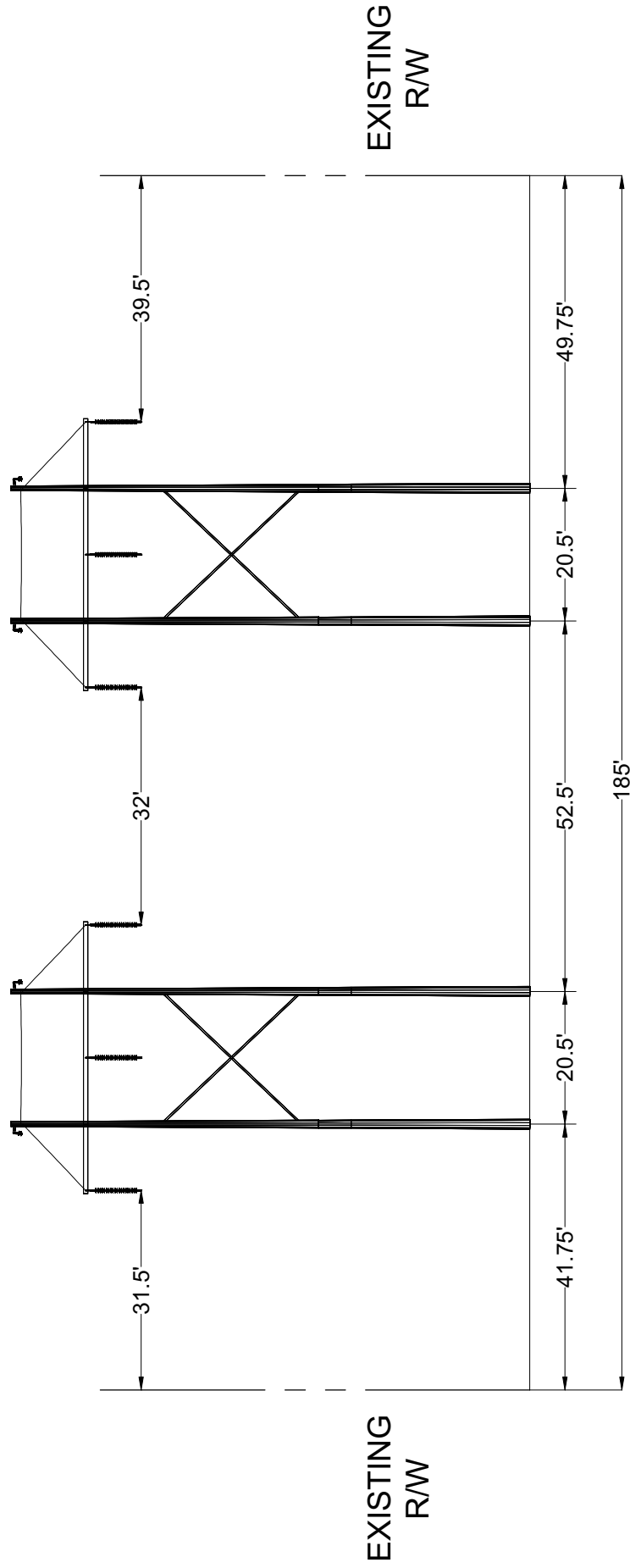
TYPICAL RIGHT OF WAY LOOKING TOWARD EARLEYS FROM STR #246/39 TO STR #246/94

NOTE: INFORMATION CONTAINED ON DRAWING IS CONSIDERED PRELIMINARY IN NATURE AND SUBJECT TO CHANGE BASED ON FINAL DESIGN.

**SUFFOLK - EARLEYS, LINE #246  
PROPOSED CONFIGURATION**

**EXISTING 230kV  
CIRCUIT  
LINE #247**

**PROPOSED 230kV  
CIRCUIT  
LINE #246**



**TYPICAL RIGHT OF WAY LOOKING TOWARD EARLEYS FROM SUFFOLK TO STR. #246/39**

**NOTE: INFORMATION CONTAINED ON DRAWING IS CONSIDERED PRELIMINARY IN NATURE AND SUBJECT TO CHANGE BASED ON FINAL DESIGN.**

## **II. DESCRIPTION OF THE PROPOSED PROJECT**

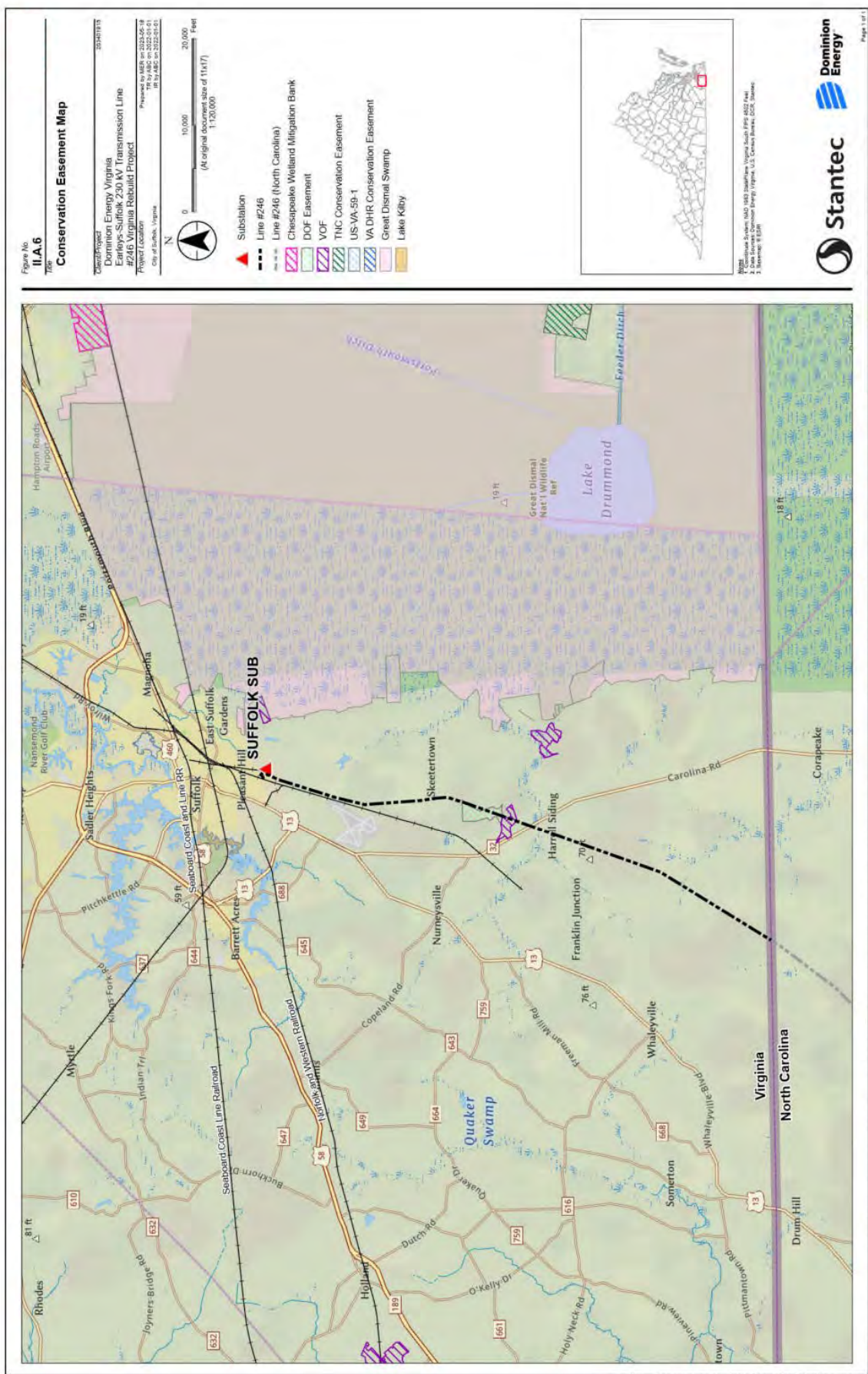
### **A. Right-of-way (“ROW”)**

#### **6. Detail what portions of the ROW are subject to existing easements and over what portions new easements will be needed.**

Response: The Company obtained most of its easements along the existing right-of-way of the Virginia Rebuild Project corridor in 1969. The Company does not anticipate that new easements will be required as the Virginia Rebuild Project is within existing rights-of-way or on Company-owned property.

The existing right-of-way intersects the following easements held by others but established after the Company obtained its easements:

- For approximately 0.42 miles and 0.12 miles at two separate points, the existing right-of-way intersects a Virginia Department of Forestry (“DOF”) easement (SUF-2009-003) established in 2009; and
- For approximately 0.32 miles, the existing right-of-way intersects a Virginia Outdoors Foundation (“VOF”) easement (SUF-VOF-1394) established in 2003.



## II. DESCRIPTION OF THE PROPOSED PROJECT

### A. Right-of-way (“ROW”)

#### 7. **Detail the proposed ROW clearing methods to be used and the ROW restoration and maintenance practices planned for the proposed project.**

Response: The entire 120-foot width of the existing transmission line corridor is currently cleared and maintained for operation of the existing transmission facilities.

Trimming of tree limbs along the edge of the right-of-way may be conducted to support construction activities for the Virginia Rebuild Project. When clearing is required, trees will be cut to no more than three inches above ground level. Trees located outside of the right-of-way that are tall enough to potentially impact the transmission facilities, commonly referred to as “danger trees,” may also need to be cut. Danger trees will be cut to be no more than three inches above ground level, limbed, and will remain where felled. No grubbing of roots or stumps will occur. Debris that is adjacent to homes will be disposed of by chipping or removal. In other areas, debris may be mulched or chipped as practicable. Danger tree removal will be accomplished by hand or from equipment placed on mats in wetland areas and within 100 feet of streams, if applicable. Care will be taken not to leave debris in streams or wetland areas that may cause an impediment to the flow of water. No mulching will occur in wetlands. Erosion control devices will be used on an ongoing basis, as appropriate, during all clearing and construction activities.

Erosion control will be maintained and temporary stabilization for all soil-disturbing activities will be used until the right-of-way has been restored. Upon completion of the Virginia Rebuild Project, the Company will restore the right-of-way utilizing site rehabilitation procedures outlined in the Company’s General Erosion and Sedimentation Control Specifications for the Construction and Maintenance of Electric Transmission Lines that was approved by the Virginia Department of Environmental Quality (“DEQ”). Time of year and weather conditions may affect when permanent stabilization takes place.

Limited clearing or limbing may be required to accommodate construction access. Any clearing will be done in accordance with the Company’s Integrated Vegetation Management Plan (“IVMP”) practice with no grubbing of roots or stump materials. The remainder of the existing right-of-way is currently cleared and maintained.

The right-of-way will continue to be maintained on a regular cycle to prevent interruptions to electric service and provide ready access to the right-of-way in order to patrol and make emergency repairs. Periodic maintenance to control woody growth will consist of hand cutting, machine mowing and herbicide application.

Based on recommendations by the Virginia Department of Wildlife Resources (“DWR”), the Company will endeavor to adhere to the TOYRs for cutting trees and

vegetation favorable to winged animals from March 15 – November 15, to the extent practicable. This includes further minimizing potential effects by avoiding trees favorable for bat maternity roosting locations and nesting bird habitat, to the extent practicable.



## **II. DESCRIPTION OF THE PROPOSED PROJECT**

### **A. Right-of-way (“ROW”)**

#### **8. Indicate the permitted uses of the proposed ROW by the easement landowner and the Applicant.**

Response: Any non-transmission use will be permitted that:

- Is in accordance with the terms of the easement agreement for the right-of-way;
- Is consistent with the safe maintenance and operation of the transmission lines;
- Will not restrict future line design flexibility; and
- Will not permanently interfere with future construction.

Subject to the terms of the easement, examples of typical permitted uses include but are not limited to:

- Agriculture;
- Hiking Trails;
- Fences;
- Perpendicular Road Crossings;
- Perpendicular Utility Crossings;
- Residential Driveways; and
- Wildlife / Pollinator Habitat.

## II. DESCRIPTION OF THE PROPOSED PROJECT

### A. Right-of-way (“ROW”)

9. **Describe the Applicant’s route selection procedures. Detail the feasible alternative routes considered. For each such route, provide the estimated cost and identify and describe the cost classification (e.g. “conceptual cost,” “detailed cost,” etc.). Describe the Applicant’s efforts in considering these feasible alternatives. Detail why the proposed route was selected and other feasible alternatives were rejected. In the event that the proposed route crosses, or one of the feasible routes was rejected in part due to the need to cross, land managed by federal, state, or local agencies or conservation easements or open space easements qualifying under §§ 10.1-1009 – 1016 or §§ 10.1-1700 – 1705 of the Code (or a comparable prior or subsequent provision of the Code), describe the Applicant’s efforts to secure the necessary ROW.**

Response: The Company’s route selection for transmission line rebuild projects begins with a review of the existing right-of-way. This approach generally minimizes impacts on the natural and human environments. This approach also is consistent with FERC Guideline #1 (included as Attachment 1 to these Guidelines), which states that existing rights-of-way should be given priority when adding new transmission facilities, and §§ 56-46.1 and 56-529 of the Code of Virginia, which promote the use of existing rights-of-way for new transmission facilities. For the proposed Virginia Rebuild Project, the existing transmission corridor right-of-way that currently contains Line #246 is adequate.

Because the existing right-of-way and Company-owned property are adequate to construct the Virginia Rebuild Project, no new right-of-way is necessary. Given no need for new right of way, the availability of existing right-of-way and the statutory preference given to the use of existing rights-of-way, and because additional costs and environmental impacts would be associated with the acquisition of and construction on new right-of-way, the Company did not consider any alternate routes requiring new right-of-way for this Virginia Rebuild Project.

The existing right-of-way crosses the easements and facilities listed in Section II.A.6 and as depicted on Attachment II.A.6.

## II. DESCRIPTION OF THE PROPOSED PROJECT

### A. Right-of-way (“ROW”)

10. **Describe the Applicant’s construction plans for the project, including how the Applicant will minimize service disruption to the affected load area. Include requested and approved line outage schedules for affected lines as appropriate.**

Response: To limit service disruption to the affected load area, the Company plans to take Line #246 out of service. The outages are scheduled to allow the adjacent infrastructure to adequately provide service to connected customers while Line #246 is out of service. This strategy will allow the grid to be in normal and optimal configuration and available to respond to contingency issues should they arise. Assuming a final order by June 11, 2024, as requested in Section I.H, the Company expects to start construction by April 2026, and to complete construction of the VA-NC Rebuild Project by December 31, 2028. Dates may need to be adjusted based on permitting delays or design modifications to comply with additional agency requirements identified during the permitting application process.

The Company has requested two outages. The first outage will affect the Virginia portion of Line #246 and will occur from Spring of 2026 through the end of 2028. The second outage will only affect portions of Line #246 in North Carolina. It is customary for PJM to not grant approval of the outages until shortly before the outages are expected to occur (up until one week prior) and, therefore, they may be subject to change.

## **II. DESCRIPTION OF THE PROPOSED PROJECT**

### **A. Right-of-way (“ROW”)**

#### **11. Indicate how the construction of this transmission line follows the provisions discussed in Attachment 1 of these Guidelines.**

Response: The FERC Guidelines, included as Attachment 1 to these Guidelines, are a tool routinely used by the Company in routing its transmission line projects.

The Company utilized Guideline #1 (existing rights-of-way should be given priority when adding additional facilities) by siting the proposed Virginia Rebuild Project with an existing transmission corridor.

By utilizing the existing transmission corridor, the proposed Virginia Rebuild Project will minimize impact to any site listed on the National Register of Historic Places (“NRHP”). Thus, the Virginia Rebuild Project is consistent with Guideline #2 (where practical, rights-of-way should avoid sites listed on the National Register of Historic Places). In any event, the Company will coordinate with the VDHR regarding its plans prior to engineering and construction of the Virginia Rebuild Project to avoid or minimize impacts. See Section III.A for a discussion of the Stage I Pre-Application Analysis prepared by Stantec which is included with the DEQ Supplement as Attachment 2.I.2. The Company will coordinate with the VDHR through review of the Stage I Pre-Application Analysis regarding these initial findings.

The Company has communicated with a number of local, state, and federal agencies prior to filing this application consistent with Guideline #4 (where government land is involved the applicant should contact the agencies early in the planning process). See Section III.B and III.J of this Appendix, and the DEQ Supplement.

The Company follows construction methods in the Guidelines on a site-specific basis for typical construction projects (Guidelines #8, #10, #11, #15, #16, #18, and #22).

The Company also utilizes recommended Guidelines in clearing right-of-way, constructing facilities, and maintaining rights-of-way after construction. Moreover, secondary uses of rights-of-way that are consistent with the safe maintenance and operation of facilities are permitted, as noted in Section II.A.8.

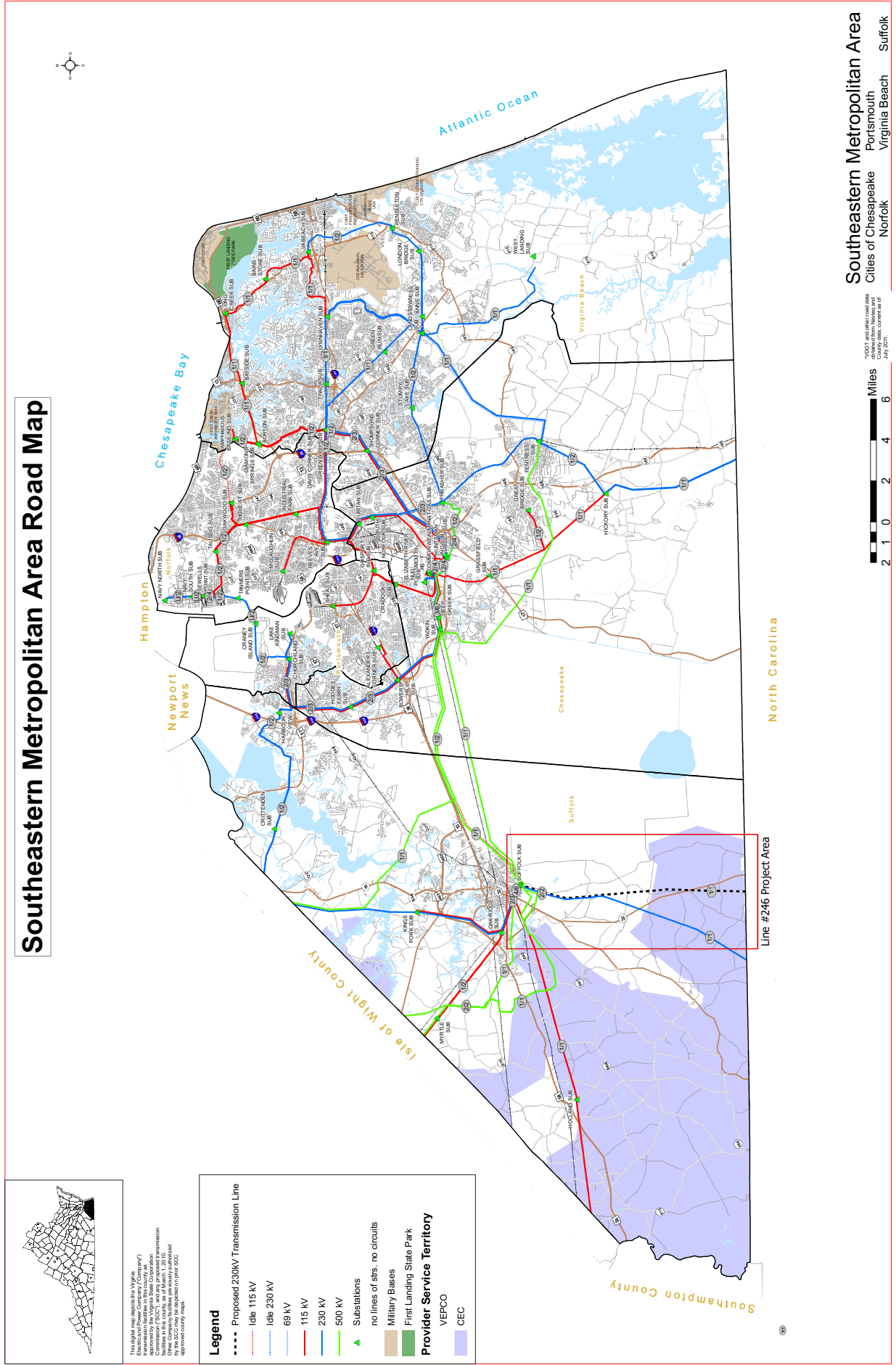
## **II. DESCRIPTION OF THE PROPOSED PROJECT**

### **A. Right-of-way (“ROW”)**

- 12. a. Detail counties and localities through which the line will pass. If any portion of the line will be located outside of the Applicant’s certificated service area: (1) identify each electric utility affected; (2) state whether any affected electric utility objects to such construction; and (3) identify the length of line(s) proposed to be located in the service area of an electric utility other than the Applicant; and**
- b. Provide three (3) color copies of the Virginia Department of Transportation “General Highway Map” for each county and city through which the line will pass. On the maps show the proposed line and all previously approved and certificated facilities of the Applicant. Also, where the line will be located outside of the Applicant’s certificated service area, show the boundaries between the Applicant and each affected electric utility. On each map where the proposed line would be outside of the Applicant’s certificated service area, the map must include a signature of an appropriate representative of the affected electric utility indicating that the affected utility is not opposed to the proposed construction within its service area.**

Response:      a.      The proposed Virginia Rebuild Project traverses the City of Suffolk for a total of approximately 11.9 miles and is located entirely within the Company’s service territory.

                         b.      An electronic version of the Virginia Department of Transportation (“VDOT”) “General Highway Map” for the City of Suffolk has been marked as required and filed with the Application. A reduced copy of the map is provided as Attachment II.A.12.



## **II. DESCRIPTION OF THE PROPOSED PROJECT**

### **B. Line Design and Operational Features**

- 1. Detail the number of circuits and their design voltage, initial operational voltage, any anticipated voltage upgrade, and transfer capabilities.**

Response: The single circuit 230 kV Line #246 will be designed and operated at 230 kV and will have a summer/winter transfer capability of 1572 MVA. No voltage upgrades are anticipated.

## **II. DESCRIPTION OF THE PROPOSED PROJECT**

### **B. Line Design and Operational Features**

- 2. Detail the number, size(s), type(s), coating and typical configurations of conductors. Provide the rationale for the type(s) of conductor(s) to be used.**

Response: The proposed conductor for 230 kV Line #246 will be three phases of two (2) 768.2 ACSS/TW (20/7) "Maumee." See Attachments II.B.3.a-b for more details on conductor configurations at each structure type.



## **II. DESCRIPTION OF THE PROPOSED PROJECT**

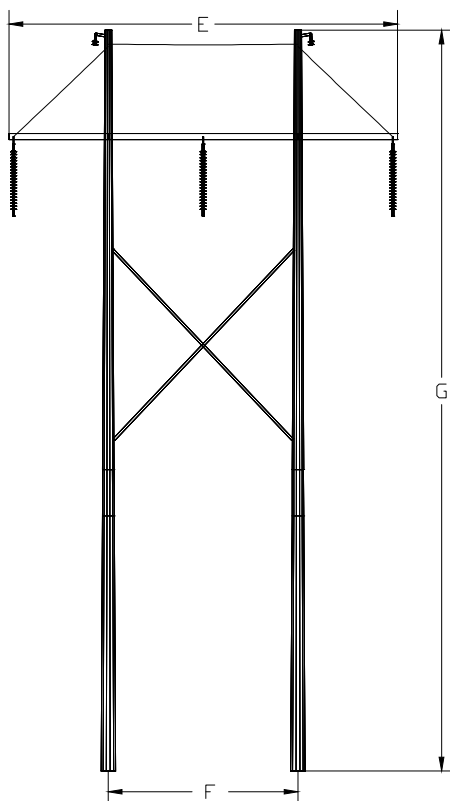
### **B. Line Design and Operational Features**

- 3. With regard to the proposed supporting structures over each portion of the ROW for the preferred route, provide diagrams (including foundation reveal) and descriptions of all the structure types, to include:**
  - a. mapping that identifies each portion of the preferred route;**
  - b. the rationale for the selection of the structure type;**
  - c. the number of each type of structure and the length of each portion of the ROW;**
  - d. the structure material and rationale for the selection of such material;**
  - e. the foundation material;**
  - f. the average width at cross arms;**
  - g. the average width at the base;**
  - h. the maximum, minimum and average structure heights;**
  - i. the average span length; and**
  - j. the minimum conductor-to-ground clearances under maximum operating conditions.**

Response: See Attachments II.B.3.a-b.

## PROPOSED 230kV CIRCUIT

LINE #246  
SUFFOLK - EARLEYS

**230 kV SC H-FRAME SUSPENSION STRUCTURE**

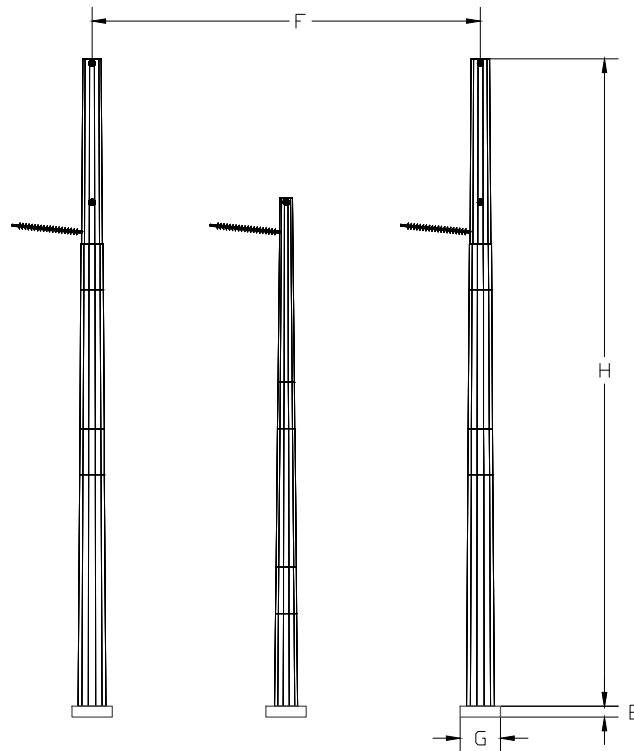
A. MAPPING OF THE ROUTE:	SEE ATTACHMENT II.B.3.iv
B. RATIONALE FOR STRUCTURE TYPE:	TYPICAL CONFIGURATION FOR SINGLE CIRCUIT H-FRAME SUSPENSION STRUCTURES.
C. LENGTH OF R/W (STRUCTURE QTY):	11.9 MILES (82 STRUCTURES)
D. STRUCTURE MATERIAL:	WEATHERING STEEL
RATIONALE FOR MATERIAL:	WEATHERING STEEL WAS SELECTED TO MATCH OTHER LINES IN THE AREA AND IS COMPANY'S STANDARD
E. AVERAGE WIDTH AT CROSS ARM:	42'
F. AVERAGE WIDTH AT BASE:	20.5'
G. MINIMUM STRUCTURE HEIGHT:	48.5'
MAXIMUM STRUCTURE HEIGHT:	110'
AVERAGE STRUCTURE HEIGHT:	75'
H. AVERAGE SPAN LENGTH (RANGE):	670' (365'-834') (SEE NOTE 3)
I. MINIMUM CONDUCTOR-TO-GROUND:	22.5' (AT MAXIMUM OPERATING TEMPERATURE)

**NOTES:**

1. INFORMATION CONTAINED ON DRAWING IS PRELIMINARY IN NATURE AND SUBJECT TO CHANGE DURING FINAL DESIGN.
2. STRUCTURE HEIGHTS ARE MEASURED FROM STRUCTURE GROUNDLINE AND DO NOT INCLUDE EMBEDDED PORTION UNDERGROUND.
3. THE SPAN ASSOCIATED WITH EACH STRUCTURE IS THE AHEAD SPAN.

## PROPOSED 230kV CIRCUIT

LINE #246  
SUFFOLK - EARLEYS

**230 kV DC ENGINEERED 3-POLE DEADEND STRUCTURE**

A. MAPPING OF THE ROUTE:	SEE ATTACHMENT II.B.3.iv
B. RATIONALE FOR STRUCTURE TYPE:	TYPICAL CONFIGURATION FOR SINGLE CIRCUIT 3-POLE DEADEND STRUCTURES.
C. LENGTH OF R/W (STRUCTURE QTY):	11.9 MILES (12 STRUCTURES)
D. STRUCTURE MATERIAL:	WEATHERING STEEL
RATIONALE FOR MATERIAL:	WEATHERING STEEL WAS SELECTED TO MATCH OTHER LINES IN THE AREA AND IS COMPANY'S STANDARD.
E. FOUNDATION MATERIAL:	CONCRETE
AVERAGE FOUNDATION REVEAL:	SEE NOTE 2
F. AVERAGE STRUCTURE WIDTH:	42'
G. AVERAGE FOUNDATION WIDTH:	SEE NOTE 2
H. MINIMUM STRUCTURE HEIGHT:	55'
MAXIMUM STRUCTURE HEIGHT:	75'
AVERAGE STRUCTURE HEIGHT:	65'
I. AVERAGE SPAN LENGTH (RANGE):	670' (365'-834') (SEE NOTE 4)
J. MINIMUM CONDUCTOR-TO-GROUND:	22.5' (AT MAXIMUM OPERATING TEMPERATURE)

**NOTES:**

1. INFORMATION CONTAINED ON DRAWING IS PRELIMINARY IN NATURE AND SUBJECT TO CHANGE DURING FINAL DESIGN.
2. A MINIMUM FOUNDATION REVEAL SHALL BE 1.5 FEET. FOUNDATION DIAMETER SHALL BE BASED ON FINAL ENGINEERING.
3. STRUCTURE HEIGHTS ARE MEASURED FROM STRUCTURE CENTERLINE AND DO NOT INCLUDE FOUNDATION REVEAL.
4. THE SPAN ASSOCIATED WITH EACH STRUCTURE IS THE AHEAD SPAN.

**II. DESCRIPTION OF THE PROPOSED PROJECT**

**B. Line Design and Operational Features**

- 4. With regard to the proposed supporting structures for all feasible alternate routes, provide the maximum, minimum and average structure heights with respect to the whole route.**

Response: Not applicable.

## II. DESCRIPTION OF THE PROPOSED PROJECT

### B. Line Design and Operational Features

5. For lines being rebuilt, provide mapping showing existing and proposed structure heights for each individual structure within the ROW, as proposed in the application.

Response: See Attachment II.B.5 for structure mapping.

See the table below for the existing and proposed heights of permanent structures related to the Virginia Rebuild Project. The proposed approximate structure heights are from the conceptual design created to estimate the cost of the Virginia Rebuild Project and are subject to change based on final engineering design. The approximate structure heights are above ground level (“AGL”) (i.e., they are inclusive of foundation reveal).

Structure Number	Existing Structure Height (FT)	Proposed Structure Height (FT)	Attachment II.B.3 Structure Type
246/1C	65	75	**
246/1B	105	105	*
246/1A	48.5	48.5	*
246/1	59	70	II.B.3.b
246/2	59.5	60	II.B.3.b
246/3	53.5	65.5	II.B.3.a
246/4	60	65.5	II.B.3.a
246/5	65.5	55	II.B.3.b
246/6	78.5	65.5	II.B.3.a
246/7	78	70	II.B.3.a
246/8	65	74.5	II.B.3.a
246/9	64.5	70	II.B.3.a
246/10	65	70	II.B.3.a
246/11	64.5	70	II.B.3.a
246/12	65	65.5	II.B.3.a
246/13	64.5	70	II.B.3.a
246/14	64	70	II.B.3.a
246/15	64	70	II.B.3.a
246/16	64.5	65.5	II.B.3.a
246/17	55	60	II.B.3.b
246/18	64.5	65.5	II.B.3.a
246/19	64	70	II.B.3.a
246/20	63.5	70	II.B.3.a

246/21	64.5	70	II.B.3.a
246/22	65.5	79	II.B.3.a
246/23	64	60	II.B.3.b
246/24	65	70	II.B.3.a
246/25	60	74.5	II.B.3.a
246/26	65	70	II.B.3.a
246/27	59	65.5	II.B.3.a
246/28	64.5	70	II.B.3.a
246/29	59	79	II.B.3.a
246/30	64.5	65.5	II.B.3.a
246/31	63.5	70	II.B.3.a
246/32	64	70	II.B.3.a
246/33	64	74.5	II.B.3.a
246/34	59.5	65	II.B.3.b
246/35	64	74.5	II.B.3.a
246/36	63	74.5	II.B.3.a
246/37	64.5	60	II.B.3.b
246/38	64.5	70	II.B.3.a
246/39	73	70	II.B.3.b
246/40	69.5	79	II.B.3.a
246/41	69.5	74.5	II.B.3.a
246/42	69.5	74.5	II.B.3.a
246/43	69.5	79	II.B.3.a
246/44	74	79	II.B.3.a
246/45	74.5	83.5	II.B.3.a
246/46	73.5	79	II.B.3.a
246/47	69.5	74.5	II.B.3.a
246/48	69.5	74.5	II.B.3.a
246/49	73.5	79	II.B.3.a
246/50	73	83.5	II.B.3.a
246/51	73.5	79	II.B.3.a
246/52	72.5	79	II.B.3.a
246/53	69	79	II.B.3.a
246/54	69.5	79	II.B.3.a
246/55	70	79	II.B.3.a
246/56	68	70	II.B.3.b
246/57	68.5	79	II.B.3.a
246/58	67.5	74.5	II.B.3.a
246/59	69	74.5	II.B.3.a

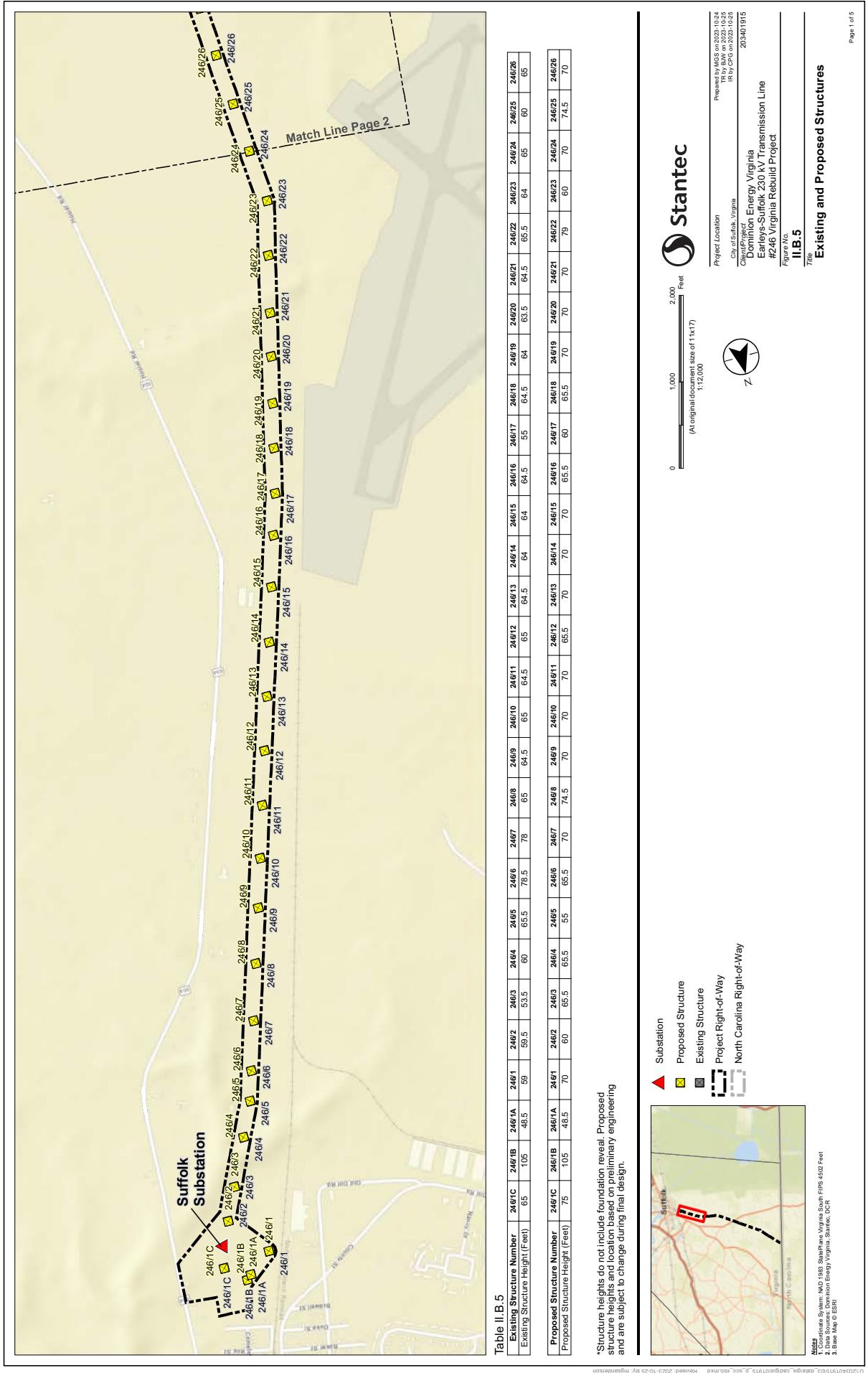
246/60	69	74.5	II.B.3.a
246/61	68	74.5	II.B.3.a
246/62	69	74.5	II.B.3.a
246/63	69.5	74.5	II.B.3.a
246/64	69.5	79	II.B.3.a
246/65	69	79	II.B.3.a
246/66	64	70	II.B.3.a
246/67	64	70	II.B.3.a
246/68	64	70	II.B.3.a
246/69	63.5	70	II.B.3.a
246/70	65	70	II.B.3.a
246/71	64.5	70	II.B.3.a
246/72	68.5	74.5	II.B.3.a
246/73	69	74.5	II.B.3.a
246/74	69	70	II.B.3.b
246/75	59	70	II.B.3.a
246/76	65	74.5	II.B.3.a
246/77	68.5	74.5	II.B.3.a
246/78	61	74.5	II.B.3.a
246/79	68	79	II.B.3.a
246/80	68.5	79	II.B.3.a
246/81	67.5	74.5	II.B.3.a
246/82	68.5	74.5	II.B.3.a
246/83	58.5	74.5	II.B.3.a
246/84	69	74.5	II.B.3.a
246/85	70	79	II.B.3.a
246/86	68.5	74.5	II.B.3.a
246/87	68.5	74.5	II.B.3.a
246/88	69	74.5	II.B.3.a
246/89	69	74.5	II.B.3.a
246/90	68.5	65	II.B.3.b
246/91	68.5	79	II.B.3.a
246/92	69	79	II.B.3.a
246/93	69	74.5	II.B.3.a
246/94	69	75	II.B.3.b
<b>Minimum***</b>	48.5	48.5	
<b>Maximum***</b>	105	110	
<b>Average***</b>	70	75	

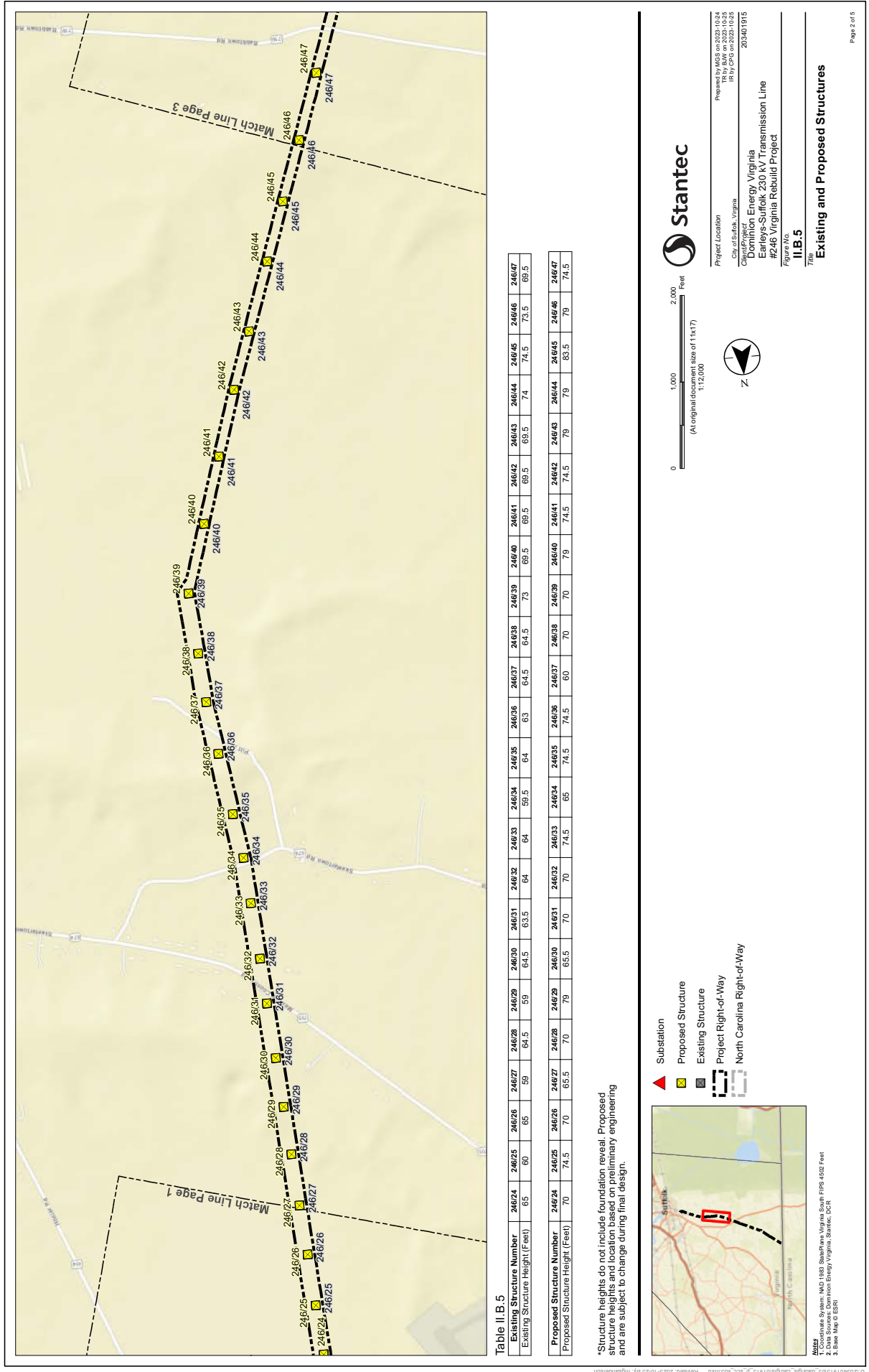
\* Existing structure included as part of the Virginia Rebuild Project, but not to be replaced.

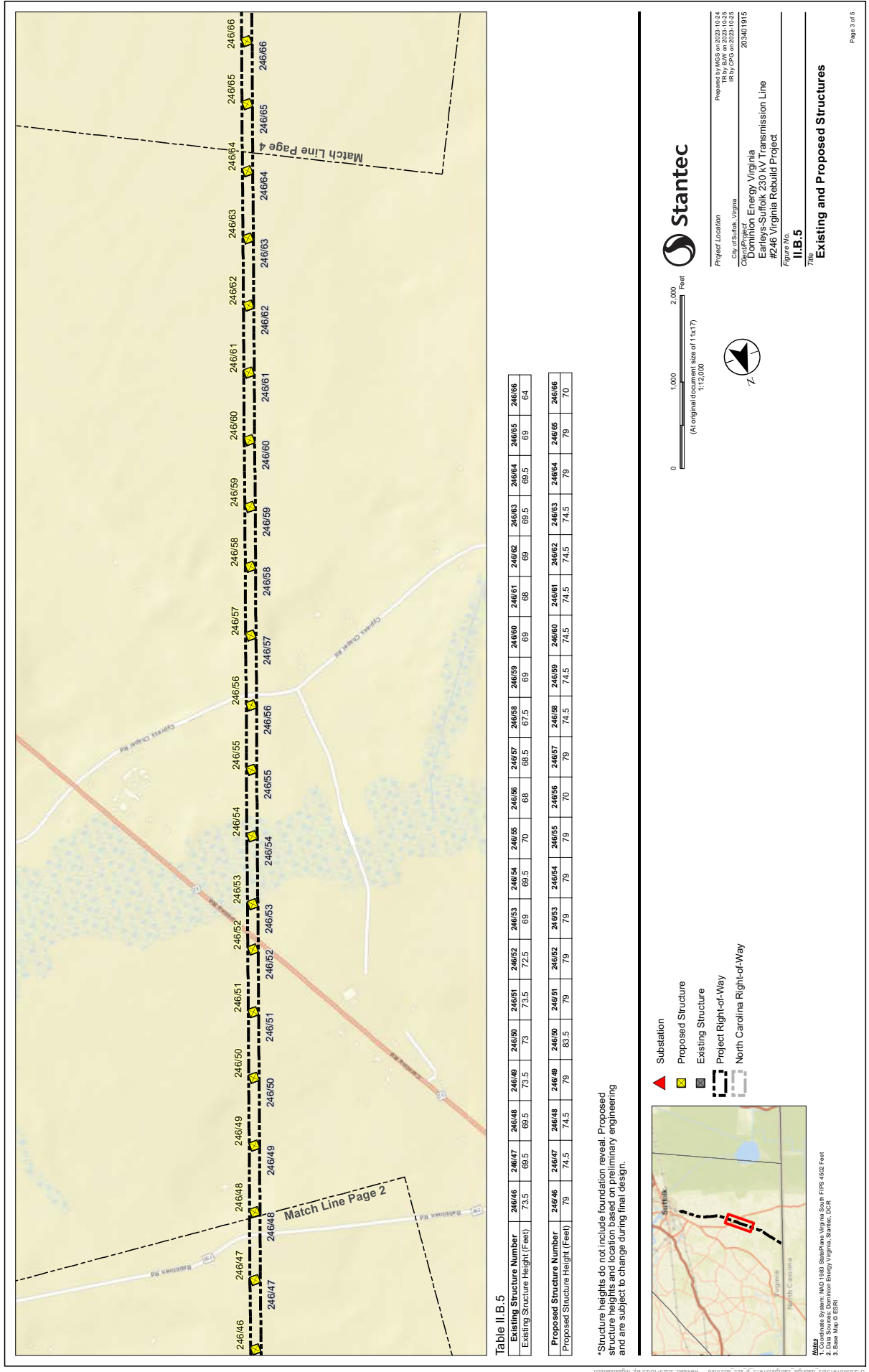
\*\* Proposed structures are located on Company-Owned property and therefore are not included in Attachments II.A.5 and II.B.3.

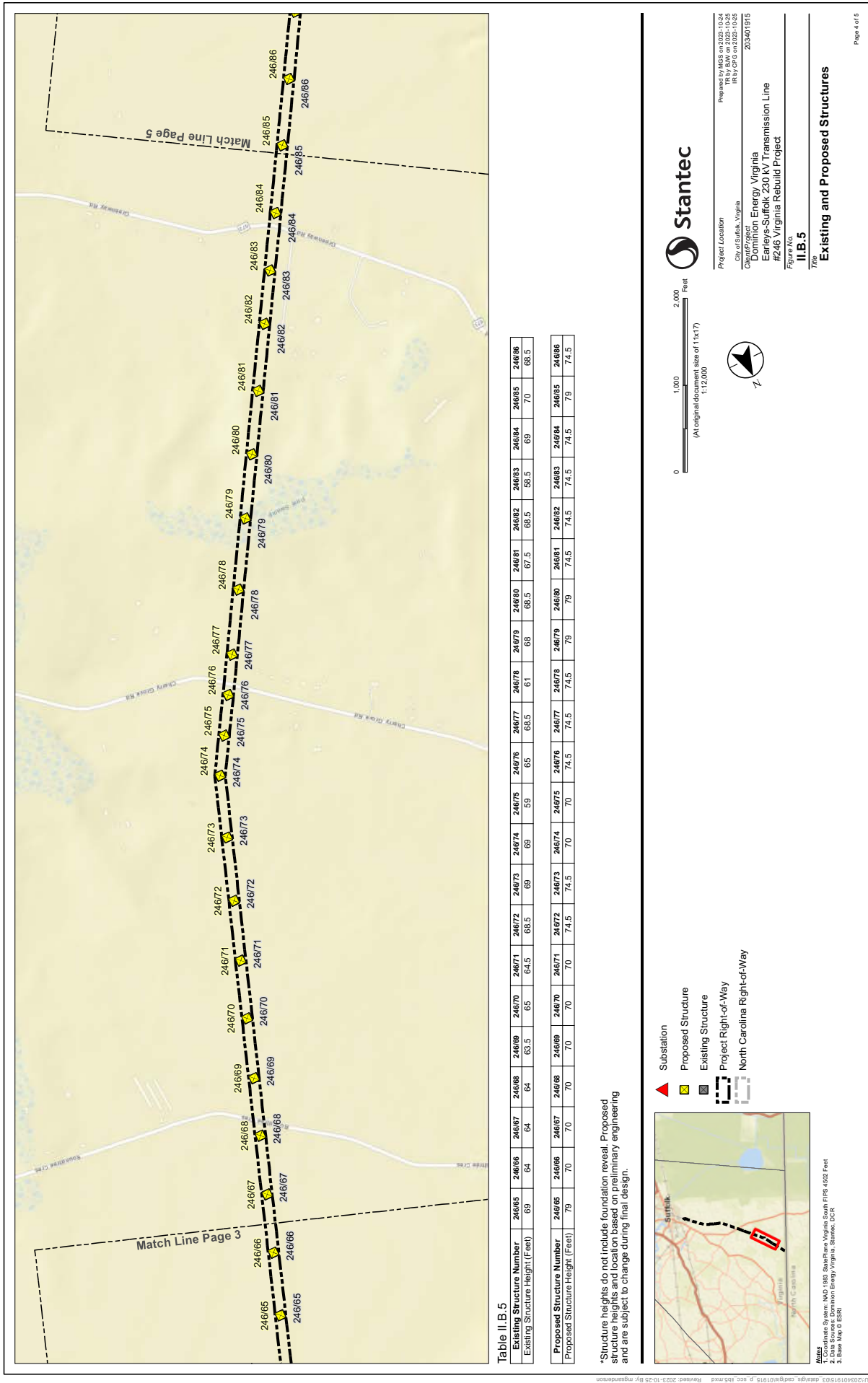
\*\*\* Exclusive of structures not being replaced.

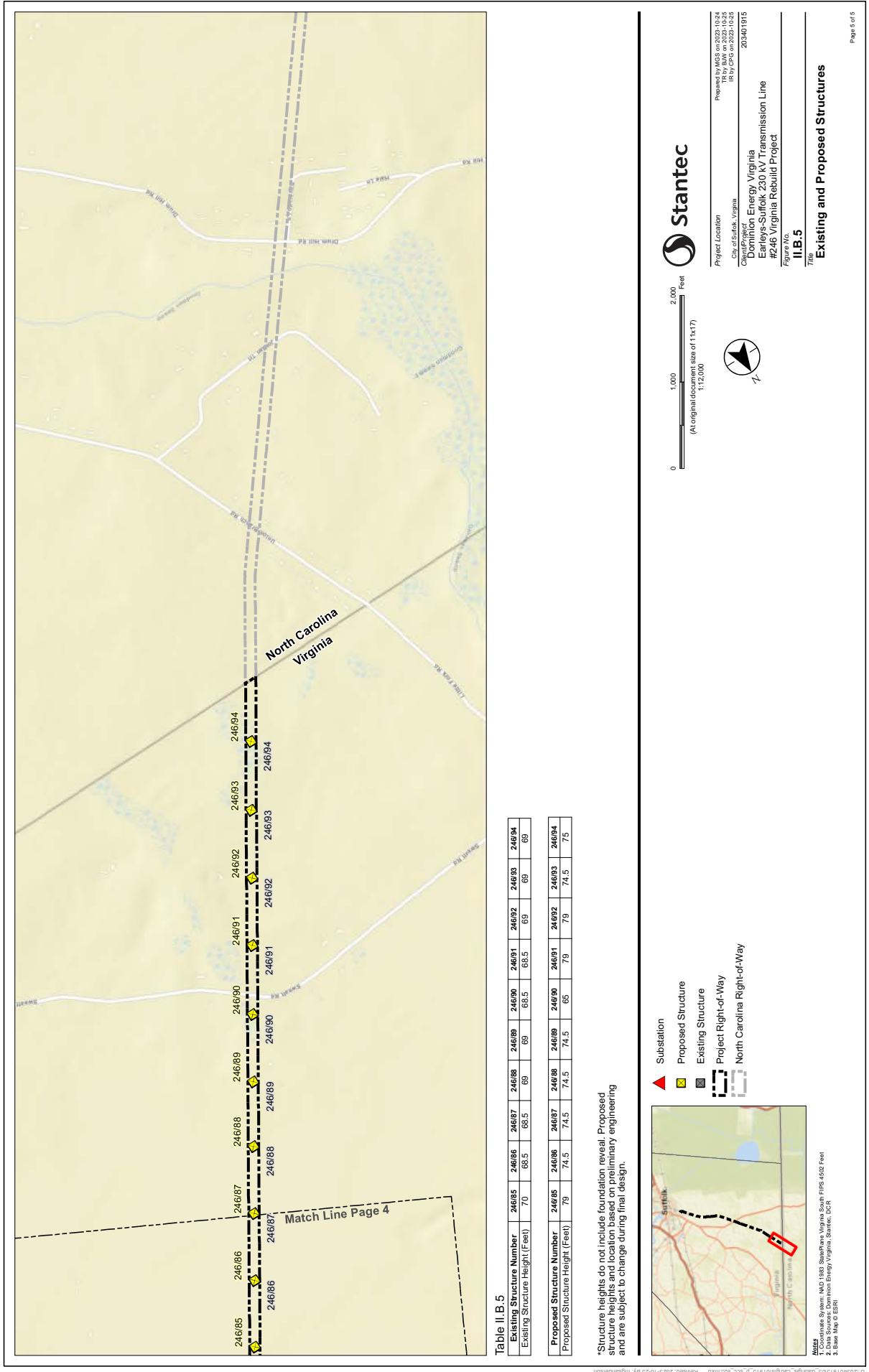












## II. DESCRIPTION OF THE PROPOSED PROJECT

### B. Line Design and Operational Features

6. Provide photographs for typical existing facilities to be removed, comparable photographs or representations for proposed structures, and visual simulations showing the appearance of all planned transmission structures at identified historic locations within one mile of the proposed centerline and in key locations identified by the Applicant.

