BEFORE THE
PUBLIC SERVICE COMMISSION OF MARYLAND

IN THE MATTER OF:	)	
	)	
THE APPLICATION OF DOMINION COVE POINT LNG, LP FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT A GENERATING STATION WITH A NAME-PLATE CAPACITY OF 130 MW AT THE DOMINION COVE POINT LIQUEFIED NATURAL GAS TERMINAL IN CALVERT COUNTY, MARYLAND	)	**CASE NO. 9318**

MOTION OF DOMINION ENERGY COVE POINT LNG, LP TO AMEND CERTAIN CONDITIONS OF ITS CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY AND REQUEST FOR EXPEDITED CONSIDERATION

The Public Service Commission of Maryland (the "Commission"), on May 30, 2014, issued Dominion Cove Point LNG, LP (which recently changed its legal name to Dominion Energy Cove Point LNG, LP ("DECP")) a Certificate of Public Convenience and Necessity ("CPCN") authorizing construction of a 130-megawatt generating station (the "Generating Station") to serve the liquefied natural gas export facility (the "LNG Facility") (together the "Project"). Order No. 86372. Since that time, DECP has been constructing the Project, which is nearing completion with commercial operation anticipated no later than December 2017. This motion requests an amendment of the CPCN to remove an unnecessary limit and to allow for operational flexibility to maintain reliability of the Project. Specifically, DECP is requesting the following revisions to the CPCN:

- **Condition A-IX-3 and related revision to Condition A-III-4**: Remove the volatile organic compound (VOC) numeric limit in Condition A-IX-3 to reflect the infeasibility of applying a measurement methodology to the piping and equipment

components, while retaining the work practice (leak detection and repair program) emission limitation. Eliminating the VOC numeric limit will not change in any way how the Project is constructed and operated, or how leaks are identified and repaired. The Project-wide VOC emissions limit in Condition A-III-4 will be decreased to reflect the change.

- **Condition A-I-3(g)**: Revise the air permitting definition of the Project in Condition A-I-3(g) to allow for the use of the existing three GE Frame 3 and the Solar Titan combustion turbines to supply power for the Project as an alternative to the already approved GE Frame 5 combustion turbines if and as needed. No increase in emission limits is requested or needed for this revision.

DECP has consulted with the Maryland Department of the Environment Air and Radiation Management Administration ("MDE-ARMA") and the Maryland Department of Natural Resources Power Plant Research Program ("PPRP") regarding this proposed amendment, which reflects their input and recommendations. DECP respectfully requests that the CPCN be amended as set forth in the redlined Conditions attached hereto as Exhibit A. A clean version including the requested revisions is provided as Exhibit B. DECP also requests that the Commission consider and rule on the proposed amendment expeditiously and no later than November 15, 2017.

I. Background

The CPCN serves as the Prevention of Significant Deterioration ("PSD") and Non-attainment New Source Review ("NNSR") preconstruction air permit for the Project. The Project is located in Calvert County which is designated nonattainment for ozone and attainment for all other pollutants. Construction of the Project is almost complete with commercial operation scheduled for no later than December 2017. In all significant respects, DECP has constructed the Project consistent with the CPCN. It is a 130-megawatt ("MW") generating station and a liquefied natural gas export facility, producing the same products, using the same equipment, configured in the same way, and with the same control features and requirements as described in the CPCN.

The first requested revision reconciles the differences in the calculated fugitive emissions between the as-built configuration and the information used in the CPCN Application.[1] As explained in more detail later, the number of as-built piping and equipment components is more than was anticipated in the Application leading to a higher fugitive emission estimate and the need for more offsets. DECP has sufficient additional emission reduction credits, which were previously approved by MDE, to meet the requirement to offset the Project's incremental emissions in the ozone nonattainment area. The first requested revision also recognizes the merit of the work practice emission limitation— implementation of the state-of-the-art Texas Commission on Environment Quality ("TCEQ") 28LAER leak detection and repair ("LDAR") program—in controlling piping and equipment component fugitive VOC emissions. It would clarify the requirement to follow the TCEQ 28LAER LDAR program and remove the piping and equipment component fugitive VOC numeric limit because measurement of actual fugitive emissions is infeasible making a numeric limit unenforceable and superfluous. Those VOC fugitive emissions would remain subject not only to the work practice emission limitation, but also to the nonattainment requirement to offset projected emissions with emission reduction credits.

