

March 27, 2024

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Mr. Bernard Logan, Clerk
c/o Document Control Center
State Corporation Commission
1300 East Main Street
Tyler Building – 1st Floor
Richmond, Virginia 23219

*Application of Virginia Electric and Power Company for approval
and certification of electric transmission facilities: 500-230 kV Aspen Substation,
500 kV Aspen-Goose Creek Line #5002, 500 kV and 230 kV Aspen-Golden Lines #5001
and #2333, 500-230 kV Golden Substation, and Lines #2081/#2150 Loop*
Case No. PUR-2024-00032

*Application of Virginia Electric and Power Company for approval
and certification of electric transmission facilities: 230 kV Apollo-Twin Creek Lines and
Twin Creeks, Sycolin Creek, Starlight, Lunar, and Apollo Substations*
Case No. PUR-2024-00044

Dear Mr. Logan:

Please find enclosed for electronic filing in the above-captioned proceedings the *Motion of Virginia Electric and Power Company to Consolidate, for Procedural and Hearing Purposes Only, Case No. PUR-2024-00032 and Case No. PUR-2024-00044.*

Please do not hesitate to call if you have any questions regarding the enclosed.

Highest regards,



Vishwa B. Link

Enclosures

cc: William H. Chambliss, Esq.
William H. Harrison, IV, Esq.
Andrew F. Major, Esq.

Mr. Bernard Logan, Clerk

March 27, 2024

Page 2

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COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

APPLICATIONS OF)	
)	
VIRGINIA ELECTRIC AND POWER COMPANY)	
)	
For approval and certification of electric transmission)	Case No. PUR-2024-00032
facilities: 500-230 kV Aspen Substation,)	
500 kV Aspen-Goose Creek Line #5002,)	
500 kV and 230 kV Aspen-Golden Lines #5001 and #2333,)	
500-230 kV Golden Substation, and Lines #2081/#2150 Loop)	
)	
For approval and certification of electric transmission)	Case No. PUR-2024-00044
facilities: 230 kV Apollo-Twin Creek Lines and)	
Twin Creeks, Sycolin Creek, Starlight)	
Lunar, and Apollo Substations)	

**MOTION OF VIRGINIA ELECTRIC AND POWER COMPANY TO
CONSOLIDATE, FOR PROCEDURAL AND HEARING PURPOSES ONLY,
CASE NO. PUR-2024-00032 AND CASE NO. PUR-2024-00044**

Pursuant to Rule 110 of the Rules of Practice and Procedure of the State Corporation Commission of Virginia (“Commission”), 5 VAC 5-20-110, Virginia Electric and Power Company (“Dominion Energy Virginia” or the “Company”), by counsel, hereby files this Motion to Consolidate, for procedural and hearing purposes only, Case No. PUR-2024-00032 and Case No. PUR-2024-00044 (“Motion”). In support of the Motion, the Company states as follows:

1. On March 7, 2024, the Company filed in Case No. PUR-2024-00032 an application (the “Aspen-Golden Application”) with the Commission for a certificate of public convenience and necessity (“CPCN”) pursuant to § 56-46.1 of the Code of Virginia (“Va. Code” or “Code”) and the Utility Facilities Act, Va. Code § 56-265.1 *et seq.* to construct a new 500-230 kilovolt (“kV”) Aspen Substation, a new approximately 0.2-mile 500 kV line between the Company’s proposed Aspen Substation and existing Goose Creek Substation (the “Aspen-Goose Creek Line”), a new approximately 9.4-mile overhead 500 kV single circuit transmission line

