

October 23, 2019

**VIA ELECTRONIC FILING**

Ms. Kimberley A. Campbell, Chief Clerk  
North Carolina Utilities Commission  
Dobbs Building  
430 North Salisbury Street  
Raleigh, North Carolina 27603

**Re: Docket No. E-22, Sub 562  
Docket No. E-22, Sub 566**

Dear Ms. Campbell:

Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (“DENC” or the “Company”), submits for filing DENC’s responses to information requests by Commissioners Brown-Bland and Clodfelter at the Evidentiary Hearing in the above-referenced dockets. The requests and the Company’s responses to those requests, including Post-Hearing Exhibits 1 through 6, are provided below and attached. Some of the Exhibits contain confidential and proprietary trade secret information. This information is exempt from public disclosure under G.S. §132-1.2, and is being filed contemporaneously under seal.

1. Commissioner Request #1: Provide studies, reports, and cost-benefit analyses related to the Company’s decision to construct landfills for dry ash handling at Chesapeake, Clover, and Yorktown. Tr. Vol. 8, p. 54.

**DENC Response:**

The construction of the Chesapeake and Yorktown landfills in the 1980s coincide with the conversion of generation units at those plants from oil to coal. Those converted coal-fired units generated dry fly ash, which necessitated the construction of dry ash landfills at those locations. Similarly, Clover was constructed in the 1990s with coal-fired units that generated dry ash as a byproduct and which necessitated the construction of a dry ash landfill. The decisions to construct dry ash landfills at Chesapeake, Clover, and Yorktown were fully explained by Company witness Williams during in his testimony. *See* Tr. Vol. 5, pp. 85-88, 139-142; Tr. Vol. 7, pp. 132-133; Tr. Vol. 8, pp. 50-54.

Please also see the documents attached as Post-Hearing Exhibit 1a. Please also see the document attached as Confidential Post-Hearing Exhibit 1b.

2. Commissioner Request #2: Produce any claims filed with the Company's insurers regarding potential environmental contamination resulting from CCR. Tr. Vol. 8, pp. 69-70.

**DENC Response:**

Please see the documents attached as Confidential Post-Hearing Exhibit 2.

3. Commissioner Request #3: Provide studies, reports, and cost-benefit analyses leading to the decision to install wastewater treatment equipment at Clover Units 1 and 2 and Chesterfield Units 5 and 6. Also, provide similar documents leading to decision not to install similar equipment at other sites. Tr. Vol. 8, p. 49.

**DENC Response:**

Wastewater treatment equipment was installed at Clover, which was unrelated to CCR, to manage manganese levels in wastewater generated by the plant to meet new VPDES permit limits. Separately, the Company installed wastewater treatment equipment at Chesterfield to provide treatment for low-volume wastewaters, including FGD wastewater, in lieu of the Lower Ash Pond, which was being closed pursuant to the CCR Rule. The wastewater treatment equipment installed at Clover and Chesterfield were constructed to meet the specific needs of those plants and to comply with the plants' VPDES permits. Therefore, construction of similar equipment at other sites would not have been considered in the context of the decision making for Clover and Chesterfield. The decisions to construct wastewater treatment equipment at Clover and Chesterfield were fully explained by Company witness Williams during his testimony. *See* Tr. Vol. 8, pp. 42-50. The Company was unable to any documents responsive to this request.

4. Commissioner Request #4: Provide studies, reports, or cost-benefit analyses in connection with the conversion of Bremo and Possum Point from coal-fired to gas-fired units. Tr. Vol. 8, p. 75.

**DENC Response:**

Coal-fired units at Possum Point and Bremo were converted to gas-fired in 2003 and 2014, respectively. The conversions did not result in the retirement or decommissioning of those plants. The conversions of these facilities from coal to gas were discussed during the testimony of Company witness Williams. *See* Tr. Vol. 5, pp. 113-118. Additional information about these conversions is provided in the documents attached as Post-Hearing Exhibit 4a and Confidential Post-Hearing Exhibit 4b.

5. Commissioner Request #5: Produce historic groundwater monitoring data prior to the last three years. Tr. Vol. 8, p. 75.

**DENC Response:**

Please see the spreadsheets attached as Post-Hearing Exhibit 5.

6. Commissioner Request #6: Produce the Chesterfield closure plan. Tr. Vol. 8, pp. 75-76.

**DENC Response:**

Please see the document attached as Post-Hearing Exhibit 6.

7. Commissioner Request #7: Produce studies, analyses, cost-benefit analyses, or options analyses with respect to the construction of any new coal waste management unit or the replacement or expansion of any existing coal ash management unit. Tr. Vol. 8, p. 76.

**DENC Response:**

Historical decisions regarding the construction, replacement, or expansion of CCR management units were explained by Company witness Williams' testimony. *See* Tr. Vol. 5, pp. 85-93, 102-154; Tr. Vol. 7, pp. 64-83, 114-142; Tr. Vol. 8, pp. 7-74. Please also see the documents that were produced as Company Late-Filed Exhibit No. 4 on September 23, 2019 in response to Waste Coal Ash Question No. 2 pursuant to the Commission's September 16, 2019 Order Providing Notice of Commission Questions.

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Please do not hesitate to contact me should you have any questions. Thank you for your assistance with this matter.

Very truly yours,

/s/Mary Lynne Grigg

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing *Response to Information Requests from Commissioners*, as filed in Docket Nos. E-22, Sub 562 and E-22, Sub 566, were served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 23<sup>rd</sup> day of October, 2019.

/s/Mary Lynne Grigg

Mary Lynne Grigg

McGuireWoods LLP

434 Fayetteville Street, Suite 2600

PO Box 27507 (27611)

Raleigh, North Carolina 27601

Telephone: (919) 755-6573

*mgrigg@mcguirewoods.com*

*Attorney for Virginia Electric and Power  
Company, d/b/a Dominion Energy North  
Carolina*