The CPCN currently allows use of the existing GE Frame 5 combustion turbines to provide backup power to the Project. The second requested amendment would allow for the operational flexibility to use the existing GE Frame 3 and Solar Titan combustion turbines to provide the backup power to the Project in the event the GE Frame 5 combustion turbines are unavailable or not in operation. The Frame 3 and Solar Titan turbines would be required to meet the same criteria and standards pursuant to which the Commission issued the CPCN in 2014.

[1] "Application" as used herein refers to the CPCN application filed with the PSD on April 1, 2013 and all supplemental filings as identified in CPCN General Requirements Gen.-2.

Since the CPCN was issued, DECP has constructed a replica control room and training simulator for training the operators. Based on operational simulations, it has become apparent that the flexibility to use the GE Frame 3 and Solar Titan combustion turbines directly as backup power for the Project will allow for more orderly startup and shutdown and less flaring. Thus, this amendment could result in less air emissions during abnormal operating scenarios.

The requested amendments will not have a significant impact on air quality. DECP has performed modeling demonstrating that the Project still will not cause or contribute to a national ambient air quality standard ("NAAQS") or PSD increment exceedance. Likewise, the updated Maryland Toxic Air Pollutant ("TAP") modeling shows that emissions from the facility will not adversely impact public health. The updated modeling is provided in Exhibit C.

II. Revision of Condition A-IX-3 and Related Condition A-III-4

One of the air "emission units" of the Project is the collective set of newly installed piping and equipment components associated with various process streams.[2] That emissions unit is designated "FUG-A" in the CPCN and it consisted of "valves, connectors, flanges, pump seals, and pressure relief valves." CPCN Condition A-I-3. The piping and equipment components are a potential source of fugitive VOC emissions, a precursor to the atmospheric formation of ozone, greenhouse gas ("GHG") emissions, and TAP emissions.

A. Revision of Piping and Equipment Component As-built Information

In preparing the initial estimate of piping and equipment component type and number used in the original application, DECP used information from piping and vendor-supplied equipment drawings of the facility. In some cases the preliminary drawings identified the piece of equipment, but not the number of connections that would be included or required to install, calibrate, and maintain that equipment. DECP obtained that precise information when the

[2] "Process stream" refers to the flow of fluid (liquid or gas) through the Project.

equipment (*e.g.*, an equipment skid instrument panel or heat exchanger) was delivered by the vendor and installed. DECP also began implementing the LDAR (*e.g.,* tagging components) program under the requirements of Condition A-IX-3 and Appendix B of the CPCN. Through this implementation, DECP's understanding of the definition of a "piping component" evolved from including things like piping flanges, connectors, and valves to also including equipment access plugs and instrument tubing valves and connectors. Indeed, the difference in component numbers is attributable primarily to the number of small components (*e.g.*, heat exchanger access plugs, instrument panel valves and instrument tubing connectors) associated with vendor supplied equipment. Photographs showing representative piping and equipment components are provided in Exhibit D.

The Application was based on a projection that there would be approximately 15,000 components. *See* Application at Appendix B-57. The current projection based on actual equipment delivered and installed is estimated to be approximately 162,700. Again, most of this increase is attributable to small diameter components such as instrument valves and tubing connectors and access plugs on heat exchangers. For example, of the estimated 162,700 components, approximately 88,700 are access plugs associated with the heat exchangers.

In designing and specifying equipment for the Project, DECP has taken steps to reduce leakage from the components. For example, connections for all piping in hydrocarbon service are welded with the exception of flanged fittings required for maintenance. The specifications require that "[p]iping shall be fabricated by bending and welding wherever possible, to minimize the use of flanges and fittings". There are over 45,000 welded connections at the facility. All fabricated piping segments are pneumatically or hydrostatically tested to higher than the design pressure of the system. Then, once the pressure testing is complete and the piping system is in

its permanent configuration, a leak test using nitrogen is performed to assure that the system is tight with no leaks to atmosphere.