and a new 230 kV single circuit transmission line (the “Aspen-Golden Lines”), a new 500-230 kV Golden Substation, and a new transmission line loop of the existing Paragon Park-Sterling Park Line #2081 and Paragon Park-Sterling Park Line #2150 into and out of the new future Golden Substation (the “Lines #2081/#2150 Loop”), all located in Loudoun County, Virginia (collectively, the “Aspen-Golden 500-230 kV Electric Transmission Project” or “Aspen-Golden Project”).¹ The proposed Aspen-Golden Project is necessary to relieve identified violations of mandatory North American Electric Reliability Corporation (“NERC”) Reliability Standards beginning in the summer 2028 timeframe, and maintain the structural integrity and reliability of the transmission system for the overall load growth in the area.² The Company identified an approximately 9.4-mile Proposed Route for the Aspen-Golden Lines (Route 1AA), an approximately 9.5-mile Alternative Route 1AB, an approximately 9.4-mile Alternative Route 1BA, and an approximately 9.5-mile Alternative Route 1BB. Additionally, the Company identified an approximately 0.2-mile Proposed Route for the Aspen-Goose Creek Line, and a <0.1-mile (490-foot) Proposed Route for the Lines #2081/#2150 Loop.³ The Company requested a final order on the Aspen-Golden Project by October 7, 2024, in order to meet a desired in-service date of June 1, 2028.⁴

2. Coincident with this Motion, the Company is filing in Case No. PUR-2024-00044 an application (the “Apollo-Twin Creeks Application”) with the Commission for a CPCN pursuant Va. Code §§ 56-46.1 and 56-265.1 *et seq.* to construct a new approximately 1.9-mile double circuit overhead 230 kV transmission line (the “Apollo-Twin Creeks Lines”) and five

¹ Aspen-Golden Application at 2-5.

² *Id.* at 5-6.

³ *Id.* at 6-9.

⁴ For purposes of judicial economy, the Company also requested that the Commission’s final order approve a CPCN sunset date of June 1, 2029, for the Aspen-Golden Project. Aspen-Golden Application at 12.

new 230-34.5 kV substations (the Twin Creeks, Sycolin Creek, Starlight, Lunar, and Apollo Substations) in Loudoun County, Virginia (collectively, the “Apollo-Twin Creeks 230 kV Electric Transmission Project” or “Apollo-Twin Creeks Project”).⁵ The Apollo-Twin Creeks Project is necessary to provide service requested by three data center customers (the “Customers”) at their respective data center campus developments (the “Campuses”), maintain reliable service for the overall load growth in the area, and comply with mandatory NERC Reliability Standards.⁶ The Company identified an approximately 1.9-mile overhead Proposed Route for the Apollo-Twin Creeks Lines.⁷ The Company requested a final order on the Apollo-Twin Creeks Project by October 28, 2024, in order to meet a desired in-service date of September 30, 2028.⁸

3. Almost half (0.9 mile or approximately 48%) of the entire 1.9-mile Proposed Route of the Apollo-Twin Creeks Lines will be collocated with the Proposed Route and all three Alternative Routes of the Aspen-Golden Lines. Indeed, the Company selected these routes in part due to this collocation opportunity, which will minimize impacts to the Project area and allow the opportunity for efficiency of Commission Staff’s (“Staff”), respondents’, and the public’s review of these routes along the collocated segment.

4. Further, while the needs driving the Proposed Projects are different, the Aspen-Golden Application and the Apollo-Twin Creeks Application were filed with the Commission close in time (March 7, 2024, and March 27, 2024, respectively), the Company has requested final orders on the Proposed Projects close in time (October 7, 2024, and October 28, 2024,

⁵ Apollo-Twin Creeks Application at 2-3. Collectively, the Aspen-Golden Project and the Apollo-Twin Creeks Project are referred to herein as the “Proposed Projects.”

⁶ *Id.* at 4.

⁷ *Id.* at 4.

⁸ For purposes of judicial economy, the Company also requested that the Commission’s final order approve a CPCN sunset date of September 30, 2029, for the Apollo-Twin Creeks Project. Apollo-Twin Creeks Application at 7.

respectively), and the desired in-service dates are close in time (June 1, 2028, and September 30, 2028, respectively).