Response: (a) *Photographs for typical existing facilities to be removed.*

See Attachments II.B.6.a.i-ii for representative photographs of typical existing structures.

(b) *Comparable photographs or representations for proposed structures.*

See Attachments II.B.6.b.i-ii, for representative photographs of the proposed structures for the Virginia Rebuild Project.

(c) *Visual simulations showing the appearance of all planned transmission structures at identified historic locations within one mile of the proposed centerline and in key locations.*

The overall average structure height will increase only minimally, by 5 feet from 70 feet or an approximately 7.2% increase, which does not meet the threshold of a “substantial increase” as outlined by the VDHR in *Guidelines for Assessing Impacts of Proposed Electric Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia* (January 2008). Nonetheless, the Company chose to prepare photo simulations from historic properties. Attachment II.B.6.c includes maps illustrating the photo simulation locations, as well as photographs of existing structures and simulations of the proposed structures from selected key-observation points (“OP”). The table below identifies the historic properties evaluated.

VDHR #	Resource Name	OP	Comments
133-5039	Siege of Suffolk/Hill’s Point Battlefield /Suffolk II Battlefield	OP1, OP2, OP3, OP4	OP1: No visibility OP2: Substation fence blocks visibility OP3: Minimal change OP4: No visibility
133-5288	Dominion Power Substation, Hosier Road	OP2	Resource within Substation. Substation fence blocks visibility from OP2

133-5568	Golden Peanut Company/The Suffolk Peanut Company	OP1	No visibility
133-5244 <sup>8</sup>	Hall Place Historic District	OP1	Viewshed model suggests no visibility. OP1 serves as proxy for resource. No visibility

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<sup>8</sup> DHR #133-5244, Hall Place Historic District, has been determined to be eligible for listing on the National Register of Historic Places. While it is within one mile of the Rebuild Project and included in this section for simulations, it is greater than 0.5 mile from the Rebuild Project and therefore not included in the Stage I Pre-application Analysis included as Attachment 2.I.2 of the DEQ Supplement.













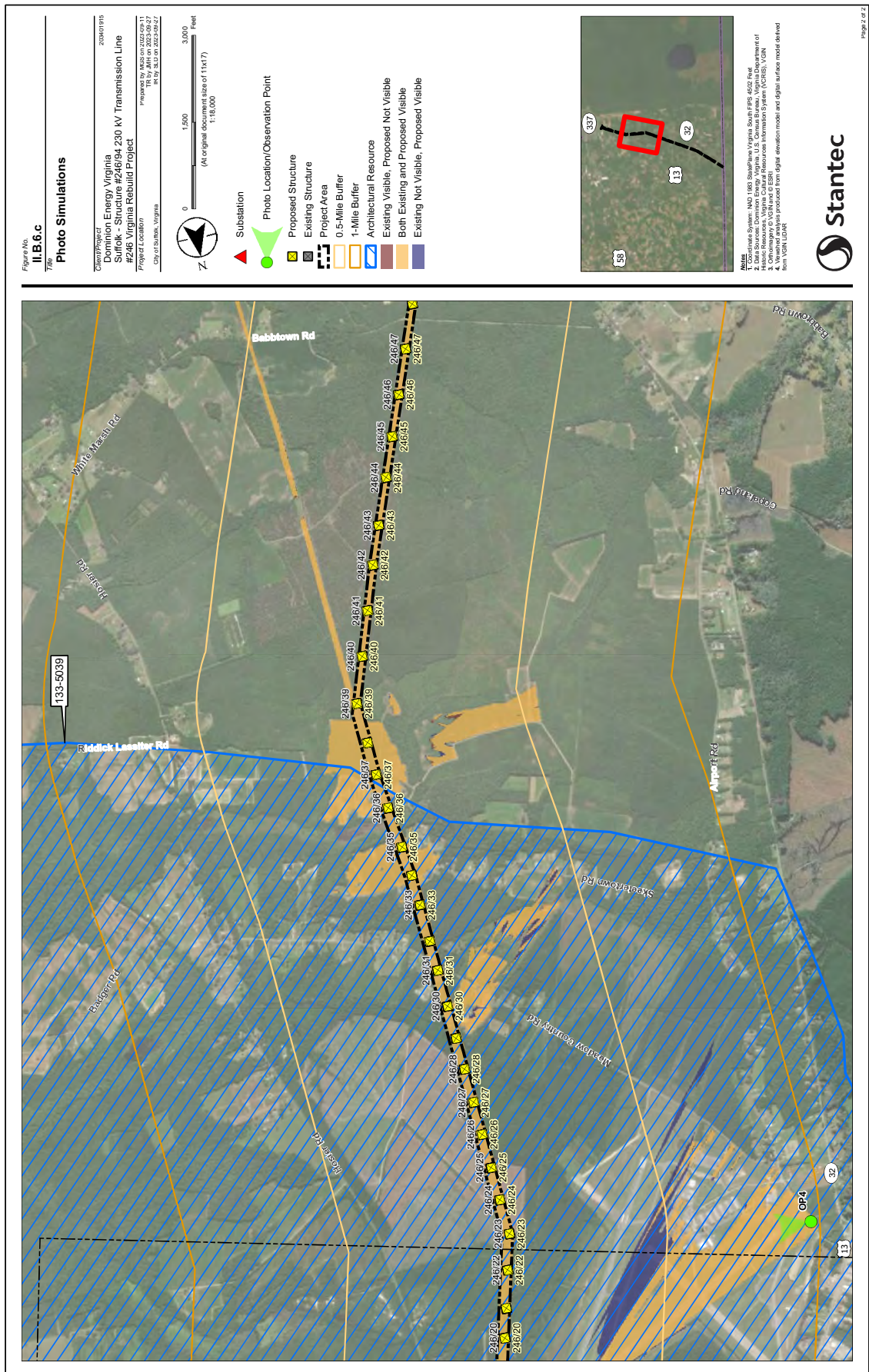
















OP01 – SOUTHEAST  
EXISTING

Photograph provided by Stantec

**OP 1 Existing**  
Suffolk II Battlefield (DHR #133-5039) &  
The Suffolk Peanut Company (DHR #133-5568)

# OP01 – SOUTHEAST PROPOSED



Photograph provided by Stantec

**OP 1 Proposed**  
Suffolk II Battlefield (DHR #133-5039) &  
The Suffolk Peanut Company (DHR #133-5568)



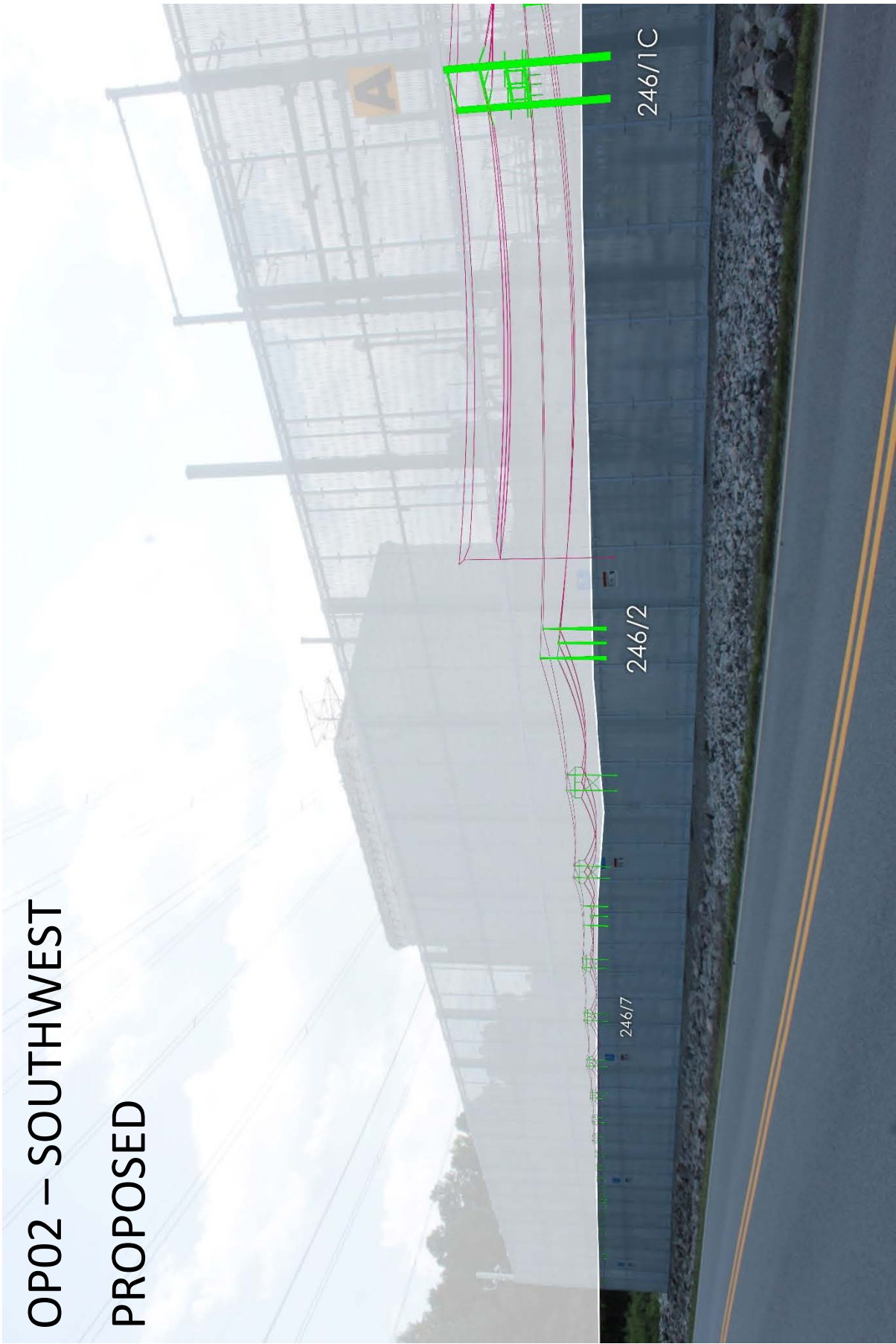


OP02 – SOUTHWEST  
EXISTING

Photograph provided by Stantec

**OP 2 Existing**  
Suffolk II Battlefield (DHR #133-5039) &  
Dominion Power Substation Hosier Road (DHR #133-5288)





Simulation provided by Stantec

**OP 2 Proposed (Not Visible)**  
Suffolk II Battlefield (DHR #133-5039) &  
Dominion Power Substation Hosier Road (DHR #133-5288)



Photograph provided by Stantec

**OP 3 Existing**  
Suffolk II Battlefield (DHR #133-5039)





OP03 – NORTH NORTHEAST  
PROPOSED

**OP 3 Proposed**  
Suffolk II Battlefield (DHR #133-5039)

Simulation provided by Stantec







OP04 – NORTHEAST  
EXISTING

**OP 4 Existing**  
Suffolk II Battlefield (DHR #133-5039)

Photograph provided by Stantec



OP04 – NORTHEAST  
PROPOSED

**OP 4 Proposed (No Visibility)**  
Suffolk II Battlefield (DHR #133-5039)

Simulation provided by Stantec



## **II. DESCRIPTION OF THE PROPOSED PROJECT**

- C. Describe and furnish plan drawings of all new substations, switching stations, and other ground facilities associated with the proposed project. Include size, acreage, and bus configurations. Describe substation expansion capability and plans. Provide one-line diagrams for each.**

Response: There are no new substations, and none of the impacted substations being expanded. The Virginia Rebuild Project will require the following substation work:

At Suffolk Substation, the Company will upgrade the circuit-breaker and line leads to 4000A and install a new dead-end structure.



### **III. IMPACT OF LINE ON SCENIC, ENVIRONMENTAL, AND HISTORIC FEATURES**

- A. Describe the character of the area that will be traversed by this line, including land use, wetlands, etc. Provide the number of dwellings within 500 feet, 250 feet and 100 feet of the centerline, and within the ROW for each route considered. Provide the estimated amount of farmland and forestland within the ROW that the proposed project would impact.**

Response: **Land Use**

The proposed Virginia Rebuild Project traverses approximately 11.9 miles through the City of Suffolk in an area that is largely characterized by agricultural and forestal land as well as woody wetlands and low-intensity developed land. The Virginia Rebuild Project runs from Structure #246/1C within the Company's existing Suffolk Substation and ends at Structure #246/94 at the Virginia state line. The route, located in the City of Suffolk, crosses primarily rural farmlands and the route is collocated with one existing transmission line.

#### **Farmlands/Forests**

Within the existing transmission right-of-way, the majority of land is zoned agricultural district, which provides for high intensity agricultural operations. According to the Natural Resources Conservation Service Data ("NRCS"), approximately 82.08 acres of prime farmland, 109.99 acres of prime farmland if drained, and 10.40 acres of farmland of statewide importance are located within the right-of-way. The right-of-way has been in use since 1969 and portions of the existing right-of-way are currently in agricultural use. The transmission line right-of-way is regularly maintained to keep vegetation at the scrub-shrub level for the safe operation of the existing facilities; as such, no portions of the existing right-of-way are forested. Therefore, it is not expected that the Virginia Rebuild Project will permanently impact farmland or forests. Prime farmlands within the Virginia Rebuild Project right-of-way are depicted in Attachment III.A.1. Section 2.L of the DEQ Supplement discusses in detail the anticipated impacts of the Virginia Rebuild Project on recreational, agricultural, and forest resources.

See Attachment III.A.1 for a map depicting prime farmland and farmland of statewide importance in the area, and Section 2.L of the DEQ Supplement for the estimated amount of farmland and forestland within the right-of-way that the proposed Virginia Rebuild Project would impact.

#### **Wetlands**

The proposed Virginia Rebuild Project is located within the Hampton Roads, Albemarle, and Chowan watersheds, Hydrologic Unit Codes 02080208, 03010205, and 03010203, respectively. According to the U.S. Geological Survey ("USGS") topographic quadrangles for Suffolk, VA, Corapeake, NC-VA, and Whaleville,

VA-NC, the existing transmission line corridor crosses Cypress Swamp and Pine Swamp.

On behalf of the Company, Stantec Consulting Services, Inc. (“Stantec”) conducted a desktop level evaluation to identify potential wetlands and other surface waters within the Virginia Rebuild Project. The details of the evaluation are discussed in Section 2.D of the DEQ Supplement. Prior to construction, the Company will delineate wetlands and other waters of the United States using the *Routine Determination Method*, as outlined in the *1987 Corps of Engineers Wetland Delineation Manual* and methods described in the *2010 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region* (Version 2.0). The Company will conduct the delineation using the latest guidance provided by the Corps and EPA and coordinate with DEQ if needed. Prior to construction, the Company will obtain any necessary permits to impact jurisdictional waters.

For additional description of the character of the area that will be traversed by the Virginia Rebuild Project and the related impacts, see Section 2.D of the DEQ Supplement.

### **Historic Features**

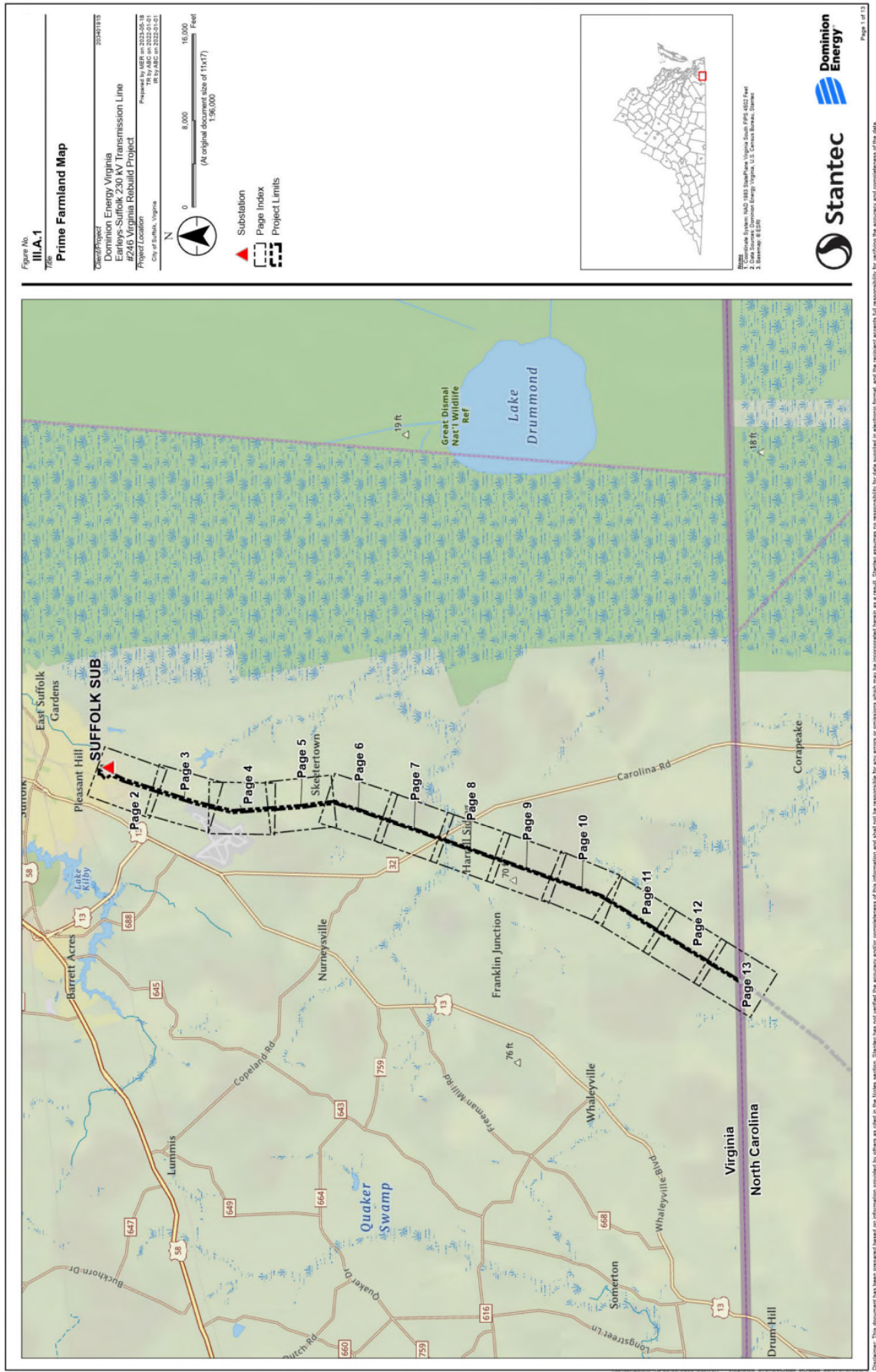
In accordance with the *Guidelines for Assessing Impacts of Proposed Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia* (2008), a Stage I Pre-Application Analysis (“Stage 1 Analysis”) was conducted by Stantec. This report was submitted to the VDHR in November 2023 and is included as Attachment 2.I.2 to the DEQ Supplement. Section 2.I of the DEQ Supplement discusses in detail the anticipated impacts of the Rebuild Project on archeological, historic, scenic, cultural, and architectural resources.

### **Threatened and Endangered Species**

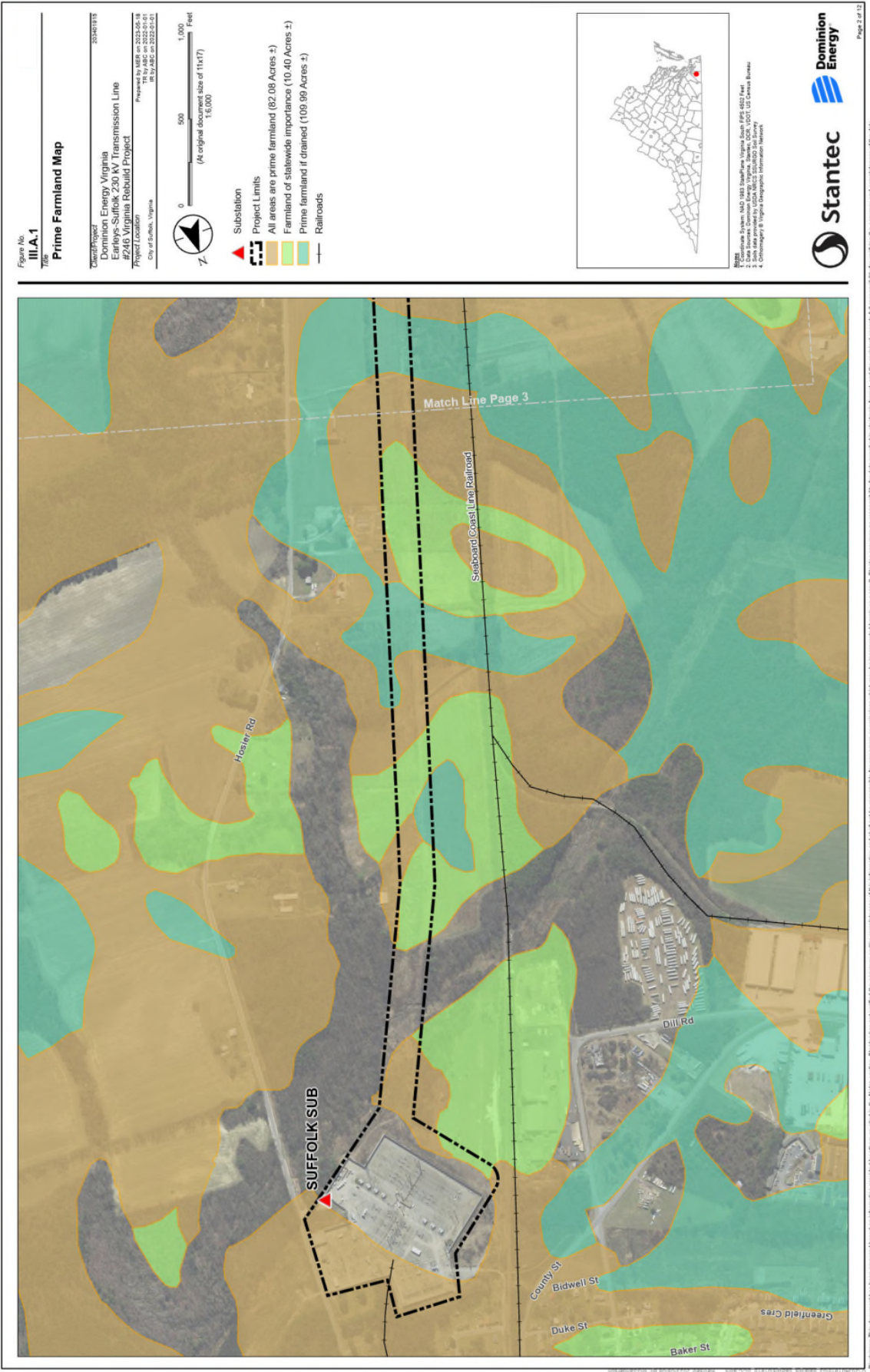
Online database searches for threatened and endangered species in the vicinity of the Virginia Rebuild Project, including the U.S. Fish and Wildlife (“USFWS”) Information, Planning, and Conservation (“IPaC”) system, the Virginia Department of Wildlife Resources (“DWR”) Virginia Fish and Wildlife Information Service (“VAFWIS”), Virginia Department of Conservation and Recreation (“DCR”), Natural Heritage Data Explorer (“NHDE”), and the Center for Conservation Biology (“CCB”) Bald Eagle Nest Locator, were conducted, which identified federal- and state-listed species that have the potential to occur in the vicinity of the Virginia Rebuild Project’s right-of-way. These results are identified in the report included as Attachment 2.G.1 to the DEQ Supplement. The Company intends to reasonably minimize any impact on these resources and coordinate with pertinent agencies, as appropriate.

## **Dwellings**

According to the City of Suffolk GIS parcel and zoning data and aerial interpretation, there are approximately seventeen buildings located within 500 feet of the centerline, eight buildings located within 250 feet of the centerline, and one building located within 100 feet of the centerline. This count is based on desktop data and has not been field verified. No dwellings are located within the existing right-of-way.





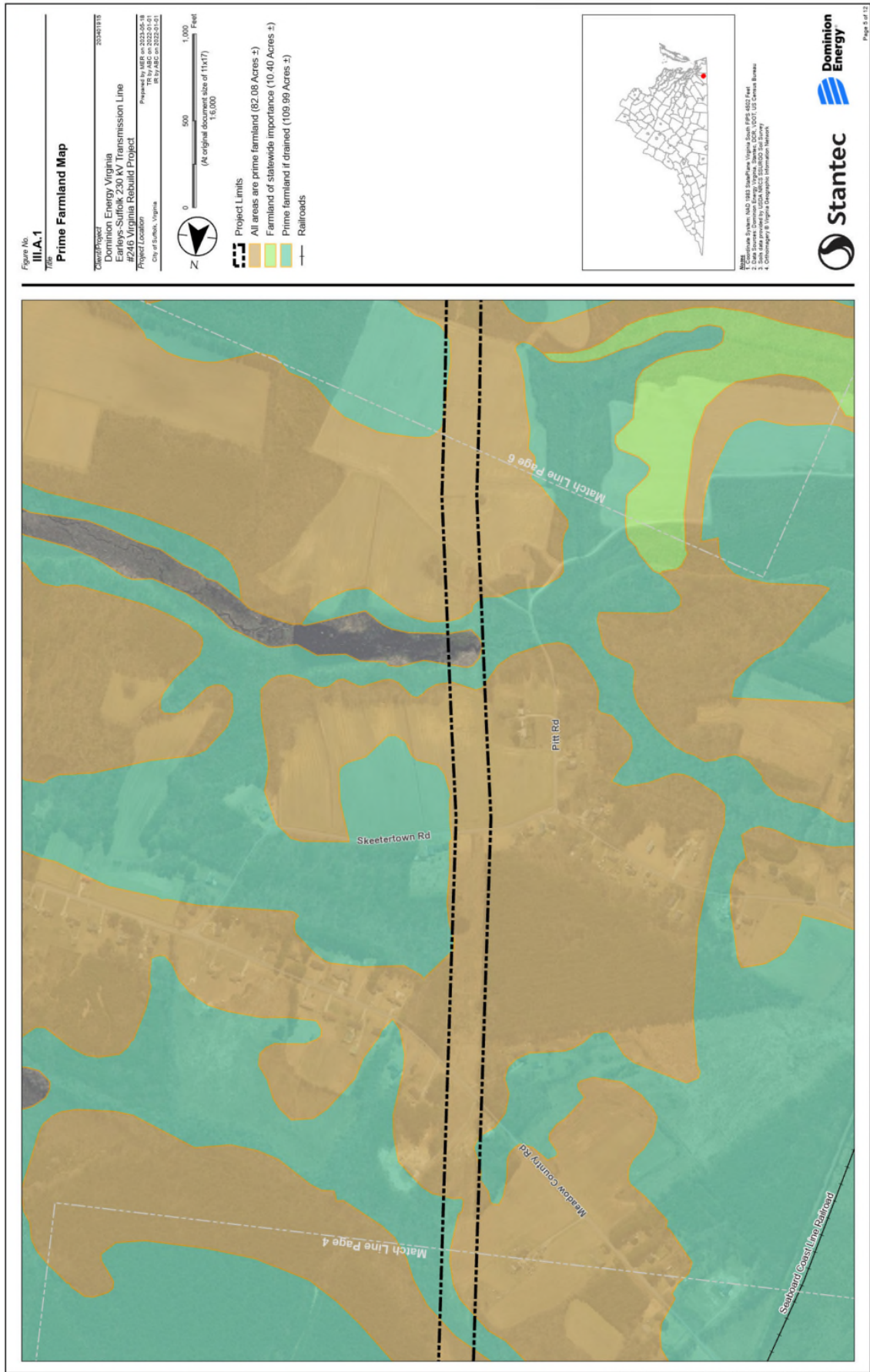


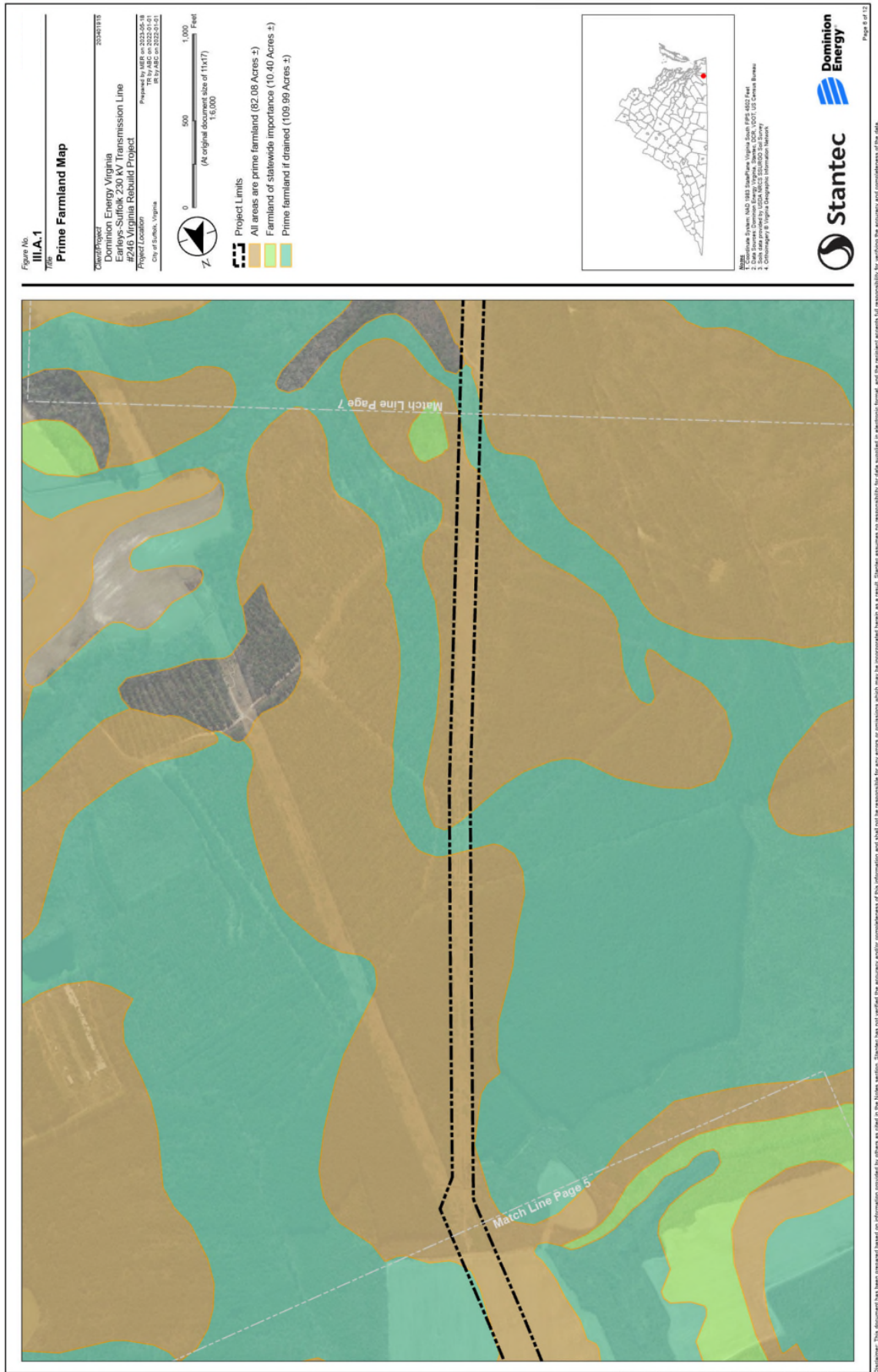




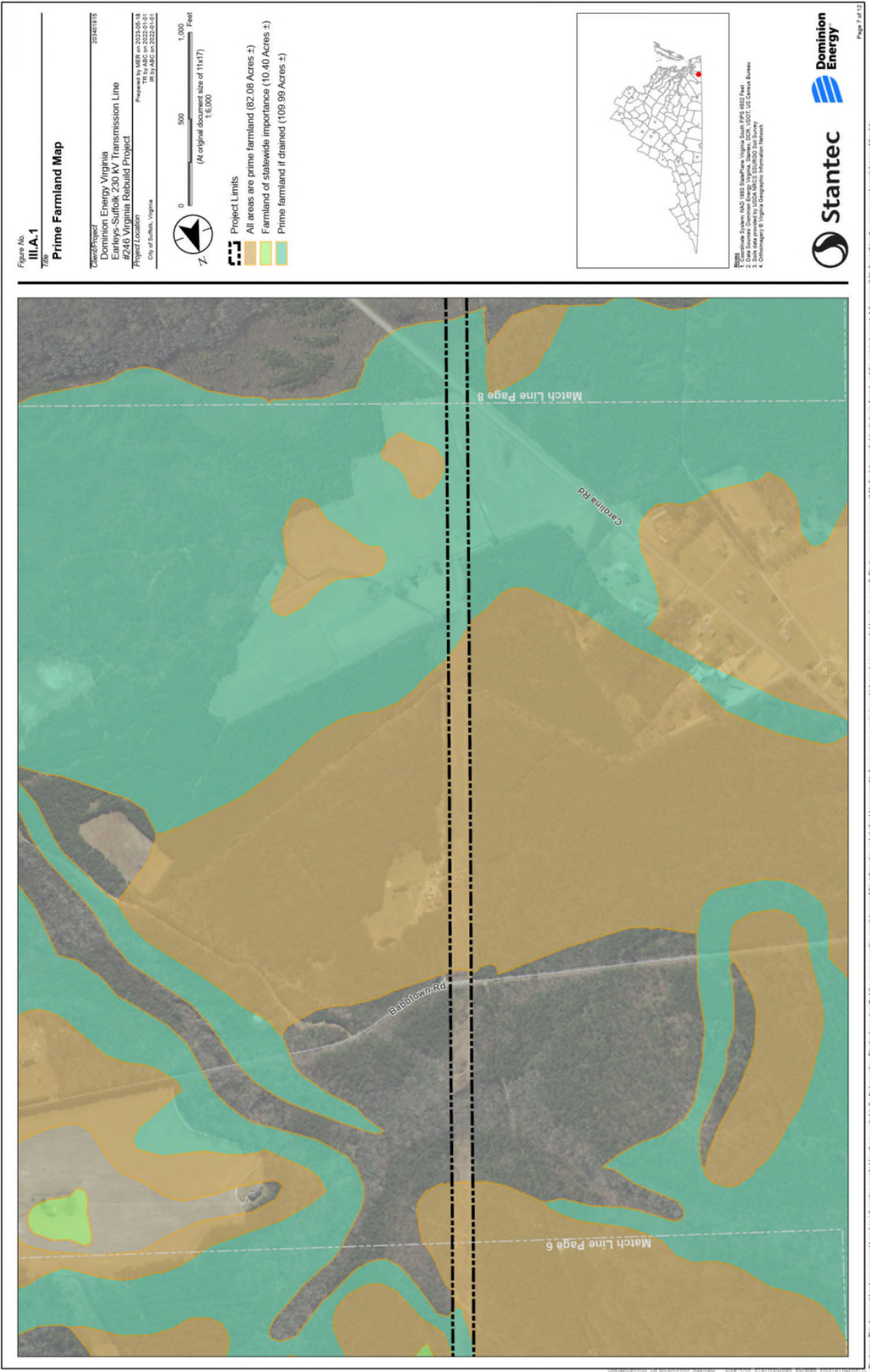




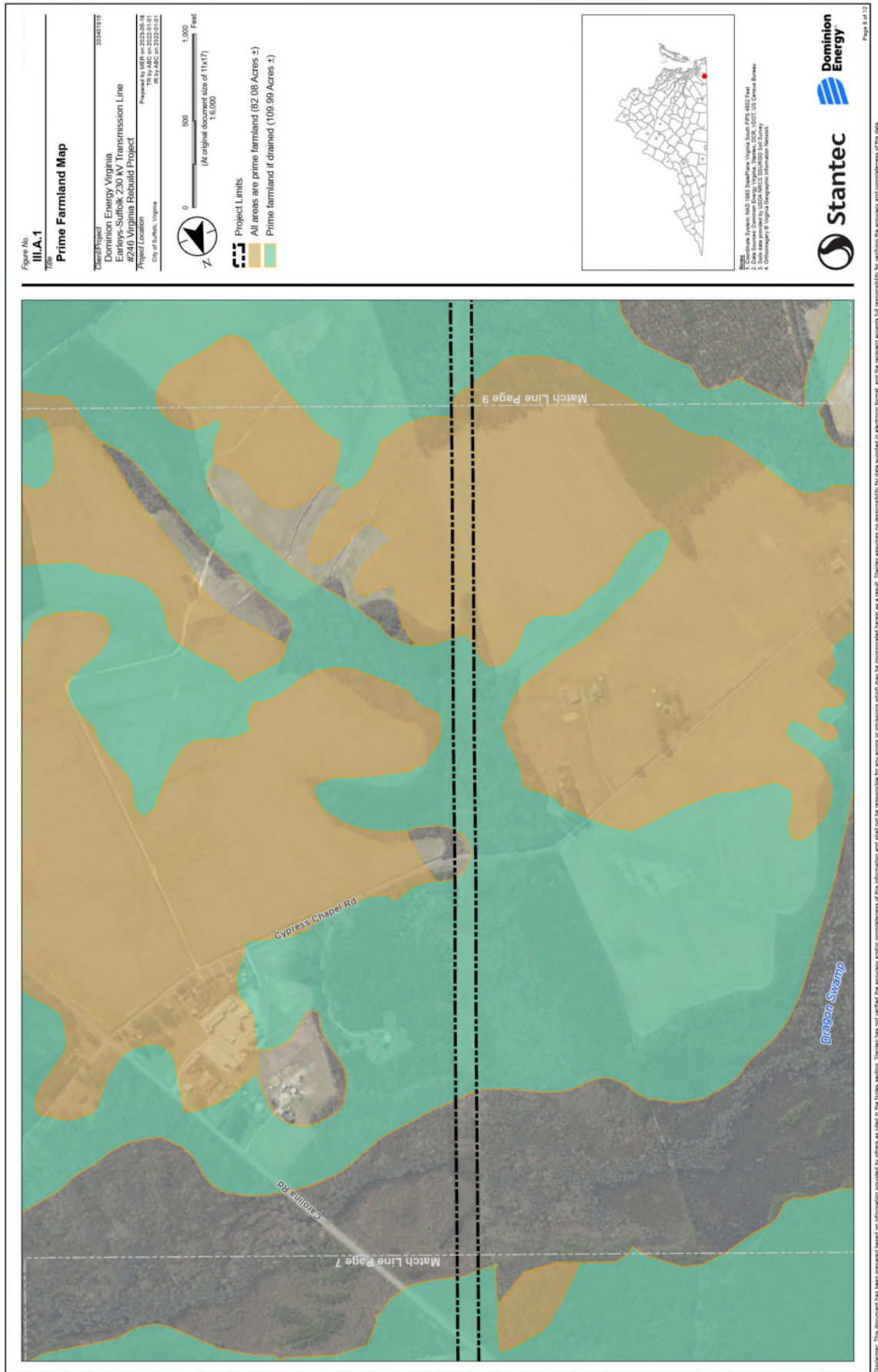


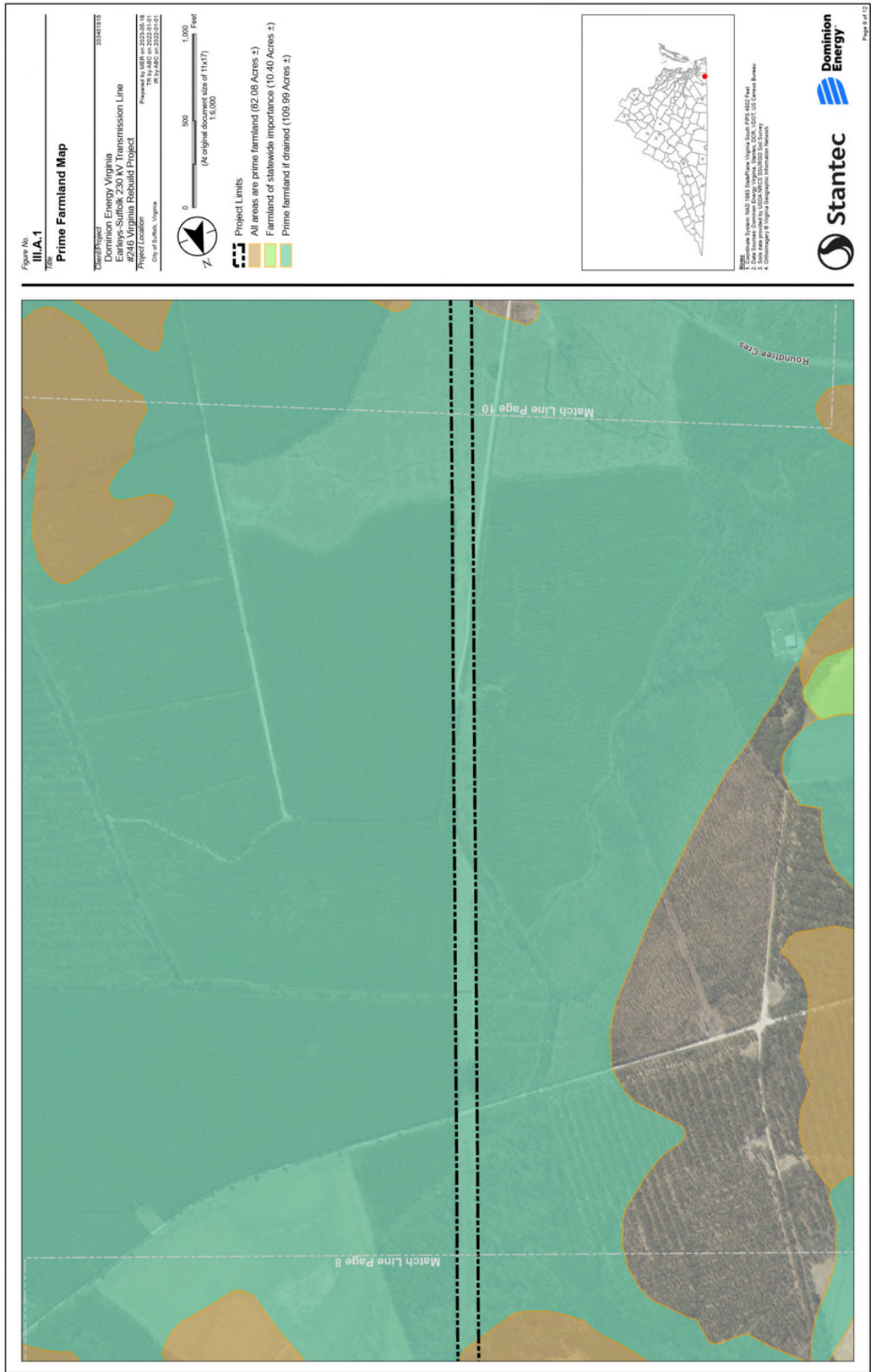




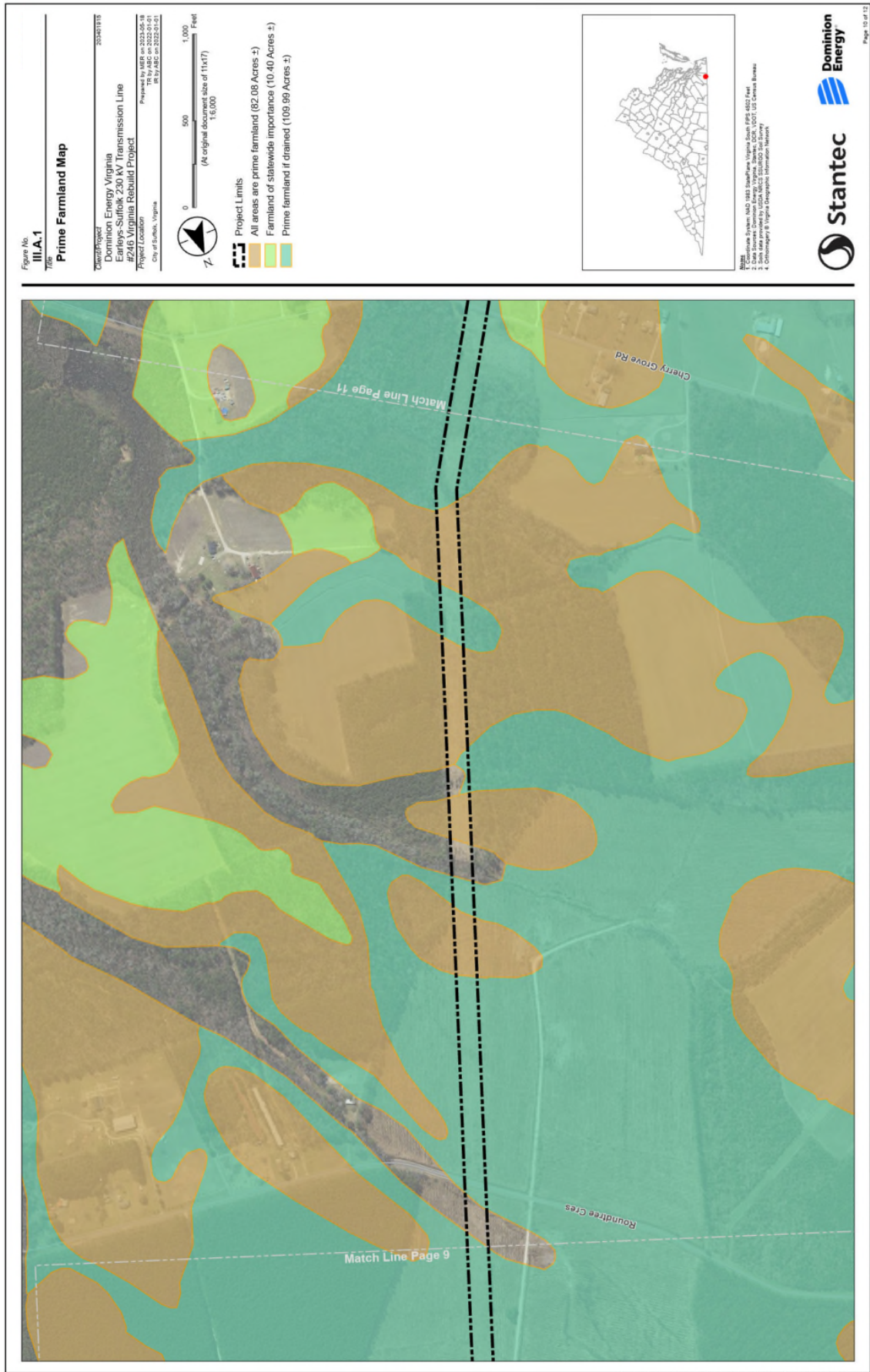


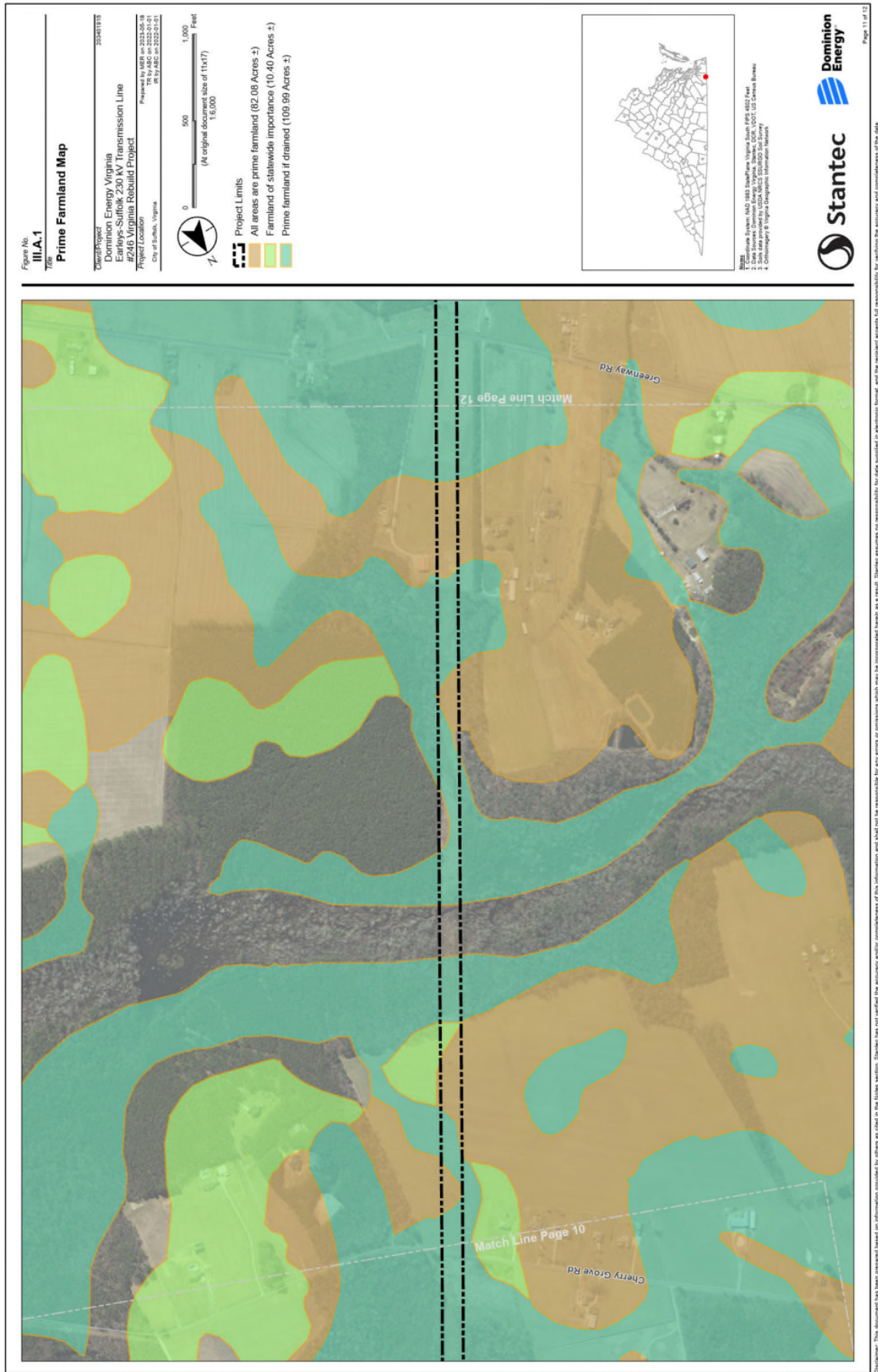




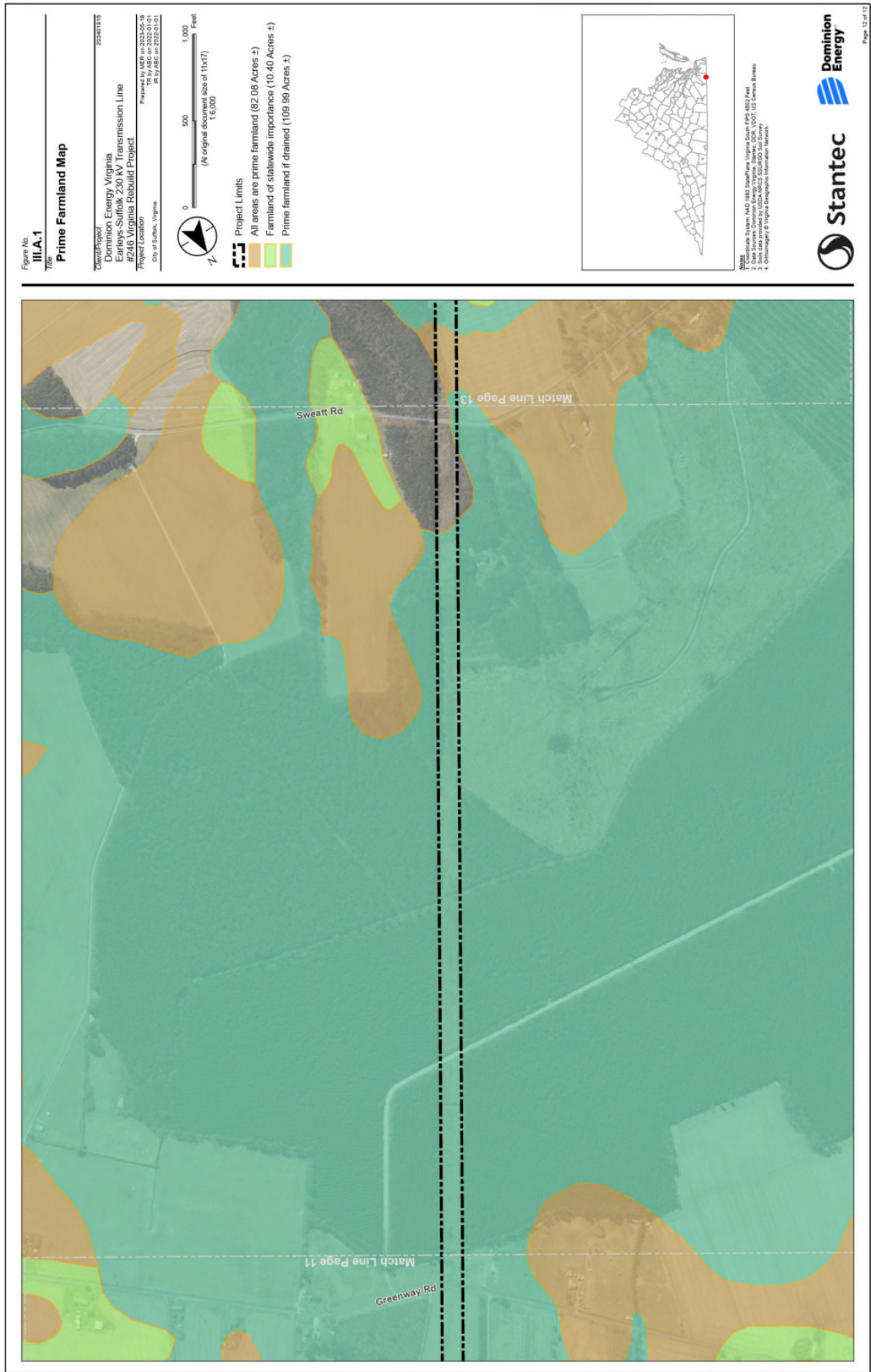




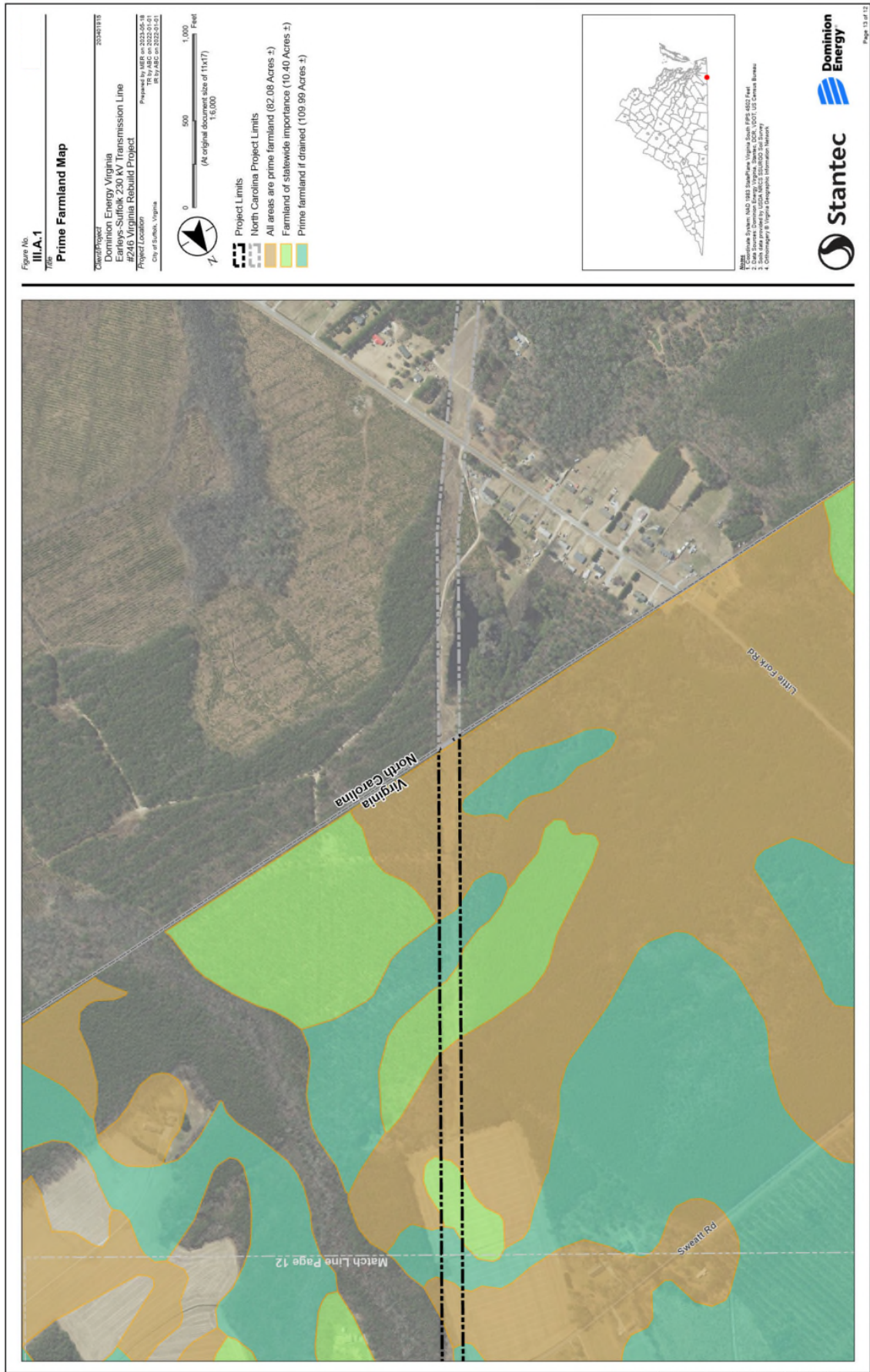












### III. IMPACT OF LINE ON SCENIC, ENVIRONMENTAL, AND HISTORIC FEATURES

#### B. Describe any public meetings the Applicant has had with neighborhood associations and/or officials of local, state or federal governments that would have an interest or responsibility with respect to the affected area or areas.