Similarly, piping components were purchased to minimize leaks. DECP's specifications require that components not leak or are appropriately sealed for the intended use. For example,

- components are to meet applicable engineering standards from the American Petroleum Institute (API) (API 622) and the International Standards Organization (ISO) that define valve packing standards for manufacturers (ISO 15848 (Parts 1 and 2)).

- high performance ball valves specifications state: "valve components shall be designed to operate at vacuum with no leakage through the packing." CP Technical specification 15685H.

- LNG cryogenic pump standard requires a helium leak test for the electrical terminal header to ensure no leakage out of the electrical connection from the motor. CP Technical specification DECP-MEC-SPE-0005.

- all process safety relief valves and pressure control in hydrocarbon service discharge to the flare system.

- enclosed pumps are considered to be leakless per the TCEQ 28LAER. All these pumps employ a gas purge and gas detection monitoring system to protect against hydrocarbon leaks through the power cabling.

- non-enclosed hydrocarbon service pumps are specified to utilize a double mechanical seal and under the TCEQ 28LAER standard are deemed to be leak free.

- with one exception, centrifugal compressors have dual tandem seals with an inert buffer gas such as nitrogen to minimize leakage. One centrifugal compressor is too large to employ the double seal design and has a single seal with a backing bar.

In sum, through procurement and installation, DECP has taken steps to minimize the potential for fugitive emissions from piping and equipment components.

B. A Work Practice Emission Limitation is Appropriate for the Piping and Equipment Component Fugitive VOC Emissions.

Because Calvert County is in an ozone non-attainment area, the piping and equipment component fugitive emissions are subject to an "emission limitation" that is determined to be the

lowest achievable emission rate ("LAER") for VOC, which is an ozone precursor. COMAR 26.11.17.03.B(2). The Clean Air Act defines emission limitation as "a requirement established by the State or the Administrator which limits the quantity, rate, or concentration of emissions of air pollutants on a continuous basis, *including any requirement relating to the operation or maintenance of a source to assure continuous emission reduction, and any design, equipment, work practice or operational standard promulgated under this chapter*. CAA §302(k) (emphasis added). Thus, an emission limitation does not necessarily have to be a numeric limit to satisfy LAER. It can be a work practice such as LDAR.

EPA's long time approach recognizes that if it is technologically or economically infeasible to apply a measurement methodology to a particular emissions unit, as is the case with FUG-A, then a work practice may be imposed instead.[3] EPA recently reconfirmed the continued

[3] The EPA *New Source Review Workshop Manual* ("NSR Manual" provides that:

> Where technically feasible, LAER generally is specified as both a numerical emissions limits (e.g. lb/MMBtu) and an emissions rate (e.g. lb/hr). Where numerical levels reflect assumptions about the performance of a control technology, the permit should specify both the numerical emissions rate and the control technology. *In some cases where enforcement of a numerical limitation is judged to be technically infeasible, the permit may specify a design, operational, or equipment standard; however, such standards must be clearly enforceable, and the reviewing agency must still make an estimate of the resulting emissions for offset purposes*.

NSR Manual at G.4 (Draft Oct. 1990) (emphasis added). Similarly, other EPA guidance provides that:

> After a review of the information contained in the attached report, it is EPA's belief that for VOC emissions from hydrotreaters and hydrogen units, at both large and small refiners, compliance with an equipment leak control program (equipment modifications, and leak detection and repair) equivalent to the Hazardous Organic National (HON) Emission Standards for Hazardous Air Pollutants (40 CFR Part 63 Subpart H) would generally represent BACT. This is the most stringent control level achievable for VOCs from these units. In evaluating whether compliance with requirements equivalent to the HON would generally represent BACT,

viability of its long term approach.[4]

Fugitive emission sources are the prototypical example of emission units where emission limitations are typically expressed as work practices instead of as enforceable numeric limits.[5] Because fugitive emissions are those "which could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening," (COMAR 26.11.17.01.B(14)) they are not readily measurable with any degree of confidence making it difficult, if not impossible, to