5. Accordingly, in the interest of judicial economy, the Company requests the Commission consolidate the Aspen-Golden Project (Case No. PUR-2024-00032) and the Apollo-Twin Creeks Project (Case No. PUR-2024-00044) for procedural and hearing schedule purposes only. Specifically, the Company requests that the procedural schedules of the Proposed Projects be consolidated in one Order for Notice and Hearing entered in both dockets, including but not limited to joint notice, proof of notice, discovery deadline, pre-filed testimony, and the public witness and evidentiary hearings—without the cases (or case numbers) being combined—to the extent practicable. As noted above, consolidating the procedural and hearing schedules would streamline the review and discussion of the Proposed Projects along the collocated segment, thereby preserving resources for the Commission, the Staff, the respondents, the public, and the Company. Additionally, the Company believes it would alleviate any potential confusion for the public along the consolidated segment, as it would be clear that both of the Proposed Projects' routes would be routed within that segment.

6. Specifically as to notice for the Proposed Projects, the Company respectfully requests that the Commission authorize the Company to provide one joint notice of the Proposed Projects, as set forth in Attachment A to this Motion, as opposed to duplicative notices that would include the collocated segment. Consistent with Va. Code § 56-46.1, this joint notice would be provided to all owners of property within all routes of the Proposed Projects, would be published as display advertising in newspapers where the Proposed Projects are located, and would be included in the consolidated Order for Notice and Hearing sent to local officials.⁹

⁹ Upon Commission approval of this Motion, the Company will file an updated Appendix Section V.A and Appendix Attachment V.A in Case No. PUR-2024-00032 and Case No. PUR-2024-00044, consistent with Attachment A hereto,

7. Specifically as to public comments, the Company requests that all public comments that are submitted in either docket be posted in both dockets to prevent any potential prejudice to respondents or public commenters that may file in only one docket. For example, the Company requests that in the event a public comment is submitted in the Case No. PUR-2024-00032 docket, the Document Control Center will post that same comment in the Case No. PUR-2024-00044 docket to ensure an accurate and complete record with all of the necessary parties and stakeholders involved in the appropriate case.

8. Finally, should the Commission grant the Company's Motion, the Company respectfully requests that the Commission issue final orders in both proceedings by October 28, 2024, in order to allow Staff and the parties sufficient time to review the cases. Should the Commission issue final orders by October 28, 2024, the Company does not anticipate any change to the desired in-service target date of June 1, 2028 for the Aspen-Golden Project.

9. Prior to filing, the Company shared a copy of the Motion with Staff. Counsel for Staff has authorized counsel for the Company to represent that Staff does not oppose consolidation of the Proposed Projects, as described herein.

WHEREFORE, for the reasons set forth above and for good cause shown, the Company respectfully requests that the Commission grant the Company's Motion as described herein and issue one procedural order for the Proposed Projects that: (1) consolidates the procedural and hearing schedules in Case Nos. PUR-2024-00032 and PUR-2024-00044; (2) directs the Company to provide one joint notice for the Proposed Projects as described herein and provided

as replacements for the as-filed versions in the respective applications, and will make the same replacements in the electronic copies of the Aspen-Golden and Apollo-Twin Creeks applications available for public inspection at www.dominionenergy.com/NOVA.

in Attachment A hereto; and (3) directs the Document Control Center to post in both dockets all public comments filed in either docket.

VIRGINIA ELECTRIC AND POWER COMPANY

By: /s/ Vishwa B. Link
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Counsel for Applicant Virginia Electric and Power Company

March 27, 2024

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: On March 7, 2024, the Company filed its application for approval and certification of electric transmission facilities for the 500-230 kilovolt (“kV”) Aspen Substation, 500 kV Aspen-Goose Creek Line #5002 (“Aspen-Goose Creek Line”), 500 kV and 230 kV Aspen-Golden Lines #5001 and #2333 (the “Aspen-Golden Lines”), 500-230 kV Golden Substation, and Lines #2081/#2150 Loop (collectively, the “Aspen-Golden 500-230 kV Electric Transmission Project” or “Aspen-Golden Project” filed in Case No. PUR-2024-00032).

On March 27, 2024, the Company filed its application for approval and certification of electric transmission facilities for the 230 kV Apollo-Twin Creeks Lines and Twin Creeks, Sycolin Creek, Starlight, Lunar, and Apollo Substations (collectively, the “Apollo-Twin Creeks 230 kV Electric Transmission Project” or “Apollo-Twin Creeks Project” filed in Case No. PUR-2024-00044).