Response: In April 2023, the Company informed the City of Suffolk of the proposed Virginia Rebuild Project.

In April 2023, the Company launched an internet website dedicated to the proposed Virginia Rebuild Project: <https://www.dominionenergy.com/projects-and-facilities/electric-projects/power-line-projects/earleys-tunis-suffolk>. The website includes a description of the proposed Virginia Rebuild Project and its benefits, an explanation of need, an overview map, photo simulations, an interactive tool to view individual structure height changes, and information on the Commission review process.

A screenshot of Backyard App is provided as Attachment III.B.1.

Since May 2023, the Company released two mailers totaling 879 pieces of correspondence informing the public about the Virginia Rebuild Project and inviting the public to learn more about the Virginia Rebuild Project. These mailers were sent to property owners within 1,000 feet of proposed Virginia Rebuild Project, and included a postcard mailed in May 2023 (Attachment III.B.2), and a postcard mailed in August 2023 (Attachment III.B.3), with details identified below.

Mail Date	Mailer Name	Mailing Universe
5/23/23	Earleys-Tunis-Suffolk Rebuild Postcard Project Announcement	441 – Virginia recipients 1000FT from ROW
8/22/23	Earleys-Tunis-Suffolk OH PC Aug 2023	438 – Virginia recipients 1000FT from ROW

Two in-person community meetings were held on September 12 and September 13, 2023. The meetings were held in Suffolk, Virginia, and Ahoskie, North Carolina respectively. Three individuals attended the meeting in Suffolk, and one individual attended the meeting in Ahoskie. In an effort to accommodate property owners' schedules, the mailers included invitations to both scheduled community meetings. At both in-person community meetings, the Company was available to discuss the project need, project timing, and the Commission approval process. Community meeting materials have been posted on the website for the proposed Virginia Rebuild Project, including simulations from key locations. The key location simulations are included as Attachment III.B.4. Additionally, map boards were developed for the community meetings showing segments of the line along with

existing and proposed structure locations. The map boards are included as Attachment III.B.5.

A newspaper print advertisement for the community meetings was placed in the Suffolk Herald News – Sunday-Half Page – FC – 10” x10” running on September 10, 2023. In addition, digital advertisements for the community meetings targeted residents in the 23434, 23438, and 23432 zip codes in the City of Suffolk, which are the zip codes most closely associated with the Virginia Rebuild Project. A copy of the digital and print ads is included as Attachment III.B.6.

An overview of the digital campaign, which ran from August 28 through September 13, 2023, resulted in the following (as of September 22, 2023).

- Pre-Event campaign results:
  - 838,170 Impressions Delivered
  - 5,723 Link Clicks
  - 0.68% Clickthrough Rate
  - 39,569 Video Views, of which 16,901 were completed video views, with a 42.71% Video Completion Rate
  - 33,897 Ad Engagements

As part of preparing for the Virginia Rebuild Project, the Company researched the demographics of the surrounding communities using the Environmental Protection Agency’s EJ mapping and screening tool, EJScreen 2.2 and census data from the U.S. Census Bureau 2017-2021 American Community Survey data. This information revealed that there are 13 Census Block Groups within the Virginia Rebuild Project area that fall within one mile of the existing transmission line corridor. A review of ethnicity, income, age, and education census data identified populations within the study area that meet the Virginia Environmental Justice Act threshold to be defined as Environmental Justice Communities (“EJ Communities”). Communities of color have been identified in 10 Census Block Groups within the one-mile search area. Ten of 13 Census Block Groups within the one-mile search area appear to be low-income as defined by the Virginia Environmental Justice Act. None of the Census Block Groups lack available income data.

Pursuant to Va. Code §§ 56-46.1 C and 56-259 C, as well as in Attachment 1 of these Guidelines, there is a strong preference for the use of existing utility right-of-way whenever feasible. The Virginia Rebuild Project is within the existing right-of-way or on Company-owned property and will not require any of the following: additional permanent or temporary right-of-way, the construction of a temporary line, or an increase in operating voltage. The structural height average will increase by 5 feet from 70 feet to 75 feet. Height differences will vary per structural location. Based on the analysis of the Virginia Rebuild Project, the Company does not anticipate disproportionately high or adverse impacts to the surrounding

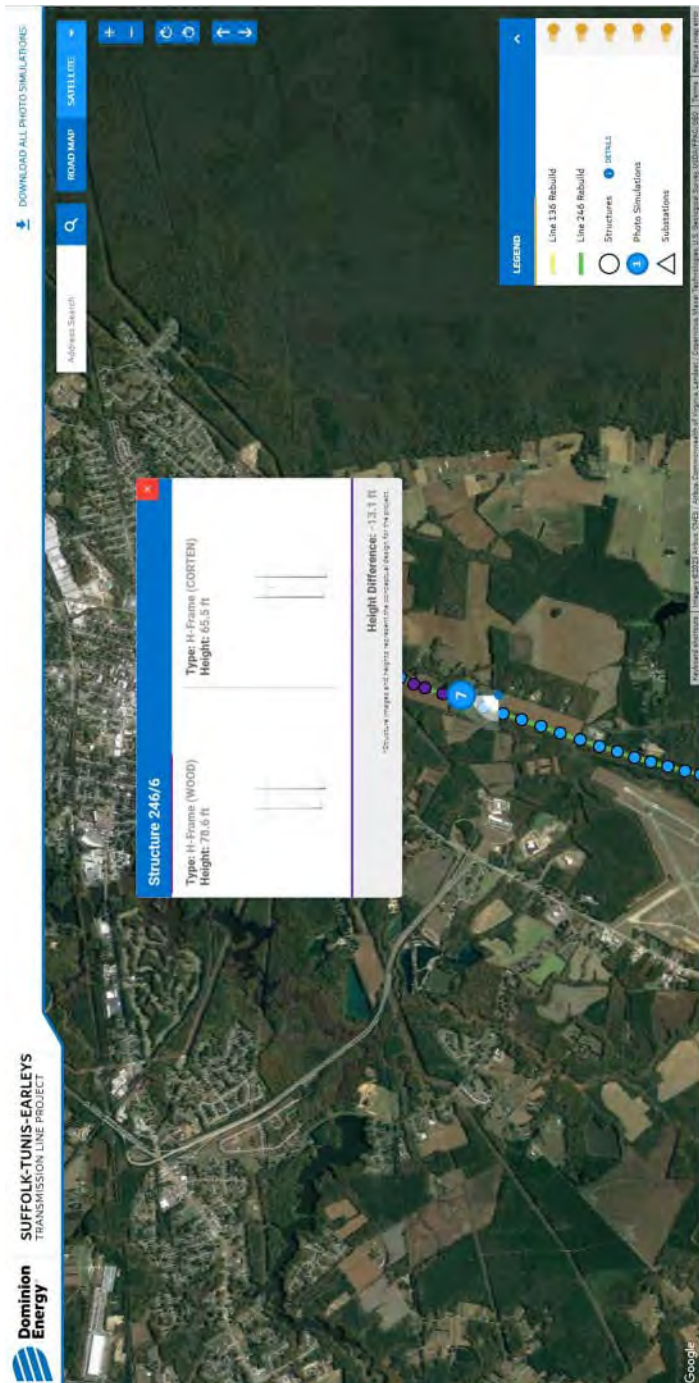
community and the EJ Communities located within the study area, consistent with the Virginia Rebuild Project design to reasonably minimize impacts.

In addition to its evaluation of impacts, the Company has and will continue to engage the EJ Communities and others affected by the Virginia Rebuild Project in a manner that allows them to meaningfully participate in the project development and approval process so that their views and input can be taken into consideration. See Attachment III.B.7 for a copy of the Company's Environmental Justice Policy.

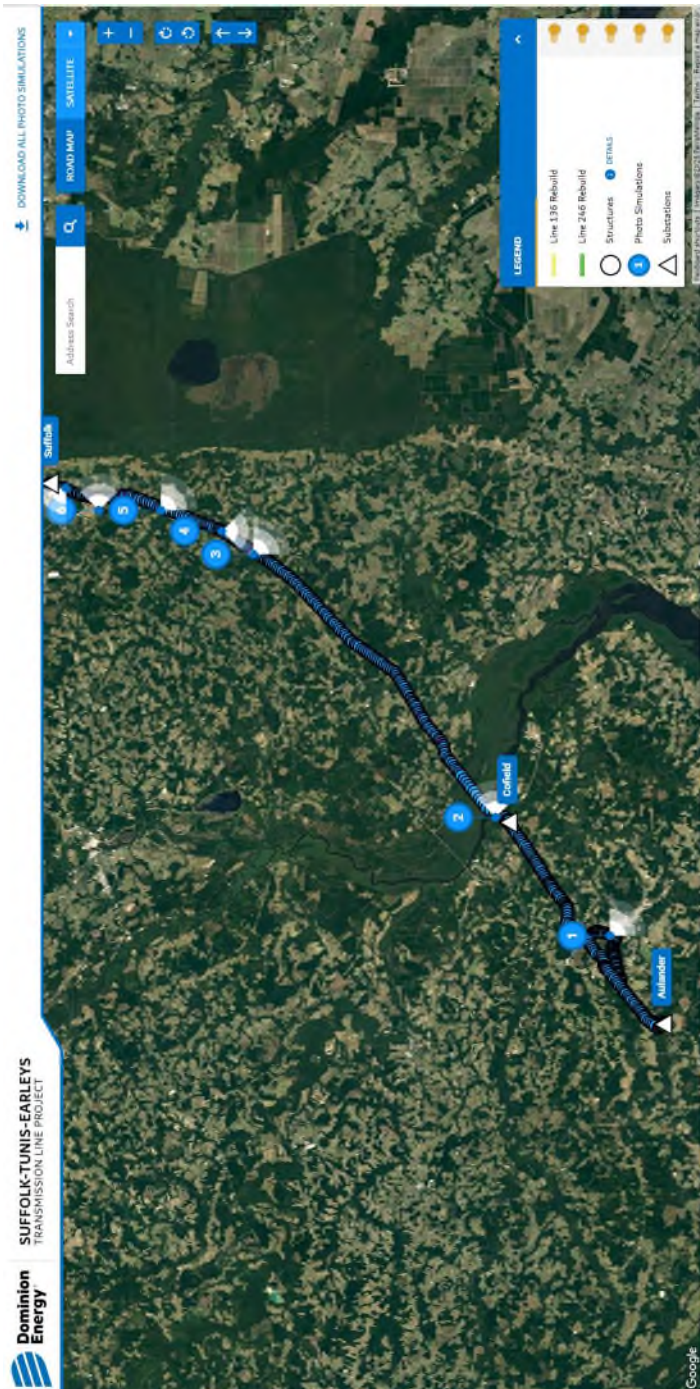


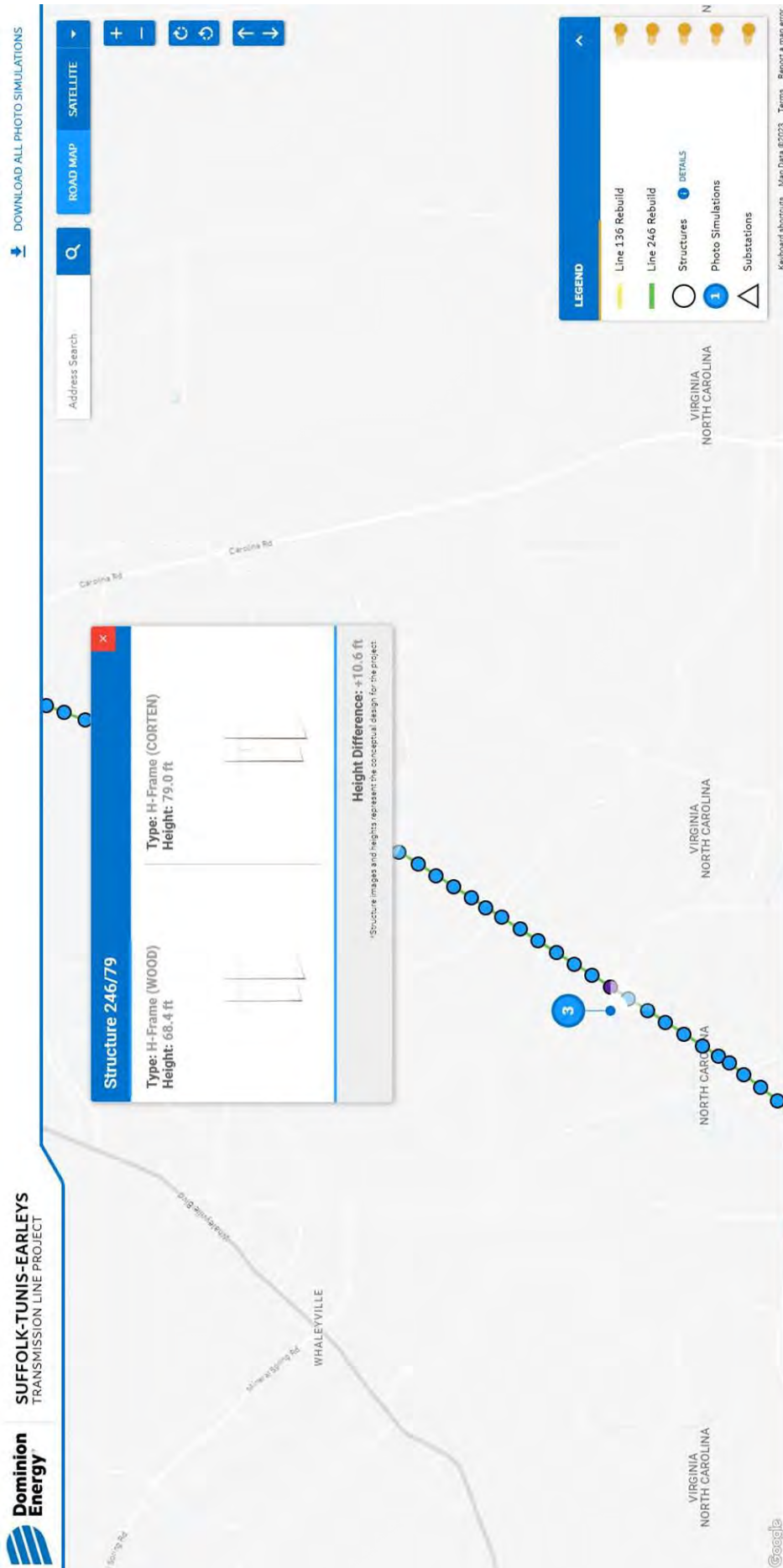














Electric Transmission  
P.O. Box 26666  
Richmond, VA 23261



**Dominion  
Energy®**

Actions Speak Louder

## Local Power Line Project Information Enclosed

HAYES, AUGUSTUS, HEIRS;  
C/O DONNA B ROWLETT  
OR CURRENT RESIDENT  
401 ARCHDALE DR APT 1302  
DURHAM, NC 27707-3998



IMPORTANT

Local Power Line Project Information

Earleys-Tunis-Suffolk 230 kV and 115 kV Electric Transmission Line Rebuild Project

Use your iPhone camera or the QR reader app on other smartphones to visit the project page on our website.



AT DOMINION ENERGY, we are dedicated to maintaining safe and reliable electric service in the communities we serve. You are receiving this postcard because we are proposing to rebuild two aging electric transmission lines in Hertford and Gates counties in North Carolina. One line extends into the City of Suffolk, Virginia. After more than five decades of dependable service, the existing structures and components on both lines are at the end of their service life. Replacing this equipment will maintain reliability for our customers.

AT DOMINION ENERGY, protecting the grid and making it secure against natural and man-made acts is a top priority. We work alongside government officials to prepare for potential incidents that could affect our ability to provide electricity safely and reliably to the communities we serve. Learn how we're keeping you safe at [powerlines101.dominionenergy.com](https://powerlines101.dominionenergy.com).

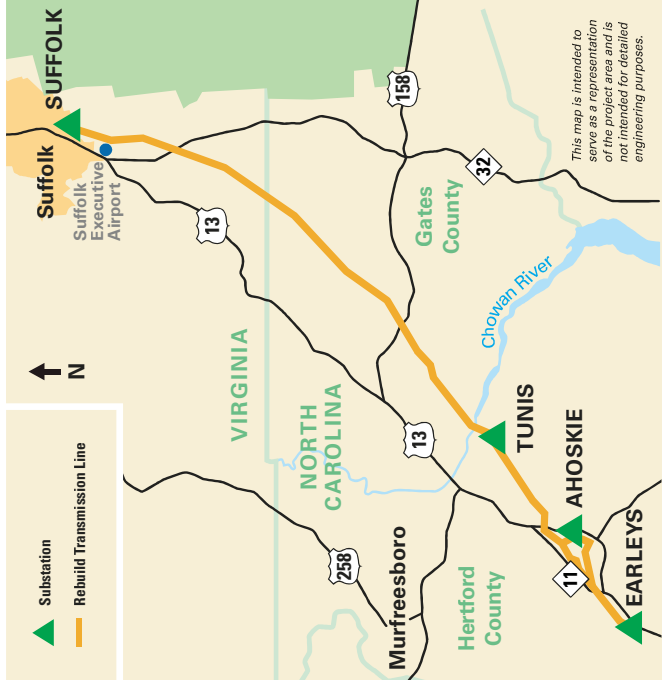
The 44.3-mile, 230 kilovolt (kV) electric transmission line between our Suffolk and Earleys substations was built on wooden H-frame and weathering steel lattice structures. We are proposing to rebuild this line using brown, weathering steel H-frame structures and galvanized steel lattice structures. The 14.8-mile, 115 kV electric transmission line between our Murfreesboro and Earleys substations was built on wooden monopole structures. We are proposing to rebuild this line using weathering steel monopole structures. No new or expanded right of way is needed.

We plan to survey the electric transmission corridor in early summer. Our crews will access the right of way on foot or in vehicles. Surveys may include collecting small soil and/or vegetation samples. Any holes will be refilled after surveying is complete.

This project does not require review by the North Carolina Utilities Commission (NCUC). However, the Virginia State Corporation Commission (SCC) requires review of the 14.7 miles of transmission line located in Suffolk, Virginia. We will host a community meeting to share more information about this project in late summer.

After receiving all necessary approvals and permits, we plan to rebuild both transmission lines between 2026 and 2028.

**CONTACT US** — Visit our website at [DominionEnergy.com/Earleys](https://DominionEnergy.com/Earleys) for project updates. Or contact us by sending an email to [powerline@dominionenergy.com](mailto:powerline@dominionenergy.com) or calling 888-291-0190.





Dominion Energy image. Not project specific.

Electric Transmission  
P.O. Box 26666  
Richmond, VA 23261



**Dominion  
Energy®**

Actions Speak Louder

## You're Invited to a Community Open House Meeting

HAYES, AUGUSTUS, HEIRS;  
C/O DONNA B ROWLETT  
OR CURRENT RESIDENT  
401 ARCHDALE DR APT 1302  
DURHAM, NC 27707-3998

IMPORTANT

Local Power Line Project Information

Earleys-Tunis-Suffolk 230 kV and 115 kV Electric Transmission Line Rebuild Project

Use your iPhone camera or the QR reader app on other smartphones to visit the project page on our website.



AT DOMINION ENERGY, we are committed to providing information about projects planned in the communities we serve.

We are proposing to rebuild two aging electric transmission lines in Hertford and Gates counties in North Carolina. One line extends 11.9 miles into the City of Suffolk, Virginia. Replacing this equipment will maintain electric reliability for our customers. No new right of way is needed.

In October, we plan to file an application with the Virginia State Corporation Commission (SCC). This project does not require review by the North Carolina Utilities Commission (NCUC).

To learn important information about the project's timelines and benefits, you are invited to attend one of our open house meetings. Here you can ask questions and interact with our project team.

We will continue to update you on this important reliability project.

CONTACT US

Visit our website at [DominionEnergy.com/Earleys](https://DominionEnergy.com/Earleys) for project updates. Or contact us by sending an email to [powerline@dominionenergy.com](mailto:powerline@dominionenergy.com) or calling 888-291-0190.

COMMUNITY MEETINGS

Tuesday  
September 12, 2023  
5:00 p.m. – 7:00 p.m.  
Rennee Celebration Center  
178 E Washington Street  
Suffolk, VA 23434

Wednesday  
September 13, 2023  
5:00 p.m. – 7:00 p.m.  
Cooper's Lounge  
& Events LLC  
1200 Memorial Drive E, Ste. B  
Ahoskie, NC 27910

*There is no formal presentation; stop by anytime during the open house.*



This map is intended to serve as a representation of the project area and is not intended for detailed engineering purposes.

AT DOMINION ENERGY, protecting the grid and making it secure against natural and man-made acts is a top priority. We work alongside government officials to prepare for potential incidents that could affect our ability to provide electricity safely and reliably to the communities we serve. Learn how we're keeping you safe at [powerlines101.dominionenergy.com](https://powerlines101.dominionenergy.com).



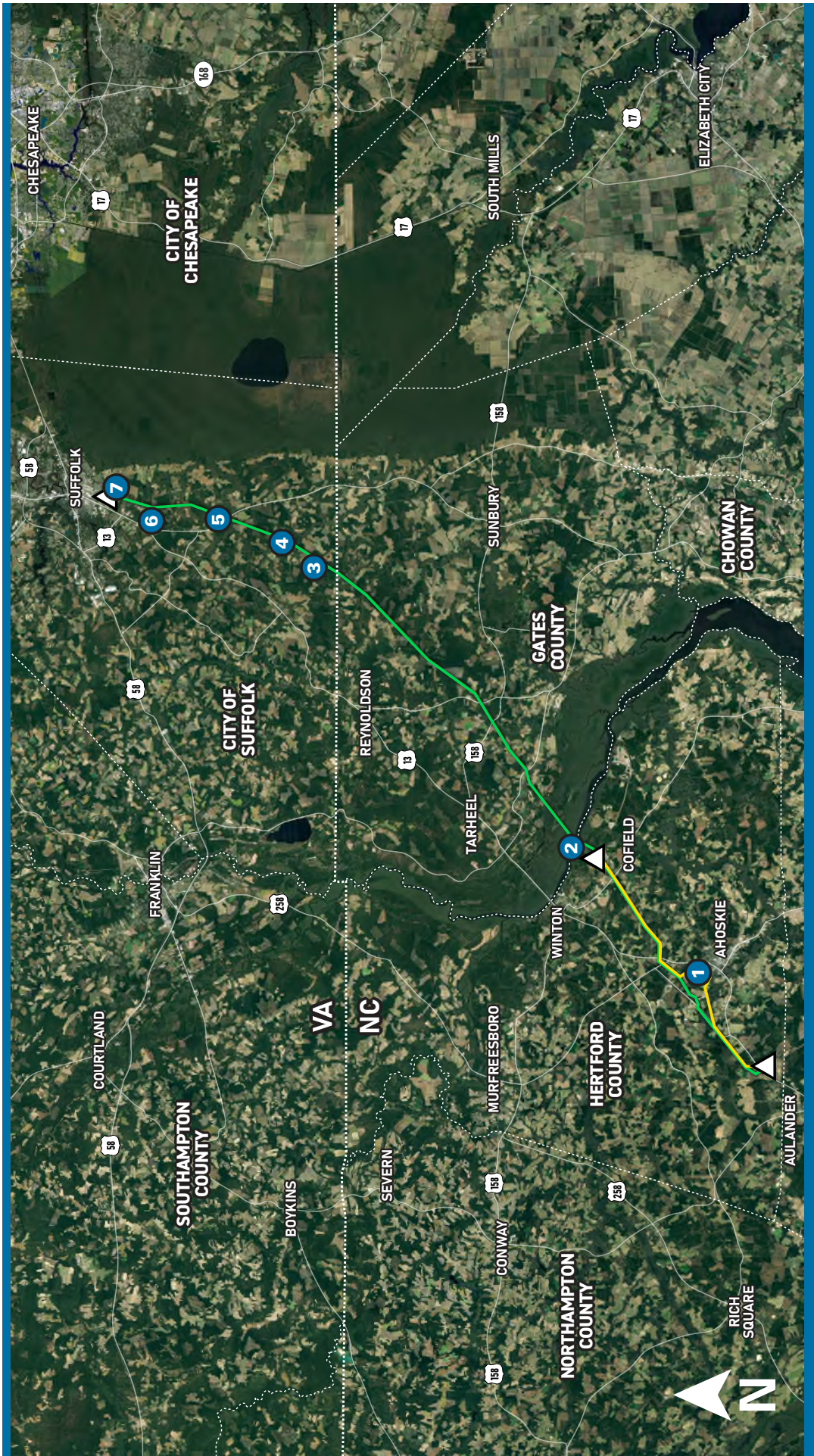
# SUFFOLK- TUNIS-EARLEYS

Transmission Line Rebuild Project

## Photo Location Map



- 1 Viewpoint Location
- Transmission Line 246 to be Rebuilt
- Transmission Line 136 to be Rebuilt
- Substation



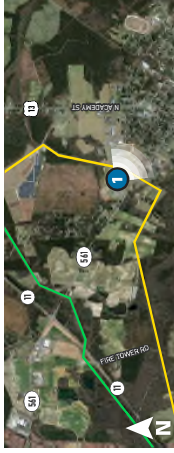


# SUFFOLK-TUNIS-EARLEYS

Transmission Line Rebuild Project

## Viewpoint 1

Date: 06/28/2023 Time: 11:14 am Viewing Direction: Southeast  
 Viewpoint Location — Transmission Line 246 to be Rebuilt  
 — Transmission Line 136 to be Rebuilt



EXISTING CONDITIONS



PROPOSED CONDITIONS

Simulations are for discussion purposes only. Final design is subject to change pending public, engineering, and regulatory review.

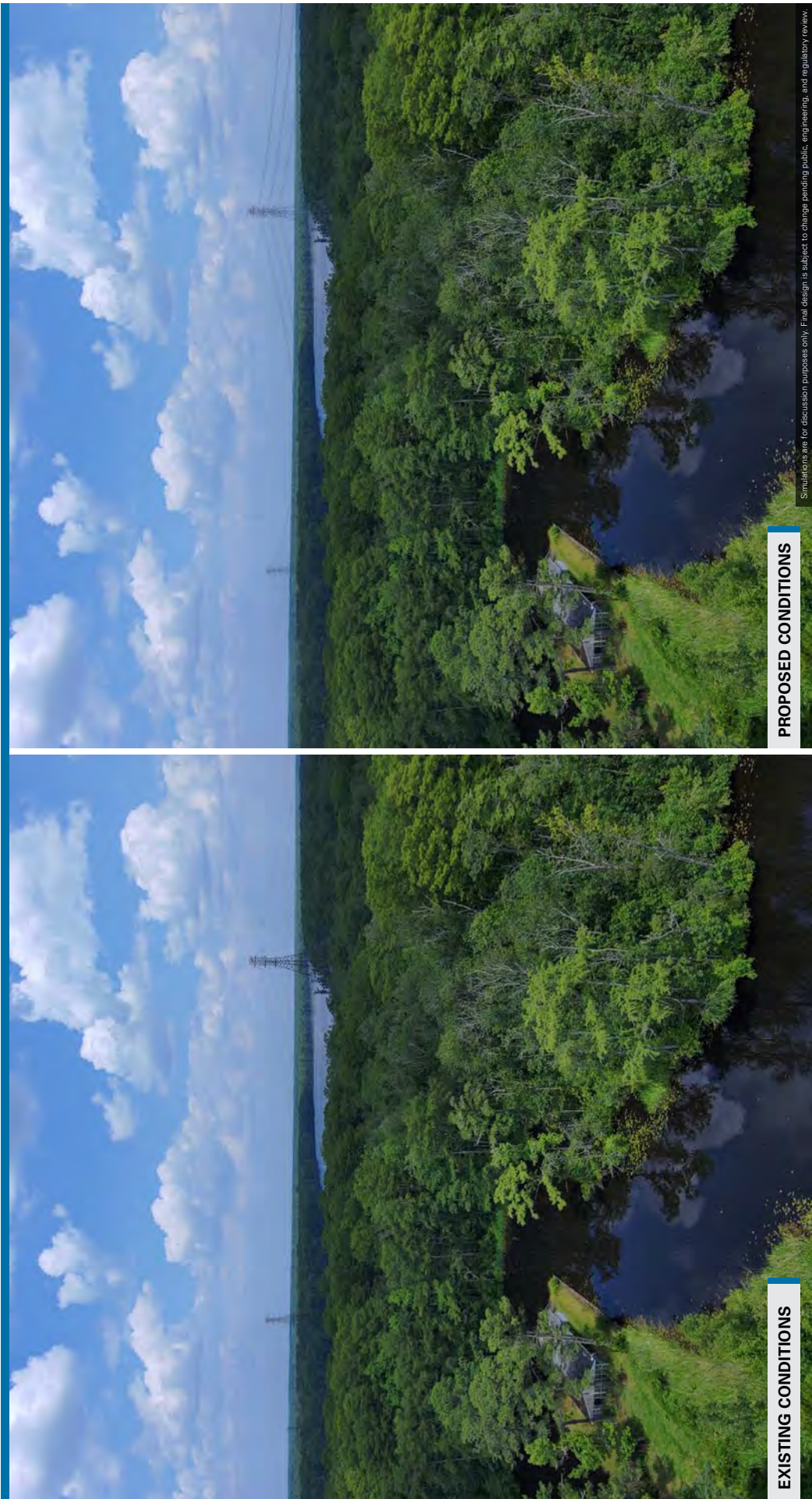


# SUFFOLK-TUNIS-EARLEYS

Transmission Line Rebuild Project

## Viewpoint 2

Date: 06/28/2023 Time: 6:28 pm Viewing Direction: East  
Viewpoint Location — Transmission Line 246 to be Rebuilt



EXISTING CONDITIONS

PROPOSED CONDITIONS

Simulations are for discussion purposes only. Final design is subject to change pending public, engineering, and regulatory review.

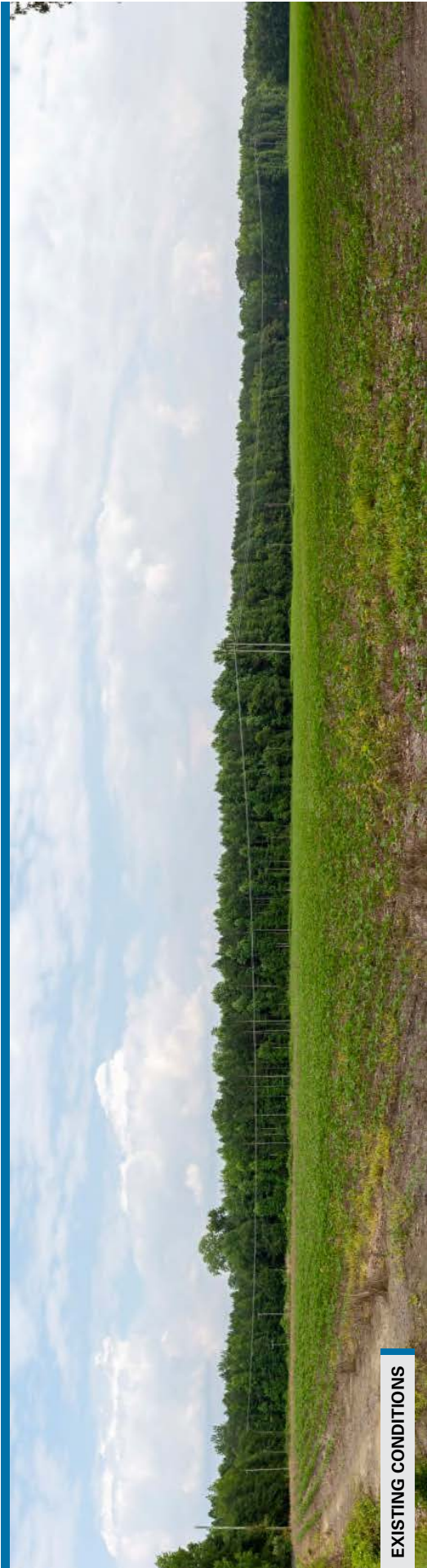


# SUFFOLK-TUNIS-EARLEYS

Transmission Line Rebuild Project

## Viewpoint 3

Date: 06/28/2023 Time: 3:43 pm Viewing Direction: Southeast  
③ Viewpoint Location — Transmission Line 246 to be Rebuilt



EXISTING CONDITIONS



PROPOSED CONDITIONS

Simulations are for discussion purposes only. Final design is subject to change pending public, engineering, and regulatory review.

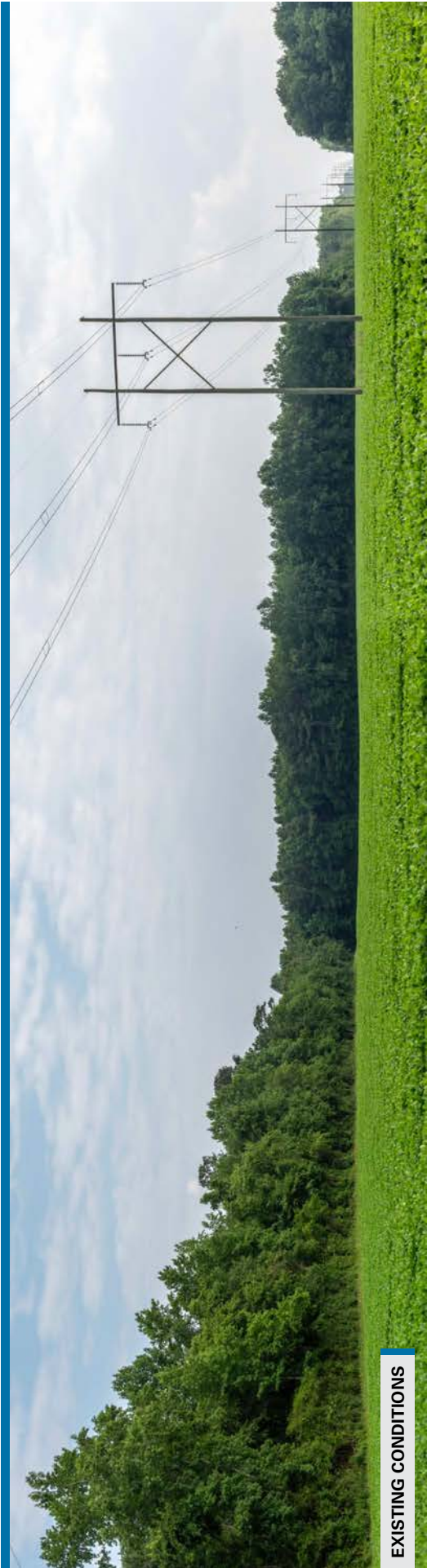
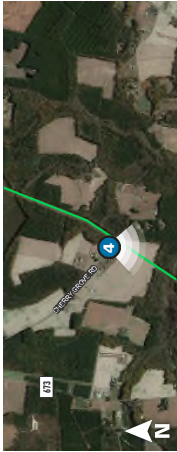


# SUFFOLK-TUNIS-EARLEYS

Transmission Line Rebuild Project

## Viewpoint 4

Date: 06/28/2023 Time: 4:11 pm Viewing Direction: South  
Viewpoint Location — Transmission Line 246 to be Rebuilt



EXISTING CONDITIONS



PROPOSED CONDITIONS

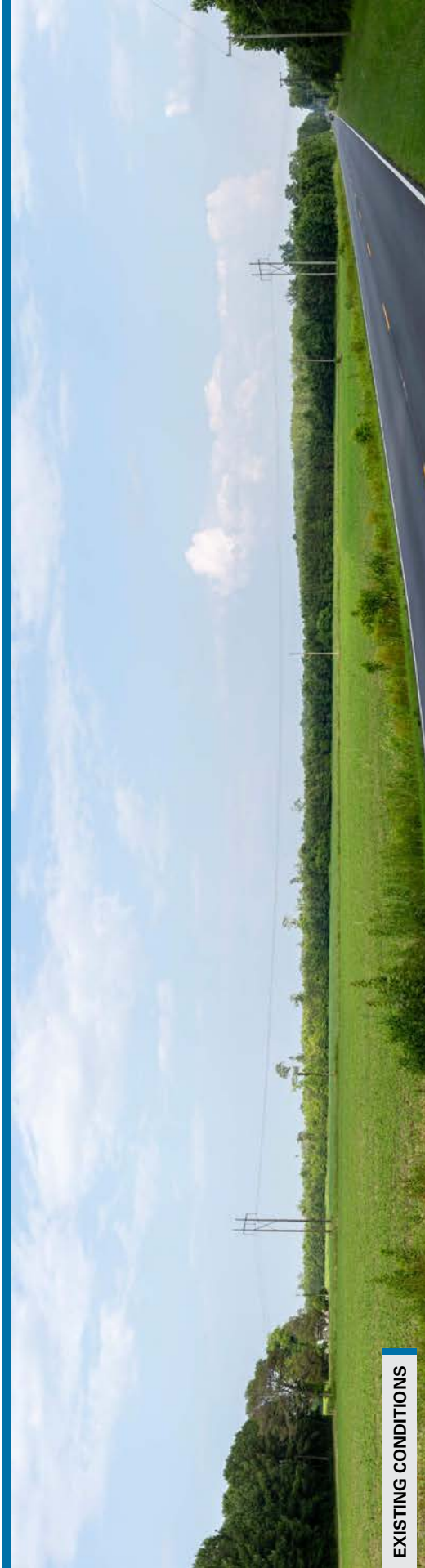
Simulations are for discussion purposes only. Final design is subject to change pending public, engineering, and regulatory review.

# SUFFOLK-TUNIS-EARLEYS

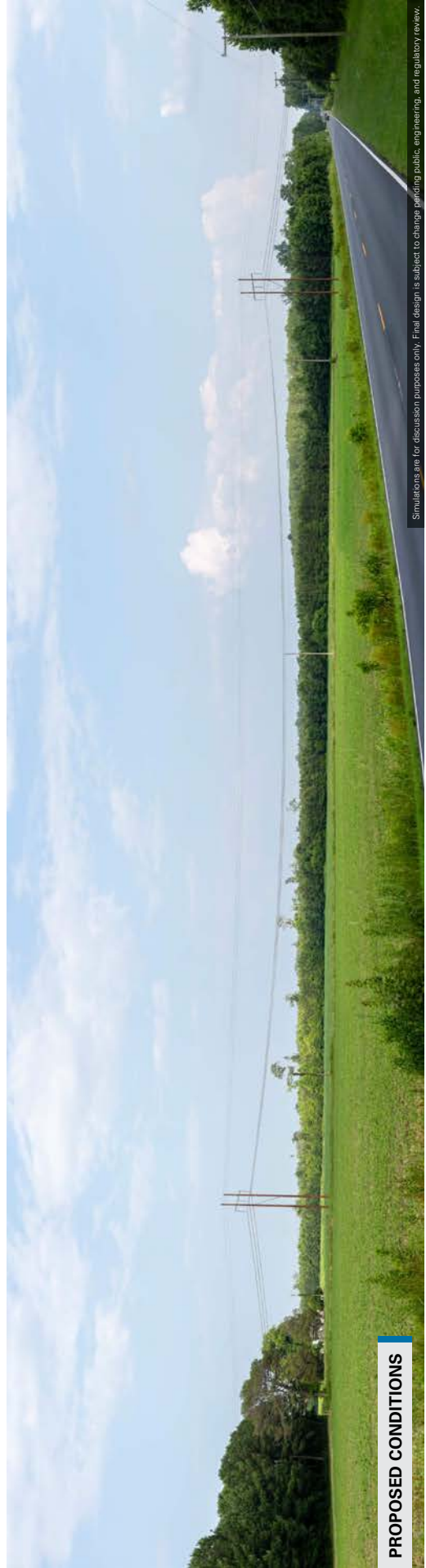
Transmission Line Rebuild Project

## Viewpoint 5

Date: 06/28/2023 Time: 4:39 pm Viewing Direction: Southeast  
 5 Viewpoint Location — Transmission Line 246 to be Rebuilt



EXISTING CONDITIONS



PROPOSED CONDITIONS

Simulations are for discussion purposes only. Final design is subject to change pending public, engineering, and regulatory review.

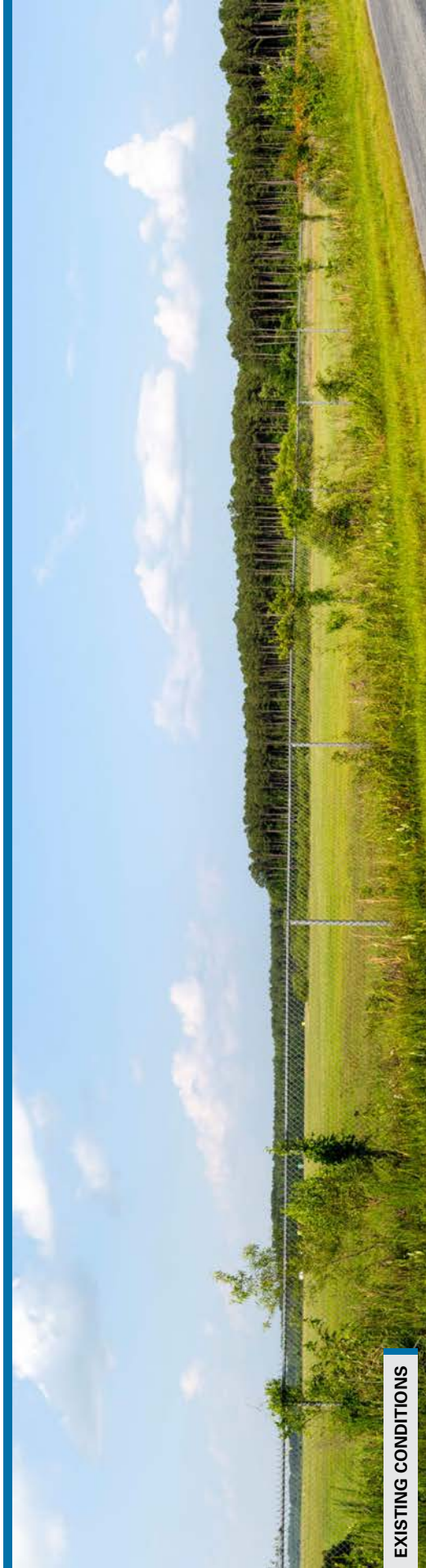
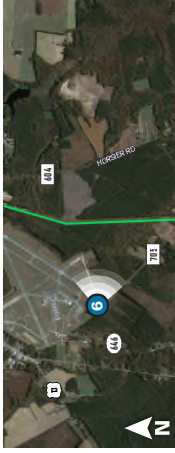


# SUFFOLK-TUNIS-EARLEYS

Transmission Line Rebuild Project

## Viewpoint 6

Date: 06/28/2023 Time: 5:06 pm Viewing Direction: East  
 Viewpoint Location — Transmission Line 246 to be Rebuilt



Objects displayed in yellow are partially or fully obscured from view due to distance, vegetation screening, or existing infrastructure. Simulations are for discussion purposes only. Final design is subject to change pending public, engineering, and regulatory review.

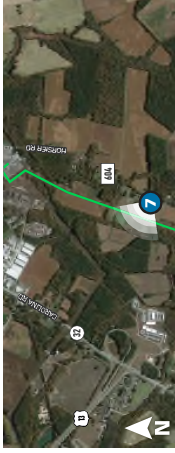


# SUFFOLK-TUNIS-EARLEYS

Transmission Line Rebuild Project

## Viewpoint 7

Date: 06/28/2023 Time: 6:38 am Viewing Direction: Northwest  
 Viewpoint Location — Transmission Line 246 to be Rebuilt



EXISTING CONDITIONS



PROPOSED CONDITIONS

Simulations are for discussion purposes only. Final design is subject to change pending public, engineering, and regulatory review.

# Project Timeline



- **Spring 2023** – Project announced
- **September 2023** – Public Open Houses
- **October 2023** – File project with the Virginia State Corporation Commission (SCC) for a Certificate of Public Convenience and Necessity (CPCN)
- **Fall 2024** – Anticipated SCC approval to proceed
- **Early 2025** – Right of way encroachment review
- **January 2026** – Begin forestry activities
- **March 2026** – Prepare construction access
- **Spring 2026 – summer 2028** – Construction activities
  - Phase 1 (Spring 2026–Fall 2027)** – 230 kV rebuild between Suffolk and Tunis substations
  - Phase 2 (Fall 2027–Summer 2028)** – 230 kV and 115 kV rebuild between Tunis and Earleys substations
- **Late summer 2028** – Expected rebuild completion
- **Fall 2028 – spring 2029** – Right of way restoration activities

*This schedule is subject to change*



# Project Overview



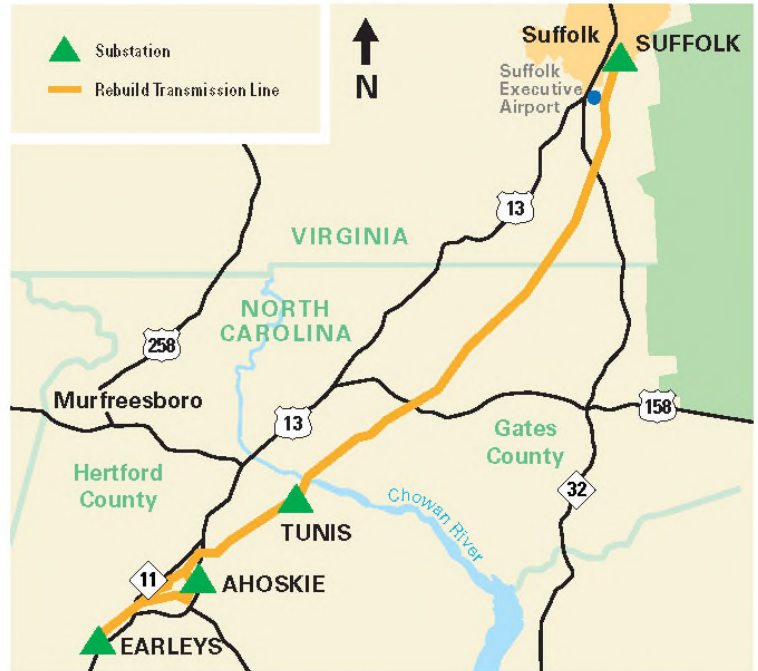
We are planning to rebuild two aging electric transmission lines in northeast North Carolina in Hertford and Gates counties. One line continues to the City of Suffolk, Virginia. After more than five decades of dependable service, the existing structures and components on both lines are at the end of their service life. Replacing this equipment will maintain reliability for our customers.

230 kV electric transmission line:

- Between Suffolk and Earleys substations
- 44.3 miles
- Built on wooden H-frame and weathering steel lattice structures

115 kV electric transmission line:

- Between Tunis and Earleys substations
- 14.8 miles
- Built on wooden monopole structures



*This map is intended to serve as a representation of the project area and is not intended for detailed engineering purposes.*

Proposal:

- Rebuild the 230 kV line using a combination of brown, weathering steel H-frame structures and galvanized steel lattice structures
- Rebuild the 115 kV line using weathering steel monopole structures
- No new right of way is needed



Existing transmission 230 kV H-frame and 115 kV monopole wooden structures by Tunis Substation in North Carolina. Photo taken in summer 2022.



Existing weathering steel lattice towers north of the Chowan River, looking south. The 230 kV electric transmission line here shares structures with a distribution line to cross the wetlands and the river. Photo taken in March 2023.