---

> EPA considered the incremental and average cost of the control strategy as well as any associated energy and environmental impacts. No adverse impacts were found to be associated with the most effective control option.
>
> *The control option represents the most stringent control level achieved or contained in a SIP, it therefore also represents LAER for those units.*

Memorandum from John Seitz, EPA OAQPS, to Air Division Directors, Regions I-IX- *BACT and LAER for Emissions of Nitrogen Oxides and Volatile Organic Compounds at Tier 2/Gasoline Refinery Projects* (January 19, 2001) (emphasis added).

[4] 80 Fed. Reg. 36,477 (June 25, 2015) (approving Ohio use of a work practice as LAER when measurement is infeasible).

[5] Although TCEQ includes fugitive emission rates for leaking components in its permits for both LAER and best available control technology ("BACT"), they are "estimates" and not "limits"; compliance is demonstrated through implementation of a work practice such as 28LAER LDAR. *See, e.g.*, Flint Hills Resources Houston Chemical, LLC, *Emission Sources - Maximum Allowable Emission Rates* (Permit Numbers 18999, PSDTX755M1, and N216) (June 24, 2016) (footnote describing fugitive emissions: "Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.").
https://webmail.tceq.texas.gov/gw/webpub/b56838e211448616eaff9e62b0e8972d2513dfa2/GWDOC/DREF/tnrdom3.dms3apo.ansrp01/563800/Official/HTML/GWContentRoot?action=Document.View&merge=fileview&bNoRefresh=1&Item.Attachment.filename=MRT+%2d+18999+Flint+Hills+%5bamend%5d&User.context=b56838e211448616eaff9e62b0e8972d2513dfa2&Item.Attachment.type=Document&Item.Attachment.Library.id=tnrdom3.dms3apo.ansrp01&Item.Attachment.Document.id=563800&Item.Attachment.Document.version=Official&Item.Attachment.allowViewNative=1

The same footnote is used for both LAER and BACT. TCEQ has explained the reason for the footnote as follows: "Given the limitations on directly measuring the VOC emissions from the leaks at the site there is not an ability to prescribe a specific emission standard to the fugitive leaks." Freeport LNG Development, L.P., *Preliminary Determination Summary* (Permit Numbers 100114, N150, and PSDTX1282) (July 16, 2014).
(https://webmail.tceq.texas.gov/gw/webpub/8c6d983bcfe66428a80e615f0f0afbd402214/GWDOC/DREF/tnrdom3.dms3apo.ansrp01/491180/Official/HTML/GWContentRoot?action=Document.View&merge=fileview&bNoRefresh=1&Item.Attachment.filename=PDS+%2d+100114+Freeport+LNG+%5binitial%5d&User.context=8c6d983bcfe66428a80e615f0f0afbd402214&Item.Attachment.type=Document&Item.Attachment.Library.id=tnrdom3.dms3apo.ansrp01&Item.Attachment.Document.id=491180&Item.Attachment.Document.version=Official&Item.Attachment.allowViewNative=1)

determine compliance with and enforce a numeric limit. And a LAER limit must be enforceable whether it is a numeric limit or a work practice. While piping and equipment component leaks can and will be detected by the LDAR program, actual emissions associated with a leaking component are not (and cannot be) directly measured. They are estimated using correlation equations developed for the petroleum industry based on data collected before 1995.[6] Thus, the representativeness of these correlation equations to estimate emissions for the new Project is questionable, making the enforceability of a numeric limit likewise questionable.

The CPCN currently imposes both a work practice and a numeric limit on piping and equipment component VOC fugitive emissions. Notably, the CPCN imposes only a work practice on GHG and TAP emissions from piping and equipment components.

The CPCN requires DECP to implement a LDAR program based on the one developed by the TCEQ referred to as "28LAER" to meet LAER. CPCN Condition A-IX-3; Appendix B-3.[7] The intent of the LDAR program is to provide a methodical and disciplined process that requires owners to identify and evaluate the leaks in their facility using leak detection monitoring equipment and to take quantifiable steps to reduce and maintain lower fugitive emissions from their piping and equipment components.[8] It is the implementation of the LDAR program that will impact actual emissions from the piping and equipment components, not the imposition of the numeric limit.