As proposed, the approximately 9.4-mile Proposed Route of the Aspen-Golden Lines and the approximately 1.9-mile Proposed Route of the Apollo-Twin Creeks Lines will be collocated for approximately 0.9 mile and, therefore, the Aspen-Golden Project and the Apollo-Twin Creeks Project (the “Proposed Projects”) have been consolidated for procedural and hearing schedule purposes only, including for purposes of this joint notice.

A map showing the overhead Proposed and Alternative Routes for Aspen-Golden Lines and the Apollo-Twin Creeks Lines is provided in Attachment V.A, attached hereto. Specifically, the map includes the following:

Aspen-Golden Project

- Proposed Route for the Aspen-Goose Creek Line
- Proposed Route (Route 1AA) for the Aspen-Golden Lines
- Alternative Route 1AB for the Aspen Golden Lines
- Alternative Route 1BA for the Aspen Golden Lines
- Alternative Route 1BB for the Aspen Golden Lines
- Proposed Route for the Lines #2081/#2150 Loop

Apollo-Twin Creeks Project

- Proposed Route of the Apollo-Twin Creeks Lines

The map provided in Attachment V.A also includes the location of the proposed Aspen and Golden Substations (Aspen-Golden Project) and the location of the

proposed Twin Creeks, Sycolin Creek, Starlight, Lunar, and Apollo Substations (Apollo-Twin Creeks Project). Written descriptions of the Proposed Projects' routes are as follows.

ASPEN-GOLDEN PROJECT
Case No. PUR-2024-00032

Aspen-Goose Creek Line

Proposed Route

The Proposed Route of the Aspen-Goose Creek Line #5002 is approximately 0.2 mile in length. The route originates at the proposed Aspen Substation located between Crosstrail Boulevard and Cochran Mill Road. The route travels northwest for 0.1 mile and then northeast for 0.1 mile before terminating at the Company's existing 500 kV Goose Creek Substation.

The Proposed Route of the Aspen-Goose Creek Line will be constructed on existing right-of-way or Company-owned property with one single circuit 500 kV monopole structure with a minimum structure height of approximately 190 feet, a maximum structure height of approximately 190 feet, and an average structure height of approximately 190 feet, based on preliminary conceptual design, not including foundation reveal, and subject to change based on final engineering design.

Aspen-Golden Lines

Proposed Route (Route 1AA)

The Proposed Route (Route 1AA) of the Aspen-Golden Lines is approximately 9.4 miles in length. The route originates at the proposed Aspen Substation located between Crosstrail Boulevard and Cochran Mill Road. The route travels east, and at Cochran Mill Road the proposed Aspen-Golden Lines begin collocating with the Company's future Apollo-Twin Creeks Lines, which were filed by the Company for State Corporation Commission approval on March 27, 2024, in Case No. PUR-2024-00044. The route then continues east for 0.5 mile crossing Goose Creek, and northeast for 0.4 mile, where collocation with the Apollo-Twin Creeks Lines ends on the east side of Goose Creek. The route continues east across Belmont Ridge Road, then follows the south side of Rt. 7 past Loudoun County Parkway before turning south between Loudoun County Parkway and Sully Road, and then crosses Russell Branch Parkway. The route continues southwest toward Loudoun County Parkway and turns south following Loudoun County Parkway to the Washington and Old Dominion Trail. The route then turns southeast, crossing Pacific Boulevard, before terminating at the proposed Golden Substation, located northwest of Sully Road and the Washington and Old Dominion Trail.

The Proposed Route of the Aspen-Golden Lines will be constructed on new 100- to 150-foot-wide right-of-way to support a 5-2 configuration on either double circuit three-pole or two-pole H-frame structures or double circuit two-pole or

monopole structures with a minimum structure height of approximately 120 feet, a maximum structure height of approximately 196 feet, and an average structure height of approximately 171 feet, based on preliminary conceptual design, not including foundation reveal, and subject to change based on final engineering design.