# Structures



New weathering steel structures are about five feet taller than original wooden structures



Old Average Height: 67 FT



New Average Height: 73 FT



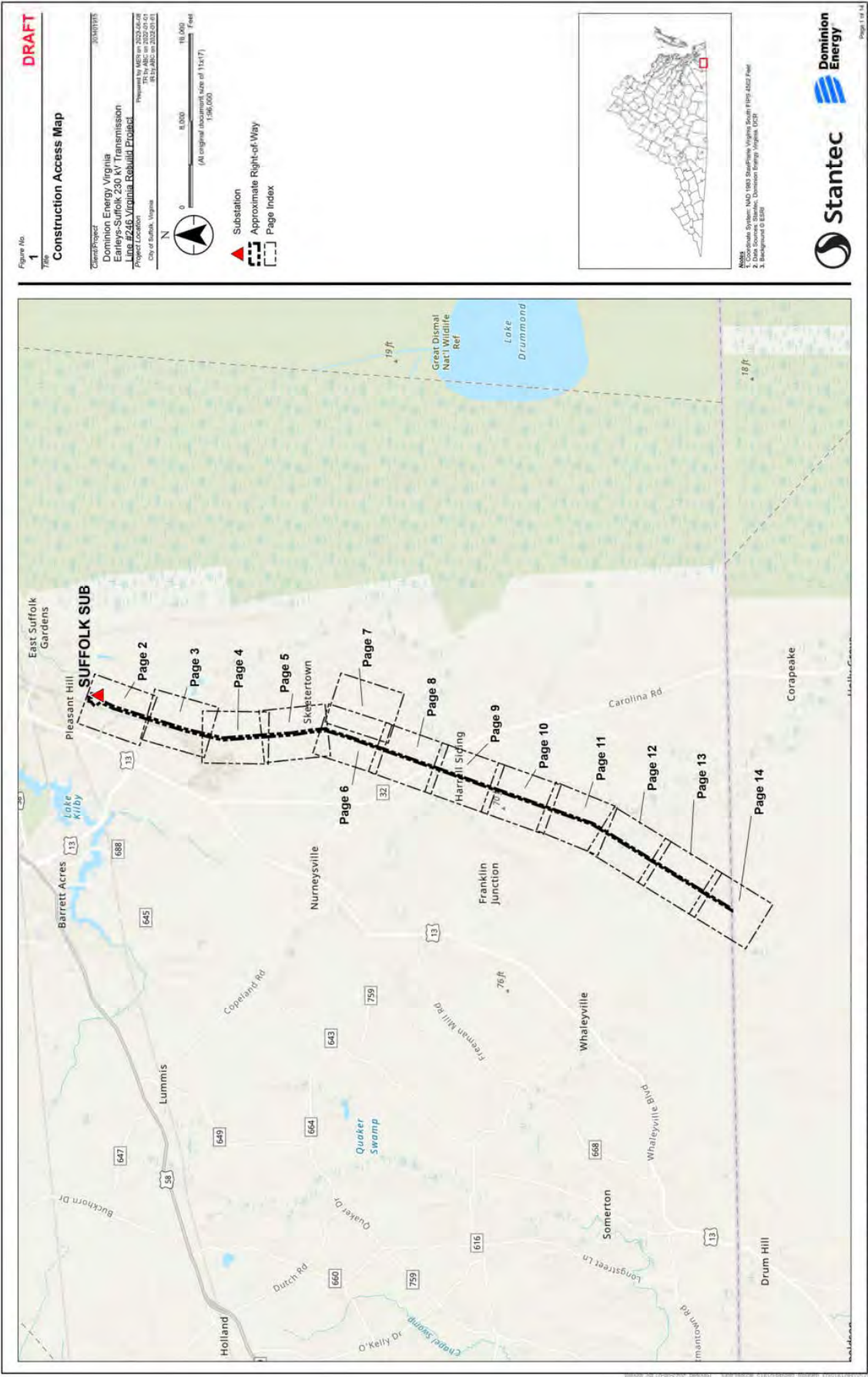
Old Average Height: 58 FT



New Average Height: 63 FT

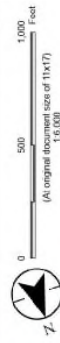
*Heights subject to change during final engineering*



















**Construction Access Map**

Client/Project: Dominion Energy Virginia  
 Earlees-Suffolk 230 kV Transmission  
 Line #246 Virginia Rebuild Project  
 Project Location: City of Suffolk, Virginia  
 Prepared by: VER on 2023-09-08  
 T10 By ABC on 2022-01-01  
 R1 By ABC on 2022-01-01  
 202401915

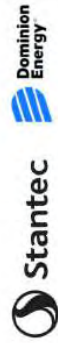


-  Substation  
 Existing Structure  
 Existing Structure  
 Preferred Access - No Existing  
 Preferred Existing Access - Dirt  
 Preferred Existing Access - Gravel  
 Freshwater Emergent Wetland  
 Freshwater Forest/Shrub Wetland  
 Freshwater Pond  
 Riverine  
 Approximate Right-of-Way  
 Parcel Boundary  
 Distribution Line  
 2-Foot Contours



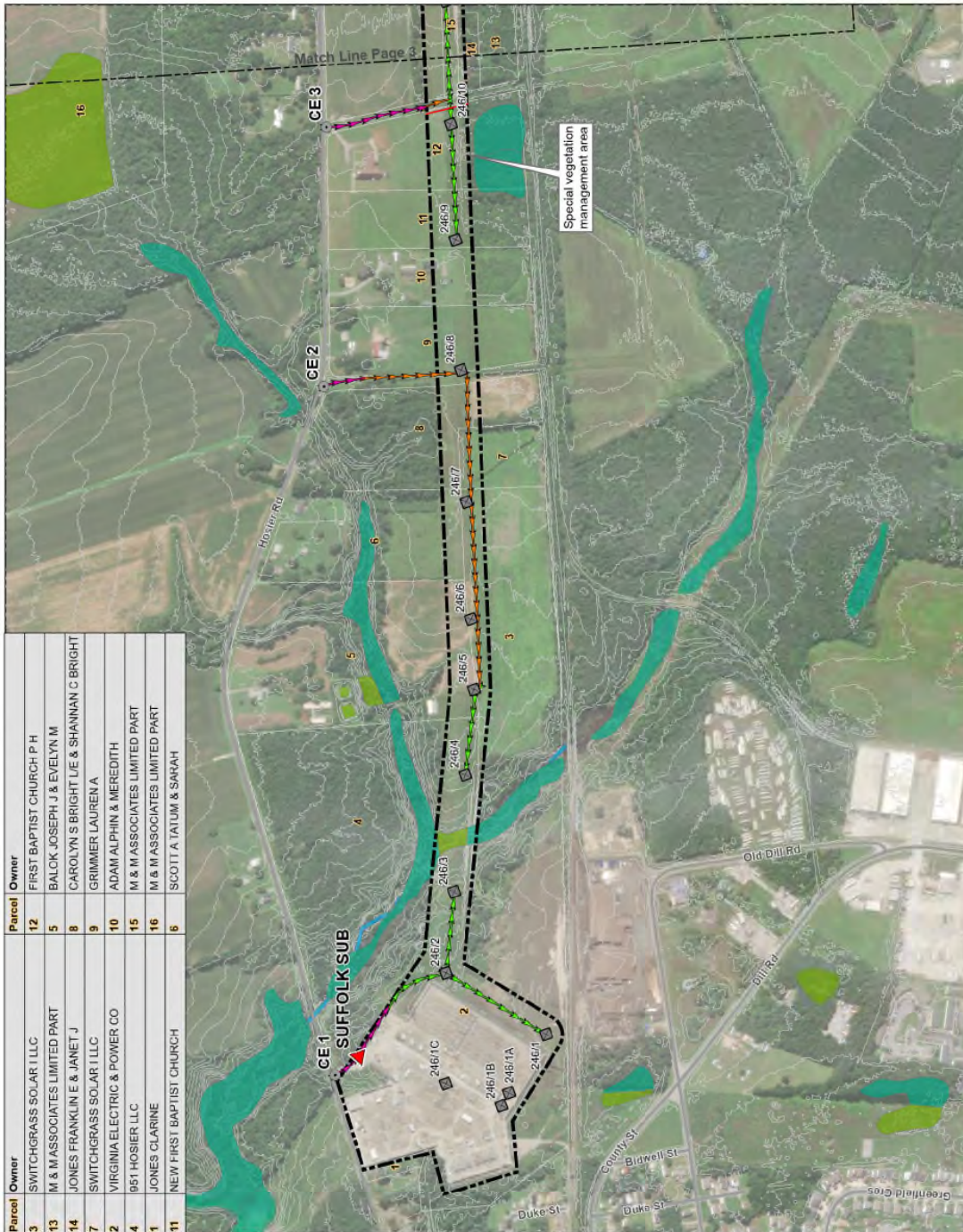
**Notes**

1. Corporate System: NAD 1983 StatePlane Virginia State FIPS 4502 Fed
2. Data Sources: Santee, Dominion Energy Virginia, DCR
3. Background © F.SQI



Page 3 of 18

Parcel	Owner	Parcel	Owner	Parcel	Owner
3	SWITCHGRASS SOLAR I LLC	12	FIRST BAPTIST CHURCH P H		
13	M & M ASSOCIATES LIMITED PART	5	BALCK, JOSEPH J & EVELYN M		
14	JONES FRANKLIN E & JANET J	8	CAROLYN S BRIGHT LEE & SHANNAN C BRIGHT		
7	SWITCHGRASS SOLAR I LLC	9	GRIMMER LAUREN A		
2	VIRGINIA ELECTRIC & POWER CO	10	ADAM ALPHIN & MEREDITH		
4	951 HOSIER LLC	15	M & M ASSOCIATES LIMITED PART		
1	JONES CLARINE	16	M & M ASSOCIATES LIMITED PART		
11	NEW FIRST BAPTIST CHURCH	6	SCOTT A TATUM & SARAH		

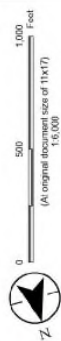


Disclaimer: This document has been prepared based on information provided by others as cited in the Issues section. Stetec does not verify the accuracy and/or completeness of the information provided by others and shall not be responsible for any errors or omissions which may be incorporated herein as a result. Stetec assumes no responsibility for omissions supplied in electronic format, and the recipient assumes full responsibility for verifying the accuracy and completeness of the data.



## Construction Access Map

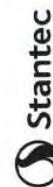
Client/Project: Dominion Energy Virginia  
 Prepared by: M&E on 2023-06-08  
 Titled by: ABC on 2022-01-01  
 Line #: 246 Virginia Rebuild Project  
 Project Location: City of Suffolk, Virginia  
 203401915



- Existing Structure  
Existing Entrance  
Preferred Access - No Existing  
Preferred Existing Access - Gravel  
Freshwater Emergent Wetland  
Freshwater Forested/Shrub Wetland  
Freshwater Pond  
Riverine  
Approximate Right-of-Way  
Parcel Boundary  
2-Foot Contours

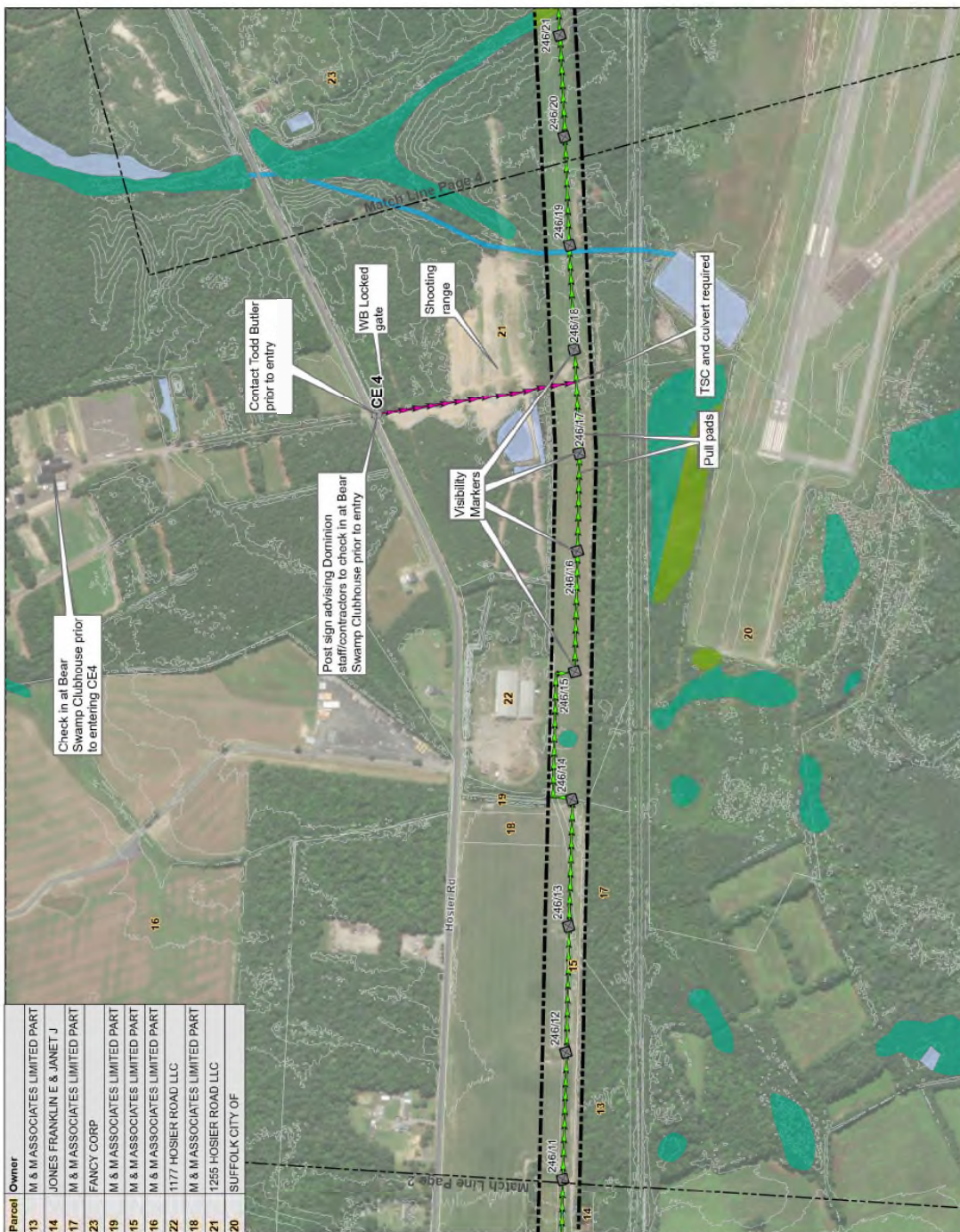


**Notes**  
1. Coordinate System: NAD 1983 StatePlane Virginia South FIPS 4502 Feet  
2. Data Sources: Santee, Dominion Energy Virginia, DCR

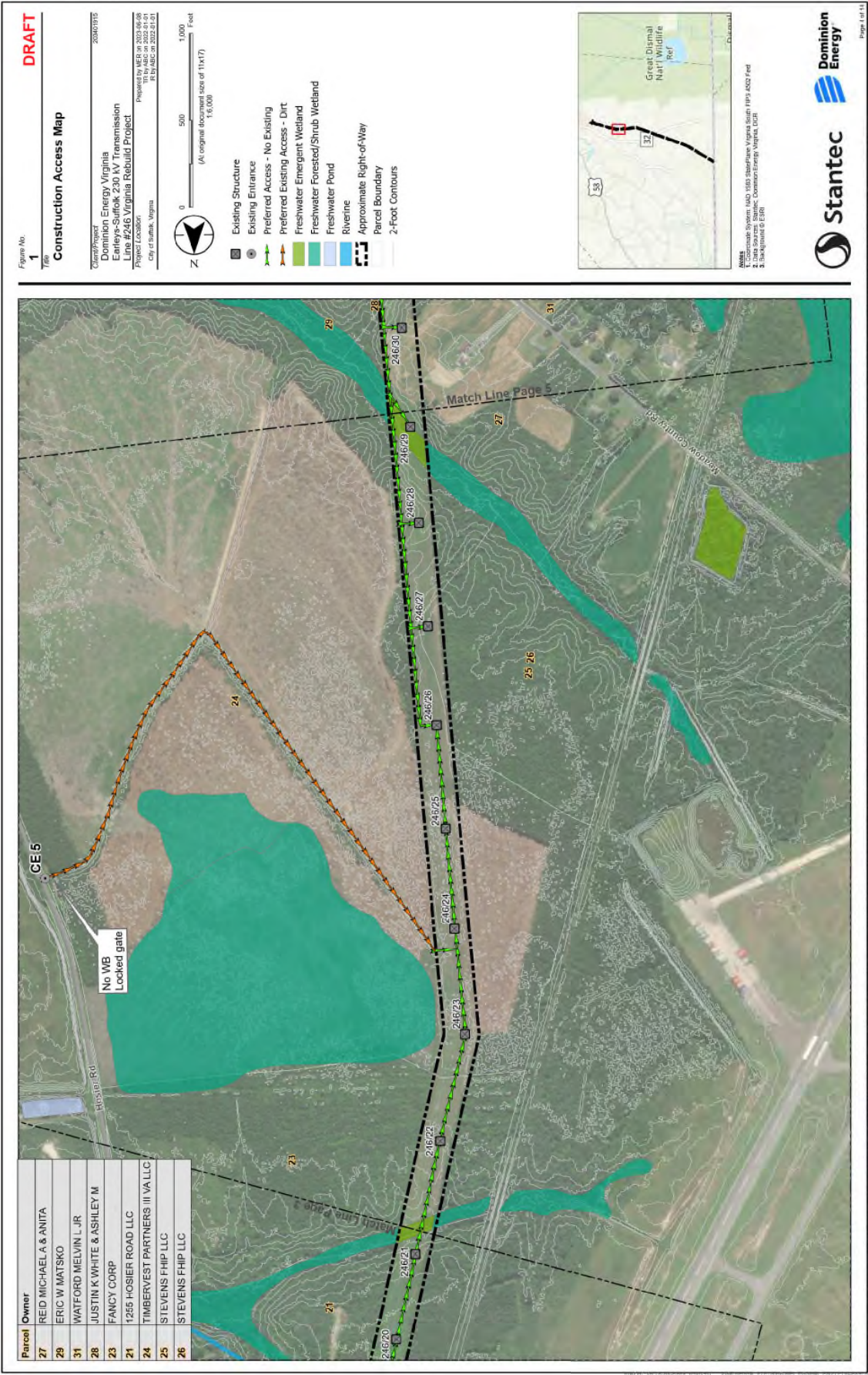


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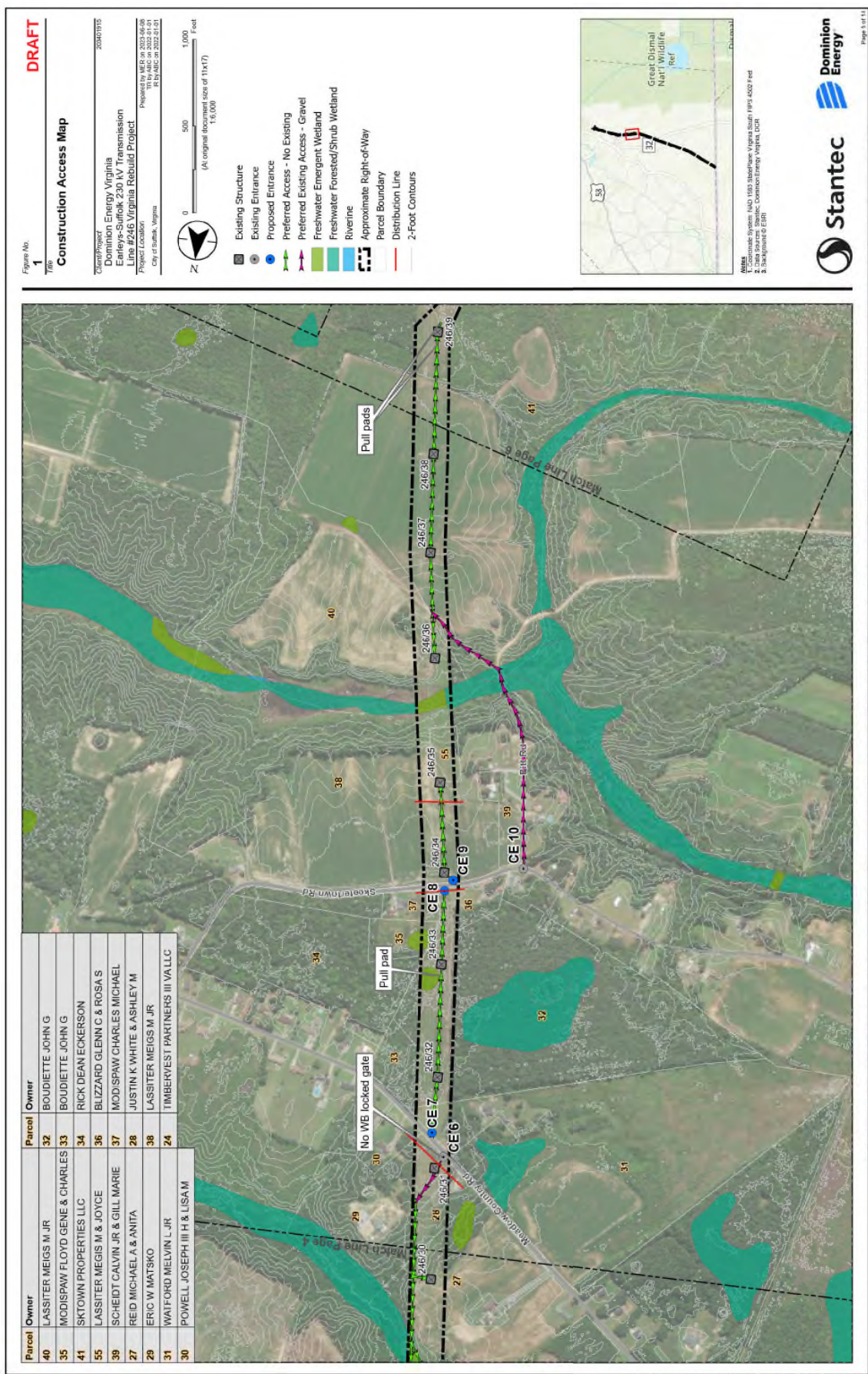
Parcel	Owner
13	M & M ASSOCIATES LIMITED PART
14	JONES FRANKLINE E & JANET J
17	M & M ASSOCIATES LIMITED PART
23	FANCY CORP
25	M & M ASSOCIATES LIMITED PART
19	M & M ASSOCIATES LIMITED PART
16	M & M ASSOCIATES LIMITED PART
22	1177 HOSIER ROAD LLC
21	M & M ASSOCIATES LIMITED PART
18	1255 HOSIER ROAD LLC
20	SUFFOLK CITY OF



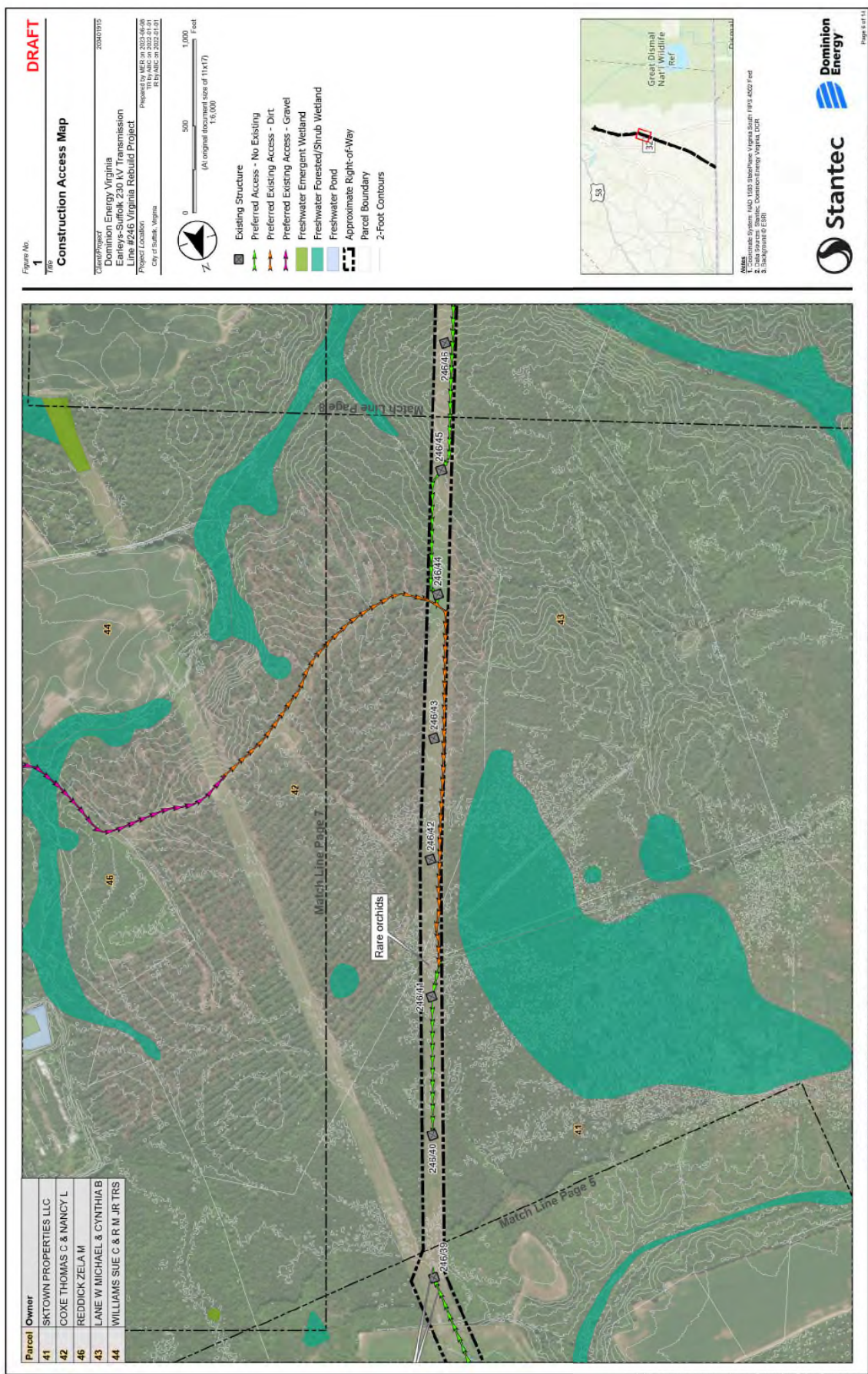




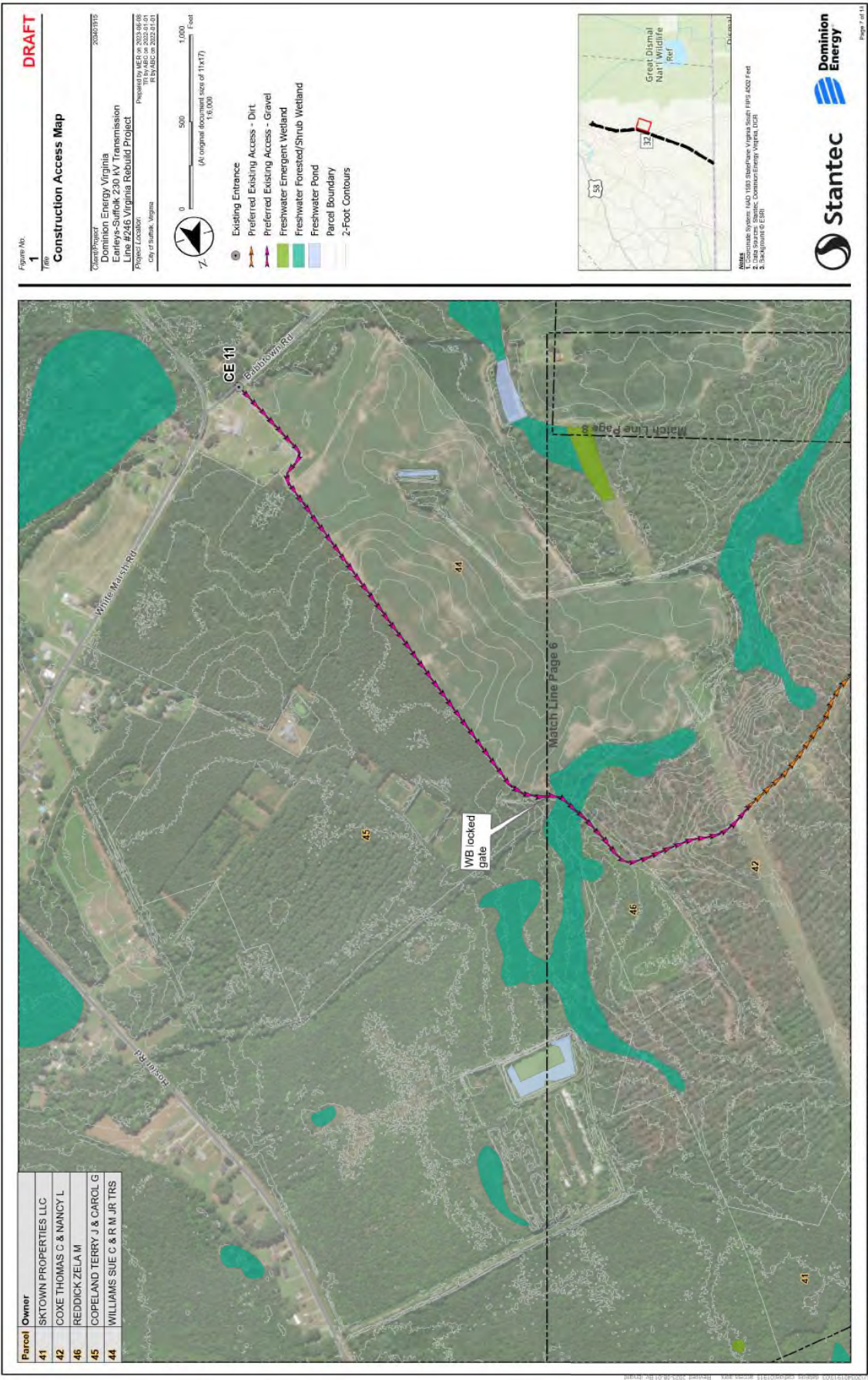








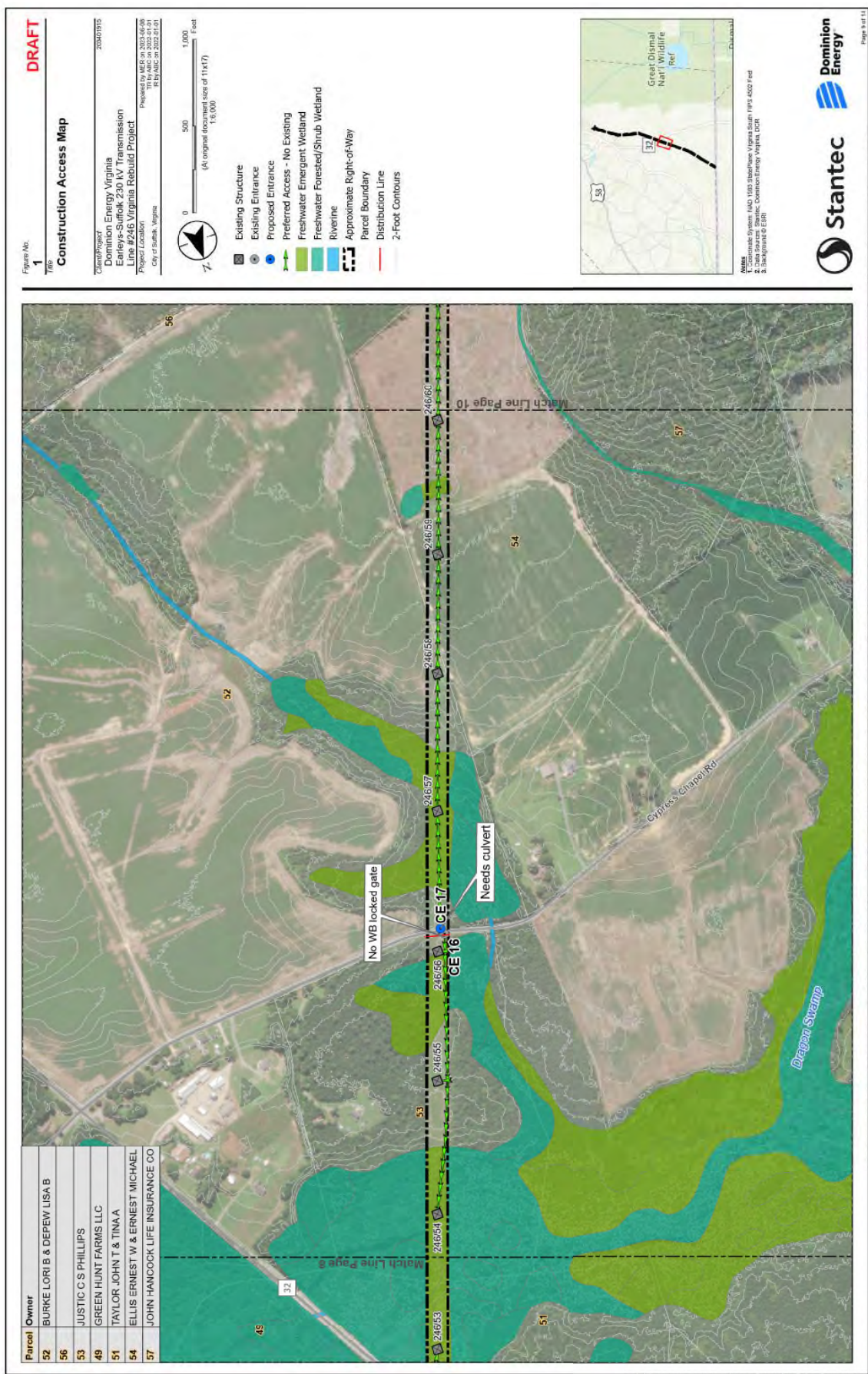




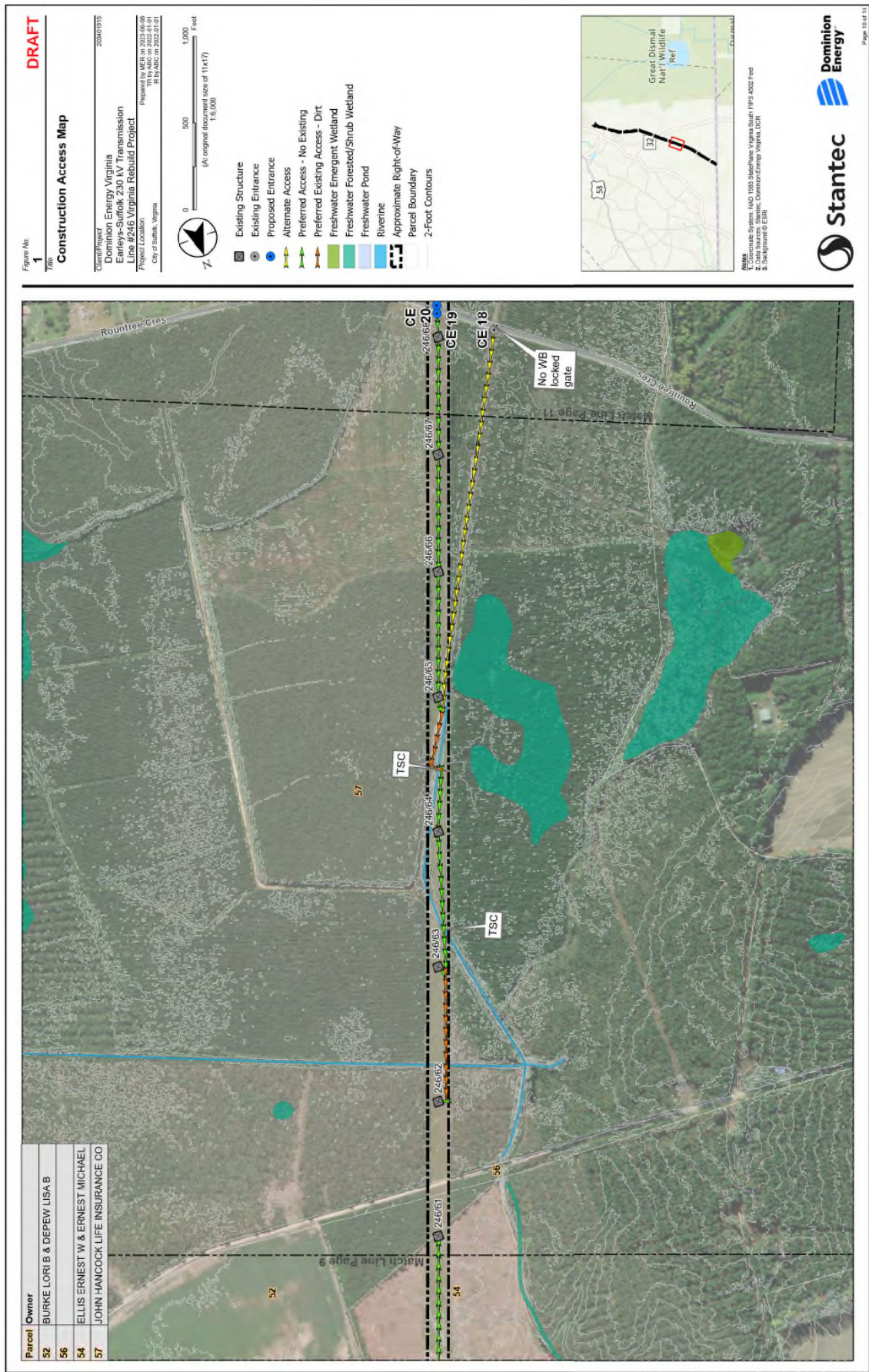








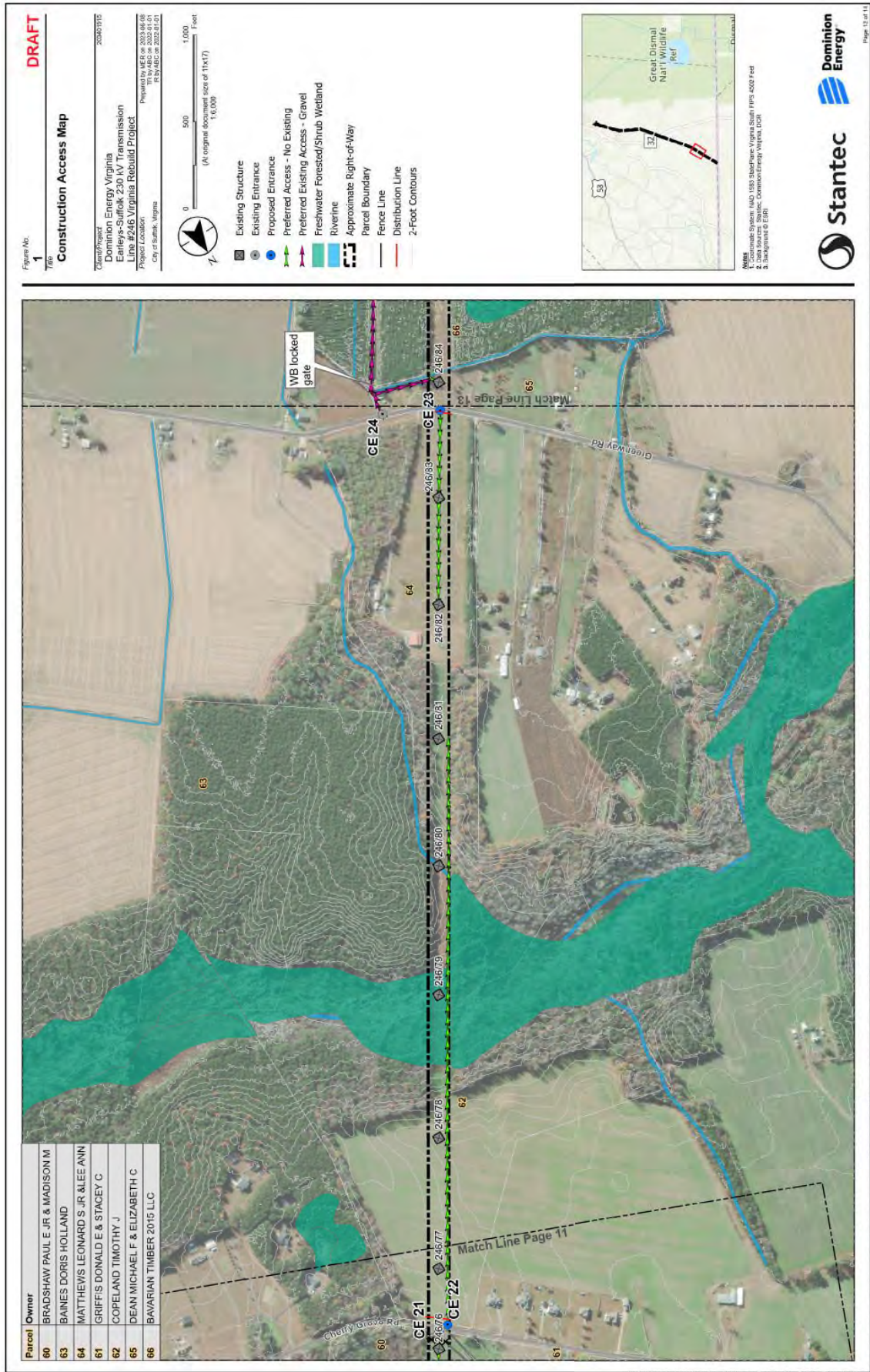








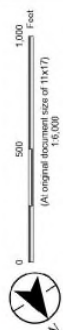






## Construction Access Map

Client/Project: Dominion Energy Virginia  
 Earleys-Suffolk 230 kV Transmission  
 Line #246 Virginia Rebuild Project  
 Project Location: City of Suffolk, Virginia  
 Prepared by: MFR on 2023-06-06  
 TTR by ABC on 2022-01-01  
 IR by ABC on 2022-01-01  
 202401915



- Existing Structure  
Existing Entrance  
Proposed Entrance  
Preferred Access - No Existing  
Preferred Existing Access - Dirt  
Preferred Existing Access - Gravel  
Freshwater Emergent Wetland  
Freshwater Forested/Shrub Wetland  
Riverine  
Approximate Right-of-Way  
Parcel Boundary  
Distribution Line  
2-Foot Contours



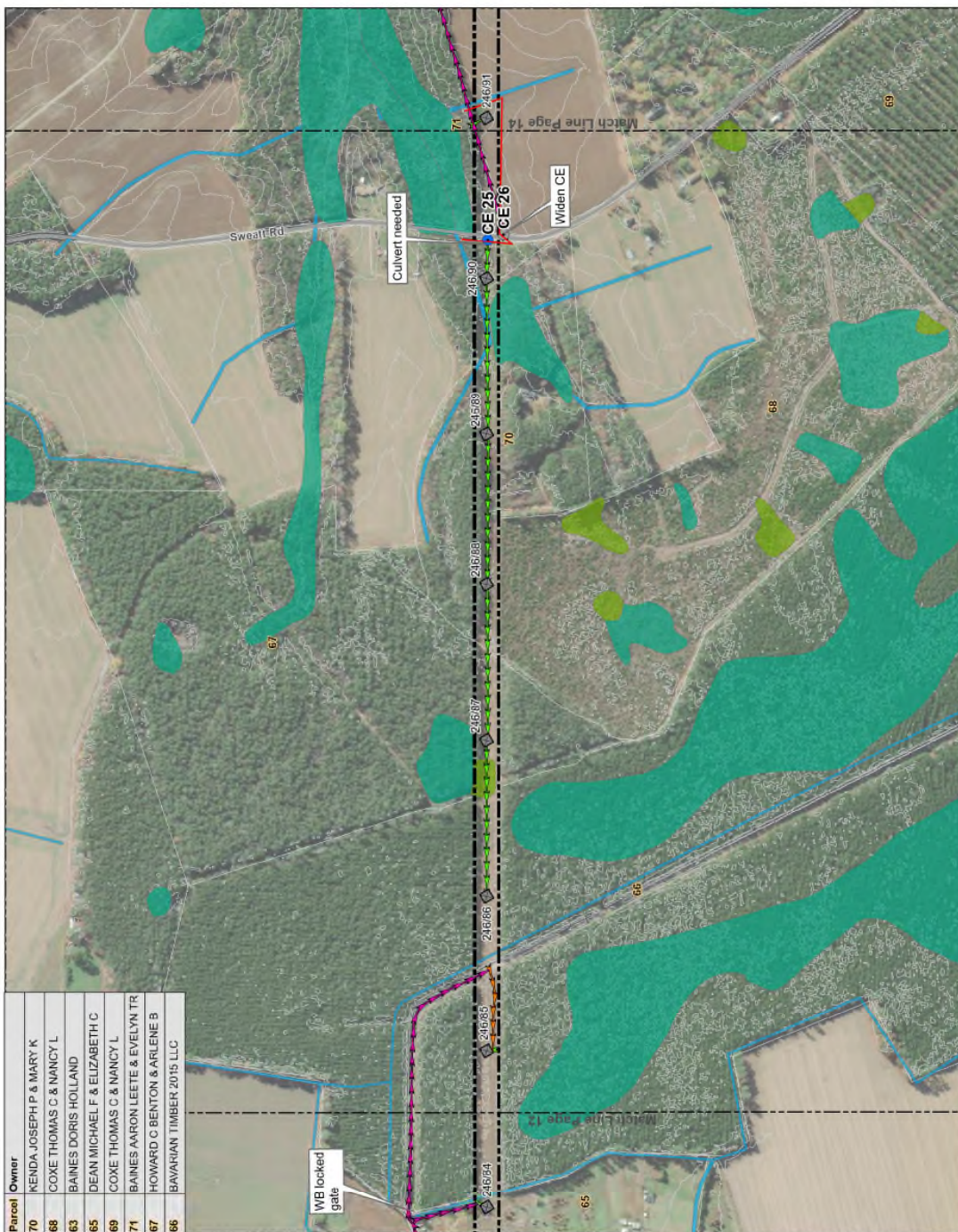
**Notes**

1. Coordinate System: NAD 1983 StatePlane Virginia South FIPS 4502 Feet
2. Data Sources: Santee, Dominion Energy Virginia, DCR Background © ESRI



Page 13 of 18

Parcel	Owner
70	KENDA JOSEPH P & MARY K
68	COXE THOMAS C & NANCY L
63	BAINES DORIS HOLLAND
65	DEAN MICHAEL F & ELIZABETH C
69	COXE THOMAS C & NANCY L
71	BAINES AARON LEETE & EVELYN TR
67	HOWARD C BENTON & ARLENE B
66	BAVARIAN TIMBER 2015 LLC

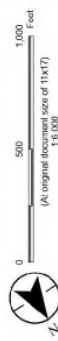


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**Construction Access Map**

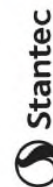
Client/Project: Dominion Energy Virginia  
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 Line #246 Virginia Rebuild Project  
 Project Location: City of Suffolk, Virginia  
 Prepared by: MFR on 2023-06-06  
 TTR by ABC on 2022-01-01  
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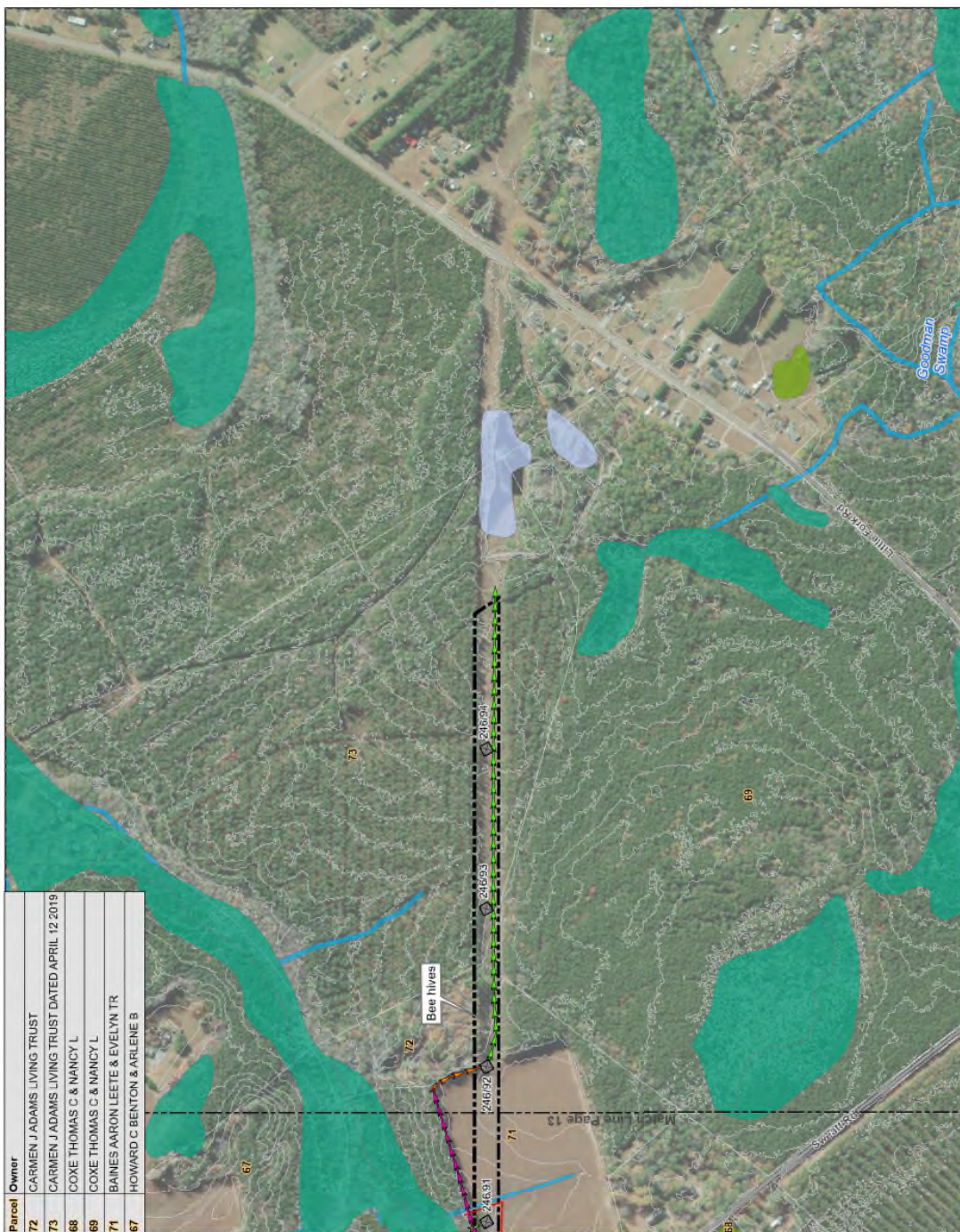


**Notes**  
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2. Data Sources: Santee, Dominion Energy Virginia, DCR



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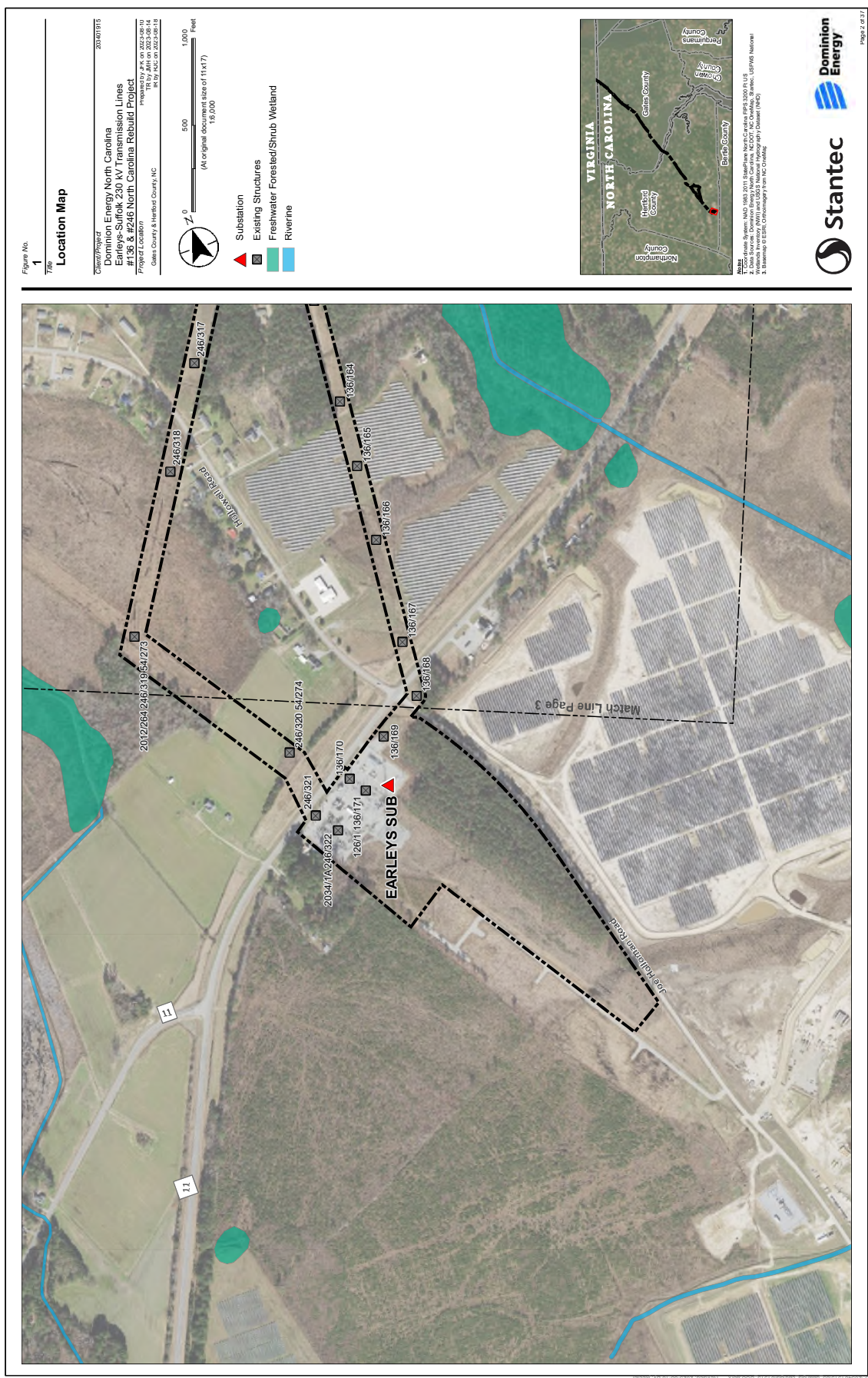
Parcel	Owner
72	CARMEN J ADAMS LIVING TRUST
73	CARMEN J ADAMS LIVING TRUST DATED APRIL 12 2019
68	COXE THOMAS C & NANCY L
69	COXE THOMAS C & NANCY L
71	BAINES AARON LEETE & EVELYN TR
67	HOWARD C BENTON & ARLENE B