---

[6] *Protocol for Equipment Leak Emission Estimates* (EPA-453/R-95-017).

[7] DECP is requesting a revision to Condition A-IX-3 to clarify that the LDAR program for VOC must follow TCEQ 28LAER and thus make that condition consistent with Appendix B.

[8] In addition to the 28LAER LDAR program, the piping and equipment components are subject to the visual inspection and leaking component repair requirements of COMAR 26.11.19.16.

The CPCN currently requires DECP to also comply with a numeric limit of 2.53 tons per year on a 12-month rolling basis. That limit is based on the original potential to emit ("PTE") estimate that was provided in the Application to determine the amount of emission reduction credits needed to offset those emissions under the non-attainment program requirements. The emissions estimate was calculated using EPA approved methodology based on (1) the projected number and types of piping and equipment components in each process stream, (2) the available preconstruction information on the VOC content of the process streams, and (3) the implementation of the LDAR program. Application at 3-26. Any change in those variables results in a change to the PTE estimate on which the limit was based.

Based on the as-built Project, the calculated VOC fugitive PTE estimate associated with the piping and equipment components is 20.1 tpy. The updated PTE calculation is provided in Exhibit E. This calculation assumes that the emission rate from a connector on a 0.25-inch tube is the same as the emission rate from a connector on a 20-inch diameter pipe.[9] In other words, while the piping and equipment component emission estimate reflects the best available data and standard industry practice for estimating such emissions, it still is not sufficiently accurate for purposes of enforcing an emission limit.

To address the correction to the emissions estimate in the Application and the infeasibility of measuring actual fugitive emissions as discussed above, DECP requests that CPCN Condition A-IX-3, the FUG-A VOC limit, be revised such that LAER is defined solely in terms of the state-of-the-art TCEQ 28LAER LDAR program required and the VOC numerical limit be removed as it is superfluous. Eliminating the VOC numerical limit will not change in

[9] *See Protocol for Equipment Leak Emission Estimates*, Table 2-4 (providing a single emission factor for each component type (*e.g.*, connector) and service (*e.g.*, gas) with no consideration of component size).

any way how the Project is constructed and operated, or how leaks are identified and repaired. Nor will it change the actual fugitive emissions associated with the piping and equipment components, which will still be subject to the TCEQ 28LAER LDAR program.

The requested removal of the FUG-A numerical VOC limit necessitates a decrease to the VOC Project-wide emission limit in CPCN Condition A-III-4. Accordingly, DECP requests that Condition A-III-4 be decreased from 33.3 to 30.8 tpy of VOC and that FUG-A VOC emissions be excluded from the calculation to demonstrate compliance with that limit. The recommended changes to effectuate this request are shown in Exhibit A (redline version) and Exhibit B (clean version)

As previously indicated, DECP has sufficient, MDE-approved, emission reduction credits for the calculated fugitive VOC emissions from the facility. VOC emissions will still be calculated as described in CPCN Condition A-IX-5 for emission reporting purposes. The revision also does not result in an adverse impact to public health as demonstrated by the updated TAP modeling (Exhibit C).

III. Revision of Condition A-I-3(g)

Prior to the Project, the facility already had one Solar Titan, two GE Frame 5, and three GE Frame 3 combustion turbines to provide electricity to the LNG import operations. To serve the Project, the CPCN authorized construction of a new 130-MW Generating Station. The two new GE Frame 7 combustion turbines provide direct mechanical power to run the liquefaction compressors.[10] Waste heat from those GE Frame 7 turbines is used by the two heat recovery steam generators ("HRSGs") that supply steam to the two new steam turbines (rated at 65 MW

[10] There is no back up for the mechanical power provided by the GE Frame 7 combustion turbines; the requested backup is for the steam generators and steam turbines that provide electricity for the Project.

each), which serve the electricity needs of the Project. During normal operations at full LNG production, the Project power requirements are 70 to 80 MW.[11] This requires both GE Frame 7 combustion turbines to be operating and providing waste heat for the HRSGs. The Frame 7 turbines produce enough waste heat for the HRSGs to allow each steam turbine to produce 35 to 40 MW, which is sufficient to power the Project.