Alternative Route 1AB

Alternative Route 1AB of the Aspen-Golden Lines is approximately 9.5 miles in length. The route originates at the proposed Aspen Substation located between Crosstrail Boulevard and Cochran Mill Road. The route travels east, and at Cochran Mill Road the proposed Aspen-Golden Lines begin collocating with the Company's future Apollo-Twin Creeks Lines, which were filed by the Company for State Corporation Commission approval on March 27, 2024, in Case No. PUR-2024-00044. The route then continues east for 0.5 mile crossing Goose Creek, and northeast for 0.4 mile, where collocation with the Apollo-Twin Creeks Lines ends on the east side of Goose Creek. The route continues east across Belmont Ridge Road, then follows the south side of Rt. 7 past Loudoun County Parkway before turning south between Loudoun County Parkway and Sully Road, and then crosses Russell Branch Parkway. The route continues southwest toward Loudoun County Parkway before turning back to the southwest where it follows an existing utility right-of-way adjacent to Broad Run, then turns south, crossing Broad Run, Gloucester Parkway, and Pacific Boulevard before terminating at the proposed Golden Substation, located northwest of Sully Road and the Washington and Old Dominion Trail.

Alternative Route 1AB of the Aspen-Golden Lines will be constructed on new 100- to 150-foot-wide right-of-way to support a 5-2 configuration primarily on double circuit three-pole or two-pole H-frame structures with a minimum structure height of approximately 120 feet, a maximum structure height of approximately 195 feet, and an average structure height of approximately 171 feet, based on preliminary conceptual design, not including foundation reveal, and subject to change based on final engineering design.

Alternative Route 1BA

Alternative Route 1BA of the Aspen-Golden Lines is approximately 9.4 miles in length. The route originates at the proposed Aspen Substation located between Crosstrail Boulevard and Cochran Mill Road. The route travels east, and at Cochran Mill Road the proposed Aspen-Golden Lines begin collocating with the Company's future Apollo-Twin Creeks Lines, which were filed by the Company for State Corporation Commission approval on March 27, 2024, in Case No. PUR-2024-00044. The route then continues east for 0.5 mile crossing Goose Creek, and northeast for 0.4 mile, where collocation with the Apollo-Twin Creeks Lines ends on the east side of Goose Creek. The route continues east across Belmont Ridge Road, then follows the south side of Rt. 7, briefly crossing to the north side of Rt. 7 near Lansdowne Boulevard, then crossing back to the south side of Rt. 7 and

continuing past Loudoun County Parkway before the turning south between Loudoun County Parkway and Sully Road, and then crosses Russell Branch Parkway. The route continues southwest toward Loudoun County Parkway and turns south following Loudoun County Parkway to where it intersects the Washington and Old Dominion Trail. The route then turns southeast, crossing Pacific Boulevard, before terminating at the proposed Golden Substation, located northwest of Sully Road and the Washington and Old Dominion Trail.

Alternative Route 1BA of the Aspen-Golden Lines will be constructed on new 100- to 150-foot-wide right-of-way to support a 5-2 configuration primarily on double circuit three-pole or two-pole H-frame structures with a minimum structure height of approximately 120 feet, a maximum structure height of approximately 196 feet, and an average structure height of approximately 170 feet, based on preliminary conceptual design, not including foundation reveal, and subject to change based on final engineering design.

Alternative Route 1BB

Alternative Route 1BB of the Aspen-Golden Lines is approximately 9.4 miles in length. The route originates at the proposed Aspen Substation located between Crosstrail Boulevard and Cochran Mill Road. The route travels east, and at Cochran Mill Road the proposed Aspen-Golden Lines begin collocating with the Company's future Apollo-Twin Creeks Lines, which were filed by the Company for State Corporation Commission approval on March 27, 2024, in Case No. PUR-2024-00044. The route then continues east for 0.5 mile crossing Goose Creek, and northeast for 0.4 mile, where collocation with the Apollo-Twin Creeks Lines ends on the east side of Goose Creek. The route continues east across Belmont Ridge Road, then follows the south side of Rt. 7, briefly crossing to the north side of Rt. 7 near Lansdowne Boulevard, then crossing back to the south side of Rt. 7 and continuing past Loudoun County Parkway before the turning south between Loudoun County Parkway and Sully Road, and then crosses Russell Branch Parkway. The route continues southwest toward Loudoun County Parkway before turning back to the southwest where it follows an existing utility right-of-way adjacent to Broad Run, then turns south, crossing Broad Run, Gloucester Parkway, and Pacific Boulevard before terminating at the proposed Golden Substation, located northwest of Sully Road and the Washington and Old Dominion Trail.