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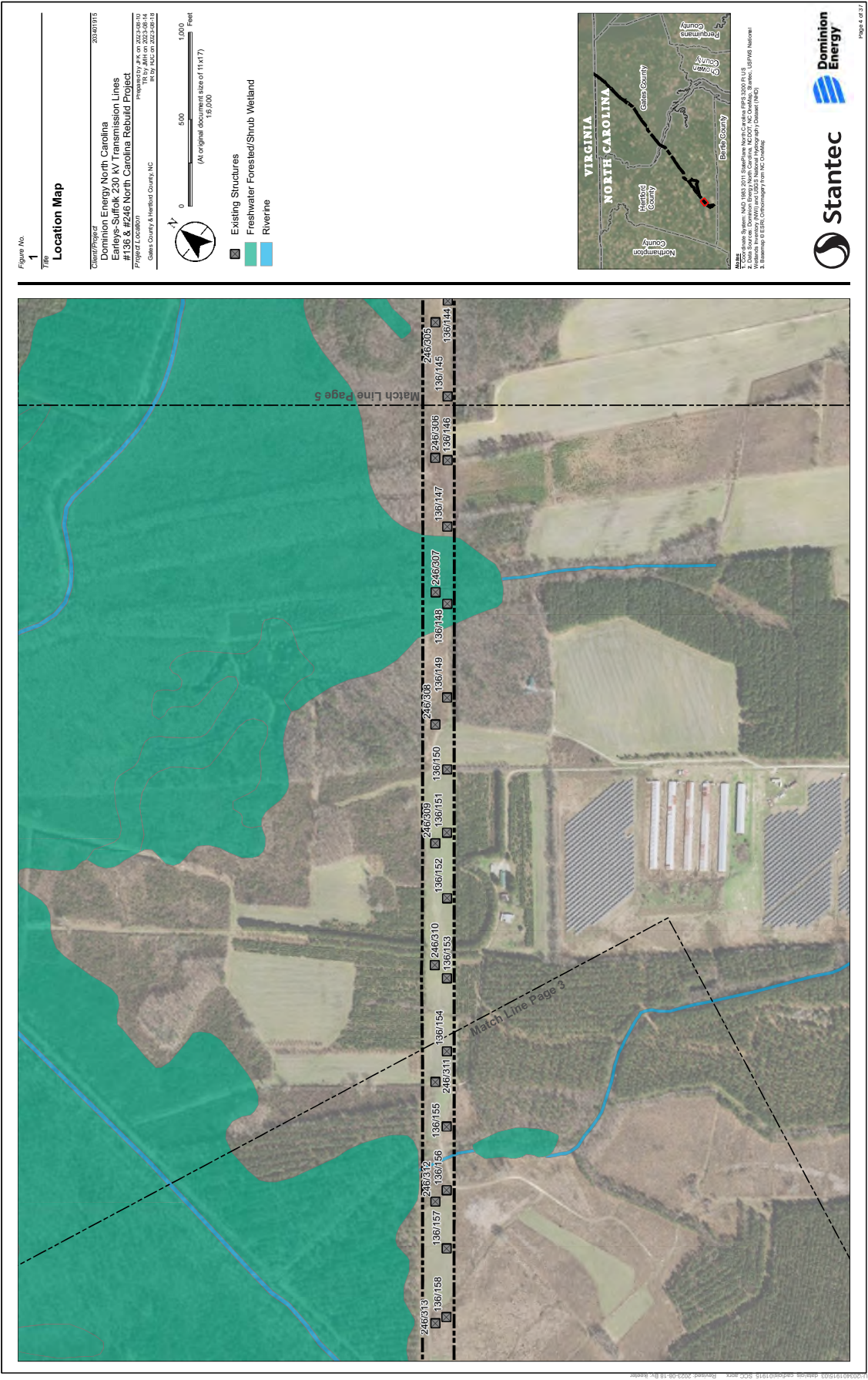