If for any reason one of the 65 MW steam turbines is unavailable (e.g., planned outage, malfunction), the Project still would need the 70 to 80 MW to maintain normal operations. Currently, the CPCN specifically identifies the two existing GE Frame 5 combustion turbines as providing up to 25 MW to the Project. Condition A-I-3(g) (defining the "DCP Project" for air permitting purposes). While the Frame 5 turbines in most cases will be sufficient and are the preferred source of backup power for the Project, DECP has recently identified potential scenarios where being able to use the GE Frame 3 or Solar Titan combustion turbines to provide power to the Project could result in less emissions overall and enhance the reliability of the facility.

Since the CPCN was issued in 2014, DECP built a simulator for training purposes that replicates the Project control room. During training simulations, DECP recently learned that for certain abnormal operating scenarios, providing the 25 MW to the Project from the GE Frame 3 or Solar Titan combustion turbines instead of the GE Frame 5 combustion turbines could more readily facilitate orderly operation, including during startup, shutdown, or loss of electrical power, and could reduce the potential need for flaring from having to depressurize the process equipment.

[11] The range is caused by fluctuations in ambient temperature. During warmer weather the combustion turbine horsepower output is reduced and the lost energy must be provided by the electric driven helper motor. In addition the cooling requirements of the facility are higher in warmer weather which requires more electric power.

For example, if the site loses power, the currently authorized sequence for a black start of the Project is starting the Frame 3 or Solar Titan turbines, which are the only turbines at the site that have the ability to start without any support power, and using them to start the Frame 5 turbines before any power could be provided to the Project. This obviously takes more time to provide power to the Project than if the Frame 3 and Solar Titan turbines could provide power to the Project directly. That delay could lead to the piping and equipment warming up sufficiently before restart of operations to cause the LNG, propane, and or mixed refrigerant to be released to the flares. That potential flaring likely could be reduced if the Frame 3 and Solar Titan turbines are authorized to provide power directly to the Project, as that power could be provided earlier resulting in a more orderly startup. In addition to providing power to start the Frame 5 turbines, the Frame 3 and Solar Titan turbines would temporarily provide power to the Project for auxiliary loads such as lighting, control system power, lube oil pumps and air compressors until power could be provided from the Frame 5 turbines.

While it is not possible to identify all potential scenarios where direct use of the Frame 3 and Solar Titan turbines would be preferable, DECP has identified two scenarios in addition to the site-wide power loss discussed above. Both of these scenarios would be considered abnormal events: (1) when one of the steam turbines and both Frame 5 turbines are unavailable; or (2) when both steam turbines and the Frame 5 turbines are unavailable.

As previously discussed, the power requirements for the Project are 70 to 80 MW when the facility is operating at full LNG production. If one steam turbine is out of service as a result of an equipment failure, the remaining steam turbine can be operated at a higher output (60 to 65 MW) with the remaining 10 to 20 MW being supplied by the Frame 5 turbines. Currently, the Project would have to operate on reduced power if the Frame 5 turbines are unavailable. The

requested CPCN amendment would authorize the Frame 3 or Solar Titan turbines to be used instead to maintain full operation of the Project.

If both steam turbines are lost during normal operation, the LNG Facility is designed to safely shut down using the emergency diesel generator, uninterruptible power supplies for the control system, battery operated lube oil pumps, and power from the Frame 5 turbines. But in the event the Frame 5 turbines are not online when the steam turbines are lost, the system still is designed to orderly shutdown just over a longer period of time. As equipment heats up over this longer time period, vapor would be released through the pressure relief system to the flares. If the LNG facility is authorized to draw power automatically from whatever generation is online (*i.e.*, the Frame 3 or Solar Titan turbines) until the Frame 5 turbines can be brought on line, the potential for flaring would be reduced. The requested revision would authorize the facility to be operated in this manner.