Alternative Route 1BB of the Aspen-Golden Lines will be constructed on new 100- to 150-foot-wide right-of-way to support a 5-2 configuration primarily on double circuit three-pole or two-pole H-frame structures with a minimum structure height of approximately 120 feet, a maximum structure height of approximately 190 feet, and an average structure height of approximately 170 feet, based on preliminary conceptual design, not including foundation reveal, and subject to change based on final engineering design.

Lines #2081/#2150 Loop

Proposed Route

The Proposed Route of the Lines #2081/#2150 Loop is approximately 0.1 mile in length. The Line Loop cuts into the Company's existing Paragon Park-Sterling Park Line #2081 and Paragon Park-Sterling Park Line #2150 right-of-way (along the Washington and Old Dominion Trail) and then crosses onto property to be acquired by the Company for the proposed Golden Substation.

The Proposed Route of the Lines #2081/#2150 Loop will be constructed on existing right-of-way or on property to be owned by the Company with four single circuit 230 kV monopole structures with a minimum structure height of approximately 105 feet, a maximum structure height of approximately 115 feet, and an average structure height of approximately 110 feet, based on preliminary conceptual design, not including foundation reveal, and subject to change based on final engineering design.

APOLLO-TWIN CREEKS PROJECT

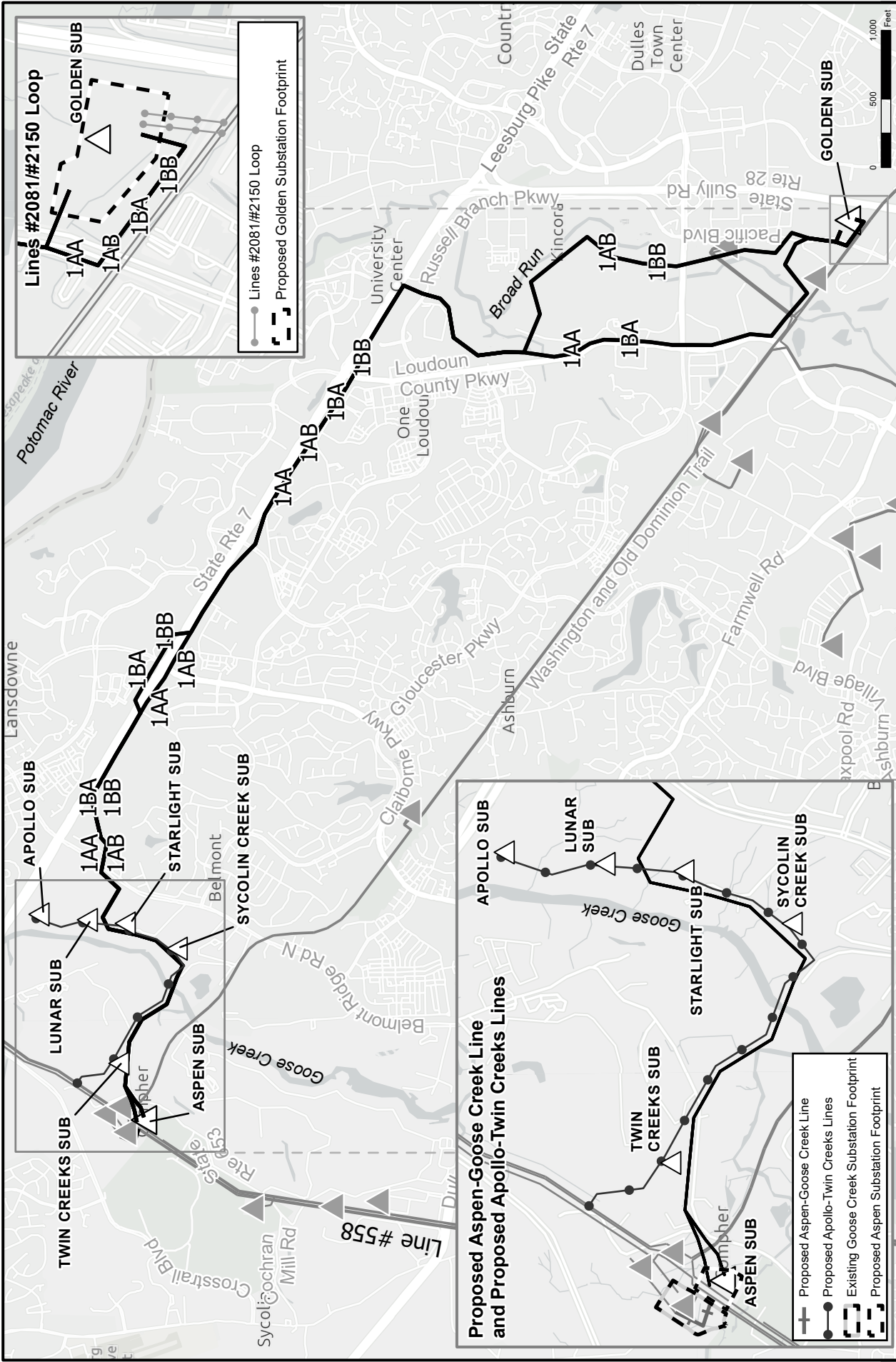
Case No. PUR-2024-00044

Apollo-Twin Creeks Lines

Proposed Route

The Proposed Route of the Apollo-Twin Creeks Lines is approximately 1.9 miles in length. Beginning at the cut-in location at Structure #203/2 located east of Crosstrail Boulevard, the route travels approximately 0.4 mile southeast and crosses Cochran Mill Road. At this point, the proposed Apollo-Twin Creeks Lines begin