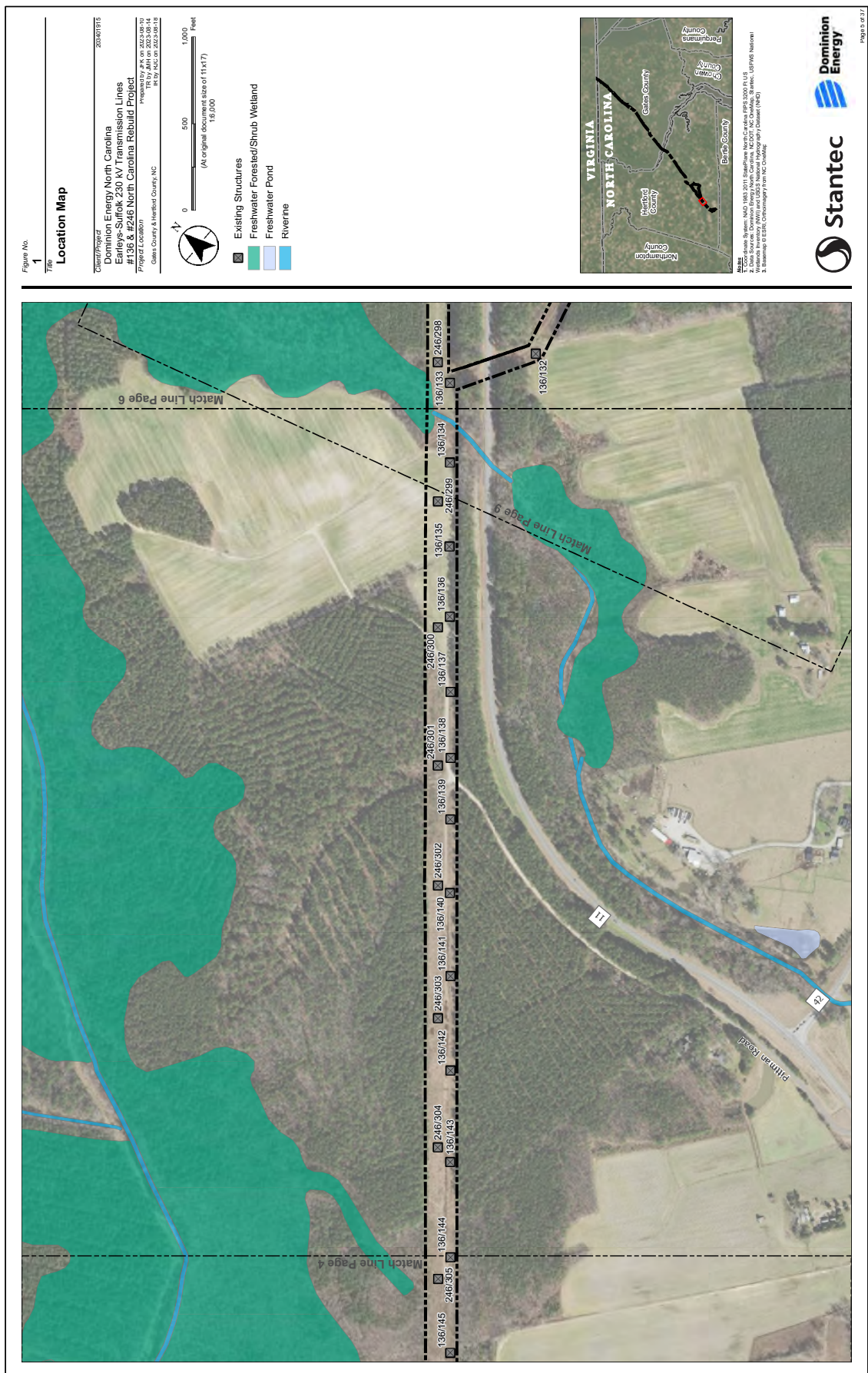




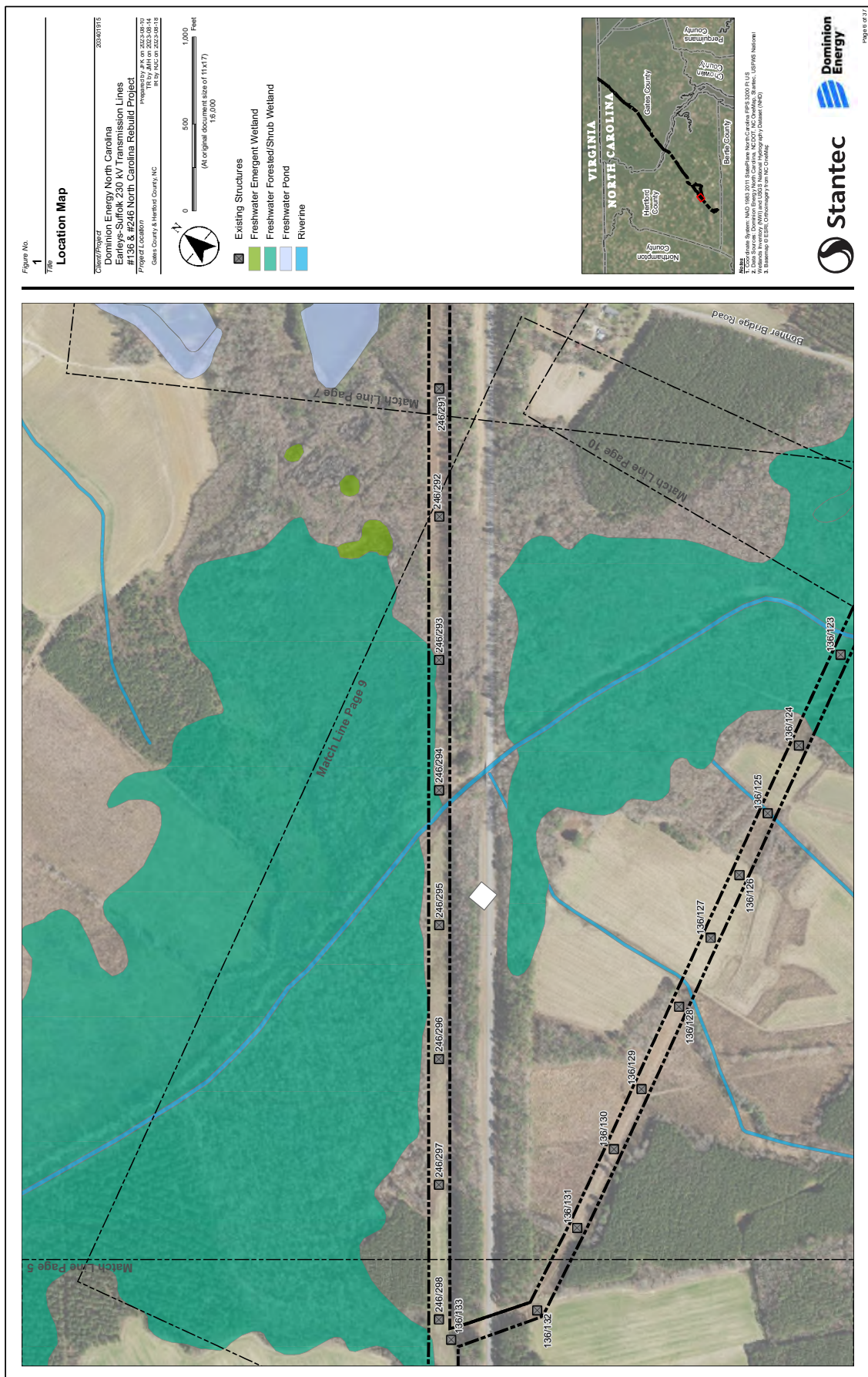




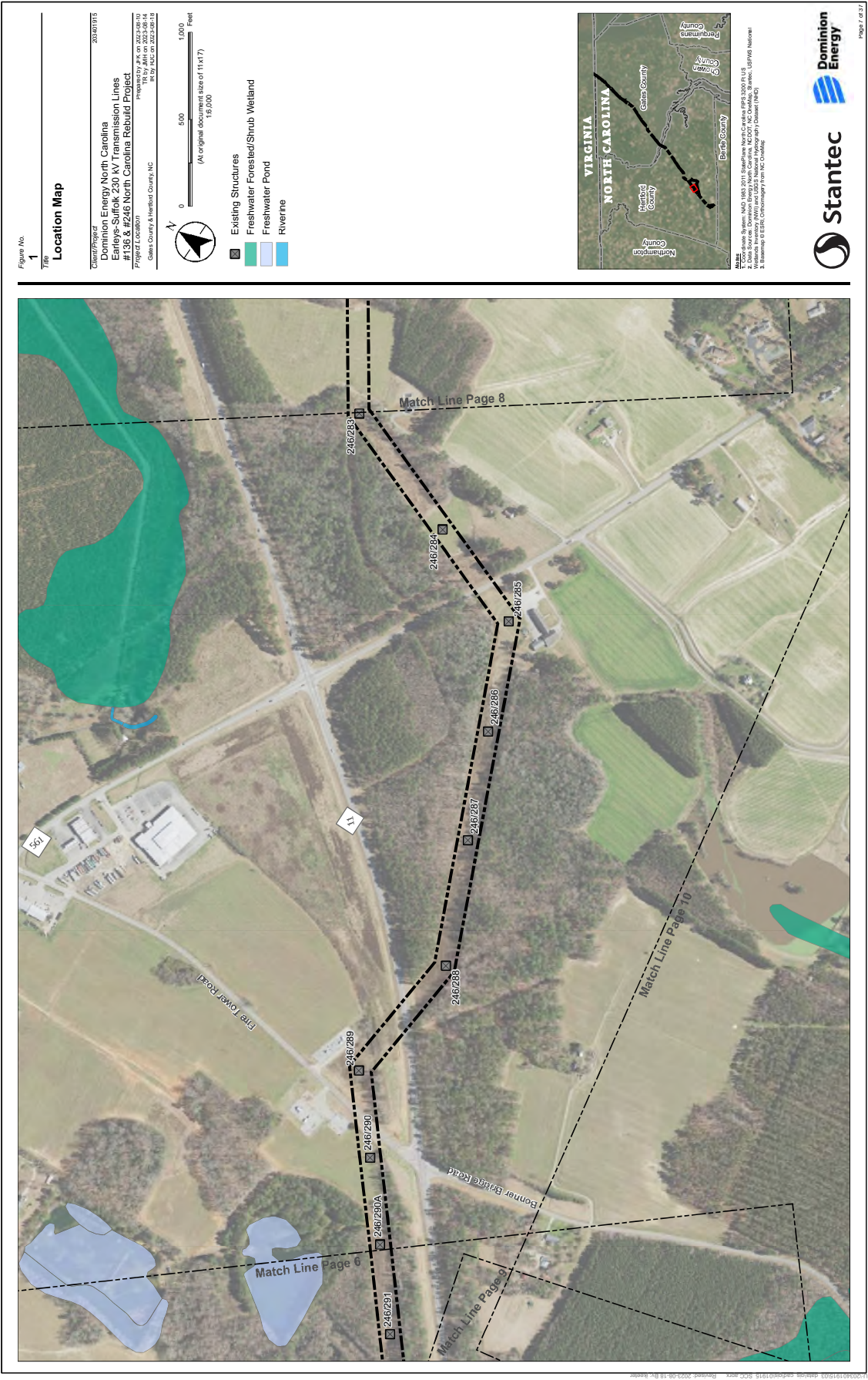




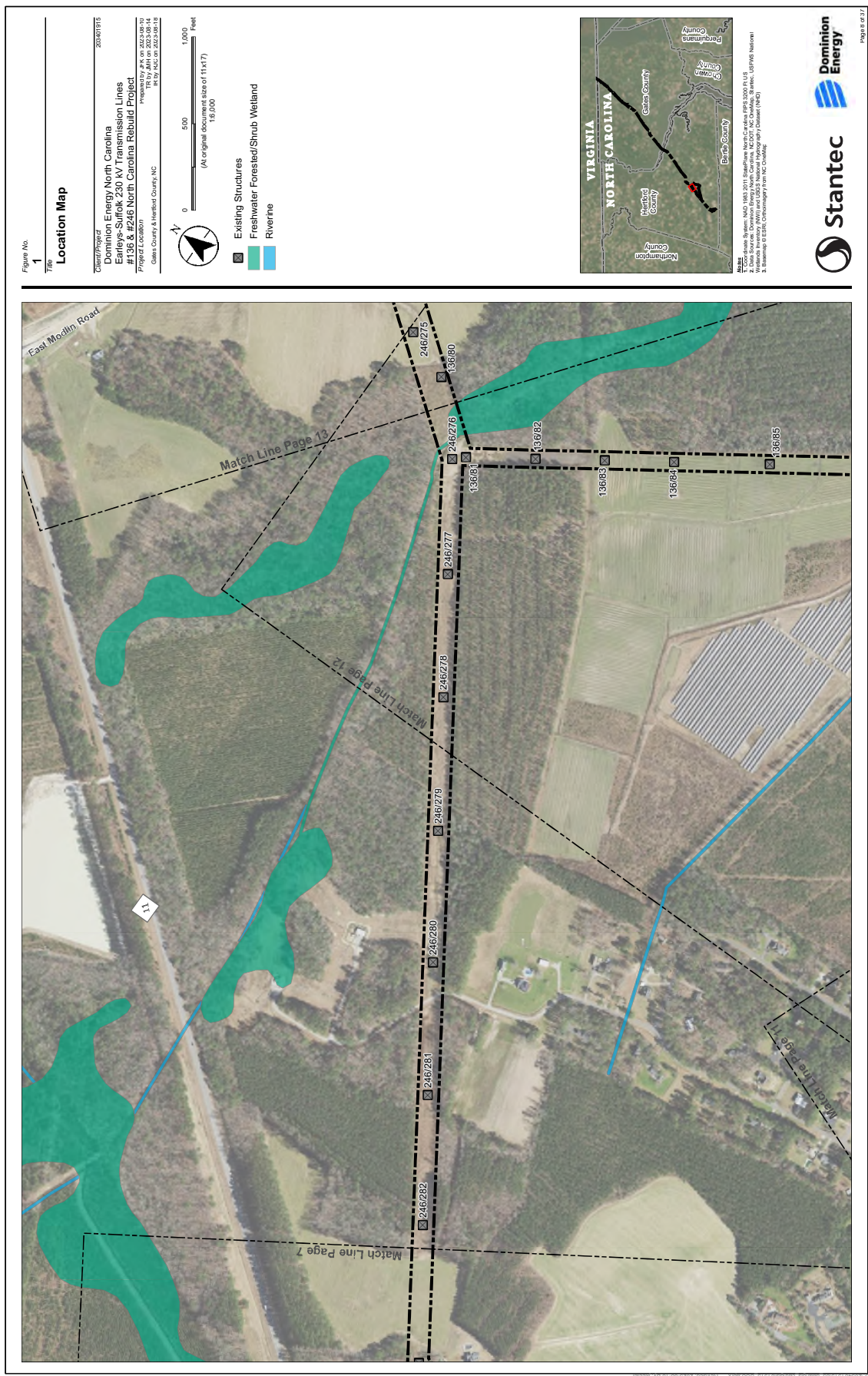




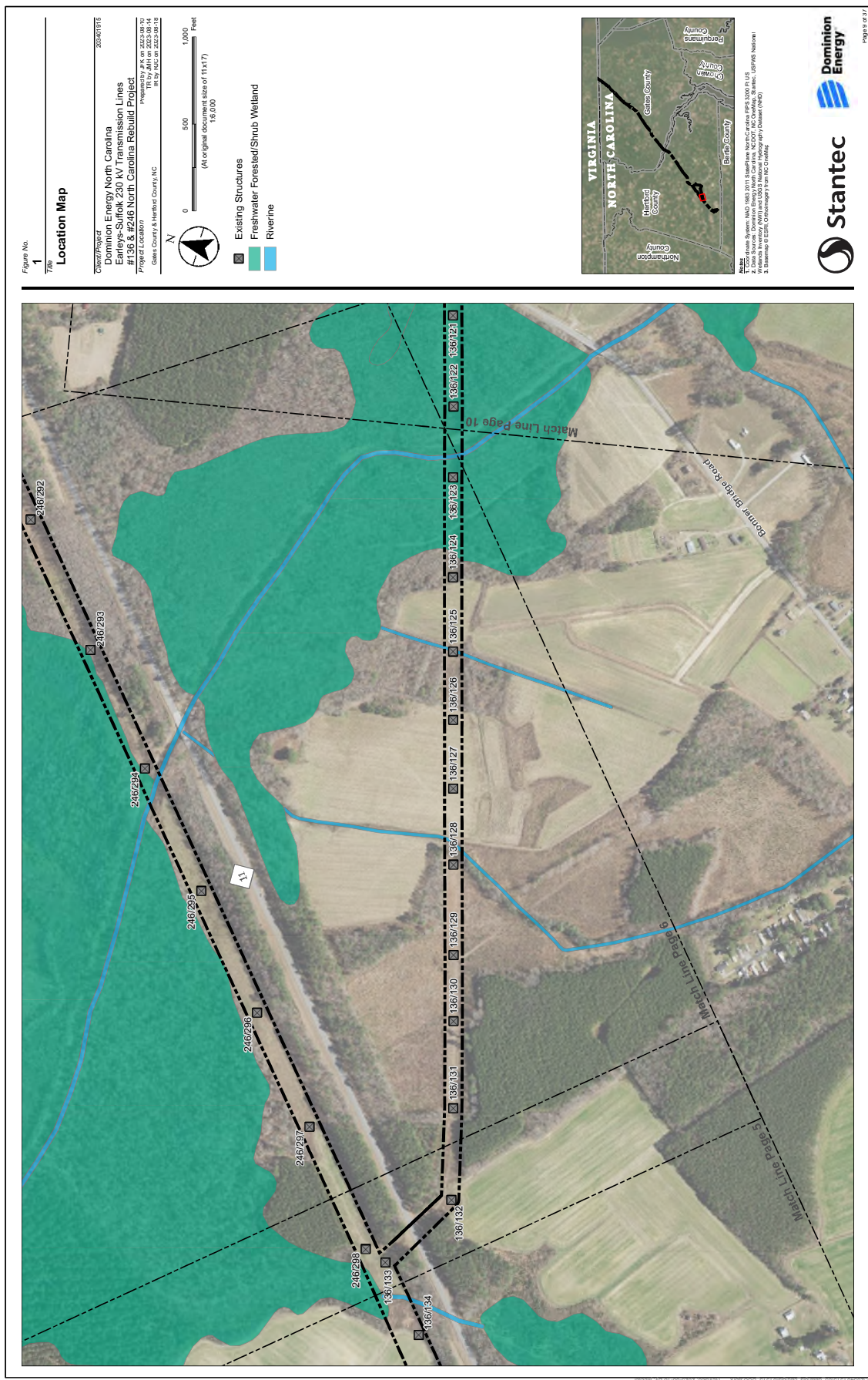




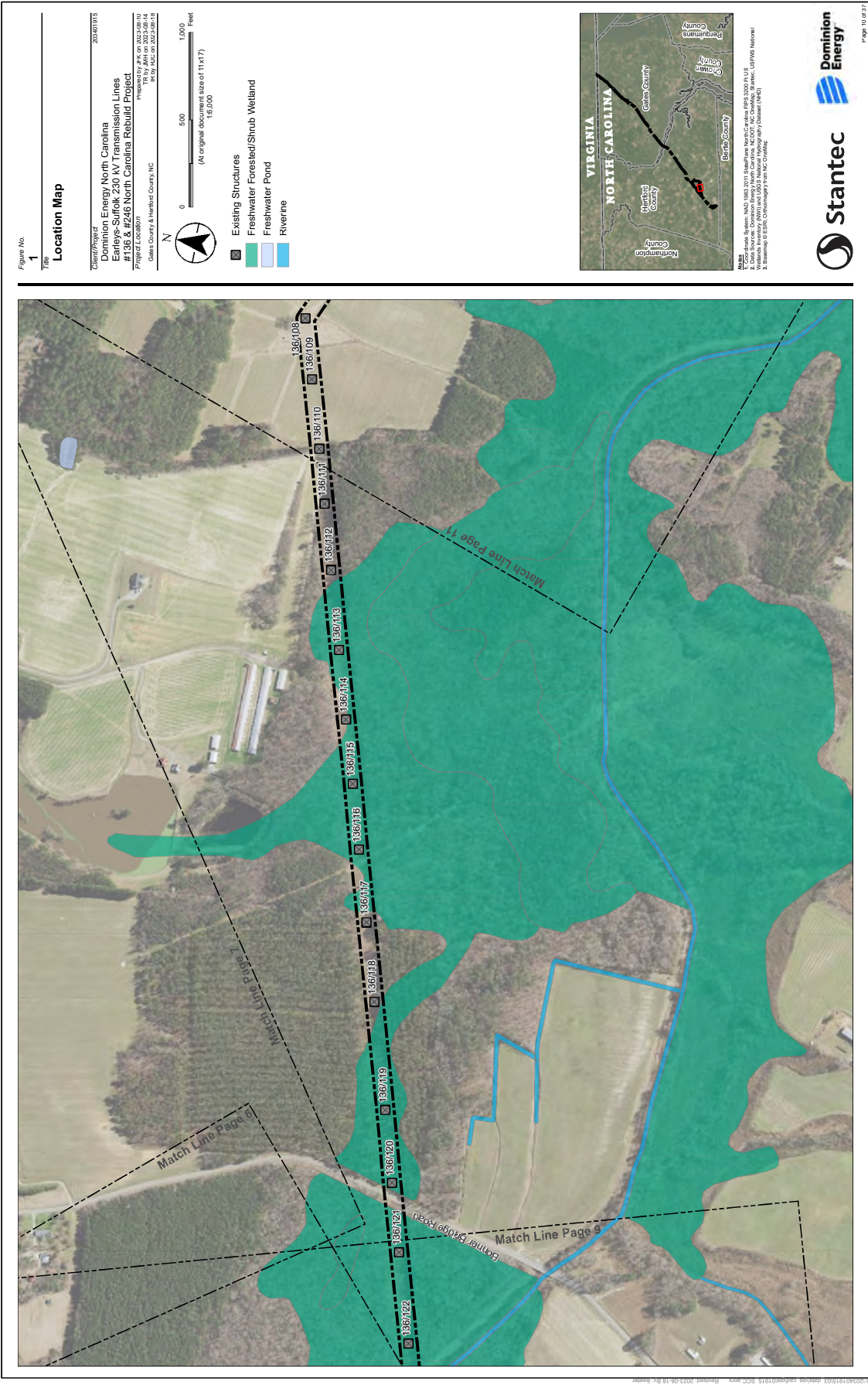








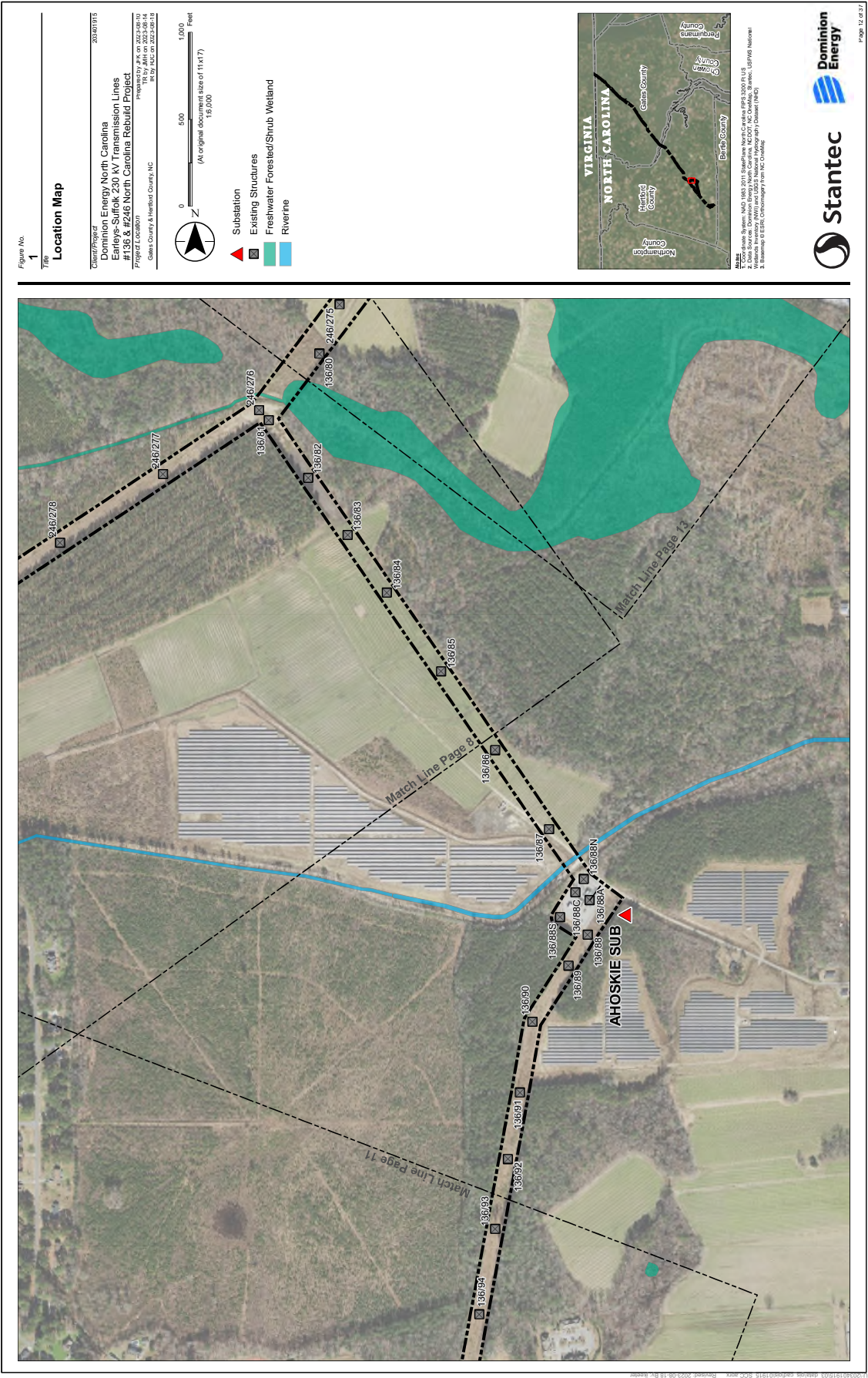




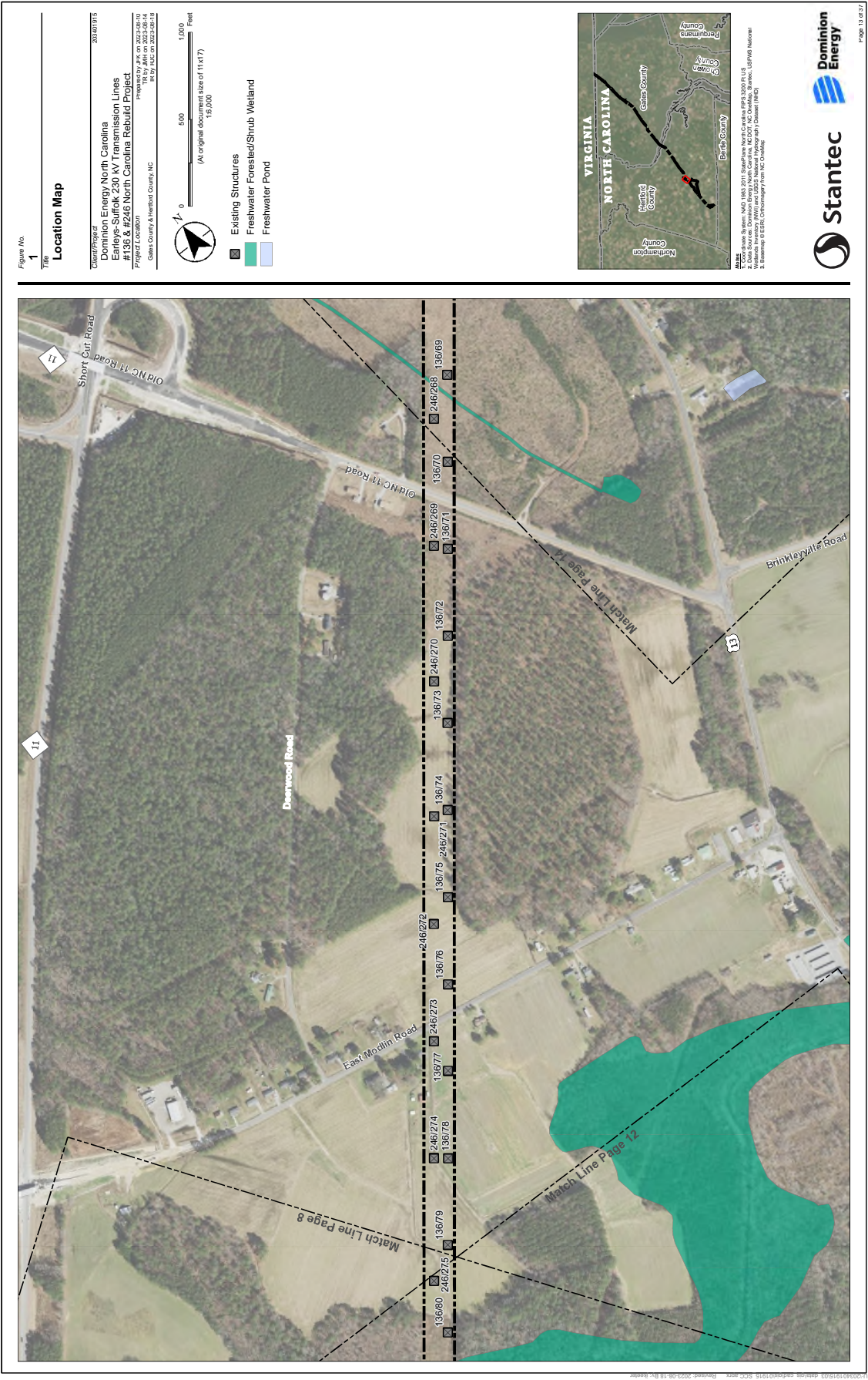




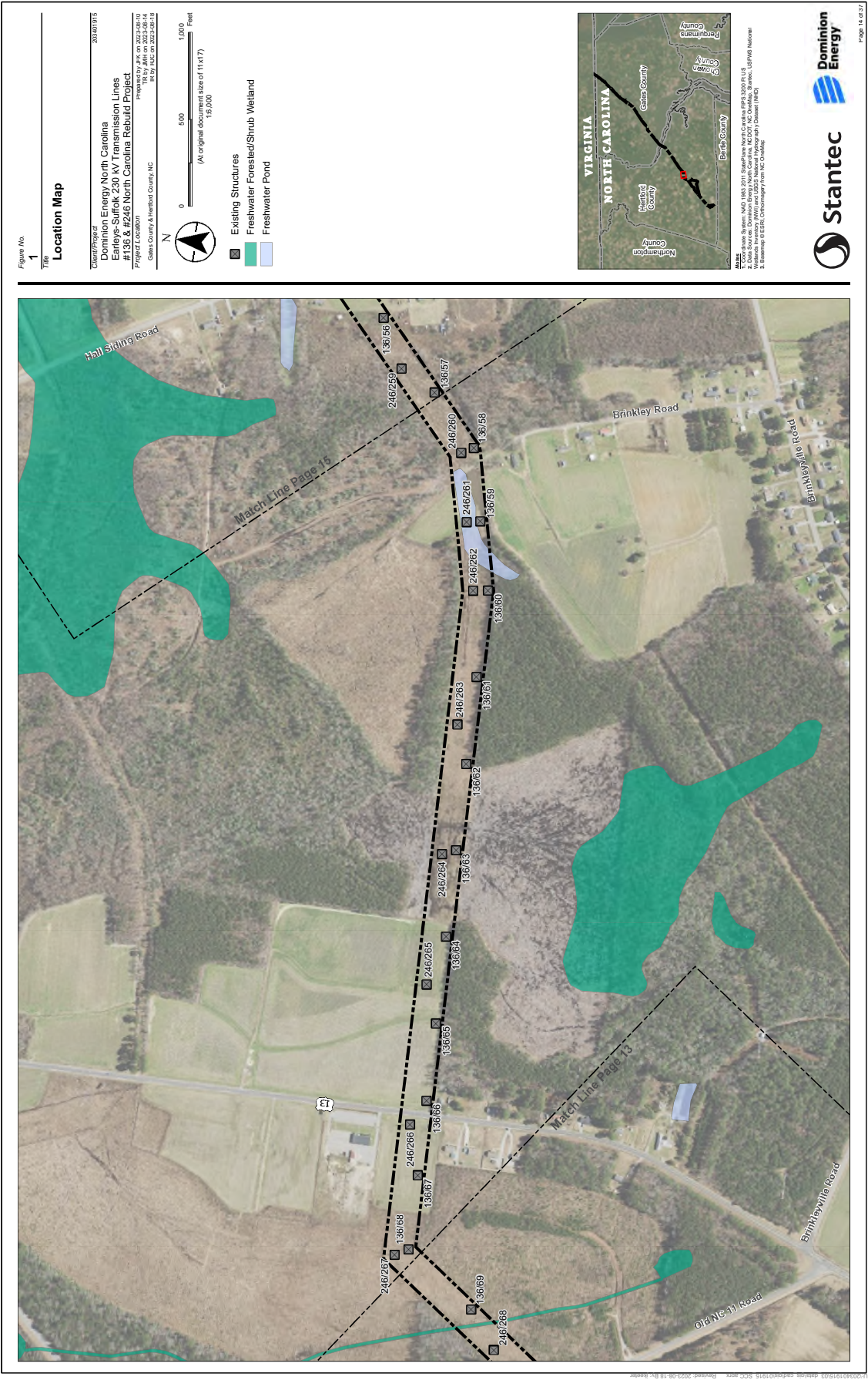








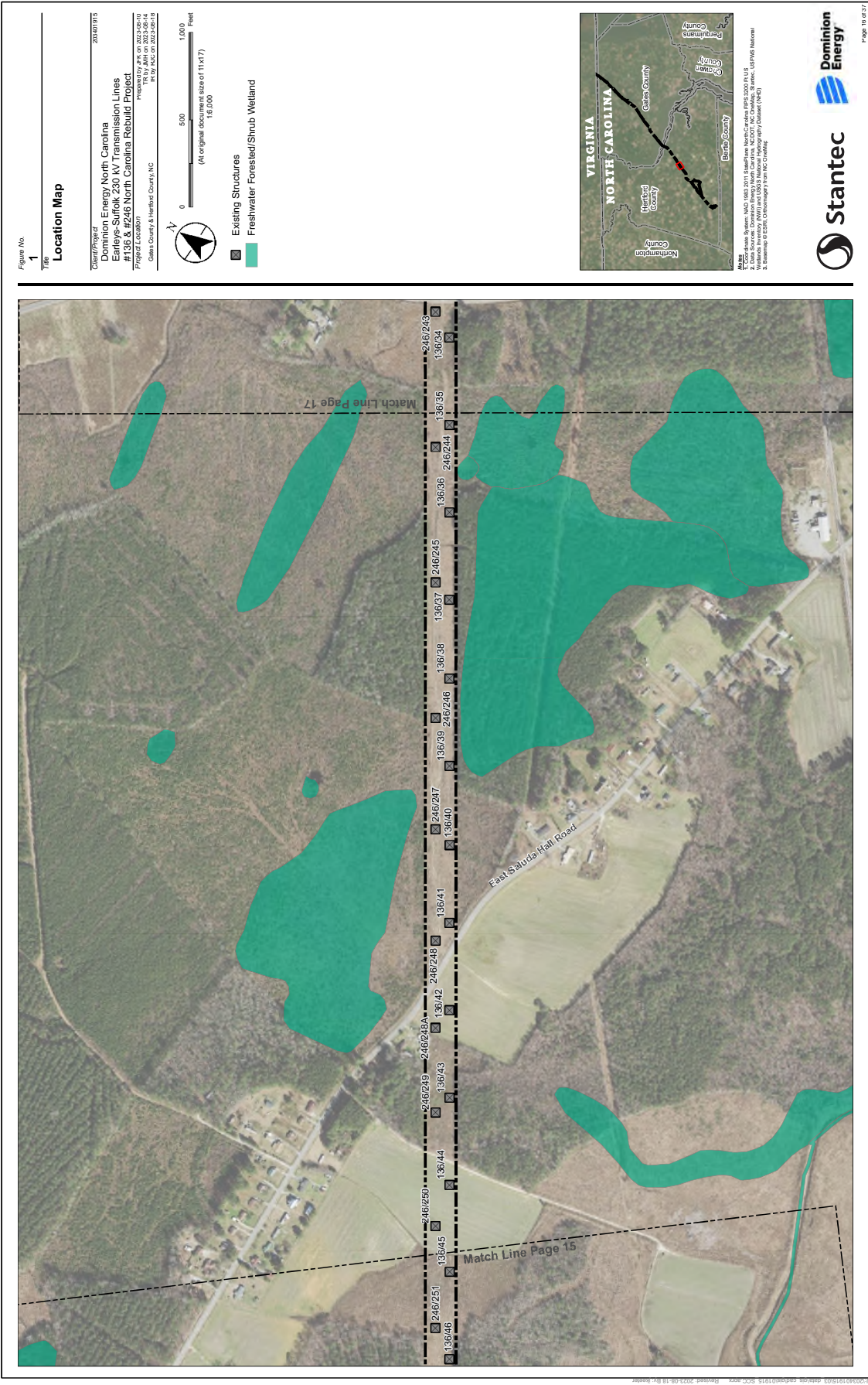








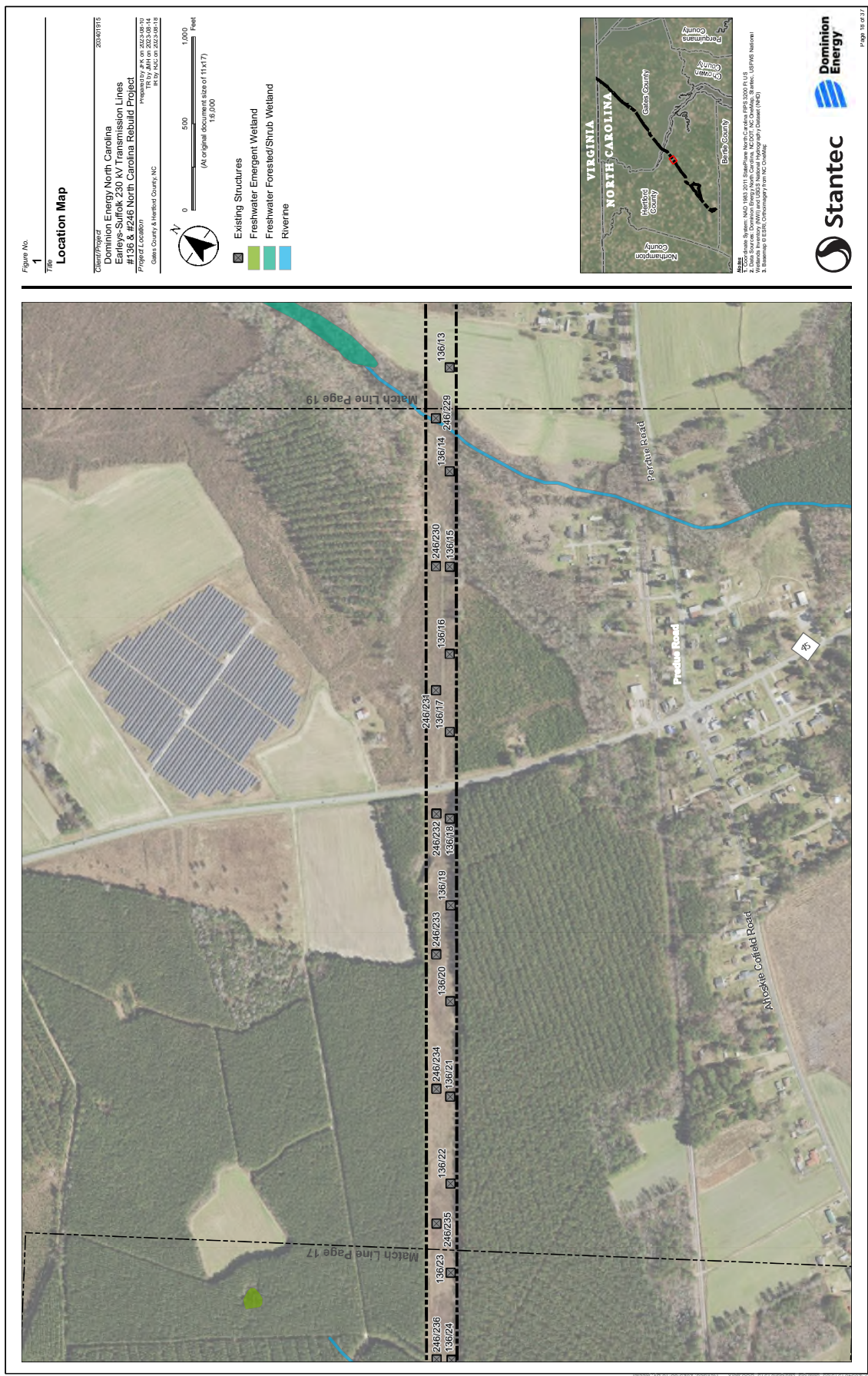








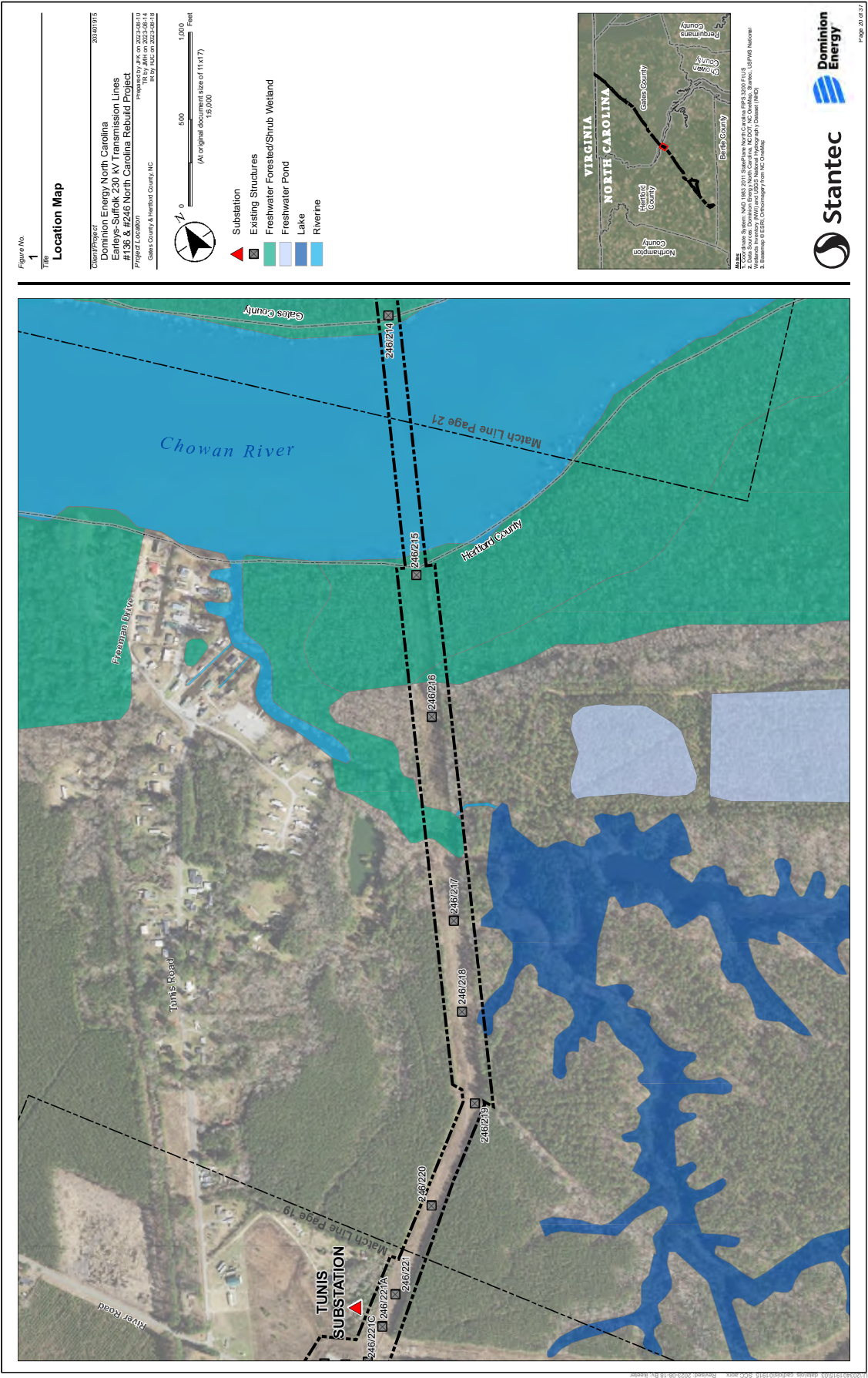






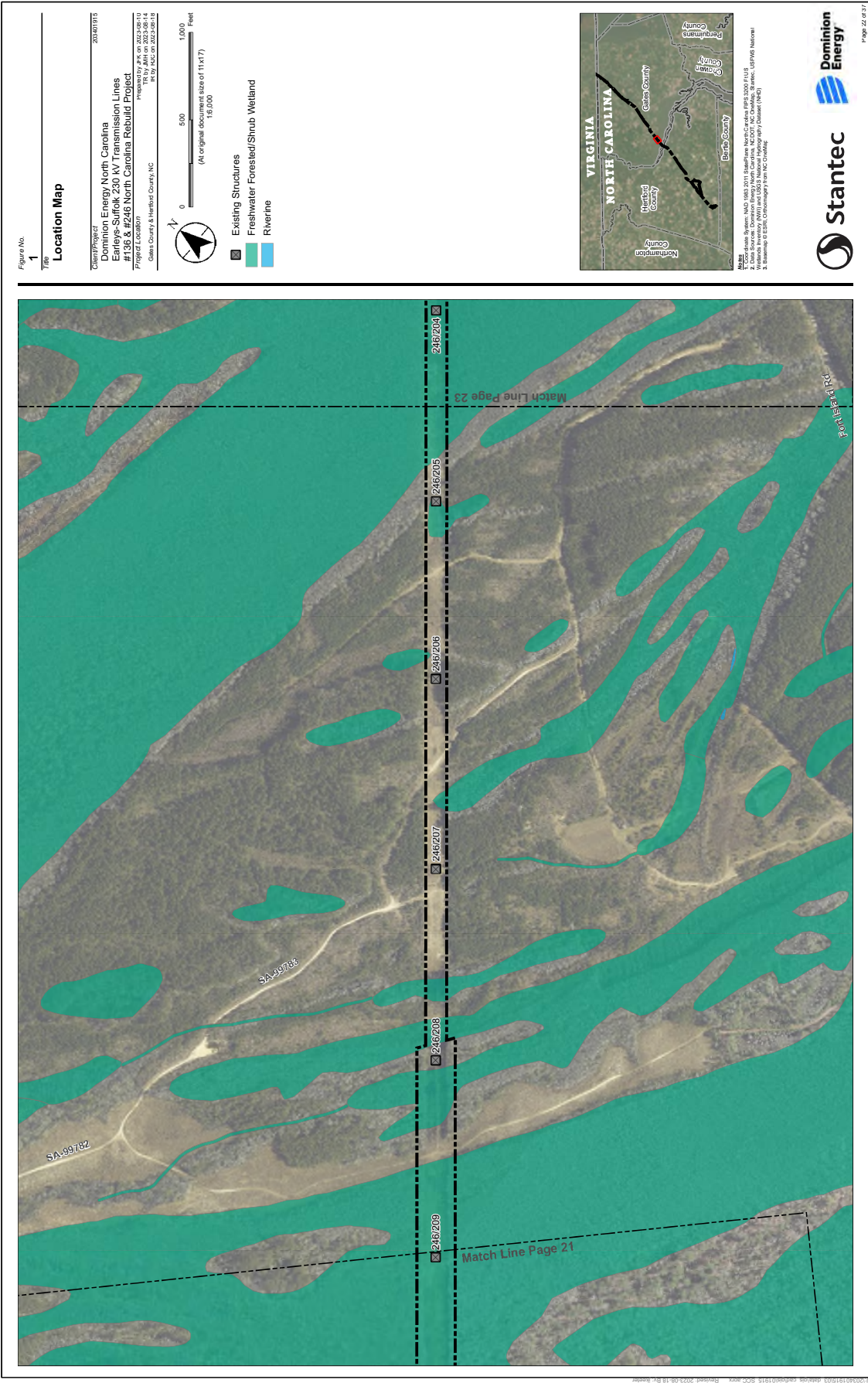




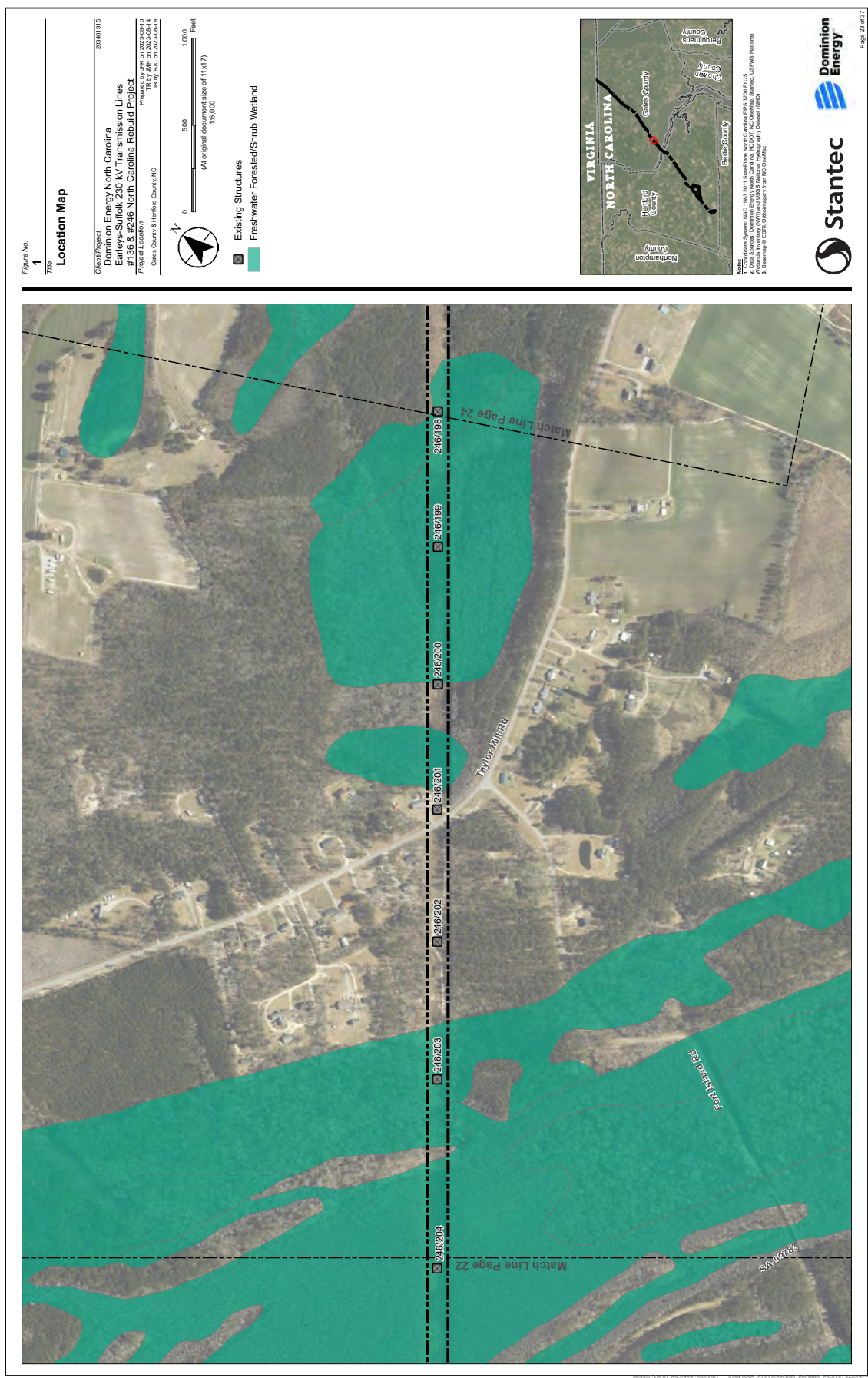


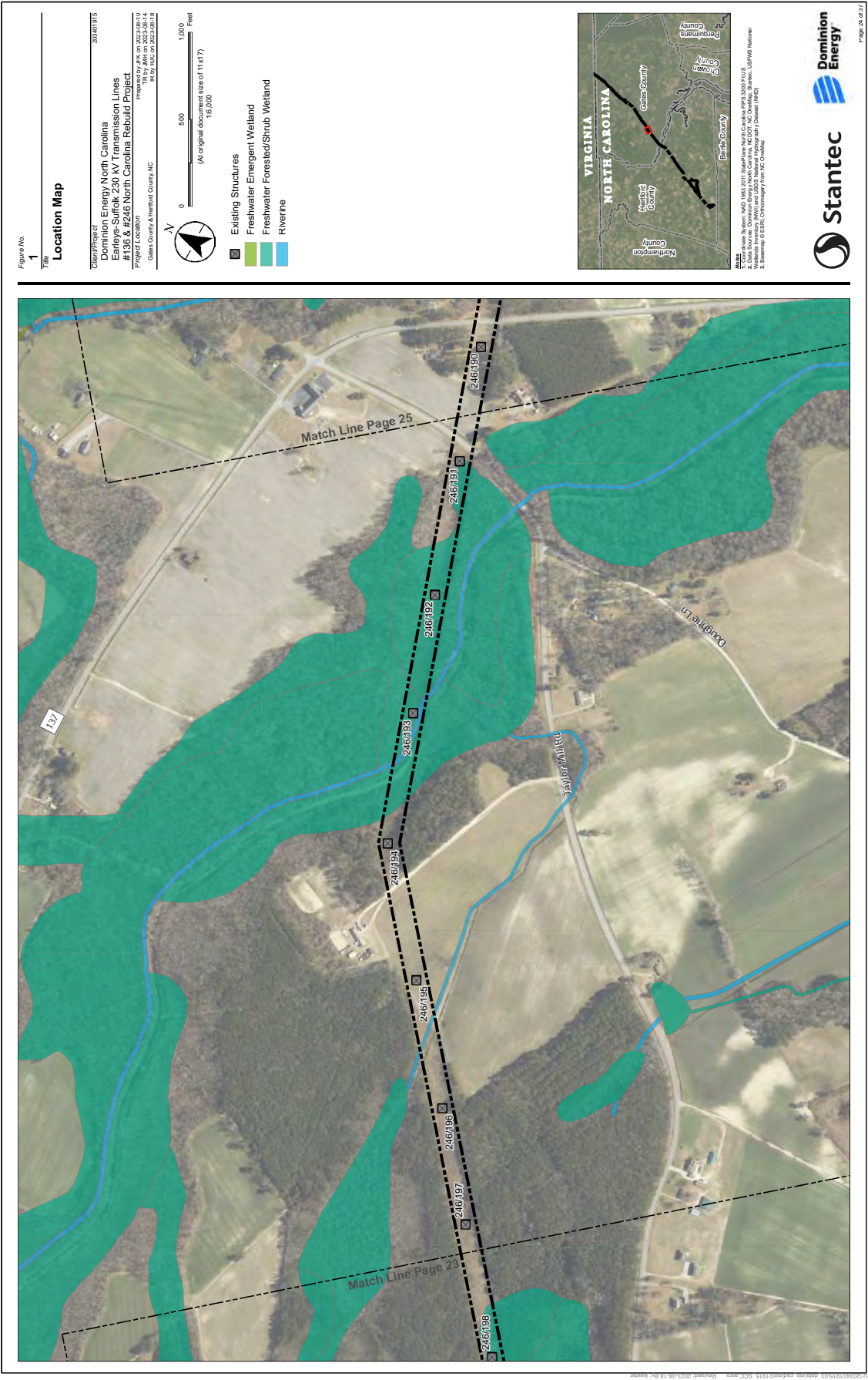




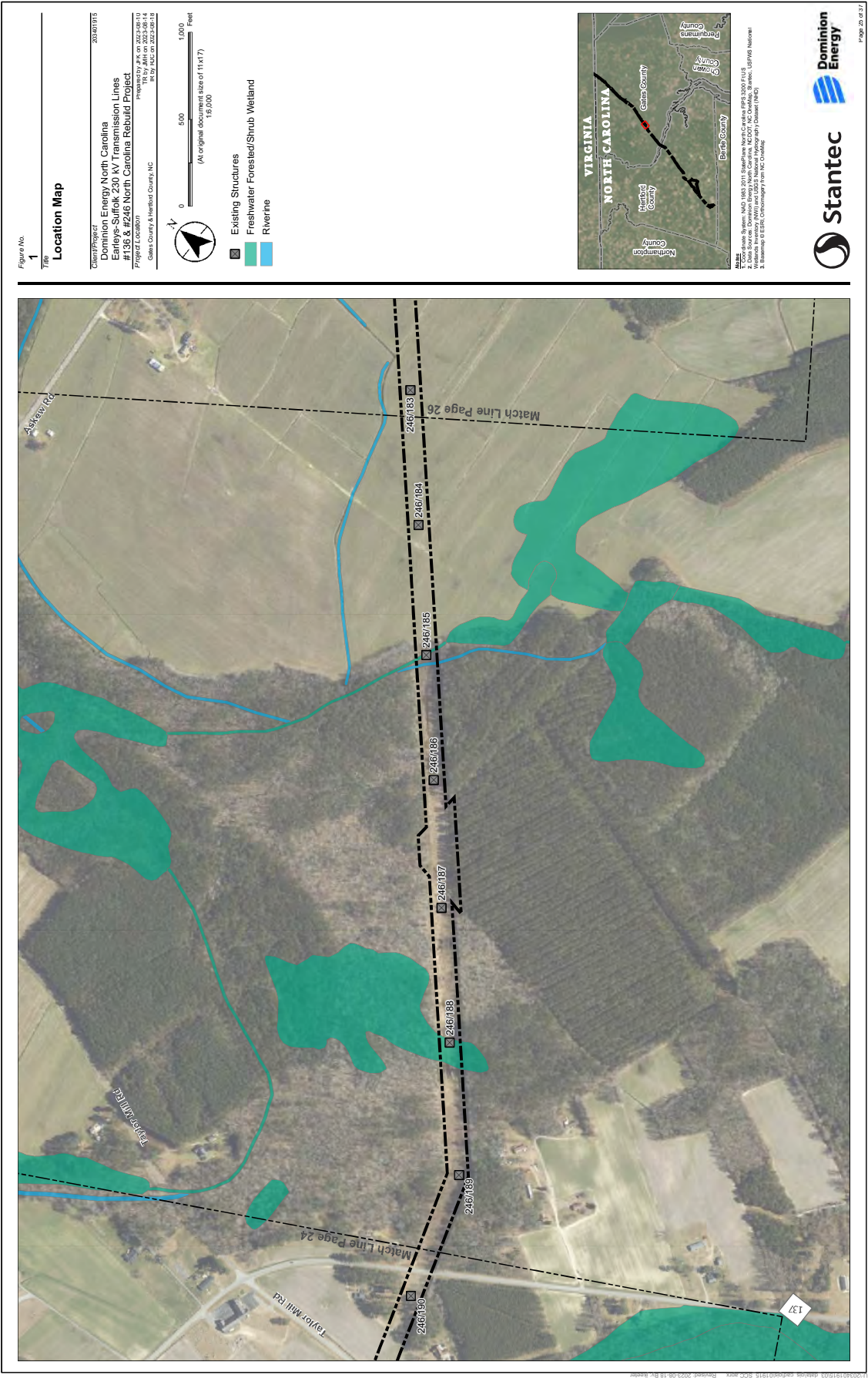




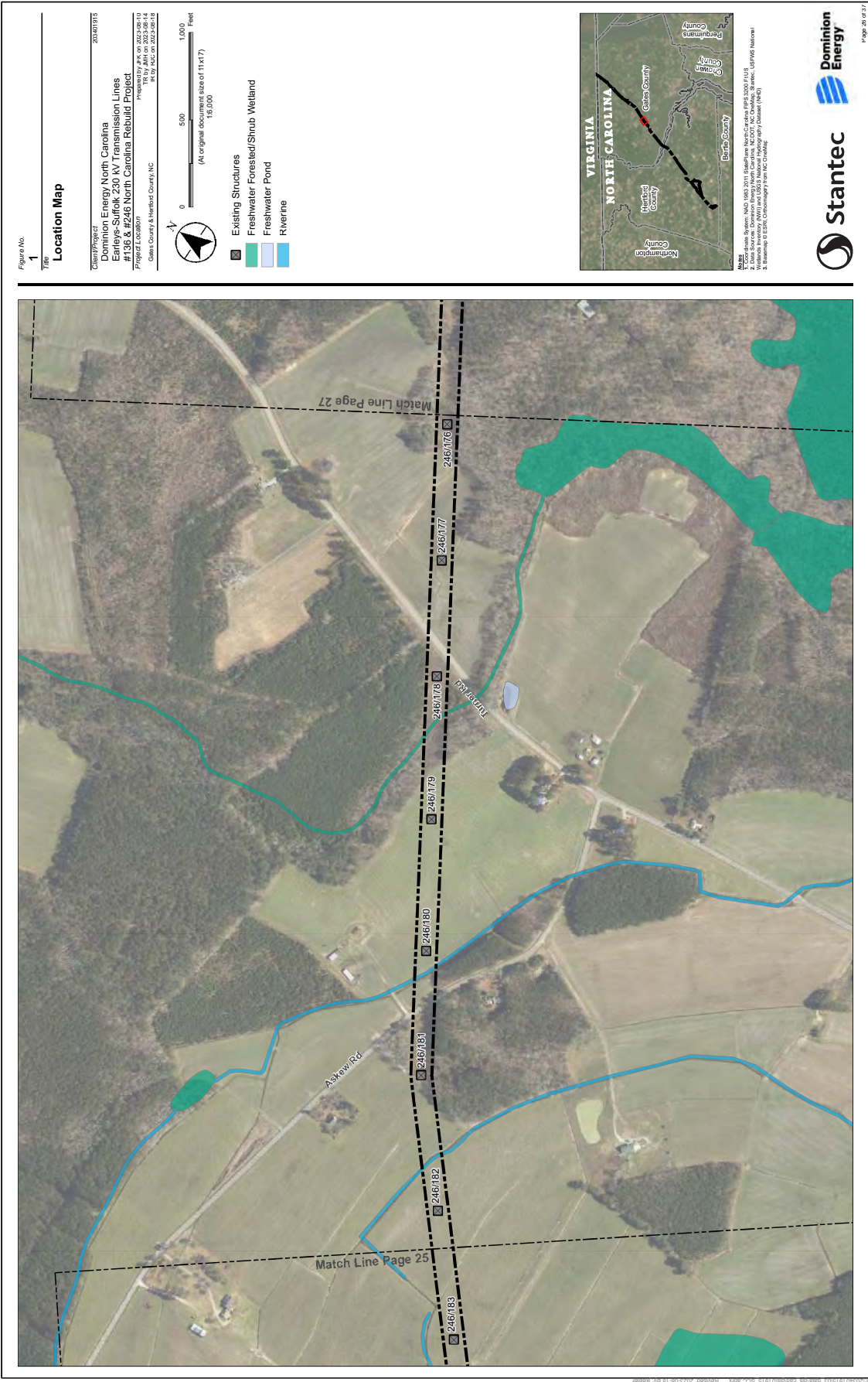


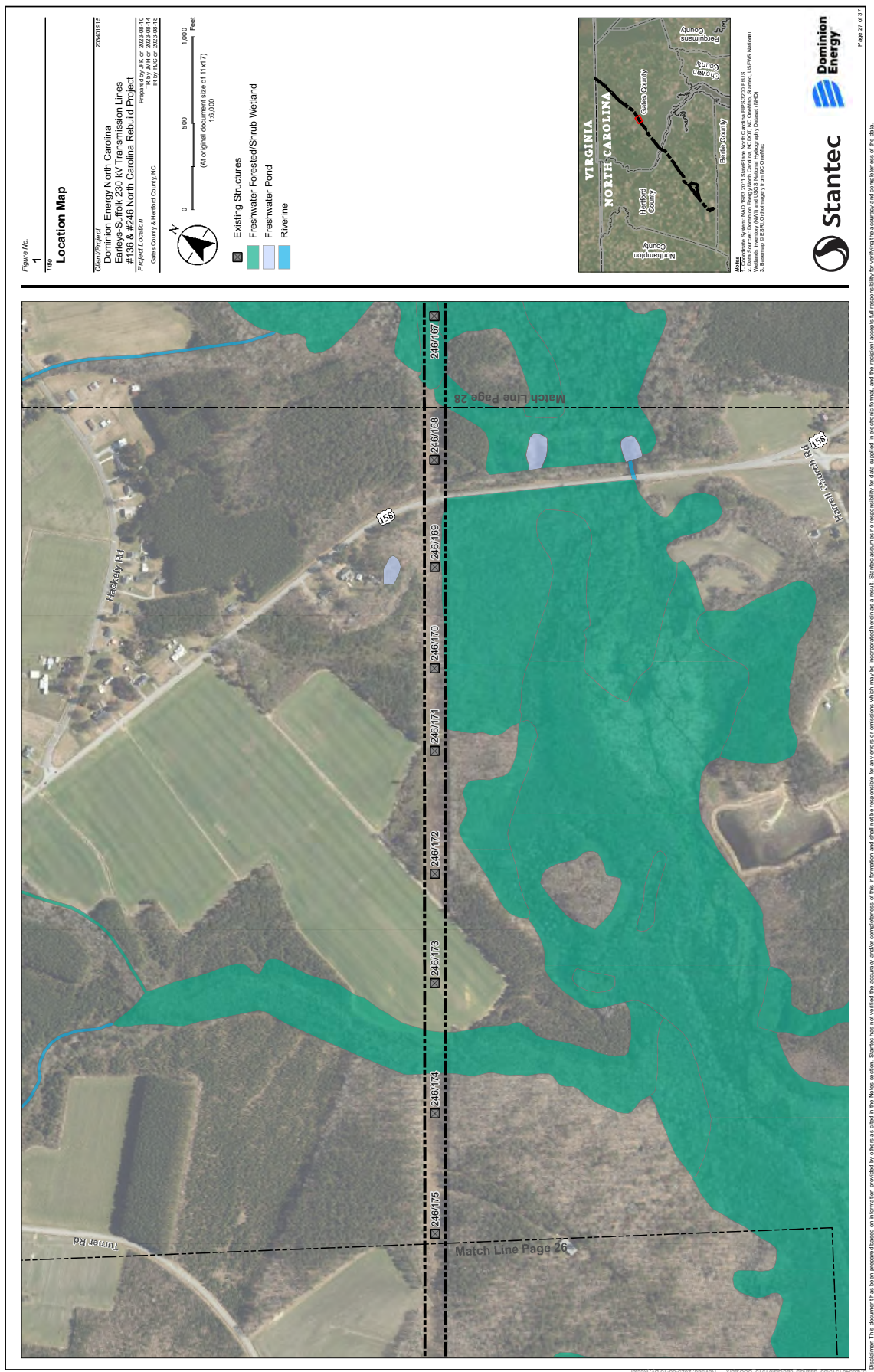




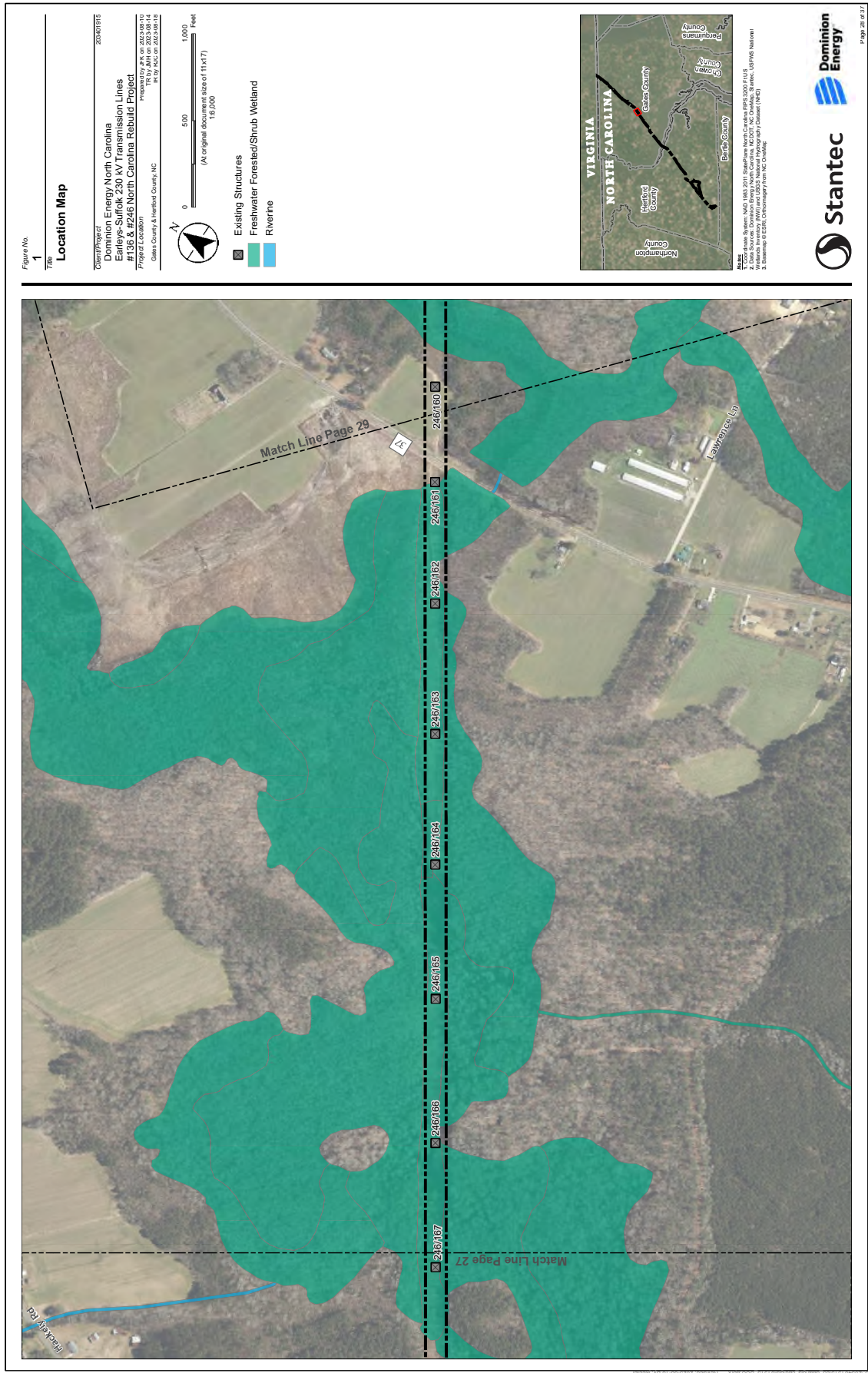




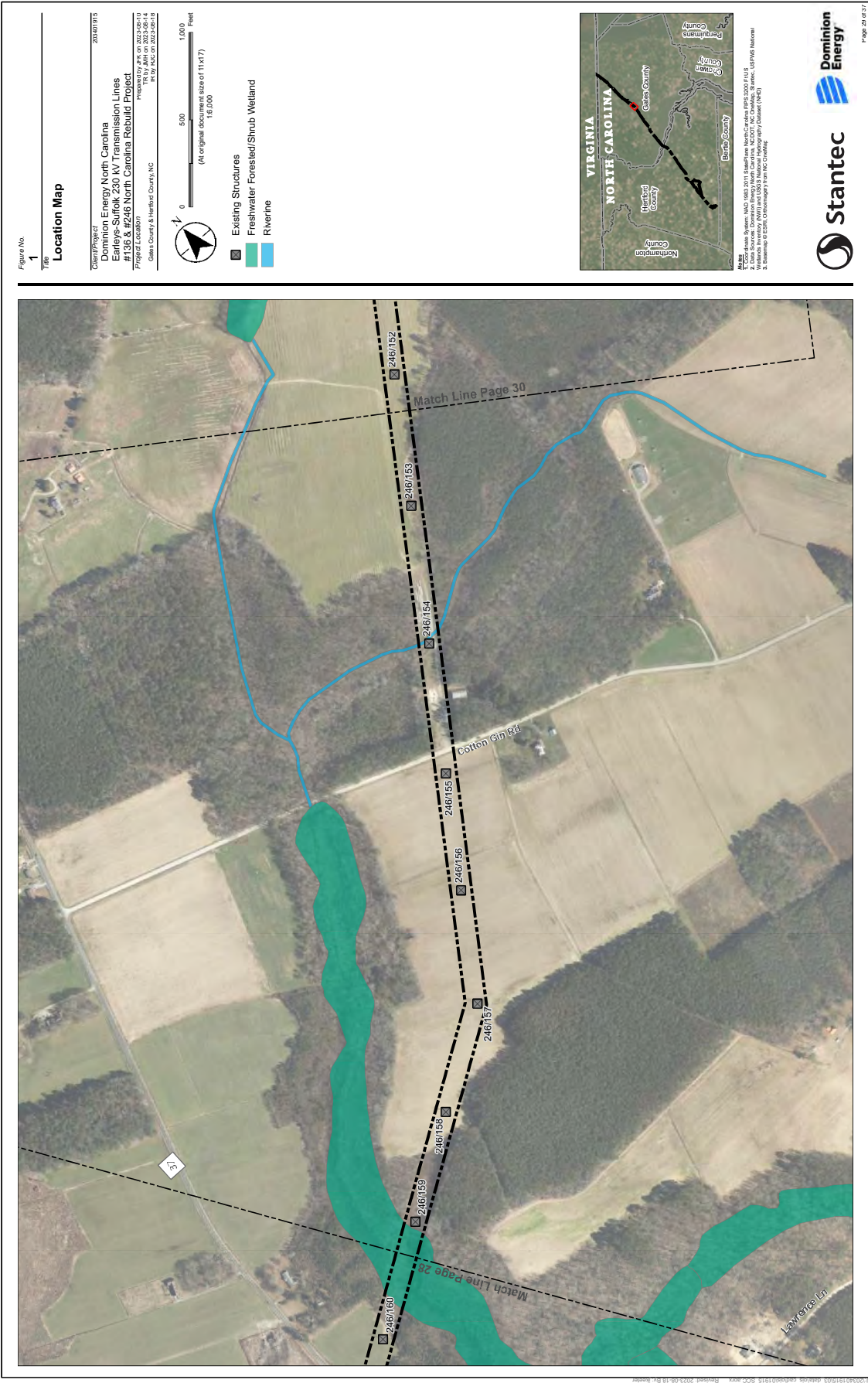










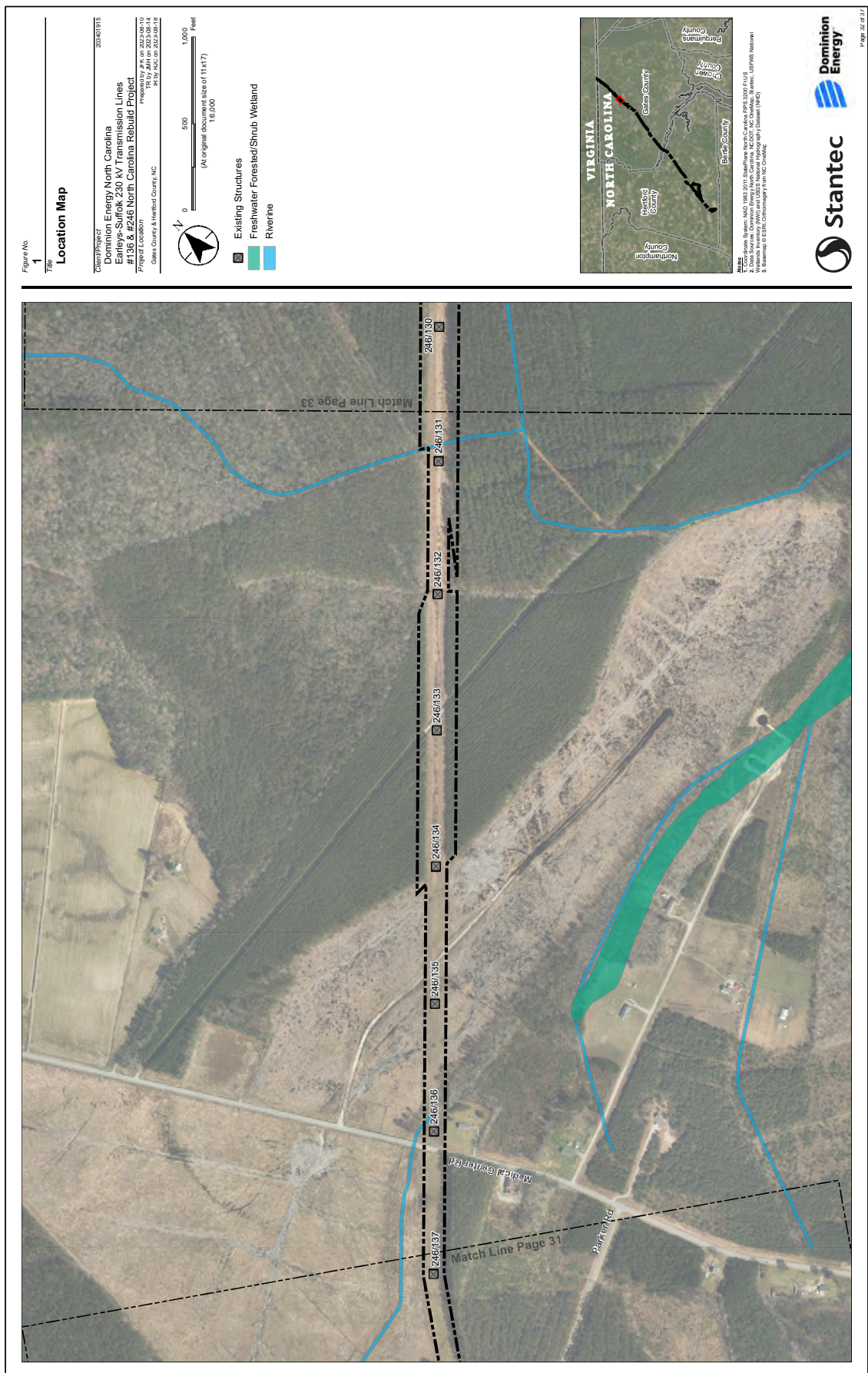




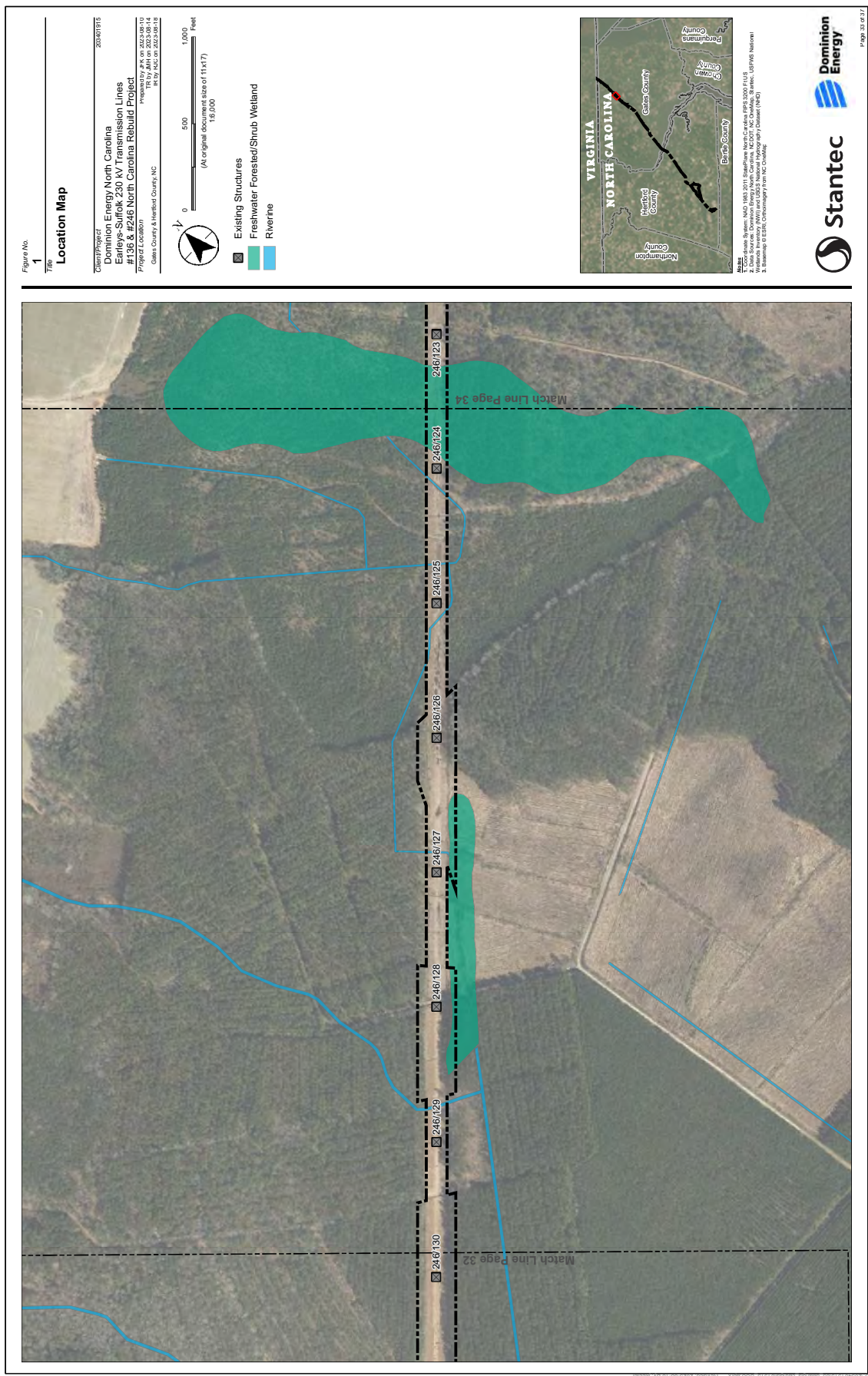


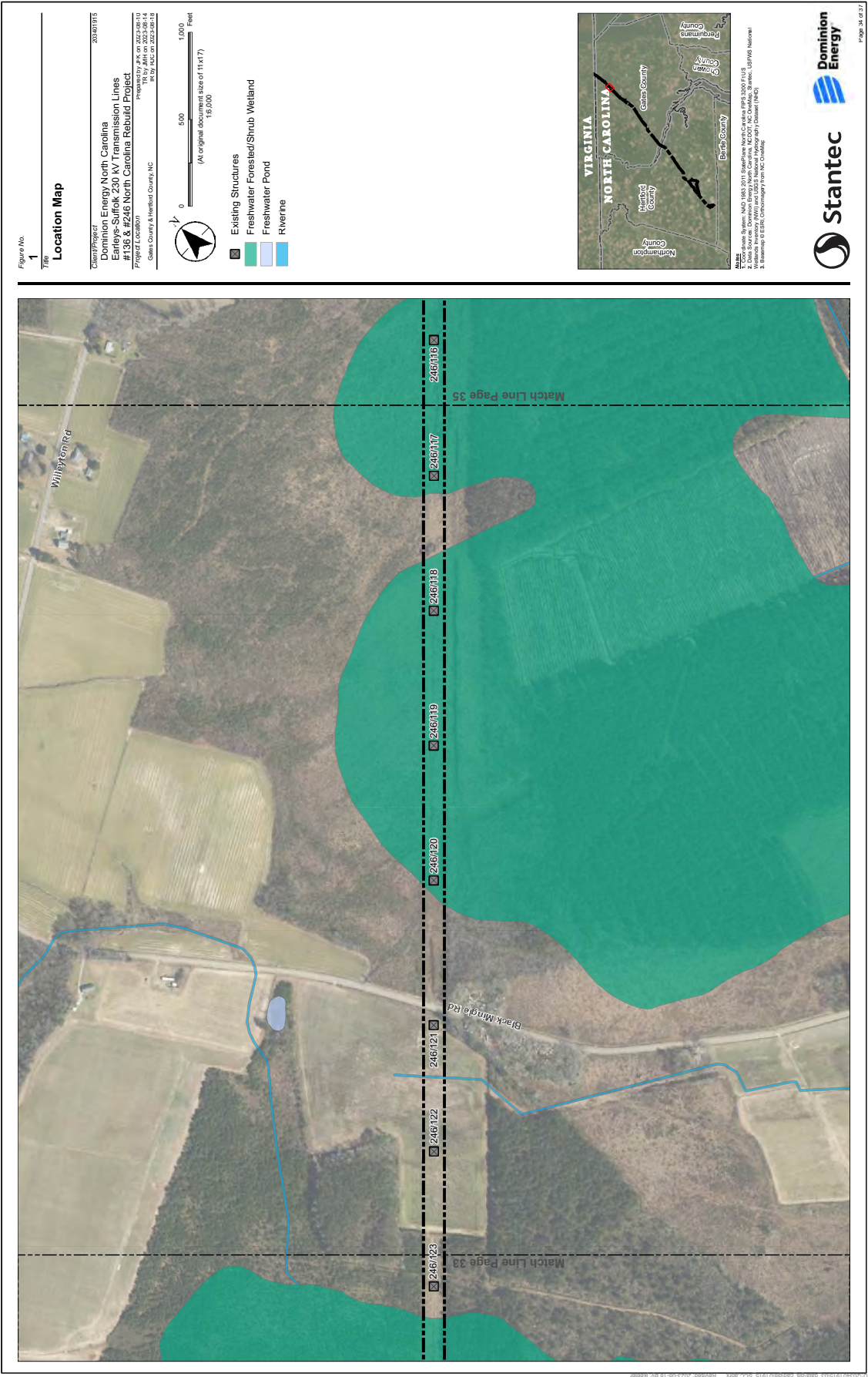












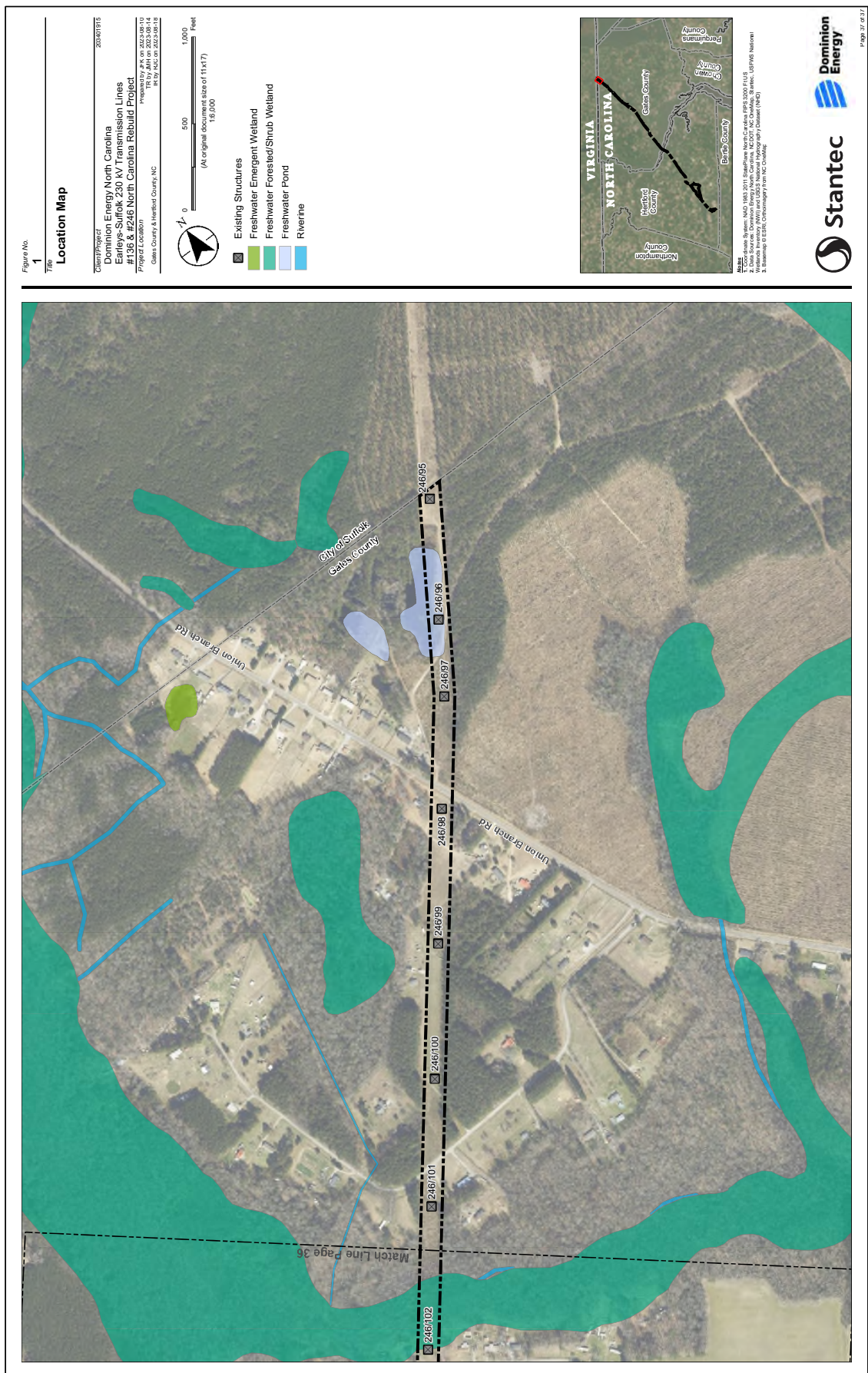














**Dominion Energy  
Electric Transmission**


Earleys Tunis Suffolk Event  
Display

Suffolk, VA: Sept. 12, 5-7 p.m.  
Ahoskie, NC: Sept. 13, 5-7 p.m.  
[Click here to learn more.](#)




Actions Speak Louder

Suffolk, VA: Sept. 12, 5-7 p.m.  
Ahoskie, NC: Sept. 13, 5-7 p.m.  
[Click here to learn more.](#)



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Actions Speak Louder




Suffolk, VA  
Rennet Celebration Center  
Sept. 12, 5-7 p.m.  
Ahoskie, NC  
Cooper's Lounge & Events LLC  
Sept. 13, 5-7 p.m.  
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Actions Speak Louder

**Dominion Energy  
Electric Transmission**

Earleys Tunis Suffolk Event  
Nextdoor Imagery

Event Image:



**Dominion Energy  
Electric Transmission**

Earleys Tunis Suffolk Event  
Social Videos

[Pre-event Video \(Click to Play\)](#)



Learn about the Earleys-Tunis-Suffolk Electric Transmission Line Rebuild Project taking place in the City of Suffolk and northeast North Carolina.

**Join us:**

Tuesday, September 12, 5-7 p.m.  
Rennee Celebration Center  
178 E Washington St, Suffolk, VA 23434

Wednesday, September 13, 5-7 p.m.  
Cooper's Lounge & Events LLC  
1200 Memorial Dr E Ste B, Ahoskie, NC 27910

You can find event details at  
[DominionEnergy.com/Earleys](http://DominionEnergy.com/Earleys)



**Dominion Energy  
Electric Transmission**

Earleys Tunis Suffolk Event  
Newspaper

# You are invited to our Community Meetings

Learn about the Earleys-Tunis-Suffolk Electric Transmission Line Rebuild Project taking place in the City of Suffolk and northeast North Carolina.

Join us:

**Tuesday, September 12, 5-7 p.m.**

Renee Celebration Center

178 E Washington St, Suffolk, VA 23434

**Wednesday, September 13, 5-7 p.m.**

Cooper's Lounge & Events LLC

1200 Memorial Dr E Ste B, Ahoskie, NC 27910

You can find event details at [DominionEnergy.com/Earleys](https://www.dominionenergy.com/Earleys)



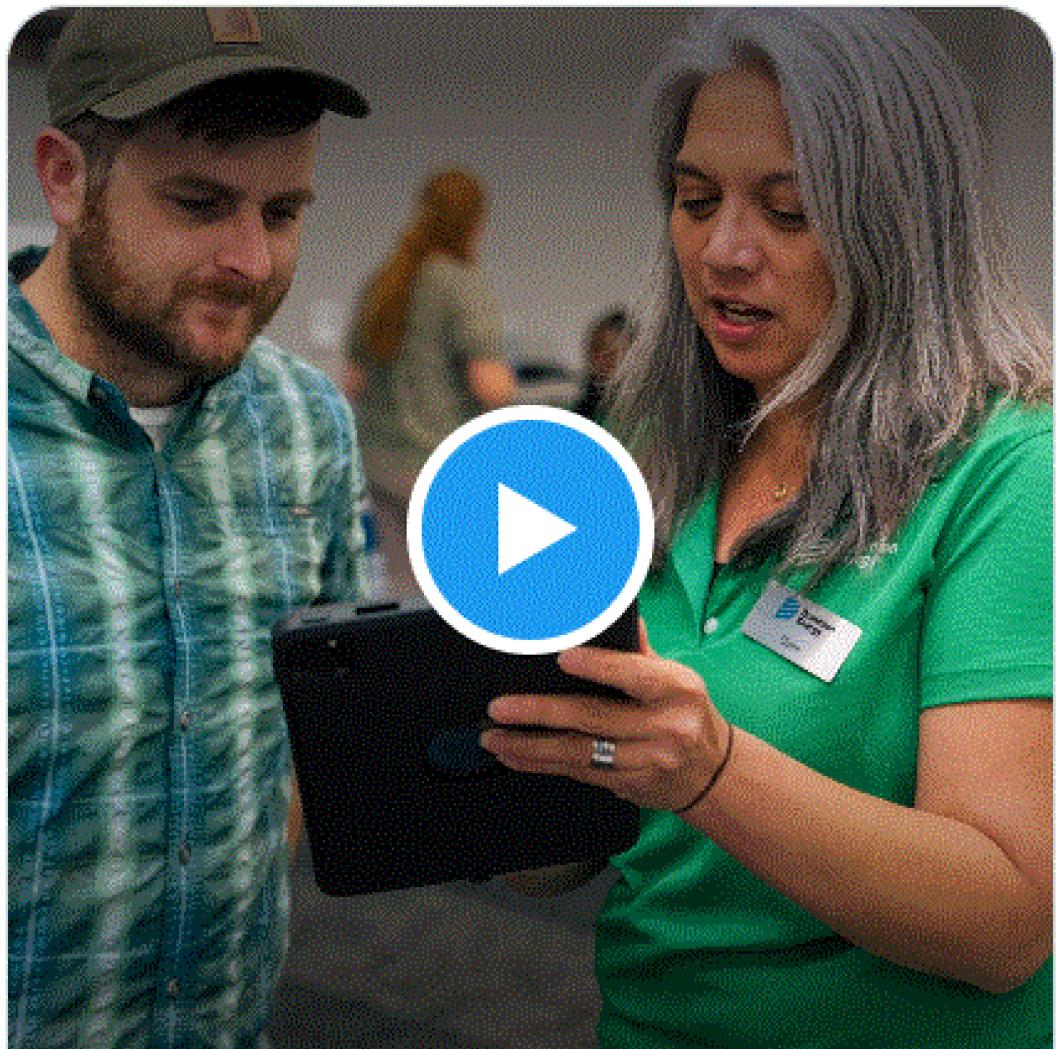
Use your phone's  
camera or QR  
reader app to visit  
the project page  
directly.



 **Dominion  
Energy**  
Actions Speak Louder

**Dominion Energy** @DominionEnergy

Join us for a Community Open House to learn more about the Earleys-Tunis-Suffolk Electric Transmission Line Rebuild Project taking place in the City of Suffolk and northeast North Carolina. This project will improve electric reliability in your area.



[www.dominionenergy.com](http://www.dominionenergy.com)  
Community Open Houses





**Dominion Energy**  
Sponsored

## Community Open Houses

Learn more about an electric transmission line rebuild project in your area.

A banner image for a community open house. It features a man in a blue plaid shirt and a woman in a green shirt looking at a laptop. Overlaid on the image is a graphic of three power lines. The text "You are invited to our Community Meetings" is written in large white letters. Below it, the dates and times for the meetings are listed: "Rennet Celebration Center: Sept. 12, 5-7 p.m." and "Cooper's Lounge & Events LLC: Sept. 13, 5-7 p.m.". The Dominion Energy logo and the text "Actions Speak Louder" are in the bottom right corner.

**You are invited to our Community Meetings**

Rennet Celebration Center: Sept. 12, 5-7 p.m.  
Cooper's Lounge & Events LLC: Sept. 13, 5-7 p.m.

**Dominion Energy**  
Actions Speak Louder

September 12 & 13, 5 - 7 p.m.

[Learn more](#)





### **Environmental Justice: Ongoing Commitment to Our Communities**

At Dominion Energy, we are committed to providing reliable, affordable, clean energy in accordance with our values of safety, ethics, excellence, embrace change and team work. This includes listening to and learning all we can from the communities we are privileged to serve.

Our values also recognize that environmental justice considerations must be part of our everyday decisions, community outreach and evaluations as we move forward with projects to modernize the generation and delivery of energy.

To that end, communities should have a meaningful voice in our planning and development process, regardless of race, color, national origin, or income. Our neighbors should have early and continuing opportunities to work with us. We pledge to undertake collaborative efforts to work to resolve issues. We will advance purposeful inclusion to ensure a diversity of views in our public engagement processes.

Dominion Energy will be guided in meeting environmental justice expectations of fair treatment and sincere involvement by being inclusive, understanding, dedicated to finding solutions, and effectively communicating with our customers and our neighbors. We pledge to be a positive catalyst in our communities.

November 2018

### **III. IMPACT OF LINE ON SCENIC, ENVIRONMENTAL, AND HISTORIC FEATURES**

#### **C. Detail the nature, location, and ownership of each building that would have to be demolished or relocated if the project is built as proposed.**

Response: During the Company's initial review of the existing transmission corridor for the Virginia Rebuild Project, the Company identified five unauthorized encroachments within the Virginia Rebuild Project corridor which include vehicles, debris, trailers, etc. The encroachments will need to be addressed with the respective property owners as the Company continues to investigate the right-of-way.

The Company is not aware of any residences encroaching on the existing corridor and does not expect to have any residences demolished or relocated in connection with the Virginia Rebuild Project.

### **III. IMPACT OF LINE ON SCENIC, ENVIRONMENTAL, AND HISTORIC FEATURES**

- D. Identify existing physical facilities that the line will parallel, if any, such as existing transmission lines, railroad tracks, highways, pipelines, etc. Describe the current use and physical appearance and characteristics of the existing ROW that would be paralleled, as well as the length of time the transmission ROW has been in use.**

Response: Construction of Line #246 was completed in the early 1970s. The right-of-way was acquired in 1969 and has been in continuous use since that time. The proposed Virginia Rebuild Project shares the existing transmission corridor right-of-way with Line #247 from Structure #246/2 within the Company's existing Suffolk Substation to Structure #246/39, a distance of approximately four miles. Line #246 also parallels the CSX railroad from Suffolk Substation to Structure #246/15, a distance of approximately 1.39 miles (approximate distance is based on GIS data). The Line #246 right-of-way does not overlap with the CSX railroad. Based on aerial data, the CSX railroad bed is not being maintained and appears abandoned. The CSX railroad is located approximately 250 feet from the Company's right-of-way. The Virginia Rebuild Project does not otherwise parallel any other existing physical facilities.



### **III. IMPACT OF LINE ON SCENIC, ENVIRONMENTAL, AND HISTORIC FEATURES**

- E. Indicate whether the Applicant has investigated land use plans in the areas of the proposed route and indicate how the building of the proposed line would affect any proposed land use.**

Response: The City of Suffolk Comprehensive Plan, adopted April 1, 2015, was reviewed to evaluate the potential effect the Virginia Rebuild Project could have on future development. The placement and construction of electric transmission lines are not addressed within the Plan. Instead, the Comprehensive Plan addresses the development and growth of the City, and the preservation and enhancement of natural and cultural resources. The Virginia Rebuild Project is located entirely within the existing right-of-way or on Company-owned property and is not expected to affect land use. The Virginia Rebuild Project is not expected to impact the character of the community as the transmission corridor has been in use for over 50 years, and is also on land designated as either an Agricultural District or Heavy Industrial District. Any markings or lights that may be required by the Federal Aviation Administration due to a portion of Line #246 being located within the Airport Overlay District will be implemented during construction. The proximity of Line #246 will not be changing and will have no effect or electrical interference with navigational signals or radio communications.

### **III. IMPACT OF LINE ON SCENIC, ENVIRONMENTAL, AND HISTORIC FEATURES**

#### **F. Government Bodies**

- 1. Indicate if the Applicant determined from the governing bodies of each county, city and town in which the proposed facilities will be located whether those bodies have designated the important farmlands within their jurisdictions, as required by § 3.2-205 B of the Code.**
- 2. If so, and if any portion of the proposed facilities will be located on any such important farmland:**
  - a. Include maps and other evidence showing the nature and extent of the impact on such farmlands;**
  - b. Describe what alternatives exist to locating the proposed facilities on the affected farmlands, and why those alternatives are not suitable; and**
  - c. Describe the Applicant's proposals to minimize the impact of the facilities on the affected farmland.**

- Response:
1. The City of Suffolk has not designated important farmland within their jurisdiction pursuant to Va. Code § 3.2-205 B. See Attachment III.A.1 for a map depicting prime farmland and farmland of statewide importance.
  2. Not applicable.

### **III. IMPACT OF LINE ON SCENIC, ENVIRONMENTAL, AND HISTORIC FEATURES**

#### **G. Identify the following that lie within or adjacent to the proposed ROW:**

- 1. Any district, site, building, structure, or other object included in the National Register of Historic Places maintained by the U.S. Secretary of the Interior;**
- 2. Any historic architectural, archeological, and cultural resources, such as historic landmarks, battlefields, sites, buildings, structures, districts or objects listed or determined eligible by the Virginia Department of Historic Resources (“DHR”);**
- 3. Any historic district designated by the governing body of any city or county;**
- 4. Any state archaeological site or zone designated by the Director of the DHR, or its predecessor, and any site designated by a local archaeological commission, or similar body;**
- 5. Any underwater historic assets designated by the DHR, or predecessor agency or board;**
- 6. Any National Natural Landmark designated by the U.S. Secretary of the Interior;**
- 7. Any area or feature included in the Virginia Registry of Natural Areas maintained by the Virginia Department of Conservation and Recreation (“DCR”);**
- 8. Any area accepted by the Director of the DCR for the Virginia Natural Area Preserves System;**
- 9. Any conservation easement or open space easement qualifying under §§ 10.1-1009 – 1016, or §§ 10.1-1700 – 1705, of the Code (or a comparable prior or subsequent provision of the Code);**
- 10. Any state scenic river;**
- 11. Any lands owned by a municipality or school district; and**
- 12. Any federal, state or local battlefield, park, forest, game or wildlife preserve, recreational area, or similar facility. Features, sites, and the like listed in 1 through 11 above need not be identified again.**



- Response:
1. NRHP-listed resources that are within and adjacent to the Virginia Rebuild Project are provided in Table 4 of the DEQ Supplement. Section 2.I of the DEQ Supplement provides additional discussion.
  2. Resources that are eligible or potentially eligible for listing in the NRHP that are within and adjacent to the Virginia Rebuild Project are provided in Table 4 of the DEQ Supplement. Section 2.I of the DEQ Supplement provides additional discussion.
  3. None.
  4. Archaeological sites within and adjacent to the Virginia Rebuild Project right-of-way are provided in Section 2.I of the DEQ Supplement.
  5. None.
  6. None.
  7. None.
  8. None.
  9. As described in Section II.A.6, the Virginia Rebuild Project crosses easements held by the VOF and DOF. These easements were obtained after the Company acquired easements for the right-of-way.
  10. None.
  11. None.
  12. None.

### III. IMPACT OF LINE ON SCENIC, ENVIRONMENTAL, AND HISTORIC FEATURES

- H. List any registered aeronautical facilities (airports, helipads) where the proposed route would place a structure or conductor within the federally-defined airspace of the facilities. Advise of contacts, and results of contacts, made with appropriate officials regarding the effect on the facilities' operations.**

Response: The Federal Aviation Administration ("FAA") is responsible for overseeing air transportation in the United States. The FAA manages air traffic in the United States and evaluates physical objects that may affect the safety of aeronautical operations through an obstruction evaluation. The prime objective of the FAA in conducting an obstruction evaluation is to ensure the safety of air navigation and the efficient utilization of navigable airspace by aircraft.

The Company has reviewed the FAA's website<sup>9</sup> to identify airports within 10.0 nautical miles of the proposed Virginia Rebuild Project. The following airports were identified:

- Suffolk Executive Airport, runway approximately 0.16 nautical miles west of the Virginia Rebuild Project.
- Hampton Roads Executive Airport, approximately 7.3 nautical miles northeast of the Suffolk Substation.

