From: <u>Steve Chafin (VirginiaPower - 1)</u>

To: Walker, William T Jr CIV USARMY CENAO (US); Steffey, Randy L CIV USARMY CENAO (US)

Cc: Scott Miller (VirginiaPower - 1); Ronnie Bailey (VirginiaPower - 1T); Peter Nedwick (VirginiaPower - 6)

Subject: [Non-DoD Source] RE: Response needed to NTHP Comment Ltr; RE: Dominion S-S-W

**Date:** Friday, June 02, 2017 1:53:27 PM

Tom & Randy,

This email is to supplement information provided in the letter to the Corps dated May 26, 2017, regarding the proposed Surry – Skiffes Creek – Whealton 500 kV Project. As you know, the letter was in response to the National Trust for Historic Preservation's (NTHP) letter to the Corps dated May 1, 2017, with respect to proposed generation in Charles City County near Dominion Energy's Chickahominy substation. We provide this supplemental email to summarize our telephone conversation pertaining to your questions regarding our response to NTHP's letter.

Specifically, we discussed and would like to make the following clarifying points:

- \* The same NERC Reliability violations that are driving the Skiffes Creek project remain and are unchanged by the addition of this new generation. Any new generation must be physically located in the highlighted load center within the NHRLA area (reference the map included in the May 26, 2017 letter) in order to resolve any of the NERC Reliability violations.
- \* This proposed generation or any other generation that is physically located outside the specific highlighted load area within the NHLRA regardless of proximity does not change or improve the viability of any alternative evaluated to replace the proposed Skiffes Creek Project.
- \* In order to resolve the NERC Reliability violations, any solution must directly inject power into that load zone, meaning generation must be physically located within that zone or adequate transmission paths into that zone must be created (like the proposed Skiffes Creek Project).
- \* The PJM studies for the proposed generation nearby the Company's Chickahominy substation, which are to ensure the power from these plants can flow onto the transmission system to serve load in a manner that does not violate the NERC Reliability standards, included the assumption that all PJM approved projects--including the proposed Skiffes Creek Project--were constructed and in operation. Absent the Skiffes Creek project being included in the PJM studies, the same NERC Reliability violations driving the proposed project would still exist.

To summarize, this proposed generation does nothing to alter or change the purpose and need for the Surry-Skiffes Creek Project.

Thank you for the discussion and hope this helps clarify our letter. We are always available to answer any other questions you may have on this project.

Sincerely,

Steve Chafin Director – Electric Transmission Planning & Strategic Initiatives **Dominion Energy** ----Original Message-----From: Steffey, Randy L CIV USARMY CENAO (US) [mailto:Randy.L.Steffey@usace.army.mil] Sent: Tuesday, May 23, 2017 7:20 AM To: Gray, Corey Cc: Courtney R Fisher (Services - 6); Rachel W Snead (Services - 6); Walker, William T Jr CIV USARMY CENAO (US) Subject: Response needed to NTHP Comment Ltr; RE: Dominion S-S-W Corey, Please work with Dominion to have them develop a detailed response to the NTHP letter attached. Specifically, we are interested in what impact, either individually or collectively, these new generation facilities located in the NHRLA will have on Dominion's need to deliver the capacity they are proposing. Have either of these facilities been factored into projected modeling thus far? If not, what impact would they have on Dominion's current plan moving forward (500kV vs 230kV)? Based on a conversation I had with a fellow project manager and his involvement with the C4GT, LLC plant, it appears very likely this plant will be a reality. Please help us better understand what, if any, impact this new information has on Dominion. Thanks, Randy Steffey Environmental Scientist / Project Manager US Army Corps of Engineers - Norfolk District 803 Front Street Norfolk, VA 23510

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Dominion Energy Virginia Dominion Energy North Carolina Electric Transmission 701 East Cary Street, Richmond, VA 23219 DominionEnergy.com



US Army Corps of Engineers Norfolk District Regulatory Office Received by: RLS Date: May 26, 2017

May 26, 2017

Colonel Jason E. Kelly Norfolk District, Corps of Engineers 803 Front Street Norfolk, Virginia 23510

Re:

Surry-Skiffes Creek-Whealton 500 kV Project - Response to National Trust for Historic

Preservation Letter

Dear Colonel Kelly:

This letter responds to a May 23, 2017, email from the U.S. Army Corps of Engineers (Corps) to our consultant Stantec regarding certain statements contained in a May 1, 2017, letter from the National Trust for Historic Preservation (NTHP) to the Corps. Specifically, the Corps asked Dominion Energy to respond to what impact, if any, two proposed new generating facilities proposed for construction in Charles City County may have on Dominion Energy's need to deliver the capacity of electricity it is proposing for the Surry-Skiffes Creek-Whealton 500 kV project (Project).

Although these proposed combined-cycle gas units will be located near Dominion Energy's Chickahominy Substation, they are not located within the specific region of, nor adequately connected to, the North Hampton Roads Load Area (NHRLA) in a way that will resolve the NERC reliability violations located down the Peninsula that are driving the need for the Project. In order to resolve those violations, this generation would need to be located physically and electrically within the NHRLA area shown on the attached map. This is because the NERC violations generally are created by the energy deficiency within the NHRLA. Thus, generating power within, or transmitting power into, the NHRLA is required. Consequently, these proposed generating units will not alleviate the need for the new 500-kV Surry-Skiffes Creek electric transmission line.

The attached map shows the distance between the locations of the NERC violations that are being resolved by the Project, the generation in question near the Chickahominy Substation, and the lack of sufficient transmission lines of adequate voltage to bring such generation into the NHRLA. Absent such transmission, the general location of where generation must be located is within the NHRLA in order to alleviate the NERC reliability violations.

Based on this information and these evaluations, the new generating facilities do not "severely undercut the purpose and need for the Surry-Skiffes Creek Project" as stated by the NTHP. These proposed generation facilities, if actually constructed, are not viable alternatives to the Project due to their physical location. The Surry-Skiffes Creek line remains the best option to power the Peninsula – with the least environmental impact and the lowest cost to customers to resolve the NERC reliability violations.

Sincerely,

Steve Chafin

Director, Electric Transmission Planning & Strategic Initiatives

Attachment

Cc: William T. Walker, Army Corps of Engineers

Randy Steffey, Army Corps of Engineers

## SYSTEM OVERLOADS without YORKTOWN or SKIFFES CREEK