Thus, there may be unusual circumstances when the GE Frame 5 combustion turbines are unavailable or not operating, such as black start situations or unplanned Frame 5 outages. To provide additional operational flexibility for the Project, DECP requests that Condition A-I-3(g) be revised as shown in Exhibit A (clean version in Exhibit B) to allow the alternative of using the three GE Frame 3 and the Solar Titan combustion turbines to supply up to 25 MW if required by operating conditions when the Frame 5s are not operating for this purpose.

No other revisions to the CPCN are requested or necessary to allow for this alternative operating scenario. Although the GE Frame 3 and Solar Titan hourly emission rates are higher than the GE Frame 5 hourly emission rates, DECP is not requesting an increase in the DCP Project-wide emission limits provided in CPCN Condition A-III-4. Therefore, there is no emissions increase associated with this requested operational flexibility. The GE Frame 3 and

Solar Titan combustion turbines currently can operate without restriction to provide power to the existing equipment at any time. The requested amendment would impose the same restrictions and limitations on the GE Frame 3 and Solar Titan combustion turbines when they are used to provide power to the Project as are currently imposed on the GE Frame 5 combustion turbines when they are used for that purpose—that is, their emissions being included in the Project-wide 12-month rolling limits in CPCN Condition A-III-4.

To confirm that the requested alternative operating scenario would not impact ambient air quality, DECP included the use of the GE Frame 3 and Solar Titan combustion turbines as part of the Project emissions in the updated modeling (Exhibit C). The modeling for the GE Frame 3 and Solar Titan combustion turbines as part of the Project was performed consistent with the previously approved modeling protocol and modeling for the GE Frame 5 turbines providing the 25 MW to the Project. Moreover, as existing sources, emissions from the GE Frame 3, Solar Titan, and GE Frame 5 combustion turbines were modeled at maximum, full-load hourly and annual rates in the cumulative NAAQS modeling, along with all the other existing sources at the facility. As previously discussed, the updated modeling still demonstrates compliance with the NAAQS and PSD increment.

IV. Expedited Consideration and Proposed Schedule

DECP anticipates that the Project will commence commercial operation no later than December 2017. DECP respectfully requests expedited consideration of the proposed amendment to the CPCN and seeks a final order by November 15, 2017. DECP recognizes that the amendment process will need to include the opportunity for public participation.

DECP accordingly proposes the following schedule, which incorporates public participation and assumes that the Commission (1) offers the opportunity for evidentiary proceedings and (2) delegates consideration of the amendment to a public utility law judge.

Projected Dominion Cove Point Amendment Procedural Schedules

Amendment Filing	August 10, 2017
Any Reply Testimony	September 5, 2017
Begin advertisements for hearing	~September 7, 2017
Any Rebuttal Testimony	September 18, 2017
Evidentiary Hearing (if necessary)	October 11, 2017
Public Hearing	October 11, 2017
Post-Hearing Briefs	October 18, 2017
Proposed Order (if delegated)	October 25, 2017
Final Order	November 15, 2017

In the event the Commission requires an evidentiary hearing, DECP is providing with this submittal Direct Testimony of Robert R. McKinley and Elizabeth H. Gayne. DECP will expedite responses to any data requests or requests for information to the greatest extent possible to facilitate expeditious review.

V. Conclusion

For the foregoing reasons, DECP respectfully requests that the Commission amend the CPCN as requested as expeditiously as possible.

Respectfully submitted

August 10, 2017

Counsel for Dominion Energy Cove Point:

Lisa S. Booth
Dominion Energy Services, Inc.
120 Tredegar Street, RS-2
Richmond, Virginia 23219

Kevin J. Finto
Harry M. Johnson, III
Hunton & Williams LLP
951 East Byrd Street
Richmond, Virginia 23219

J. Joseph Curran, III
F. William DuBois
Venable LLP
750 East Pratt Street, Suite 900
Baltimore, MD 21202

CERTIFICATE OF SERVICE

I hereby certify that this 10th day of August 2017, a copy of the foregoing filing was served upon all parties and interested persons included on the service list in this proceeding.

August 10, 2017