collocating with the Company's future Aspen-Golden Lines, which were filed by the Company for State Corporation Commission approval on March 7, 2024, in Case No. PUR-2024-00032. The route then continues southeast for 0.5 mile, crosses Goose Creek, and turns northeast for 0.1 mile. The route continues northeast for 0.3 mile on the east side of Goose Creek, where collocation with the Aspen-Golden Lines ends south of the proposed Starlight Substation. The route then continues northeast for 0.6 mile, terminating at the proposed Apollo Substation, located south of Route 7 and west of Belmont Ridge Road.

The Proposed Route of the Apollo-Twin Creeks Lines will be constructed on new right-of-way primarily supported by double circuit dulled galvanized steel monopoles. For the Proposed Route, the minimum structure height is 85 feet, the maximum structure height is 135 feet, and the average structure height is 112 feet, based on preliminary conceptual design, not including foundation reveal, and subject to change based on final engineering design.



Proposed Aspen-Goose Creek Line and Proposed Apollo-Twin Creeks Lines

- ▲ Existing Substation
- △ Proposed Substation
- Existing Dominion Transmission Lines
- Proposed Apollo-Twin Creeks Lines

Proposed Aspen-Golden Lines

- 1AA- Proposed Route (Route 1AA)
- 1AB- Alternative Route 1AB
- 1BA- Alternative Route 1BA
- 1BB- Alternative Route 1BB

Proposed Aspen Substation Footprint

- Lines #2081/#2150 Loop
- ▭ Proposed Golden Substation Footprint

Proposed Golden Substation Footprint

- Lines #2081/#2150 Loop
- ▭ Proposed Golden Substation Footprint

0 500 1,000 Feet

North Arrow

Project Location

Attachment V.A - Notice Map
Aspen-Golden 500-230 kV Electric Transmission Project (PUR-2024-00032)
Apollo-Twin Creeks 230 kV Electric Transmission Project (PUR-2024-00044)
 Dominion Energy Virginia
 Loudoun County, Virginia