In an email dated September 11, 2023, the Virginia Department of Aviation ("DOAv") stated that a Form 7460 will need to be submitted to the FAA to initiate an aeronautical study to ensure that the proposed Virginia Rebuild Project will not constitute a hazard to air navigation. This correspondence is provided as Attachment 2.O.2 of the DEQ Supplement. The Company will submit Form 7460 to the FAA prior to construction to initiate aeronautical studies and will design the proposed structures to avoid interference with air navigation.

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<sup>9</sup> See <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>

### **III. IMPACT OF LINE ON SCENIC, ENVIRONMENTAL, AND HISTORIC FEATURES**

- I. Advise of any scenic byways that are in close proximity to or that will be crossed by the proposed transmission line and describe what steps will be taken to mitigate any visual impacts on such byways. Describe typical mitigation techniques for other highways' crossings.**

Response: The Virginia Rebuild Project does not cross any scenic Virginia byways. Use of the existing right-of-way minimizes or eliminates permanent incremental impacts at road crossings.



### **III. IMPACT OF LINE ON SCENIC, ENVIRONMENTAL, AND HISTORIC FEATURES**

#### **J. Identify coordination with appropriate municipal, state, and federal agencies.**

Response: As described in Sections III.B and V.D, the Company solicited feedback from the City of Suffolk regarding the proposed Virginia Rebuild Project. Below is a list of coordination efforts that have occurred with municipal, state, and federal agencies:

- A Wetland and Waters Review has been completed and sent to DEQ's Office of Wetlands and Stream Protection to initiate the wetlands impact consultation. See Attachment 2.D.1 of the DEQ Supplement.
- A Stage I Pre-Application Analysis has been prepared and submitted to VDHR. See Attachment 2.I.2 of the DEQ Supplement.
- The Company solicited comments from the Virginia Marine Resources Commission ("VMRC") and the Corps regarding the proposed Virginia Rebuild Project. See Sections 2.B and 2.D of the DEQ Supplement.
- The Company requested comments from the USFWS, DWR, and DCR regarding the proposed Virginia Rebuild Project. See Section 2.G of the DEQ Supplement.
- Letters were submitted to City of Suffolk pursuant to Va. Code § 15.2-2202 E to describe the Virginia Rebuild Project and request comment. See Section V.D of this Appendix.
- The Company solicited comments from the DOAv regarding the proposed Virginia Rebuild Project. See Attachment 2.O.2 of the DEQ Supplement.
- Letters were submitted to the agencies listed in Section V.C in September 2023, describing the Virginia Rebuild Project and requesting comment. A copy of a letter template sent to these agencies is included as Attachment 2.1 of the DEQ Supplement.
- In April and September 2023, the Company sent letters to the Virginia Department of Historic Resources. The DHR responded on May 16, 2023, and had no immediate concerns about the Virginia Rebuild Project. This correspondence is included as Attachment 2.I.1 of the DEQ Supplement.
- On April 19, 2023, the Company solicited comments via letter from several federally and state recognized Native American tribes and Tribal Nations with an interest in the project area, including:

Tribal VA	-	Chief Walt “Red Hawk” Brown	Cheroenhaka (Nottoway) Indian Tribe
Tribal VA	-	Mary Frances Wilkerson	Cheroenhaka (Nottoway) Indian Tribe
Tribal VA	-	Chief Stephen Adkins	Chickahominy Indian Tribe
Tribal VA	-	Assistant Chief Reginald Stewart	Chickahominy Indian Tribe
Tribal VA	-	Chief Gerald A Stewart	Chickahominy Indian Tribe Eastern Division
Tribal VA	-	Jessica Phillips	Chickahominy Indian Tribe Eastern Division
Tribal VA	-	Dana Adkins	Chickahominy Tribe
Tribal VA	-	Chief Mark Custalow	Mattaponi Tribe
Tribal VA	-	Chief Kenneth Branham	Monacan Indian Nation
Tribal VA & TDAT (Suffolk, Hertford & Gates)	-	Chief Keith Anderson	Nansemond Indian Nation
Tribal VA	-	Chief Lynette Allston	Nottoway Indian Tribe of Virginia
Tribal VA	-	SUB: Ms. Beth Roach	Nottoway Indian Tribe of Virginia
Tribal VA & TDAT (Suffolk)	-	Chief Robert Gray	Pamunkey Indian Tribe
Tribal	-	Shaleigh R. Howells	Pamunkey Indian Tribal Resource Office

VA		
Tribal VA	- Chief Charles (Bootsie) Bullock	Patawomeck Indian Tribe of Virginia
Tribal VA	- Chief G. Anne Richardson	Rappahannock Tribe
Tribal VA	- SUB: Assistant Chief	Rappahannock Tribe
Tribal VA	- Chief W. Frank Adams	Upper Mattaponi Indian Tribe
Tribal VA	- Leigh Mitchell	Upper Mattaponi Indian Tribe
Tribal NC	- Jamie Oxendine	Haliwa-Saponi Indian Tribe
Tribal NC	- Dr. Ogletree Richardson	Haliwa-Saponi Indian Tribe
Tribal NC	- Jonathan Caudill, Jr.	Meherrin Indian Tribe
Tribal TDAT (Suffolk)	- Carissa Speck	Delaware Nation of Oklahoma
Tribal TDAT (Hertford & Gates)	- Caitlin Rogers	Catawba Indian Nation
Tribal TDAT (Hertford)	- Bryan Printup	Tuscarora Nation

A copy of the letter template is included as Attachment III.J.1. The Company received a letter of concurrence from the Catawba Indian Nation on May 18, 2023. A copy of the letter is included as Attachment III.J.2. The Company also received a confirmation of receipt from the Delaware Nation of Oklahoma on May 24, 2023. A copy of the receipt is included as Attachment III.J.3.



Dominion Energy Virginia  
Electric Transmission  
P.O. Box 26666, Richmond, VA 23261-6666  
DominionEnergy.com



April 19, 2023

### **Earleys-Tunis-Suffolk 230 kV and 115 kV Electric Transmission Line Rebuild Project**

Dear Chief Red Hawk:

Dominion Energy is dedicated to maintaining safe, reliable, and affordable electric service in the communities we serve. You are receiving this project announcement letter as part of our efforts to proactively communicate early with Tribal Nations who may have an interest in this area. With your unique perspective, you can help us better plan projects in their earliest stages. Please note, this letter is not a notification of formal government-to-government consultation from any state or federal agency. Dominion Energy has been and continues to be committed to creating and maintaining strong, open, supportive, and mutually beneficial relationships with Tribal Nations.

We are reaching out to you as we have an upcoming project in the City of Suffolk, Virginia, and in the North Carolina counties of Hertford and Gates, and you may have an interest in this area. We are planning to rebuild two aging electric transmission lines. After more than five decades of dependable service, the structures and components on both lines are at the end of their service life. Replacing the equipment will maintain reliability for our customers.

#### **Transmission Line 246 – Suffolk to Earleys substations**

- 44.3 miles
- 230 kilovolt (kV)
- Previous material: wooden H-frame and weathering steel lattice structures
- New material: brown, weathering steel H-frame structures and galvanized steel lattice structures
- No new right of way is needed

#### **Transmission Line 136 – Tunis to Earleys substations**

- 14.8 miles
- 115 kV
- Previous material: wooden monopole structures
- New material: weathering steel monopole structures
- No new right of way is needed

Enclosed is a project overview map for your reference. The Virginia State Corporation Commission (SCC) does require a review of the portion (14.7 miles) of the 230 kV line that is in the City of Suffolk, Virginia. This project does not require review by the North Carolina Utilities Commission (NCUC).

We are only in the planning phase of the project and have not determined the exact locations of the new poles. However, we plan to rebuild each structure close to the original structure's

location within the existing right of way. Providing your input allows us to consider any concerns you may have as we work to meet the project's needs. Please feel free to notify other relevant organizations that may have an interest in the project area. For reference, other recipients of this letter include county and state historic, cultural, and scenic organizations, as well as Tribal Nations.

We will host an in-person community meeting in late summer 2023 before we submit the SCC application. Please visit the project webpage at [DominionEnergy.com/Earleys](https://DominionEnergy.com/Earleys) for meeting updates and more project information.

If you have questions or would like to set up a meeting to discuss the project, contact me by calling 804-771-4878 or sending an email to [carrie.s.rose.pace@dominionenergy.com](mailto:carrie.s.rose.pace@dominionenergy.com). You may also contact Tribal Relations Manager Ken Custalow by sending an email to [Ken.Custalow@dominionenergy.com](mailto:Ken.Custalow@dominionenergy.com).

Sincerely,

A handwritten signature in cursive script, appearing to read "Carrie Rose Pace".

Carrie Rose Pace  
Communications Specialist  
The Electric Transmission Project Team

# Earleys-Tunis-Suffolk 230 kV and 115 kV Electric Transmission Line Rebuild Project



City of Suffolk, Virginia  
Gates County, North Carolina  
Hertford County, North Carolina

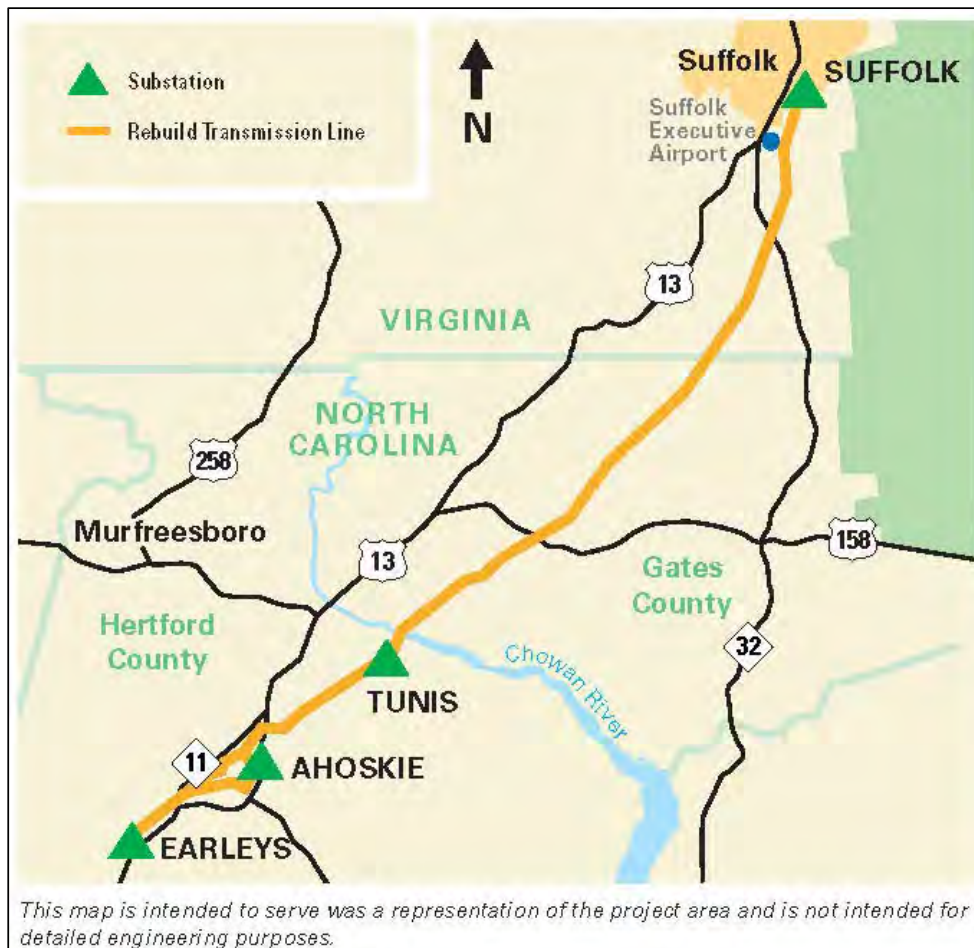


Photo by Tunis Substation

## Project Proposal

**Rebuild two aging electric transmission lines** that are at the end of their service life after more than five decades of reliable service. No new right of way is needed.

- **230 kilovolt (kV) electric transmission line:**
  - Between our Suffolk and Earleys substations
  - 44.3 miles long
  - Was built on wooden H-frame and weathering steel lattice structures
  - Will rebuild using brown, weathering steel H-frame structures and galvanized steel lattice structures
- **115 kV electric transmission line:**
  - Between our Tunis and Earleys substations
  - 14.8 miles long
  - Was built on wooden monopole structures
  - Will rebuild this line using weathering steel monopole structures





# Earleys-Tunis-Suffolk 230 kV and 115 kV Electric Transmission Line Rebuild Project



City of Suffolk, Virginia  
Gates County, North Carolina  
Hertford County, North Carolina



Photo by Tunis Substation

## Project Timeline

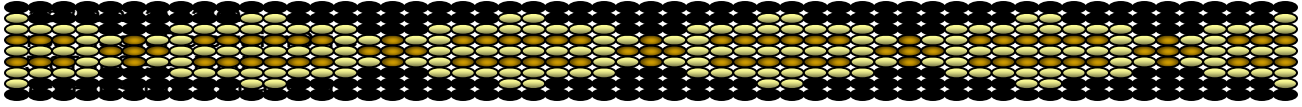
<b>Spring 2023</b>	Project announcement; public engagement begins
<b>Late summer 2023</b>	Community Open Houses (to be announced)
<b>Fall 2023</b>	File project with the Virginia State Corporation Commission (SCC) <i>This project does not require review by the North Carolina Utilities Commission (NCUC)</i>
<b>Fall 2024</b>	Anticipated SCC project approval
<b>2025</b>	Right of way review and permitting
<b>January 2026</b>	Begin forestry activities
<b>Spring 2026</b>	Construction activities begin <b>Phase 1 (spring 2026 – fall 2027):</b> 230 kV rebuild between Suffolk and Tunis substations <b>Phase 2 (fall 2027 – summer 2028):</b> 230 kV and 115 kV rebuild between Tunis and Earleys substations
<b>Summer 2028</b>	Anticipated rebuild completion
<b>Fall 2028 – spring 2029</b>	Restoration activities, including vegetation management and rehabilitation

For more information about this project, visit our website at  
**DominionEnergy.com/Earleys.**

Or contact us

**email:** powerline@dominionenergy.com

**phone:** 888-291-0190



Office 803-328-2427  
Fax 803-328-5791

May 18, 2023

Attention: Carrie Rose Pace  
Dominion Energy  
P.O. Box 26666  
Richmond, VA 23261

Re. THPO #	TCNS #	Project Description
2023-1108-20		Earleys-Tunis-Suffolk 230 kV and 115 kV Electric Transmission Line Rebuild Project

Dear Ms. Pace,

The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. **However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.**

If you have questions please contact Caitlin Rogers at 803-328-2427 ext. 226, or e-mail [Caitlin.Rogers@catawba.com](mailto:Caitlin.Rogers@catawba.com).

Sincerely,

Wenonah G. Haire  
Tribal Historic Preservation Officer

**From:** Carissa Speck <cspeck@delawarenation-nsn.gov>  
**Sent:** Wednesday, May 24, 2023 12:04 PM  
**To:** Carrie S Rose Pace (DEV Trans Distribution - 1)  
**Cc:** Ken Custalow (Services - 6)  
**Subject:** [EXTERNAL] RE: Dominion Energy: Earleys-Tunis-Suffolk 230 kV and 115 kV Electric Transmission Line Rebuild Project

**CAUTION! This message was NOT SENT from DOMINION ENERGY**

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Received. Thank you.

---

**From:** carrie.s.rose.pace@dominionenergy.com <carrie.s.rose.pace@dominionenergy.com>  
**Sent:** Tuesday, April 18, 2023 4:10 PM  
**To:** Carissa Speck <cspeck@delawarenation-nsn.gov>  
**Cc:** ken.custalow@dominionenergy.com  
**Subject:** Dominion Energy: Earleys-Tunis-Suffolk 230 kV and 115 kV Electric Transmission Line Rebuild Project

Good afternoon Ms. Speck,

We are mailing a project announcement letter to your office tomorrow. A PDF letter copy is attached for your records.

The project website URL referenced in the letter is currently in production, and should be live later this week in conjunction with the mailing.

Please do not hesitate to connect with us if we may assist.

Warmly,

**Carrie Rose Pace**  
Communications Specialist  
Electric Transmission

Dominion Energy  
5000 Dominion Boulevard, Glen Allen, VA 23060  
Mailing Address: P.O. Box 26666, Richmond, VA 23261  
O: 804-771-4878 C: 804-664-6422



Actions Speak Louder™

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### III. IMPACT OF LINE ON SCENIC, ENVIRONMENTAL, AND HISTORIC FEATURES

#### K. Identify coordination with any non-governmental organizations or private citizen groups.

Response: On April 19, 2023, the Company solicited comments via letter from the nongovernmental organizations and private citizen groups identified below. A copy of the letter template and overview map is included as Attachment III.K.1.

The community leaders, environmental groups, and business groups identified below also were included in the Company's public mailing (see Attachment III.B.3), which invited communities to the public meetings.

<u>Name</u>	<u>Organization</u>
Ms. Elizabeth S. Kostelny	Preservation Virginia
Mr. Thomas Gilmore	American Battlefield Trust
Mr. Jim Campi	American Battlefield Trust
Mr. Max Hokit	American Battlefield Trust
Ms. Eleanor Breen	Council of Virginia Archaeologists
Ms. Leighton Powell	Scenic Virginia
Ms. Elaine Chang	National Trust for Historic Preservation
Mr. Roger Kirchen, Archaeologist	Virginia Department of Historic Resources
Ms. Adrienne Birge-Wilson	Virginia Department of Historic Resources
Mr. Dave Dutton	Dutton + Associates, LLC

Dominion Energy Virginia  
Electric Transmission  
P.O. Box 26666, Richmond, VA 23261-6666  
DominionEnergy.com



April 19, 2023

### **Earleys-Tunis-Suffolk 230 kV and 115 kV Electric Transmission Line Rebuild Project**

Dear Ms. Kostelny:

Dominion Energy is dedicated to maintaining safe, reliable, and affordable electric service in the communities we serve. As a valued stakeholder with a unique perspective, you can help us meet these objectives as we plan necessary electric infrastructure projects. We are reaching out to you as we have an upcoming project in the City of Suffolk, Virginia, and in the North Carolina counties of Hertford and Gates, and you may have an interest in this area.

We are planning to rebuild two aging electric transmission lines. After more than five decades of dependable service, the structures and components on both lines are at the end of their service life. Replacing this equipment will maintain reliability for our customers.

#### **Transmission Line 246 – Suffolk to Earleys substations**

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- No new right of way is needed

#### **Transmission Line 136 – Tunis to Earleys substations**

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- Previous material: wooden monopole structures
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We are only in the planning phase of the project and have not determined the exact locations of the new poles. However, we plan to rebuild each structure close to the original structure's location within the existing right of way. Providing your input allows us to consider any concerns you may have as we work to meet the project's needs. Please feel free to notify other relevant organizations that may have an interest in the project area. For reference, other recipients of this letter include county and state historic, cultural, and scenic organizations, as well as Tribal Nations.



We will host an in-person community meeting in late summer 2023 before we submit the SCC application. Please visit the project webpage at [DominionEnergy.com/Earleys](https://DominionEnergy.com/Earleys) for meeting updates and more project information.

If you have questions or would like to set up a meeting to discuss the project, contact me by calling 804-771-4878 or sending an email to [carrie.s.rose.pace@dominionenergy.com](mailto:carrie.s.rose.pace@dominionenergy.com).

Sincerely,

A handwritten signature in cursive script, appearing to read "Carrie Rose Pace".

Carrie Rose Pace  
Communications Specialist  
The Electric Transmission Project Team

# Earleys-Tunis-Suffolk 230 kV and 115 kV Electric Transmission Line Rebuild Project



City of Suffolk, Virginia  
Gates County, North Carolina  
Hertford County, North Carolina

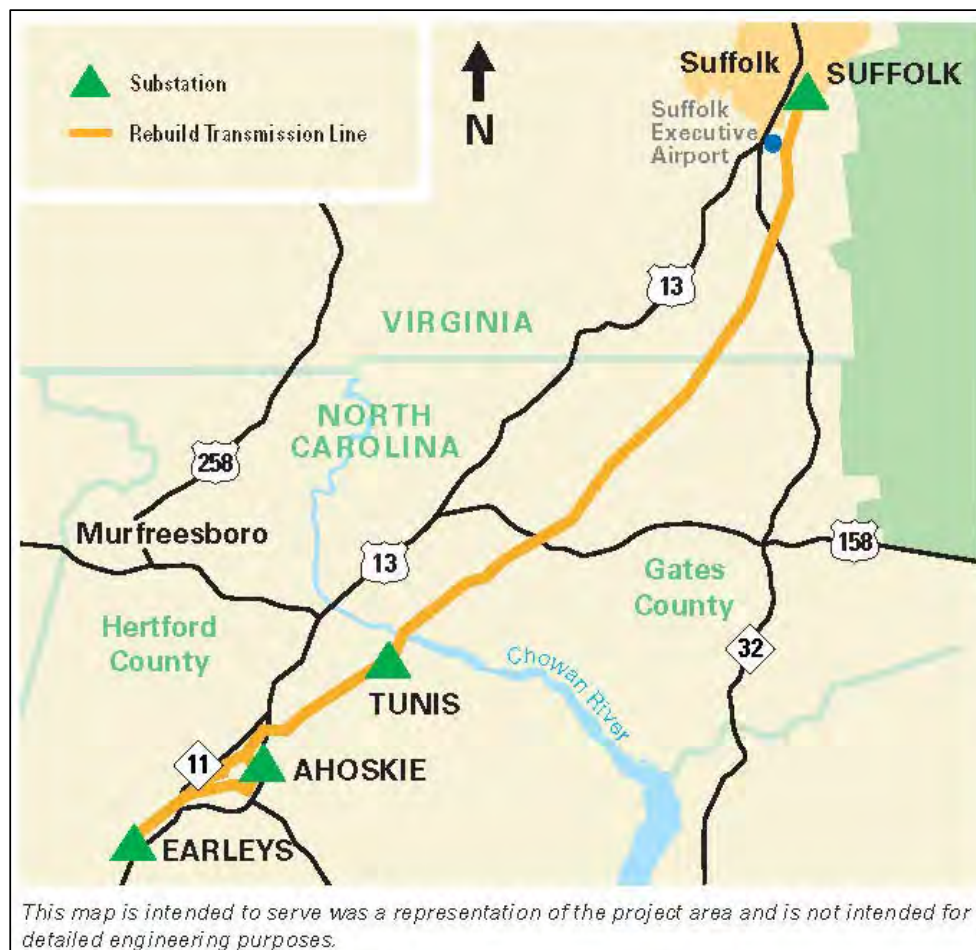


Photo by Tunis Substation

## Project Proposal

**Rebuild two aging electric transmission lines** that are at the end of their service life after more than five decades of reliable service. No new right of way is needed.

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  - Was built on wooden H-frame and weathering steel lattice structures
  - Will rebuild using brown, weathering steel H-frame structures and galvanized steel lattice structures
- **115 kV electric transmission line:**
  - Between our Tunis and Earleys substations
  - 14.8 miles long
  - Was built on wooden monopole structures
  - Will rebuild this line using weathering steel monopole structures



# Earleys-Tunis-Suffolk 230 kV and 115 kV Electric Transmission Line Rebuild Project



City of Suffolk, Virginia  
Gates County, North Carolina  
Hertford County, North Carolina



Photo by Tunis Substation

## Project Timeline

<b>Spring 2023</b>	Project announcement; public engagement begins
<b>Late summer 2023</b>	Community Open Houses (to be announced)
<b>Fall 2023</b>	File project with the Virginia State Corporation Commission (SCC) <i>This project does not require review by the North Carolina Utilities Commission (NCUC)</i>
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<b>2025</b>	Right of way review and permitting
<b>January 2026</b>	Begin forestry activities
<b>Spring 2026</b>	Construction activities begin <b>Phase 1 (spring 2026 – fall 2027):</b> 230 kV rebuild between Suffolk and Tunis substations <b>Phase 2 (fall 2027 – summer 2028):</b> 230 kV and 115 kV rebuild between Tunis and Earleys substations
<b>Summer 2028</b>	Anticipated rebuild completion
<b>Fall 2028 – spring 2029</b>	Restoration activities, including vegetation management and rehabilitation

For more information about this project, visit our website at  
**DominionEnergy.com/Earleys.**

Or contact us

**email:** powerline@dominionenergy.com

**phone:** 888-291-0190





## COMMONWEALTH of VIRGINIA

Travis A. Voyles  
Secretary of Natural and  
Historic Resources

**Department of Historic Resources**  
2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan  
Director  
Tel: (804) 367-2323  
Fax: (804) 367-2391  
[www.dhr.virginia.gov](http://www.dhr.virginia.gov)

May 16, 2023

Carrie Rose Pace  
Dominion Energy Virginia  
Electric Transmission  
P.O. Box 26666  
Richmond, VA 23261

Re: Earleys-Tunis-Suffolk 230 kv and 115kv Transmission Line  
City of Suffolk, Virginia  
DHR File No. 2023-3145

Dear Ms. Rose Pace,

We have received your request for comments on the project referenced above. The undertaking, as presented, involves the rebuild of a 230 kv line in the City of Suffolk, Virginia and in North Carolina. Our comments are provided as technical assistance to Dominion. We have not been notified by any state or federal agency of their involvement in this project; however, we reserve the right to provide additional comment pursuant to the National Historic Preservation Act, if applicable.

Based on the notice, the proposed project does meet the requirements to be filed with the Virginia State Corporation Commission (SCC). Typically, for SCC permitted projects, we recommend that Dominion follows the *Guidelines for Assessing Impacts of Proposed Electric Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia*, developed by DHR and the SCC to assist project proponents in developing transmission line projects that minimize impacts to historic resources.

Typically, we recommend that the project proponent establish a study area for each route alternative under consideration and gather information on known resources. A qualified cultural resources consultant in the appropriate discipline should perform an assessment of impact for each known historic resource present within the proposed study area.

Once the route alternatives have been finalized, DHR recommends that full archaeological and architectural surveys be performed to determine the effect of the project on all historic resources listed in or eligible for listing in the National Register. This process involves the identification and recordation of all archaeological sites and structures greater than 50 years of age, the evaluation of those resources for listing in the National Register, determining the degree of impact of the project on eligible resources, and developing a plan to avoid, minimize, or mitigate any negative impacts. Comments received from the public or other stakeholder

Western Region Office  
962 Kime Lane  
Salem, VA 24153  
Tel: (540) 387-5443  
Fax: (540) 387-5446

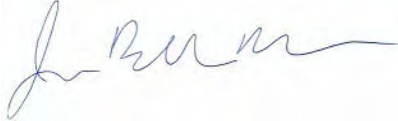
Northern Region Office  
5357 Main Street  
PO Box 519  
Stephens City, VA 22655  
Tel: (540) 868-7029  
Fax: (540) 868-7033

Eastern Region Office  
2801 Kensington Avenue  
Richmond, VA 23221  
Tel: (804) 367-2323  
Fax: (804) 367-2391

regarding impacts to specific historic resources should be addressed as part of this survey and assessment process.

Thank you for seeking our comments on this project. If you have any questions at this time, please do not hesitate to contact me at [jennifer.bellville-marrion@dhr.virginia.gov](mailto:jennifer.bellville-marrion@dhr.virginia.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Bellville-Marrion", with a long horizontal flourish extending to the right.

Jenny Bellville-Marrion, Project Review Archaeologist  
Review and Compliance Division

### **III. IMPACT OF LINE ON SCENIC, ENVIRONMENTAL, AND HISTORIC FEATURES**

#### **L. Identify any environmental permits or special permissions anticipated to be needed.**

Response: See the table below for potential permits anticipated for the proposed Virginia Rebuild Project.

**Potential Permits**

<b>Activity</b>	<b>Permit</b>	<b>Agency</b>
Impacts to wetlands and waters of the U.S.	Nationwide Permit	U.S. Army Corps of Engineers
Impacts to wetlands and waters of the U.S.	Virginia Water Protection Permit	Virginia Department of Environmental Quality
Work within, over or under state subaqueous bottom and tidal waters	Subaqueous Bottom Permit	Virginia Marine Resources Commission
Discharges of Stormwater from Construction Activities	Construction General Permit	Virginia Department of Environmental Quality
Work within VDOT right-of-way	Land Use Permit	Virginia Department of Transportation
Airspace obstruction evaluation	FAA 7460-1	Federal Aviation Administration



#### IV. HEALTH ASPECTS OF ELECTROMAGNETIC FIELDS (“EMF”)

- A. Provide the calculated maximum electric and magnetic field levels that are expected to occur at the edge of the ROW. If the new transmission line is to be constructed on an existing electric transmission line ROW, provide the present levels as well as the maximum levels calculated at the edge of ROW after the new line is operational.

Response: Public exposure to magnetic fields is best estimated by field levels from power lines calculated at annual average loading. For any day of the year, the EMF levels associated with average conditions provide the best estimate of potential exposure. Maximum (peak) values are less relevant as they may occur for only a few minutes or hours each year.

This section describes the levels of EMF associated with the existing and proposed transmission line. EMF levels are provided for both historical (2022) and future (2028) annual average and maximum (peak) loading conditions.

##### Existing line – Historical Average Loading in 2022

EMF levels were calculated for the existing line at the *historical average* load condition of 232 amps at an operating voltage of 230 kV when supported on the existing structures – see Attachment II.A.5.a and b.

These field levels were calculated at mid-span where the conductors are closest to the ground and the conductors are at an historical average load operating temperature.

EMF levels at the edge of the right-of-way for the proposed Virginia Rebuild Project at the historical average loading:

##### Existing Line - Historic Average Loading (2022)

Attachment	Left Edge ROW Per II.A.5 Drawing View		Right Edge ROW Per II.A.5 Drawing View	
	<u>Electric Field</u> (kV/m)	<u>Magnetic Field</u> (mG)	<u>Electric Field</u> (kV/m)	<u>Magnetic Field</u> (mG)
II.A.5.a	1.4	14	1.4	14
II.A.5.b	2.4	14	1.4	13

##### Existing line – Historical Peak Loading in 2022

EMF levels were calculated for the existing line at the *historical peak* load condition of 986 amps and at an operating voltage of 230 kV when supported on the existing structures – see Attachment II.A.5.a and b.

These field levels were calculated at mid-span where the conductors are closest to the ground and the conductors are at an historical peak load operating temperature.

EMF levels at the edge of the right-of-way for the proposed Virginia Rebuild Project at the historical peak loading:

**Existing Line - Historic Average Loading (2022)**

<b>Attachment</b>	<b>Left Edge ROW Per II.A.5 Drawing View</b>		<b>Right Edge ROW Per II.A.5 Drawing View</b>	
	<u>Electric Field</u> (kV/m)	<u>Magnetic Field</u> (mG)	<u>Electric Field</u> (kV/m)	<u>Magnetic Field</u> (mG)
<b>II.A.5.a</b>	1.4	60	1.4	60
<b>II.A.5.b</b>	2.6	44	1.5	60

**Proposed Virginia Rebuild Project – Projected Average Loading in 2028**

EMF levels were calculated for the proposed Virginia Rebuild Project at the *projected average* load condition of 490.8 amps and at an operating voltage of 230 kV when supported on the proposed Virginia Rebuild Project structures – see Attachments II.A.5.c and d.

These field levels were calculated at mid-span where the conductors are closest to the ground and the conductors are at a projected average load operating temperature.

EMF levels at the edge of the right-of-way for the proposed Virginia Rebuild Project at the projected average loading:

**Proposed Virginia Rebuild Project - Projected Average Loading (2028)**

<b>Attachment</b>	<b>Left Edge ROW Per II.A.5 Drawing View</b>		<b>Right Edge ROW Per II.A.5 Drawing View</b>	
	<u>Electric Field</u> (kV/m)	<u>Magnetic Field</u> (mG)	<u>Electric Field</u> (kV/m)	<u>Magnetic Field</u> (mG)
<b>II.A.5.c</b>	1.4	30	1.4	30
<b>II.A.5.d</b>	2.1	5	1.8	36

**Proposed Virginia Rebuild Project – Projected Peak Loading in 2028**

EMF levels were calculated for the proposed Virginia Rebuild Project at the *projected peak* load condition of 818 amps and at an operating voltage of 230 kV when supported on the proposed Virginia Rebuild Project structures – see Attachments II.A.5.c and d.

These field levels were calculated at mid-span where the conductors are closest to the ground and the conductors are at the projected peak load operating temperature.

EMF levels at the edge of the right-of-way for the proposed Virginia Rebuild Project at the projected peak loading:

**Proposed Virginia Rebuild Project - Projected Peak Loading (2028)**

<b>Attachment</b>	<b>Left Edge ROW Per II.A.5 Drawing View</b>		<b>Right Edge ROW Per II.A.5 Drawing View</b>	
	<u>Electric Field</u> (kV/m)	<u>Magnetic Field</u> (mG)	<u>Electric Field</u> (kV/m)	<u>Magnetic Field</u> (mG)
<b>II.A.5.c</b>	1.4	50	1.4	50
<b>II.A.5.d</b>	2.1	8	1.8	60



#### IV. HEALTH ASPECTS OF ELECTROMAGNETIC FIELDS (“EMF”)

- B. If the Applicant is of the opinion that no significant health effects will result from the construction and operation of the line, describe in detail the reasons for that opinion and provide references or citations to supporting documentation.**

Response: The conclusions of multidisciplinary scientific review panels assembled by national and international scientific agencies during the past three decades are the foundation of the Company’s opinion that no adverse health effects are anticipated to result from the operation of the proposed Virginia Rebuild Project. Each of these panels has evaluated the scientific research related to health and power-frequency EMF and provided conclusions that form the basis of guidance to governments and industries. The Company regularly monitors the recommendations of these expert panels to guide their approach to EMF.

Research on EMF and human health varies widely in approach. Some studies evaluate the effects of high, short-term EMF exposures not typically found in people’s day-to-day lives on biological responses, while others evaluate the effects of common, lower EMF exposures found throughout communities. Studies also have evaluated the possibility of effects (e.g., cancer, neurodegenerative diseases, reproductive effects) of long-term exposure. Altogether, this research includes well over a hundred epidemiologic studies of people in their natural environment and many more laboratory studies of animals (*in vivo*) and isolated cells and tissues (*in vitro*). Standard scientific procedures, such as weight-of-evidence methods, were used by the expert panels assembled by agencies to identify, review, and summarize the results of this large and diverse research.

The reviews of EMF-related biological and health research have been conducted by numerous scientific and health agencies, including, for example, the European Health Risk Assessment Network on Electromagnetic Fields Exposure (“EFHRAN”), the International Commission on Non-Ionizing Radiation Protection (“ICNIRP”), the World Health Organization (“WHO”), the International Committee on Electromagnetic Safety (“ICES”), the Scientific Committee on Emerging and Newly Identified Health Risks (“SCENIHR”) of the European Commission, and the Swedish Radiation Safety Authority (“SSM”) [(formerly the Swedish Radiation Protection Authority (“SSI”)) (WHO, 2007; SCENIHR, 2009, 2015; EFHRAN, 2010, 2012; ICNIRP, 2010; SSM, 2015, 2016, 2018, 2019, 2020, 2021, 2022; ICES, 2019). The general scientific consensus of the agencies that have reviewed this research, relying on generally accepted scientific methods, is that the scientific evidence does not show that common sources of EMF in the environment, including transmission lines and other parts of the electric system, appliances, etc., are a cause of any adverse health effects.

The most recent reviews on this topic include the 2015 report by SCENIHR and annual reviews published by SSM (e.g., for the years 2015 through 2022). These reports, similar to previous reviews, found that the scientific evidence does not

confirm the existence of any adverse health effects caused by environmental or community exposure to EMF.

The WHO has recommended that countries adopt recognized international standards published by ICNIRP and ICES. Typical levels of EMF from Dominion's power lines outside its property and rights-of-way are far below the screening reference levels of EMF recommended for the general public and still lower than exposures equivalent to restrictions to limits on fields within the body (ICNIRP, 2010; ICES, 2019).

Thus, based on the conclusions of scientific reviews and the levels of EMF associated with the proposed Project, the Company has determined that no adverse health effects are anticipated to result from the operation of the proposed Virginia Rebuild Project.

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#### IV. HEALTH ASPECTS OF ELECTROMAGNETIC FIELDS (“EMF”)

**C. Describe and cite any research studies on EMF the Applicant is aware of that meet the following criteria:**

- 1. Became available for consideration since the completion of the Virginia Department of Health’s most recent review of studies on EMF and its subsequent report to the Virginia General Assembly in compliance with 1985 Senate Joint Resolution No. 126;**
- 2. Include findings regarding EMF that have not been reported previously and/or provide substantial additional insight into findings; and**
- 3. Have been subjected to peer review.**

Response: The Virginia Department of Health (“VDH”) conducted its most recent review and issued its report on the scientific evidence on potential health effects of extremely low frequency (“ELF”) EMF in 2000: “[T]he Virginia Department of Health is of the opinion that there is no conclusive and convincing evidence that exposure to extremely low frequency EMF emanated from nearby high voltage transmission lines is causally associated with an increased incidence of cancer or other detrimental health effects in humans.”<sup>10</sup>

The continuing scientific research on EMF exposure and health has resulted in many peer-reviewed publications since 2000. The accumulating research results have been regularly and repeatedly reviewed and evaluated by national and international health, scientific, and government agencies, including most notably:

- The WHO, which published one of the most comprehensive and detailed reviews of the relevant scientific peer-reviewed literature in 2007.
- SCENIHR, a committee of the European Commission, that published its assessments in 2009 and 2015;
- The SSM, which has published annual reviews of the relevant peer-reviewed scientific literature since 2003, with its most recent review published in 2022; and,
- EFHRAN, that published its reviews in 2010 and 2012.

The above reviews provide detailed analyses and summaries of relevant recent peer-reviewed scientific publications. The conclusions of these reviews that the evidence overall does not confirm the existence of any adverse health effects due

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<sup>10</sup> See <http://www.vdh.virginia.gov/content/uploads/sites/12/2016/02/highfinal.pdf>.

to exposure to EMF are consistent with the conclusions of the VDH report. With respect to the statistical association observed in some of the childhood leukemia epidemiologic studies, the most recent comprehensive review of the literature by SCENIHR, published in 2015, concluded that “no mechanisms have been identified and no support is existing [*sic*] from experimental studies that could explain these findings, which, together with shortcomings of the epidemiological studies prevent a causal interpretation” (SCENIHR, 2015, p. 16).

While research is continuing on multiple aspects of EMF exposure and health, many of the recent publications have focused on an epidemiologic assessment of the relationship between EMF exposure and childhood leukemia and neurodegenerative diseases. Of these, the following recent publications, published following the inclusion date (June 2014) for the SCENIHR (2015) report through May 2023, provided additional evidence and contributed to clarification of previous findings. Overall, new research studies have not provided evidence to alter the previous conclusions of scientific and health organizations, including the WHO and SCENIHR.

Epidemiologic studies of EMF and childhood leukemia published during the above referenced period include:

- Bunch et al. (2015) assessed the potential association between residential proximity to high-voltage underground cables and development of childhood cancer in the United Kingdom largely using the same epidemiologic data as in a previously published study on overhead transmission lines (Bunch et al., 2014). No statistically significant associations or trends were reported with either distance to underground cables or calculated magnetic fields from underground cables for any type of childhood cancers.
- Pedersen et al. (2015) published a case-control study that investigated the potential association between residential proximity to power lines and childhood cancer in Denmark. The study included all cases of leukemia (n=1,536), central nervous system tumor, and malignant lymphoma (n=417) diagnosed before the age of 15 between 1968 and 2003 in Denmark, along with 9,129 healthy control children matched on sex and year of birth. Considering the entire study period, no statistically significant increases were reported for any of the childhood cancer types.
- Salvan et al. (2015) compared measured magnetic-field levels in the bedroom for 412 cases of childhood leukemia under the age of 10 and 587 healthy control children in Italy. Although the statistical power of the study was limited because of the small number of highly exposed subjects, no consistent statistical associations or trends were reported between measured magnetic-field levels and the occurrence of leukemia among children in the study.
- Bunch et al. (2016) and Swanson and Bunch (2018) published additional analyses using data from an earlier study (Bunch et al., 2014). Bunch et al.

(2016) reported that the association with distance to power lines observed in earlier years was linked to calendar year of birth or year of cancer diagnosis, rather than the age of the power lines. Swanson and Bunch (2018) re-analyzed data using finer exposure categories (e.g., cut-points of every 50-meter distance) and broader groupings of diagnosis date (e.g., 1960-1979, 1980-1999, and 2000-on) and reported no overall associations between exposure categories and childhood leukemia for the later time periods (1980 and on), and consistent pattern for time periods prior to 1980.

- Crespi et al. (2016) conducted a case-control epidemiologic study of childhood cancers and residential proximity to high-voltage power lines (60 kV to 500 kV) in California. Childhood cancer cases, including 5,788 cases of leukemia and 3,308 cases of brain tumor, diagnosed under the age of 16 between 1986 and 2008, were identified from the California Cancer Registry. Controls, matched on age and sex, were selected from the California Birth Registry. Overall, no consistent statistically significant associations for leukemia or brain tumor and residential distance to power lines were reported.
- Kheifets et al. (2017) assessed the relationship between calculated magnetic-field levels from power lines and development of childhood leukemia within the same study population evaluated in Crespi et al. (2016). In the main analyses, which included 4,824 cases of leukemia and 4,782 controls matched on age and sex, the authors reported no consistent patterns, or statistically significant associations between calculated magnetic-field levels and childhood leukemia development. Similar results were reported in subgroup and sensitivity analyses. In two subsequent studies (Amoon et al., 2018a, 2019), the potential impact of residential mobility (i.e., moving residences between birth and diagnosis) on the associations reported in Crespi et al. (2016) and Kheifets et al. (2017) were examined. Amoon et al. (2019) concluded that while uncontrolled confounding by residential mobility had some impact on the association between EMF exposure and childhood leukemia, it was unlikely to be the primary driving force behind the previously reported associations.
- Amoon et al. (2018b) conducted a pooled analysis of 29,049 cases and 68,231 controls from 11 epidemiologic studies of childhood leukemia and residential distance from high-voltage power lines. The authors reported no statistically-significant association between childhood leukemia and proximity to transmission lines of any voltage. Among subgroup analyses, the reported associations were slightly stronger for leukemia cases diagnosed before 5 years of age and in study periods prior to 1980. Adjustment for various potential confounders (e.g., socioeconomic status, dwelling type, residential mobility) had little effect on the estimated associations.
- Kyriakopoulou et al. (2018) assessed the association between childhood acute leukemia and parental occupational exposure to social contacts, chemicals, and electromagnetic fields. The study was conducted at a major pediatric hospital in Greece and included 108 cases and 108 controls matched for age, gender,



and ethnicity. Statistically non-significant associations were observed between paternal exposure to magnetic fields and childhood acute leukemia for any of the exposure periods examined (1 year before conception; during pregnancy; during breastfeeding; and from birth until diagnosis); maternal exposure was not assessed due to the limited sample size. No associations were observed between childhood acute leukemia and exposure to social contacts or chemicals.

- Auger et al. (2019) examined the relationship between exposure to EMF during pregnancy and risk of childhood cancer in a cohort of 784,000 children born in Québec. Exposure was defined using residential distance to the nearest high-voltage transmission line or transformer station. The authors reported statistically non-significant associations between proximity to transformer stations and any cancer, hematopoietic cancer, or solid tumors. No associations were reported with distance to transmission lines.
- Crespi et al. (2019) investigated the relationship between childhood leukemia and distance from high-voltage lines and calculated magnetic-field exposure, separately and combined, within the California study population previously analyzed in Crespi et al. (2016) and Kheifets et al. (2017). The authors reported that neither close proximity to high-voltage lines nor exposure to calculated magnetic fields alone were associated with childhood leukemia; an association was observed only for those participants who were both close to high-voltage lines ( $< 50$  meters) and had high calculated magnetic fields ( $\geq 0.4$  microtesla [ $\mu\text{T}$ ]) (i.e.,  $\geq 4$  milligauss [ $\text{mG}$ ]). No associations were observed with low-voltage power lines ( $< 200$  kV). In a subsequent study, Amoon et al. (2020) examined the potential impact of dwelling type on the associations reported in Crespi et al. (2019). Amoon et al. (2020) concluded that while the type of dwelling at which a child resides (e.g., single-family home, apartment, duplex, mobile home) was associated with socioeconomic status and race or ethnicity, it was not associated with childhood leukemia and did not appear to be a potential confounder in the relationship between childhood leukemia and magnetic-field exposure in this study population.
- Swanson et al. (2019) conducted a meta-analysis of 41 epidemiologic studies of childhood leukemia and magnetic-field exposure published between 1979 and 2017 to examine trends in childhood leukemia development over time. The authors reported that while the estimated risk of childhood leukemia initially increased during the earlier period, a statistically non-significant decline in estimated risk has been observed from the mid-1990s until the present (i.e., 2019).
- Talibov et al. (2019) conducted a pooled analysis of 9,723 cases and 17,099 controls from 11 epidemiologic studies to examine the relationship between parental occupational exposure to magnetic fields and childhood leukemia. No statistically significant association was found between either paternal or maternal exposure and leukemia (overall or by subtype). No associations were

observed in the meta-analyses.

- Nunez-Enriquez et al. (2020) assessed the relationship between residential magnetic-field exposure and B-lineage acute lymphoblastic leukemia (“BALL”) in children under 16 years of age in Mexico. The study included 290 cases and 407 controls matched on age, gender, and health institution; magnetic-field exposure was assessed through the collection of 24-hour measurements in the participants’ bedrooms. While the authors reported some statistically significant associations between elevated magnetic-field levels and development of B-ALL, the results were dependent on the chosen cut-points.
- Seomun et al. (2021) performed a meta-analysis based on 33 previously published epidemiologic studies investigating the potential relationship between magnetic-field exposure and childhood cancers, including leukemia and brain cancer. For childhood leukemia, the authors reported statistically significant associations with some, but not all, of the chosen cut-points for magnetic-field exposure. The associations between magnetic-field exposure and childhood brain cancer were statistically non-significant. The study provided limited new insight as most of the studies included in the current meta-analysis, were included in previously conducted meta- and pooled analyses.
- Amoon et al. (2022) conducted a pooled analysis of four studies of residential exposure to magnetic fields and childhood leukemia published following a 2010 pooled analysis by Kheifets et al. (2010). The study by Amoon et al. (2022) compared the exposures of 24,994 children with leukemia to the exposures of 30,769 controls without leukemia in California, Denmark, Italy, and the United Kingdom. Exposure was assessed by measured or calculated magnetic fields at their residences. The exposure of these two groups to magnetic fields were found not to significantly differ. A decrease in the combined effect estimates in epidemiologic studies was observed over time, and the authors concluded that their findings, based on the most recent studies, were “not in line” with previous pooled analyses that reported an increased risk of childhood leukemia.
- Brabant et al. (2022) performed a literature review and meta-analysis of studies of childhood leukemia and magnetic-field exposure. The overall analysis included 21 epidemiologic studies published from 1979 to 2020. The authors reported a statistically significant association, which they noted was “mainly explained by the studies conducted before 2000.” The authors reported a statistically significant association between childhood leukemia and measured or calculated magnetic-field exposures  $> 0.4 \mu\text{T}$  (4 mG); no statistically significant overall associations were reported between childhood leukemia and lower magnetic-field exposures ( $< 0.4 \mu\text{T}$  [4 mG]), residential distance from power lines, or wire coding configuration. An association between childhood leukemia and electric blanket use was also reported. The overall results were likely influenced by the inclusion of a large number of earlier studies; 10 of the 21 studies in the main analysis were published prior to 2000. Studies published

prior to 2000 included fewer studies deemed to be of higher study quality, as determined by the authors, compared to studies published after 2000.

- Nguyen et al. (2022) investigated whether potential pesticide exposure from living in close proximity to commercial plant nurseries confounds the association between magnetic-field exposure and childhood leukemia development reported within the California study population previously analyzed in Crespi et al. (2016) and Kheifets et al. (2017). The authors in Nguyen et al. (2022) noted that while the association between childhood leukemia and magnetic-field exposure was “slightly attenuated” after adjusting for nursery proximity or when restricting to subjects living > 300 meters from nurseries, their results “do not support plant nurseries as an explanation for observed childhood leukemia risks.” The authors further noted that close residential proximity to nurseries may be an independent risk factor for childhood leukemia.
- Zagar et al. (2023) examined the relationship between magnetic fields and childhood cancers, including childhood leukemia, in Slovenia. Cancer cases, including 194 cases of leukemia, were identified from the Slovenian Cancer Registry; cases were then classified into one of five calculated magnetic-field exposure levels (ranging from < 0.1  $\mu$ T to  $\geq$  0.4  $\mu$ T) based on residential distance to high-voltage (e.g., 110-kV, 220-kV, and 400-kV) power lines. The authors reported that less than 1% of Slovenian children and adolescents lived in an area near high-voltage power lines. No differences in the development of childhood cancers, including leukemia, brain tumors, or all cancers combined, were reported across the five exposure categories.

Epidemiologic studies of EMF and neurodegenerative diseases published during the above referenced period include:

- Seelen et al. (2014) conducted a population-based case-control study in the Netherlands and included 1,139 cases diagnosed with amyotrophic lateral sclerosis (“ALS”) between 2006 and 2013 and 2,864 frequency-matched controls. The shortest distance from the case and control residences to the nearest high-voltage power line (50 kV to 380 kV) was determined by geocoding. No statistically significant associations between residential proximity to power lines with voltages of either 50 to 150 kV or 220 to 380 kV and ALS were reported.
- Sorahan and Mohammed (2014) analyzed mortality from neurodegenerative diseases in a cohort of approximately 73,000 electricity supply workers in the United Kingdom. Cumulative occupational exposure to magnetic-fields was calculated for each worker in the cohort based on their job titles and job locations. Death certificates were used to identify deaths from neurodegenerative diseases. No associations or trends for any of the included neurodegenerative diseases (Alzheimer’s disease, Parkinson’s disease, and ALS) were observed with various measures of calculated magnetic fields.



- Koeman et al. (2015, 2017) analyzed data from the Netherlands Cohort Study of approximately 120,000 men and women who were enrolled in the cohort in 1986 and followed up until 2003. Lifetime occupational history, obtained through questionnaires, and job-exposure matrices on ELF magnetic fields and other occupational exposures were used to assign exposure to study subjects. Based on 1,552 deaths from vascular dementia, the researchers reported a statistically not significant association of vascular dementia with estimated exposure to metals, chlorinated solvents, and ELF magnetic fields. However, because no exposure-response relationship for cumulative exposure was observed and because magnetic fields and solvent exposures were highly correlated with exposure to metals, the authors attributed the association with ELF magnetic fields and solvents to confounding by exposure to metals (Koeman et al., 2015). Based on a total of 136 deaths from ALS among the cohort members, the authors reported a statistically significant, approximately two-fold association with ELF magnetic fields in the highest exposure category. This association, however, was no longer statistically significant when adjusted for exposure to insecticides (Koeman et al., 2017).
- Fischer et al. (2015) conducted a population-based case-control study that included 4,709 cases of ALS diagnosed between 1990 and 2010 in Sweden and 23,335 controls matched to cases on year of birth and sex. The study subjects' occupational exposures to ELF magnetic fields and electric shocks were classified based on their occupations, as recorded in the censuses and corresponding job-exposure matrices. Overall, neither magnetic fields nor electric shocks were related to ALS.
- Vergara et al. (2015) conducted a mortality case-control study of occupational exposure to electric shock and magnetic fields and ALS. They analyzed data on 5,886 deaths due to ALS and over 58,000 deaths from other causes in the United States between 1991 and 1999. Information on occupation was obtained from death certificates and job-exposure matrices were used to categorize exposure to electric shocks and magnetic fields. Occupations classified as "electric occupations" were moderately associated with ALS. The authors reported no consistent associations for ALS, however, with either electric shocks or magnetic fields, and they concluded that their findings did not support the hypothesis that exposure to either electric shocks or magnetic fields explained the observed association of ALS with "electric occupations."
- Pedersen et al. (2017) investigated the occurrence of central nervous system diseases among approximately 32,000 male Danish electric power company workers. Cases were identified through the national patient registry between 1982 and 2010. Exposure to ELF magnetic fields was determined for each worker based on their job titles and area of work. A statistically significant increase was reported for dementia in the high exposure category when compared to the general population, but no exposure-response pattern was identified, and no similar increase was reported in the internal comparisons among the workers. No other statistically significant increases among workers

were reported for the incidence of Alzheimer's disease, Parkinson's disease, motor neuron disease, multiple sclerosis, or epilepsy, when compared to the general population, or when incidence among workers was analyzed across estimated exposure levels.

- Vinceti et al. (2017) examined the association between ALS and calculated magnetic-field levels from high-voltage power lines in Italy. The authors included 703 ALS cases and 2,737 controls; exposure was assessed based on residential proximity to high-voltage power lines. No statistically significant associations were reported and no exposure-response trend was observed. Similar results were reported in subgroup analyses by age, calendar period of disease diagnosis, and study area.
- Checkoway et al. (2018) investigated the association between Parkinsonism<sup>11</sup> and occupational exposure to magnetic fields and several other agents (endotoxins, solvents, shift work) among 800 female textile workers in Shanghai. Exposure to magnetic fields was assessed based on the participants' work histories. The authors reported no statistically significant associations between Parkinsonism and occupational exposure to any of the agents under study, including magnetic fields.
- Gunnarsson and Bodin (2018) conducted a meta-analysis of occupational risk factors for ALS. The authors reported a statistically significant association between occupational exposures to EMF, estimated using a job-exposure matrix, and ALS among the 11 studies included. Statistically significant associations were also reported between ALS and jobs that involve working with electricity, heavy physical work, exposure to metals (including lead) and chemicals (including pesticides), and working as a nurse or physician. The authors reported some evidence for publication bias. In a subsequent publication, Gunnarsson and Bodin (2019) updated their previous meta-analysis to also include Parkinson's disease and Alzheimer's disease. A slight, statistically significant association was reported between occupational exposure to EMF and Alzheimer's disease; no association was observed for Parkinson's disease.
- Huss et al. (2018) conducted a meta-analysis of 20 epidemiologic studies of ALS and occupational exposure to magnetic fields. The authors reported a weak overall association; a slightly stronger association was observed in a subset analysis of six studies with full occupational histories available. The authors noted substantial heterogeneity among studies, evidence for publication bias, and a lack of a clear exposure-response relationship between exposure and ALS.

