

**COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION**

JOINT APPLICATION OF)
)
VIRGINIA ELECTRIC AND POWER COMPANY)
D/B/A DOMINION VIRGINIA POWER,)

CASE NO. PUE-2007-00031

and)
)
TRANS-ALLEGHENY INTERSTATE LINE)
COMPANY)

For certificates of public convenience and necessity)
to construct facilities: 500 kV Transmission Line)
from Transmission Line # 580 to Loudoun)
Substation)

APPLICATION OF)
TRANS-ALLEGHENY INTERSTATE LINE)
COMPANY)

CASE NO. PUE-2007-00033

For certificates of public convenience and necessity)
to construct facilities: 500 kV Transmission Line)
from Virginia-West Virginia Boundary to Virginia)
Electric and Power Company Transmission Line)
#580)

**RESPONSE OF TRANS-ALLEGHENY INTERSTATE LINE COMPANY
TO REPORT OF HEARING EXAMINER SKIRPAN**

By Report filed on July 28, 2008, Commission Hearing Examiner Alexander F. Skirpan recommended approval of the Virginia portion of the 500 kV transmission facility beginning in Pennsylvania and terminating at the Loudoun substation in Loudoun, Virginia ("502 Junction-Loudoun Line") proposed by Trans-Allegheny Interstate Line Company ("TrAILCo") and Dominion Virginia Power ("DVP") (collectively, the "Applicants"). Report at 222-223. In the main, the Report accepts the proposal and the reasoning of the Applicants presented in their

applications for certification for the 500 kV transmission facilities, filed April 14, 2007 (“Applications”) and in supporting testimony offered in this proceeding.

In particular, the Company appreciates the Report’s support of the 502 Junction-Loudoun Line, its careful synopsis of the testimonies and the thorough treatment of the issues raised by the public during the public hearings held in northern Virginia and at the Commission.

It is solely with respect to the following two issues that the Company respectfully files the following comments in response to the Report:

1. The electrical need in 2012 for the Amos to Kemptown transmission line (“Amos-Kemptown Line”) will persist even if the 502 Junction-Loudoun Line is constructed and in-service as scheduled.
2. The certificate of public convenience and necessity for TrAILCo must be initially granted rather than amended.

1. Persistent Need for Amos-Kemptown Facility

The Applicants have proven the need for the 502 Junction-Loudoun Line under various tests and in conjunction with a number of developments affecting the electric transmission system. The tests have included twelve load flow studies (TrAILCo Brief at 2) and the developments included the projected impact of demand side management and energy efficiency programs (TrAILCo Brief at 14), the announcement of the proposed 765 kV Amos-Kemptown Line, and the changing status of generation projects throughout the region. Report at 172.

In his assessment of the Amos-Kemptown Line as an alternative to the 502 Junction-Loudoun Line, Hearing Examiner Skirpan confirmed that the 502 Junction-Loudoun Line is the single best source of reliability benefits in 2011. Report at 193. He then quoted DVP’s statement that “there are no assurances that the Amos-Kemptown Line will be constructed and

operational in 2012.” *Id.* at 192-193 (citing DVP Brief at 84). Although this treatment of the Amos-Kempton Line was not critical to the Report’s Findings and Recommendations (Report at 221-223), TrAILCo requests that speculation regarding the construction and operation of the Amos-Kempton Line be omitted from the Commission Order in this proceeding. The 502 Junction-Loudoun Line is the “focus of these proceedings” (*id.* at 184), and the Amos-Kempton Line is relevant to the Commission decision only to the extent that the Amos-Kempton Line presents a sufficient alternative to the 2011 North American Electric Reliability Corporation (“NERC”) criteria violations addressed by the 502 Junction-Loudoun Line, which the Hearing Examiner determined it does not. Report at 193.

2. Grant of Certification

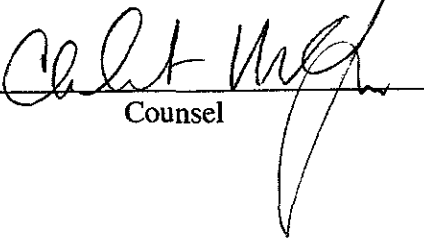
TrAILCo does not currently hold a certificate of public convenience and necessity in Virginia. Therefore, TrAILCo requests that Recommendation 5 be modified to grant, rather than amend, TrAILCo’s certificate. TrAILCo would propose Recommendation 5 be restated as follows:

6. **GRANTS** TrAILCo a certificate of public convenience and necessity to authorize construction of the proposed transmission facilities;

Respectfully submitted,

TRANS-ALLEGHENY INTERSTATE LINE
COMPANY

Dated: August 18, 2008

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