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<sup>11</sup> Parkinsonism is defined by Checkoway et al. (2018) as "a syndrome whose cardinal clinical features are bradykinesia, rest tremor, muscle rigidity, and postural instability. Parkinson disease is the most common neurodegenerative form of [parkinsonism]" (p. 887).

- Jalilian et al. (2018) conducted a meta-analysis of 20 epidemiologic studies of occupational exposure to magnetic fields and Alzheimer's disease. The authors reported a moderate, statistically significant overall association; however, they noted substantial heterogeneity among studies and evidence for publication bias.
- Rööslä and Jalilian (2018) performed a meta-analysis using data from five epidemiologic studies examining residential exposure to magnetic fields and ALS. A statistically non-significant negative association was reported between ALS and the highest exposed group, where exposure was defined based on distance from power lines or calculated magnetic-field level.
- Gervasi et al. (2019) assessed the relationship between residential distance to overhead power lines in Italy and risk of Alzheimer's dementia and Parkinson's disease. The authors included 9,835 cases of Alzheimer's dementia and 6,810 cases of Parkinson's disease; controls were matched by sex, year of birth, and municipality of residence. A weak, statistically non-significant association was observed between residences within 50 meters of overhead power lines and both Alzheimer's dementia and Parkinson's disease, compared to distances of over 600 meters.
- Peters et al. (2019) examined the relationship between ALS and occupational exposure to both magnetic fields and electric shock in a pooled study of data from three European countries. The study included 1,323 ALS cases and 2,704 controls matched for sex, age, and geographic location; exposure was assessed based on occupational title and defined as low (background), medium, or high. Statistically significant associations were observed between ALS and ever having been exposed above background levels to either magnetic fields or electric shocks; however, no clear exposure-response trends were observed with exposure duration or cumulative exposure. The authors also noted significant heterogeneity in risk by study location.
- Filippini et al. (2020) investigated the associations between ALS and several environmental and occupational exposures, including electromagnetic fields, within a case-control study in Italy. The study included 95 cases and 135 controls matched on age, gender, and residential province; exposure to electromagnetic fields was assessed using the participants' responses to questions related to occupational use of electric and electronic equipment, occupational EMF exposure, and residential distance to overhead power lines. The authors reported a statistically significant association between ALS and residential proximity to overhead power lines and a statistically non-significant association between ALS and occupational exposure to EMF; occupational use of electric and electronic equipment was associated with a statistically nonsignificant decrease in ALS development.
- Huang et al. (2020) conducted a meta-analysis of 43 epidemiologic studies examining potential occupational risk factors for dementia or mild cognitive



impairment. The authors included five cohort studies and seven case-control studies related to magnetic-field exposure. For both study types, the authors reported positive associations between dementia and work-related magnetic field exposures. The paper, however, provided no information on the occupations held by the study participants, their magnetic-field exposure levels, or how magnetic-field levels were assessed; therefore, the results are difficult to interpret. The authors also reported a high level of heterogeneity among studies. Thus, this analysis adds little, if any, to the overall weight of evidence on a potential association between dementia and magnetic fields.

- Jalilian et al. (2020) conducted a meta-analysis of ALS and occupational exposure to both magnetic fields and electric shocks within 27 studies from Europe, the United States, and New Zealand. A weak, statistically significant association was reported between magnetic-field exposure and ALS; however, the authors noted evidence of study heterogeneity and publication bias. No association was observed between ALS and electric shocks.
- Chen et al. (2021) conducted a case-control study to examine the association between occupational exposure to electric shocks, magnetic fields, and motor neuron disease (“MND”) in New Zealand. The study included 319 cases with a MND diagnosis (including ALS) and 604 controls, matched on age and gender; exposure was assessed using the participants’ occupational history questionnaire responses and previously developed job-exposure matrices for electric shocks and magnetic fields. The authors reported no associations between MND and exposure to magnetic fields; positive associations were reported between MND and working at a job with the potential for electric shock exposure.
- Grebeneva et al. (2021) evaluated disease rates among electric power company workers in the Republic of Kazakhstan. The authors included three groups of “exposed” workers who “were in contact with equipment generating [industrial frequency EMF]” (a total of 161 workers), as well as 114 controls “who were not associated with exposure to electromagnetic fields.” Disease rates were assessed “based on analyzing the sick leaves of employees” from 2010 to 2014 and expressed as “incidence rate per 100 employees.” The authors reported a higher “incidence rate” of “diseases of the nervous system” in two of the exposed categories compared to the non-exposed group. No meaningful conclusions from the study could be drawn, however, because no specific diagnoses within “*diseases of the nervous system*” were identified in the paper and no clear description was provided on how the authors defined and calculated “incidence rate” for the evaluated conditions. In addition, no measured or calculated magnetic-field levels were presented by the authors.
- Filippini et al. (2021) conducted a meta-analysis to assess the dose-response relationship between residential exposure to magnetic fields and ALS. The authors identified six ALS epidemiologic studies, published between 2009 and 2020, that assessed exposure to residential magnetic fields by either distance

from overhead power lines or magnetic-field modeling. They reported a decrease in risk of ALS in the highest exposure categories for both distance-based and modeling-based exposure estimates. The authors also reported that their dose-response analyses “showed little association between distance from power lines and ALS”; the data were too sparse to conduct a dose-response analysis for modeled magnetic-field estimates. The authors noted that their study was limited by small sample size, “imprecise” exposure categories, the potential for residual confounding, and by “some publication bias.”

- Jalilian et al. (2021) conducted a meta-analysis of occupational exposure to ELF magnetic fields and electric shocks and development of ALS. The authors included 27 studies from Europe, the United States, and New Zealand that were published between 1983 and 2019. A weak, statistically significant association was reported between magnetic-field exposure and ALS, and no association was observed between electric shocks and ALS. Indications of publication bias and “moderate to high” heterogeneity were identified for the studies of magnetic-field exposure and ALS, and the authors noted that “the results should be interpreted with caution.”
- Sorahan and Nichols (2022) investigated magnetic-field exposures and mortality from MND in a large cohort of employees of the former Central Electricity Generating Board of England and Wales. The study included nearly 38,000 employees first hired between 1942 and 1982 and still employed in 1987. Estimates of exposure magnitude, frequency, and duration were calculated using data from the power stations and the employees’ job histories, and were described in detail in a previous publication (Renew et al., 2003). Mortality from MND in the total cohort was observed to be similar to national rates. No statistically significant dose-response trends were observed with lifetime, recent, or distant magnetic-field exposure; statistically significant associations were observed for some categories of recent exposure, but not for the highest exposure category.
- Vasta et al. (2023) examined the relationship between residential distance to power lines and ALS development in a cohort study of 1,098 participants in Italy. The authors reported no differences in the age of ALS onset or ALS progression rate between low-exposed and high-exposed participants based on residential distance to power lines at the time of the participants’ diagnosis. Similarly, no differences were observed when exposure was based on residential distance to repeater antennas.

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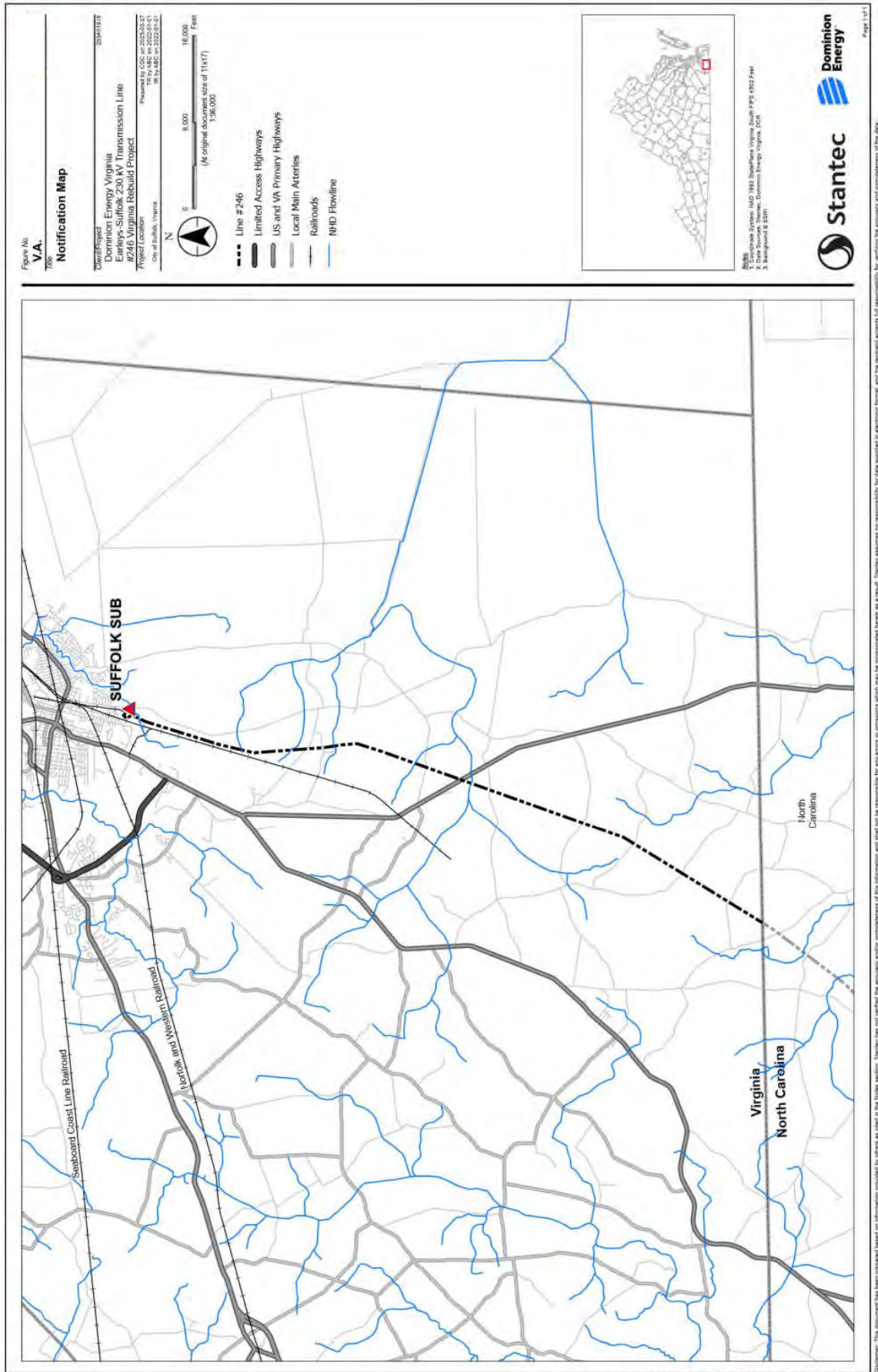
## V. NOTICE

- A. Furnish a proposed route description to be used for public notice purposes. Provide a map of suitable scale showing the route of the proposed project. For all routes that the Applicant proposed to be noticed, provide minimum, maximum and average structure heights.**

Response: A map showing the existing route to be used for the Virginia Rebuild Project is provided as Attachment V.A. A written description of the route is as follows:

The proposed route for the Virginia Rebuild Project is located within an existing 11.9-mile right-of-way corridor currently occupied by existing 230 kV transmission Line #246. The existing transmission right-of-way for the proposed route originates at the Company's existing Suffolk Substation in the City of Suffolk and heads south for approximately four miles while sharing the right-of-way with Line #247 and then heads southwesterly for approximately 7.9 miles to reach Structure #246/94 at the Virginia state line. The entire Virginia Rebuild Project is located within the City of Suffolk. The Virginia Rebuild Project crosses one major road (Carolina Road, Route 32) and nine smaller roads.

For the proposed Virginia Rebuild Project, the minimum structure height is approximately 48.5 feet, the maximum structure height is approximately 110 feet, and the average structure height is approximately 75 feet, based on preliminary conceptual design, inclusive of a foundation reveal, and subject to change based on final engineering design.



**V. NOTICE**

- B. List Applicant offices where members of the public may inspect the application. If applicable, provide a link to website(s) where the application may be found.**

Response: The application will be made available electronically for public inspection at the following website: <https://www.dominionenergy.com/projects-and-facilities/electric-projects/power-line-projects/earleys-tunis-suffolk>.



## V. NOTICE

- C. List all federal, state, and local agencies and/or officials that may reasonably be expected to have an interest in the proposed construction and to whom the Applicant has furnished or will furnish a copy of the application.**

Response : The following agency representatives may reasonably be expected to have an interest in the proposed Virginia Rebuild Project. Instead of furnishing a copy of the Application to these parties, the Company has sent a letter noting the availability of the Application for the proposed Virginia Rebuild Project on the Company's website.<sup>12</sup>

Ms. Bettina Rayfield  
Manager, Environmental Impact Review and Long Range Priorities  
Office of Environmental Impact Review  
Department of Environmental Quality, Central Office  
PO Box 1105  
Richmond, Virginia 23218

Ms. Michelle Henicheck  
Office of Wetlands and Streams  
Department of Environmental Quality  
1111 East Main Street, Suite 1400  
Richmond, Virginia 23219

Ms. Rene Hypes  
Virginia Department of Conservation and Recreation  
Division of Natural Heritage  
600 East Main Street, 24th Floor  
Richmond, Virginia 23219

Environmental Reviewer  
Virginia Department of Conservation and Recreation  
Planning & Recreation Bureau  
600 East Main Street, 17th Floor  
Richmond, Virginia 23219

Ms. Amy Martin  
Environmental Services Biologist Manager  
Virginia Department of Wildlife Resources  
P.O. Box 90778  
Henrico, Virginia 23228

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<sup>12</sup> The Virginia Department of Conservation and Recreation ("DCR") asked to be removed from the Company's post-filing mailing list. Accordingly, DCR will not receive post-filing mailings.

Mr. Keith Tignor  
Endangered Plant and Insect Species Program  
Virginia Department of Agriculture and Consumer Affairs  
102 Governor Street  
Richmond, Virginia 23219

Clint Folks  
Virginia Department of Forestry  
Forestland Conservation Division  
900 Natural Resources Drive, Suite 800  
Charlottesville, Virginia 22903

Mr. Roger Kirchen  
Director, Review and Compliance Division  
Department of Historic Resources  
2801 Kensington Avenue  
Richmond, Virginia 23221

Scoping at VMRC  
Virginia Marine Resources Commission  
Habitat Management Division  
Building 96, 380 Fenwick Road  
Ft. Monroe, Virginia 23651

Mr. Troy Andersen  
US Fish and Wildlife Service  
Ecological Services Virginia Field Office  
6669 Short Lane  
Gloucester, Virginia 23061

Mr. Keith Goodwin  
U.S. Army Corps of Engineers  
Norfolk District, Southern Section  
9100 Arboretum Parkway, Suite 235  
Richmond, VA 23236

Ms. Martha Little  
Virginia Outdoors Foundation  
P.O. Box 85073, PMB 38979  
Richmond, Virginia 23285-5073

Ms. Arlene Fields Warren  
Office of Drinking Water  
Virginia Department of Health  
109 Governor Street  
Richmond, VA 23219

Mr. Scott Denny  
Airport Services Division  
Virginia Department of Aviation  
5702 Gulfstream Road  
Richmond, Virginia 23250

Christopher G. Hall  
District Engineer  
Virginia Department of Transportation  
7511 Burbage Drive  
Suffolk, VA 23435

Paul Matticks  
Franklin Residency  
23116 Meherrin Road  
Courtland, Virginia 23837

Mr. Michael Duman  
Mayor, City of Suffolk  
P.O. Box 1858  
Suffolk, VA 23439

Mr. LeOtis Williams  
Whaleyville City Council Representative  
P.O. Box 1858  
Suffolk, VA 23439

Mr. Kevin Wyne  
Director of Community Development  
442 W Washington Street  
Suffolk, Virginia 23434

Suffolk Executive Airport  
12000 Gene Bolton Drive  
Suffolk, Virginia 23434

Mr. Albert S. Moore II  
City Manager, City of Suffolk  
441 Market Street  
Suffolk, Virginia 23434

## V. NOTICE

- D. If the application is for a transmission line with a voltage of 138 kV or greater, provide a statement and any associated correspondence indicating that prior to the filing of the application with the SCC the Applicant has notified the chief administrative officer of every locality in which it plans to undertake construction of the proposed line of its intention to file such an application, and that the Applicant gave the locality a reasonable opportunity for consultation about the proposed line (similar to the requirements of § 15.2-2202 of the Code for electric transmission lines of 150 kV or more).**

Response: In accordance with Va. Code § 15.2-2202 E, letters dated September 11, 2023, were sent to: (1) Mr. Albert Moore II, City Manager, City of Suffolk; (2) Mr. Michael Duman, Mayor, City of Suffolk; and (3) Mr. LeOtis Williams, City Council Member, Whaleyville District City Council Representative. The letters provided notice of the Company's intent to file this Application and invited the addressees to consult with the Company about the proposed Virginia Rebuild Project. These letters are included as Attachment V.D.



Dominion Energy Services, Inc.  
5000 Dominion Boulevard, 3<sup>rd</sup> Floor  
Glen Allen, VA 23060  
DominionEnergy.com



September 11, 2023

**BY EMAIL**

Mr. Albert S. Moore II  
City Manager, City of Suffolk  
441 Market Street  
Suffolk, Virginia 23434

**RE: Dominion Energy Virginia's proposed Earleys-Suffolk 230 kV Line #246 Virginia  
Rebuild Project  
Notice Pursuant to Va. Code § 15.2-2202**

Dear Mr. Moore,

Dominion Energy Virginia (the "Company") is proposing to rebuild approximately 11.9 miles of 230 kV Line #246 on single-circuit weathering steel structures between structure #246/1C within the Company's existing Suffolk Substation and #246/94 at the Virginia State line, located in the City of Suffolk, Virginia (the "Rebuild Project"). Other minor work within the Suffolk Substation will include upgrading circuit-breaker and line leads and installing a new substation dead-end structure.

The Rebuild Project, which will replace aging infrastructure at the end of its service life, is needed to maintain reliable service for the overall load growth in the area, and to comply with mandatory North American Electric Reliability Corporation ("NERC") Reliability Standards. The Company proposes to locate the Rebuild Project entirely within the existing Line #246 right-of-way or on Company-owned property. No additional right-of-way is necessary, as shown on the attached map. The Company is preparing to file an application for a Certificate of Public Convenience and Necessity ("CPCN") with the Virginia State Corporation Commission ("SCC"). Pursuant to Va. Code § 15.2-2202, the Company is writing to notify you of the proposed Rebuild Project in advance of this SCC filing. We respectfully request that you submit any comments or additional information you feel would have bearing on the Rebuild Project within 30 days of the date of this letter. Once filed, the application will be available for review on the Company's website at <https://www.dominionenergy.com/projects-and-facilities/electric-projects/power-line-projects/earleys-tunis-suffolk>.

Enclosed is a Project Overview Map and associated GIS shapefile depicting the proposed Rebuild Project, as well as its general location. Please note that the Project Overview Map and route description depicted therein are preliminary in nature and subject to final engineering. If you have any questions, please do not hesitate to contact me directly at 804-298-5646 or [Hannah.Hurst@dominionenergy.com](mailto:Hannah.Hurst@dominionenergy.com).

Dominion Energy Services, Inc.  
5000 Dominion Boulevard, 3<sup>rd</sup> Floor  
Glen Allen, VA 23060  
DominionEnergy.com



We appreciate your assistance with this project review and look forward to any additional information you may have to offer.

Regards,

A handwritten signature in black ink that reads "Elizabeth Hurst". The signature is written in a cursive, flowing style.

Hannah Hurst  
Siting and Permitting Specialist

Dominion Energy Services, Inc.  
5000 Dominion Boulevard, 3<sup>rd</sup> Floor  
Glen Allen, VA 23060  
DominionEnergy.com



September 11, 2023

**BY EMAIL**

Mr. Leotis Williams  
City Council Member, Whaleyville District  
P.O. Box 1858  
Suffolk, Virginia 23434

**RE: Dominion Energy Virginia's proposed Earleys-Suffolk 230 kV Line #246 Virginia  
Rebuild Project  
Notice Pursuant to Va. Code § 15.2-2202**

Dear Mr. Williams,

Dominion Energy Virginia (the "Company") is proposing to rebuild approximately 11.9 miles of 230 kV Line #246 on single-circuit weathering steel structures between structure #246/1C within the Company's existing Suffolk Substation and #246/94 at the Virginia State line, located in the City of Suffolk, Virginia (the "Rebuild Project"). Other minor work within the Suffolk Substation will include upgrading circuit-breaker and line leads and installing a new substation dead-end structure.

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Enclosed is a Project Overview Map and associated GIS shapefile depicting the proposed Rebuild Project, as well as its general location. Please note that the Project Overview Map and route description depicted therein are preliminary in nature and subject to final engineering. Please email comments to Hannah Hurst at [Hannah.hurst@dominionenergy.com](mailto:Hannah.hurst@dominionenergy.com). If you have any questions or need additional information, please email the same address or call (804) 298-5646.

Dominion Energy Services, Inc.  
5000 Dominion Boulevard, 3<sup>rd</sup> Floor  
Glen Allen, VA 23060  
DominionEnergy.com



We appreciate your assistance with this project review and look forward to any additional information you may have to offer.

Regards,

A handwritten signature in black ink that reads 'Elizabeth Hurst'.

Hannah Hurst  
Siting and Permitting Specialist



Dominion Energy Services, Inc.  
5000 Dominion Boulevard, 3<sup>rd</sup> Floor  
Glen Allen, VA 23060  
DominionEnergy.com



September 11, 2023

**BY EMAIL**

Mr. Michael Duman  
Mayor, City of Suffolk  
P.O. Box 1858  
Suffolk, Virginia 23439

**RE: Dominion Energy Virginia's proposed Earleys-Suffolk 230 kV Line #246 Virginia  
Rebuild Project  
Notice Pursuant to Va. Code § 15.2-2202**

Dear Mr. Duman,

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The Rebuild Project, which will replace aging infrastructure at the end of its service life, is needed to maintain reliable service for the overall load growth in the area, and to comply with mandatory North American Electric Reliability Corporation ("NERC") Reliability Standards. The Company proposes to locate the Rebuild Project entirely within the existing Line #246 right-of-way or on Company-owned property. No additional right-of-way is necessary, as shown on the attached map. The Company is preparing to file an application for a Certificate of Public Convenience and Necessity ("CPCN") with the Virginia State Corporation Commission ("SCC"). Pursuant to Va. Code § 15.2-2202, the Company is writing to notify you of the proposed Rebuild Project in advance of this SCC filing. We respectfully request that you submit any comments or additional information you feel would have bearing on the Rebuild Project within 30 days of the date of this letter. Once filed, the application will be available for review on the Company's website at <https://www.dominionenergy.com/projects-and-facilities/electric-projects/power-line-projects/earleys-tunis-suffolk>.

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Glen Allen, VA 23060  
DominionEnergy.com



We appreciate your assistance with this project review and look forward to any additional information you may have to offer.

Regards,

A handwritten signature in black ink that reads "Elizabeth Hurst".

Hannah Hurst  
Siting and Permitting Specialist

COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

APPLICATION OF	)	
	)	
VIRGINIA ELECTRIC AND POWER	)	Case No. PUR-2023-00203
COMPANY	)	
	)	
For approval and certification of electric	)	
transmission facilities: Suffolk – Structure	)	
#246/94 230 kV Transmission Line #246	)	
Virginia Rebuild Project	)	

**IDENTIFICATION, SUMMARIES AND TESTIMONY OF DIRECT WITNESSES OF  
VIRGINIA ELECTRIC AND POWER COMPANY**

**Jason Whitlow**

Witness Direct Testimony Summary  
Direct Testimony  
Appendix A: Background and Qualifications

**Wesley Strunk**

Witness Direct Testimony Summary  
Direct Testimony  
Appendix A: Background and Qualifications

**George Brimmer**

Witness Direct Testimony Summary  
Direct Testimony  
Appendix A: Background and Qualifications

**Hannah Hurst**

Witness Direct Testimony Summary  
Direct Testimony  
Appendix A: Background and Qualifications

## **WITNESS DIRECT TESTIMONY SUMMARY**

**Witness:** Jason Whitlow

**Title:** Engineer III – Electric Transmission Planning

**Summary:**

Company Witness Jason Whitlow sponsors those sections of the Appendix describing the Company's electric transmission system and the need for, and benefits of, the proposed Virginia Rebuild Project, as follows:

- Section I.B: This section details the engineering justifications for the proposed Virginia Rebuild Project.
- Section I.C: This section describes the present system and details how the proposed VA-NC Rebuild Project will effectively satisfy present and projected future load demand requirements.
- Section I.D: Although not applicable to the Virginia Rebuild Project, this section describes critical contingencies and associated violations due to the inadequacy of the existing system.
- Section I.E: This section explains feasible project alternatives.
- Section I.G: This section provides a system map for the affected area.
- Section I.H: This section provides the desired in-service date of the proposed Virginia Rebuild Project and the estimated construction time.
- Section I.J: This section provides information about the project if approved by the RTO.
- Section I.K: Although not applicable to the proposed Virginia Rebuild Project, this section provides outage history and maintenance history for existing transmission lines if the proposed project is a rebuild and is due in part to reliability issues.
- Section I.M: Although not applicable to the proposed Virginia Rebuild Project, this section contains information for transmission lines interconnecting a non-utility generator.
- Section I.N: Although not applicable to the proposed Virginia Rebuild Project, this section provides the proposed and existing generating sources, distribution circuits or load centers planned to be served by all new substations, switching stations, and other ground facilities associated with the proposed project.
- Section II.A.10: This section provides details of the construction plans for the proposed Virginia Rebuild Project, including requested and approved line outage schedules.

Additionally, Mr. Whitlow co-sponsors the following portions of the Appendix:

- Executive Summary (co-sponsored with Company Witnesses Wesley Strunk, Hannah Hurst, and George Brimmer): The Executive Summary provides a brief summary of the Virginia Rebuild Project.
- Section I.A (co-sponsored with Company Witness Wesley Strunk): This section details the primary justifications for the proposed Virginia Rebuild Project.
- Section I.F (co-sponsored with Company Witness Wesley Strunk): This section describes any lines or facilities that will be removed, replaced or taken out of service upon completion of the proposed Virginia Rebuild Project and normal and emergency ratings of the facilities.



- Section II.A.3 (co-sponsored with Company Witness Hannah Hurst): This section provides color maps of existing or proposed rights-of-way in the vicinity of the proposed Virginia Rebuild Project.

A statement of Mr. Whitlow's background and qualifications is attached to his testimony as Appendix A.

**DIRECT TESTIMONY  
OF  
JASON WHITLOW  
ON BEHALF OF  
VIRGINIA ELECTRIC AND POWER COMPANY  
BEFORE THE  
VIRGINIA STATE CORPORATION COMMISSION  
CASE NO. PUR-2023-00203**

1   **Q.     Please state your name, business address and position with Virginia Electric and**  
2       **Power Company (“Dominion Energy Virginia” or the “Company”).**

3   A.    My name is Jason Whitlow, and I am an Engineer III in the Electric Transmission Planning  
4        Department of the Company. My business address is 5000 Dominion Boulevard, Glen  
5        Allen, Virginia 23060. A statement of my qualifications and background is provided as  
6        Appendix A.

7   **Q.     Please describe your areas of responsibility with the Company.**

8   A.    I am responsible for planning the Company’s electric transmission system for voltages  
9        of 69 kilovolts (“kV”) through 500 kV.

10   **Q.    What is the purpose of your testimony in this proceeding?**

11   A.    In order to maintain the structural integrity and reliability of the Company’s transmission  
12        systems in compliance with the Company’s mandatory electric transmission planning  
13        criteria (“Planning Criteria”)<sup>1</sup> and consistent with sound engineering judgment, the  
14        Company proposes to (i) rebuild, entirely within existing right-of-way or on Company-  
15        owned property, approximately 11.9 miles of the existing 230 kV Line #246 on single

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<sup>1</sup> The Company’s Transmission Planning Criteria (effective April 1, 2023) can be found in Attachment 1 of the Company’s Facility Interconnection Requirements (“FIR”) document, which is available online at <https://cdn-dominionenergy-prd-001.azureedge.net/-/media/pdfs/virginia/parallel-generation/facility-connection-requirements.pdf?la=en&rev=f280781e90cf47f69ea526c944c9c347&hash=82DD2567D0B033C47536134B8C4D5C5E>.

1 circuit wood structures, which runs from Structure #246/1C within the Company's existing  
2 Suffolk Substation to Structure #246/94 at the Virginia state line, and is located entirely  
3 within the City of Suffolk, Virginia; and (ii) perform minor work at the existing Suffolk  
4 Substation, including upgrading circuit-breaker and line leads to 4000A and installing a  
5 new substation dead-end structure (collectively, the "Virginia Rebuild Project").<sup>2</sup>

6 The purpose of my testimony is to describe the Company's electric transmission system  
7 and the need for, and benefits of, the proposed Rebuild Project. I am sponsoring Sections  
8 I.B, I.C, I.D, I.E, I.G, I.H, I.J, I.K, I.M, I.N, and II.A.10 of the Appendix. Additionally, I  
9 also co-sponsor Sections I.A and I.F of the Appendix with Company Witness Wesley  
10 Strunk, and Section II.A.3 with Company Witness Hannah Hurst. Lastly, I co-sponsor the  
11 Executive Summary with Company Witnesses Wesley Strunk, Hannah Hurst, and George  
12 Brimmer.

13 **Q. Does this conclude your testimony?**

14 **A.** Yes, it does.

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<sup>2</sup> With this Application, the Company is seeking a certificate of public convenience and necessity ("CPCN" or "Certificate") from the Virginia State Corporation Commission ("Commission") for the rebuild of 11.9 miles of Line #246 located between the Suffolk Substation and the Virginia state line (*i.e.* from Structure #246/1C through Structure #246/94), which are entirely within the City of Suffolk, Virginia. The remaining approximately 32.4 miles of Line #246 that will be rebuilt is located entirely within North Carolina, extending from the Virginia state line, through the Company's existing Tunis and Ahoskie Substations, and concluding at the Company's existing Earleys Substation (the "North Carolina Rebuild Project") (together, the Virginia Rebuild Project and North Carolina Rebuild Project are referred to herein as the "VA-NC Rebuild Project"). The Company is not seeking approval of the North Carolina Rebuild Project herein or from the North Carolina Utilities Commission ("NCUC"). Pursuant to NCGS § 62-101(a), a certificate is required from the NCUC "to construct a new transmission line," not to rebuild an existing line. Further, NCGS § 62-101(c)(2) specifically provides that "[a] certificate is not required for construction of the following lines:... [t]he replacement or expansion of an existing line with a similar line in substantially the same location, or the rebuilding, upgrading, modifying, modernizing, or reconstructing of an existing line for the purpose of increasing capacity or widening an existing right-of-way[.]" Accordingly, because the North Carolina Rebuild Project proposes to rebuild existing Line #246 with a similar line in substantially the same location, NCUC approval of the North Carolina Rebuild Project is not required. To the extent that responses are provided within this Appendix, they should be viewed as applicable only to the Virginia Rebuild Project, and not the North Carolina Rebuild Project or the VA-NC Rebuild Project, unless so specifically stated. Any such information related specifically to the North Carolina Rebuild Project or the VA-NC Rebuild Project should be viewed as informational only, and should not be considered as applicable for the approval being sought in this Application for a CPCN for the Virginia Rebuild Project.

**BACKGROUND AND QUALIFICATIONS  
OF  
JASON WHITLOW**

Jason Whitlow received a B.S. in Mechanical Engineering from Virginia Tech in 2007. Mr. Whitlow has been employed by the Company since 2013, where he has worked in both natural gas and electric transmission planning. Prior to joining the Company, he worked as a Project Manager for The Whiting-Turner Contracting Company.

Jason Whitlow has not previously testified before the Virginia State Corporation Commission.



## **WITNESS DIRECT TESTIMONY SUMMARY**

**Witness:** Wesley Strunk

**Title:** Transmission Line Design Engineer

**Summary:**

Company Witness Wesley Strunk will sponsor those portions of the Appendix providing an overview of the design characteristics of the transmission facilities for the proposed Virginia Rebuild Project, and discussing electric and magnetic field levels, as follows:

- Section I.L: This section provides photographs illustrating the deterioration of structures and associated equipment as applicable.
- Section II.A.5: This section provides drawings of the right-of-way cross section showing typical transmission lines structure placements.
- Section II.B.1 to II.B.3: These sections provide the line design and operational features of the proposed Virginia Rebuild Project.
- Section IV: This section provides analysis on the health aspects of electric and magnetic field levels.

Additionally, Mr. Strunk co-sponsors the following portions of the Appendix:

- Executive Summary (co-sponsored with Company Witnesses Jason Whitlow, Hannah Hurst, and George Brimmer): The Executive Summary provides a brief summary of the Virginia Rebuild Project.
- Section I.A (co-sponsored with Company Witness Jason Whitlow): This section details the primary justifications for the proposed Virginia Rebuild Project.
- Section I.F (co-sponsored with Company Witness Jason Whitlow): This section describes any lines or facilities that will be removed, replaced or taken out of service upon completion of the proposed Virginia Rebuild Project and normal and emergency ratings of the facilities.
- Section I.I (co-sponsored with Company Witness George Brimmer): This section provides the estimated total cost of the proposed Virginia Rebuild Project.
- Section II.B.5 (co-sponsored with Company Witness Hannah Hurst): This section provides the mapping and structure heights for the existing and proposed overhead structures.

A statement of Mr. Strunk's background and qualifications is attached to his testimony as Appendix A.

**DIRECT TESTIMONY  
OF  
WESLEY STRUNK  
ON BEHALF OF  
VIRGINIA ELECTRIC AND POWER COMPANY  
BEFORE THE  
VIRGINIA STATE CORPORATION COMMISSION  
CASE NO. PUR-2023-00203**

1   **Q.     Please state your name, business address and position with Virginia Electric and**  
2       **Power Company (“Dominion Energy Virginia” or the “Company”).**

3   A.    My name is Wesley Strunk, and I am a Transmission Line Design Engineer at the  
4        Company. As an external contractor to Dominion, I provide engineering services to the  
5        Electric Transmission Line Engineering Department of the Company. My business address  
6        is 5000 Dominion Boulevard, Glen Allen, Virginia 23060. A statement of my  
7        qualifications and background is provided as Appendix A.

8   **Q.     Please describe your areas of responsibility with the Company.**

9   A.    I am responsible for the estimating, conceptual and final design of high voltage  
10       transmission line projects from voltages of 69 kilovolts (“kV”) to 500 kV.

11   **Q.     What is the purpose of your testimony in this proceeding?**

12   A.    In order to maintain the structural integrity and reliability of the Company’s transmission  
13       systems in compliance with the Company’s mandatory electric transmission planning  
14       criteria (“Planning Criteria”)<sup>1</sup> and consistent with sound engineering judgment, the  
15       Company proposes to (i) rebuild, entirely within existing right-of-way or on Company-

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<sup>1</sup> The Company’s Transmission Planning Criteria (effective April 1, 2023) can be found in Attachment 1 of the Company’s Facility Interconnection Requirements (“FIR”) document, which is available online at <https://cdn-dominionenergy-prd-001.azureedge.net/-/media/pdfs/virginia/parallel-generation/facility-connection-requirements.pdf?la=en&rev=f280781e90cf47f69ea526c944c9c347&hash=82DD2567D0B033C47536134B8C4D5C5E>.

1 owned property, approximately 11.9 miles of the existing 230 kV Line #246 on single  
2 circuit wood structures, which runs from Structure #246/1C within the Company's existing  
3 Suffolk Substation to Structure #246/94 at the Virginia state line, and is located entirely  
4 within the City of Suffolk, Virginia; and (ii) perform minor work at the existing Suffolk  
5 Substation, including upgrading circuit-breaker and line leads to 4000A and installing a  
6 new substation dead-end structure (collectively, the "Virginia Rebuild Project").<sup>2</sup>

7 The purpose of my testimony is to describe the design characteristics of the transmission  
8 facilities for the proposed Virginia Rebuild Project, and also to discuss electric and  
9 magnetic field ("EMF") levels. I sponsor Sections I.L, II.A.5, II.B.1 to II.B.3, and IV of  
10 the Appendix. I also co-sponsor Section I.A and Section I.F of the Appendix with  
11 Company Witness Jason Whitlow; Section I.I of the Appendix with Company Witness  
12 George Brimmer; and Section II.B.5 with Company Witness Hannah Hurst. Lastly, I co-  
13 sponsor the Executive Summary with Company Witnesses Jason Whitlow, Hannah Hurst,  
14 and George Brimmer.

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<sup>2</sup> With this Application, the Company is seeking a certificate of public convenience and necessity ("CPCN" or "Certificate") from the Virginia State Corporation Commission ("Commission") for the rebuild of 11.9 miles of Line #246 located between the Suffolk Substation and the Virginia state line (*i.e.* from Structure #246/1C through Structure #246/94), which are entirely within the City of Suffolk, Virginia. The remaining approximately 32.4 miles of Line #246 that will be rebuilt is located entirely within North Carolina, extending from the Virginia state line, through the Company's existing Tunis and Ahoskie Substations, and concluding at the Company's existing Earleys Substation (the "North Carolina Rebuild Project") (together, the Virginia Rebuild Project and North Carolina Rebuild Project are referred to herein as the "VA-NC Rebuild Project"). The Company is not seeking approval of the North Carolina Rebuild Project herein or from the North Carolina Utilities Commission ("NCUC"). Pursuant to NCGS § 62-101(a), a certificate is required from the NCUC "to construct a new transmission line," not to rebuild an existing line. Further, NCGS § 62-101(c)(2) specifically provides that "[a] certificate is not required for construction of the following lines:... [t]he replacement or expansion of an existing line with a similar line in substantially the same location, or the rebuilding, upgrading, modifying, modernizing, or reconstructing of an existing line for the purpose of increasing capacity or widening an existing right-of-way[.]" Accordingly, because the North Carolina Rebuild Project proposes to rebuild existing Line #246 with a similar line in substantially the same location, NCUC approval of the North Carolina Rebuild Project is not required. To the extent that responses are provided within this Appendix, they should be viewed as applicable only to the Virginia Rebuild Project, and not the North Carolina Rebuild Project or the VA-NC Rebuild Project, unless so specifically stated. Any such information related specifically to the North Carolina Rebuild Project or the VA-NC Rebuild Project should be viewed as informational only, and should not be considered as applicable for the approval being sought in this Application for a CPCN for the Virginia Rebuild Project.

1    **Q.**     **Does this conclude your testimony?**

2    **A.**     Yes, it does.



**BACKGROUND AND QUALIFICATIONS  
OF  
WESLEY STRUNK**

Wesley Strunk received an undergraduate degree in Civil Engineering from the University of Kentucky in 2013. Mr. Strunk also received a masters degree in Business Administration from the University of Kentucky in 2014. Mr. Strunk has been employed by the Company as a contractor since 2021. Prior to joining the Company, he worked as a transmission line engineer and manager at Sargent & Lundy. His areas of expertise are overhead transmission line design and foundation design. He is an expert in drilled pier foundation design and transmission line design utilizing PLS-CADD to ensure clearances are maintained and structural analysis is adequate.

Wesley Strunk has not previously testified before the Virginia State Corporation Commission.

## **WITNESS DIRECT TESTIMONY SUMMARY**

**Witness:** George Brimmer

**Title:** Engineer III - Substation Conceptual

**Summary:**

Company Witness George Brimmer sponsors or co-sponsors the following portions of the Appendix describing the work to be performed at the existing substations for the Virginia Rebuild Project, as follows:

- Section I.I (co-sponsored with Company Witness Wesley Strunk): This section provides the estimated total cost of the proposed Virginia Rebuild Project.
- Section II.C: Although not applicable to the Virginia Rebuild Project, this section describes and furnishes a one-line diagram of new substation(s) associated with a proposed project.

Additionally, Mr. Brimmer co-sponsors the following portion of the Appendix:

- Executive Summary (co-sponsored with Company Witnesses Wesley Strunk, Jason Whitlow, and Hannah Hurst): The Executive Summary provides a brief summary of the Virginia Rebuild Project.

A statement of Mr. Brimmer background and qualifications is attached to his testimony as Appendix A.

**DIRECT TESTIMONY  
OF  
GEORGE BRIMMER  
ON BEHALF OF  
VIRGINIA ELECTRIC AND POWER COMPANY  
BEFORE THE  
VIRGINIA STATE CORPORATION COMMISSION  
CASE NO. PUR-2023-00203**

1   **Q.     Please state your name, business address and position with Virginia Electric and**  
2       **Power Company (“Dominion Energy Virginia” or the Company”).**

3   A.    My name is George Brimmer, and I am an Engineer III - Substation Conceptual. My business  
4        address is 5000 Dominion Boulevard, Glen Allen, Virginia 23060. A statement of my  
5        qualifications and background is provided as Appendix A.

6   **Q.     Please describe your areas of responsibility with the Company.**

7   A.    I am responsible for the evaluation of substation project requirements, feasibility  
8        studies, conceptual physical design, scope development, preliminary engineering and  
9        cost estimating for high voltage transmission and distribution substations.

10   **Q.    What is the purpose of your testimony in this proceeding?**

11   A.    In order to maintain the structural integrity and reliability of the Company’s transmission  
12        systems in compliance with the Company’s mandatory electric transmission planning  
13        criteria (“Planning Criteria”)<sup>1</sup> and consistent with sound engineering judgment, the  
14        Company proposes to (i) rebuild, entirely within existing right-of-way or on Company-  
15        owned property, approximately 11.9 miles of the existing 230 kV Line #246 on single

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<sup>1</sup> The Company’s Transmission Planning Criteria (effective April 1, 2023) can be found in Attachment 1 of the Company’s Facility Interconnection Requirements (“FIR”) document, which is available online at <https://cdn-dominionenergy-prd-001.azureedge.net/-/media/pdfs/virginia/parallel-generation/facility-connection-requirements.pdf?la=en&rev=f280781e90cf47f69ea526c944c9c347&hash=82DD2567D0B033C47536134B8C4D5C5E>.

1 circuit wood structures, which runs from Structure #246/1C within the Company's existing  
2 Suffolk Substation to Structure #246/94 at the Virginia state line, and is located entirely  
3 within the City of Suffolk, Virginia; and (ii) perform minor work at the existing Suffolk  
4 Substation, including upgrading circuit-breaker and line leads to 4000A and installing a  
5 new substation dead-end structure (collectively, the "Virginia Rebuild Project").<sup>2</sup>

6 The purpose of my testimony is to describe the work to be performed at the Suffolk  
7 Substation as a part of the proposed Virginia Rebuild Project. I sponsor Section II.C of the  
8 Appendix. Additionally, I co-sponsor Section I.I of the Appendix with Company Witness  
9 Wesley Strunk, specifically as it pertains to substation work. Lastly, I co-sponsor the  
10 Executive Summary with Company Witnesses Wesley Strunk, Jason Whitlow, and Hannah  
11 Hurst.

12 **Q. Does this conclude your testimony?**

13 **A.** Yes, it does.

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<sup>2</sup> With this Application, the Company is seeking a certificate of public convenience and necessity ("CPCN" or "Certificate") from the Virginia State Corporation Commission ("Commission") for the rebuild of 11.9 miles of Line #246 located between the Suffolk Substation and the Virginia state line (*i.e.* from Structure #246/1C through Structure #246/94), which are entirely within the City of Suffolk, Virginia. The remaining approximately 32.4 miles of Line #246 that will be rebuilt is located entirely within North Carolina, extending from the Virginia state line, through the Company's existing Tunis and Ahoskie Substations, and concluding at the Company's existing Earleys Substation (the "North Carolina Rebuild Project") (together, the Virginia Rebuild Project and North Carolina Rebuild Project are referred to herein as the "VA-NC Rebuild Project"). The Company is not seeking approval of the North Carolina Rebuild Project herein or from the North Carolina Utilities Commission ("NCUC"). Pursuant to NCGS § 62-101(a), a certificate is required from the NCUC "to construct a new transmission line," not to rebuild an existing line. Further, NCGS § 62-101(c)(2) specifically provides that "[a] certificate is not required for construction of the following lines:... [t]he replacement or expansion of an existing line with a similar line in substantially the same location, or the rebuilding, upgrading, modifying, modernizing, or reconstructing of an existing line for the purpose of increasing capacity or widening an existing right-of-way[.]" Accordingly, because the North Carolina Rebuild Project proposes to rebuild existing Line #246 with a similar line in substantially the same location, NCUC approval of the North Carolina Rebuild Project is not required. To the extent that responses are provided within this Appendix, they should be viewed as applicable only to the Virginia Rebuild Project, and not the North Carolina Rebuild Project or the VA-NC Rebuild Project, unless so specifically stated. Any such information related specifically to the North Carolina Rebuild Project or the VA-NC Rebuild Project should be viewed as informational only, and should not be considered as applicable for the approval being sought in this Application for a CPCN for the Virginia Rebuild Project.



**BACKGROUND AND QUALIFICATIONS  
OF  
GEORGE BRIMMER**

George Brimmer received a Bachelor of Science degree in Electrical Engineering from Virginia Commonwealth University in 2014. Mr. Brimmer also received a Bachelor of Science degree in Psychology in 2008. Mr. Brimmer has been employed by the Company since 2013. Prior to joining the Company, he worked as Cable Technician for American Systems Corporation from 2010 to 2011. His areas of expertise are substation and grounding design.

Mr. Brimmer has not previously testified before the Virginia State Corporation Commission.

## **WITNESS DIRECT TESTIMONY SUMMARY**

**Witness:** Hannah Hurst

**Title:** Siting and Permitting Specialist

**Summary:**

Company Witness Hannah Hurst will sponsor those portions of the Appendix providing an overview of the design of the route for the proposed Virginia Rebuild Project, and related permitting, as follows:

- Section II.A.1: This section provides the length of the proposed corridor and viable alternatives to the proposed Virginia Rebuild Project.
- Section II.A.2: This section provides a map showing the route of the proposed Virginia Rebuild Project in relation to notable points close to the proposed Virginia Rebuild Project.
- Section II.A.4: Although not applicable to the Virginia Rebuild Project, this section explains why the existing right-of-way is not adequate to serve the needs of the Company.
- Sections II.A.6 to II.A.8: These sections provide detail regarding the right-of-way for the proposed Virginia Rebuild Project.
- Section II.A.9: This section describes the proposed route selection procedures and details alternative routes considered.
- Section II.A.11: This section details how the construction of the proposed Virginia Rebuild Project follows the provisions discussed in Attachment 1 of the Transmission Appendix Guidelines.
- Section II.A.12: This section identifies the counties and localities through which the proposed Virginia Rebuild Project will pass and provides General Highway Maps for these localities.
- Section II.B.6: This section provides photographs of existing facilities, representations of proposed facilities, and visual simulations.
- Section III: This section details the impact of the proposed Virginia Rebuild Project on scenic, environmental, and historic features.
- Section V: This section provides information related to public notice of the proposed Virginia Rebuild Project.

Additionally, Ms. Hurst co-sponsors the following portions of the Appendix:

- Executive Summary (co-sponsored with Company Witnesses Wesley Strunk, Jason Whitlow, and George Brimmer): The Executive Summary provides a brief summary of the Virginia Rebuild Project.
- Section II.A.3 (co-sponsored with Company Witness Jason Whitlow): This section provides color maps of existing or proposed rights-of-way in the vicinity of the proposed Virginia Rebuild Project.
- Section II.B.5 (co-sponsored with Company Witness Wesley Strunk): This section provides the mapping and structure heights for the existing and proposed overhead structures.

Finally, Ms. Hurst sponsors the DEQ Supplement filed with the Application. A statement of Ms. Hurst's background and qualifications is attached to her testimony as Appendix A.

**DIRECT TESTIMONY  
OF  
HANNAH HURST  
ON BEHALF OF  
VIRGINIA ELECTRIC AND POWER COMPANY  
BEFORE THE  
STATE CORPORATION COMMISSION OF VIRGINIA  
CASE NO. PUR-2023-00203**

**Q. Please state your name, business address and position with Virginia Electric and Power Company (“Dominion Energy Virginia” or the “Company”).**

A. My name is Hannah Hurst, and I am a Siting and Permitting Specialist for Virginia Electric and Power Company (“Dominion Energy Virginia” or the “Company”) supporting Electric Transmission. My business address is 5000 Dominion Boulevard, Glen Allen, Virginia 23060. A statement of my qualifications and background is provided as Appendix A.

**Q. Please describe your areas of responsibility with the Company.**

A. I am responsible for identifying appropriate routes for transmission lines and obtaining necessary federal, state, and local approvals and permits for those facilities. In this position, I work closely with government officials, permitting agencies, property owners, and other interested parties, as well as with other Company personnel, to develop and maintain facilities needed by the public so as to reasonably minimize environmental and other impacts on the public in a reliable, cost-effective manner.

**Q. What is the purpose of your testimony in this proceeding?**

A. In order to maintain the structural integrity and reliability of the Company’s transmission systems in compliance with the Company’s mandatory electric transmission planning criteria (“Planning Criteria”)<sup>1</sup> and consistent with sound engineering judgment, the

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<sup>1</sup> The Company’s Transmission Planning Criteria (effective April 1, 2023) can be found in Attachment 1 of the Company’s Facility Interconnection Requirements (“FIR”) document, which is available online at <https://cdn-dominionenergy-prd-001.azureedge.net/-/media/pdfs/virginia/parallel-generation/facility-connection->



Company proposes to (i) rebuild, entirely within existing right-of-way or on Company-owned property, approximately 11.9 miles of the existing 230 kV Line #246 on single circuit wood structures, which runs from Structure #246/1C within the Company's existing Suffolk Substation to Structure #246/94 at the Virginia state line, and is located entirely within the City of Suffolk, Virginia; and (ii) perform minor work at the existing Suffolk Substation, including upgrading circuit-breaker and line leads to 4000A and installing a new substation dead-end structure (collectively, the "Virginia Rebuild Project").<sup>2</sup>

The purpose of my testimony is to provide an overview of the route and permitting for the proposed Virginia Rebuild Project. As it pertains to routing and permitting, I sponsor Sections II.A.1, II.A.2, II.A.4, II.A.6, II.A.7, II.A.8, II.A.9, II.A.11, II.A.12, II.B.6, III, and V of the Appendix. I also sponsor the DEQ Supplement filed with the Application, and co-sponsor Section II.A.3 with Company Witness Jason Whitlow, and Section II.B.5 of the

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[requirements.pdf?la=en&rev=f280781e90cf47f69ea526c944c9c347&hash=82DD2567D0B033C47536134B8C4D5C5E](#).

<sup>2</sup> With this Application, the Company is seeking a certificate of public convenience and necessity ("CPCN" or "Certificate") from the Virginia State Corporation Commission ("Commission") for the rebuild of 11.9 miles of Line #246 located between the Suffolk Substation and the Virginia state line (*i.e.* from Structure #246/1C through Structure #246/94), which are entirely within the City of Suffolk, Virginia. The remaining approximately 32.4 miles of Line #246 that will be rebuilt is located entirely within North Carolina, extending from the Virginia state line, through the Company's existing Tunis and Ahoskie Substations, and concluding at the Company's existing Earleys Substation (the "North Carolina Rebuild Project") (together, the Virginia Rebuild Project and North Carolina Rebuild Project are referred to herein as the "VA-NC Rebuild Project"). The Company is not seeking approval of the North Carolina Rebuild Project herein or from the North Carolina Utilities Commission ("NCUC"). Pursuant to NCGS § 62-101(a), a certificate is required from the NCUC "to construct a new transmission line," not to rebuild an existing line. Further, NCGS § 62-101(c)(2) specifically provides that "[a] certificate is not required for construction of the following lines:... [t]he replacement or expansion of an existing line with a similar line in substantially the same location, or the rebuilding, upgrading, modifying, modernizing, or reconstructing of an existing line for the purpose of increasing capacity or widening an existing right-of-way[.]" Accordingly, because the North Carolina Rebuild Project proposes to rebuild existing Line #246 with a similar line in substantially the same location, NCUC approval of the North Carolina Rebuild Project is not required. To the extent that responses are provided within this Appendix, they should be viewed as applicable only to the Virginia Rebuild Project, and not the North Carolina Rebuild Project or the VA-NC Rebuild Project, unless so specifically stated. Any such information related specifically to the North Carolina Rebuild Project or the VA-NC Rebuild Project should be viewed as informational only, and should not be considered as applicable for the approval being sought in this Application for a CPCN for the Virginia Rebuild Project.

Appendix with Company Witness Wesley Strunk. Lastly, I co-sponsor the Executive Summary with Company Witnesses Wesley Strunk, Jason Whitlow, and George Brimmer.

**Q. Has the Company complied with Va. Code § 15.2-2202 E?**

A. In accordance with Va. Code § 15.2-2202 E, letters dated September 11, 2023, were sent to (1) Mr. Albert Moore II, City Manager for the City of Suffolk; (2) Mr. Michael Duman, Mayor, the City of Suffolk; and (3) Mr. LeOtis Williams, City Council Member, Whaleyville District, advising of the Company's intention to file this Application and inviting the City to consult with the Company about the Virginia Rebuild Project. Copies of these letters are included as Appendix Attachment V.D.

**Q. Does this conclude your pre-filed direct testimony?**

A. Yes, it does.

**BACKGROUND AND QUALIFICATIONS  
OF  
HANNAH HURST**

Hannah Hurst received a bachelor's degree in Environmental Horticulture from Virginia Tech Polytechnic Institute in 2016. Ms. Hurst has been employed by the Company since 2022 as a Siting and Permitting Specialist. Prior to joining the Company, she worked as an Environmental Planner for New Kent County where she was responsible for permitting procedures and inspections. Her areas of expertise are in local zoning, planning, and local environmental permitting.

Ms. Hurst has not previously testified before the Virginia State Corporation Commission.