



COMMONWEALTH OF VIRGINIA
COUNTY of CHARLES CITY
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COUNTY ADMINISTRATOR

MICHELLE JOHNSON

October 12, 2021

Mr. Bernard J. Logan, Clerk
State Corporation Commission
Document Control Center
Post Office Box 2118
Richmond, Virginia 23218

Re: Case No. PUR-2021-00211 – Petition of Chickahominy Pipeline, LLC

Dear Mr. Logan:

I understand that the deadline for filing comments, in this case, was last Friday, October 8, 2021. The County, however, was unable to meet that deadline, and we ask that the Commission allow for this late filing and consider these comments as it renders its decision.

In the above-referenced Case, Charles City County would like to inform the Commission that we wholeheartedly support the project. Chickahominy Power Project, for which the Commission issued a CPCN, is the ultimate recipient of the entire volume of natural gas to be transported by the pipe proposed by Chickahominy Pipeline, LLC in their Petition.

We have noted that there has been a considerable amount of misinformation stemming from Chickahominy Pipeline's effort to secure the rights of way for constructing the proposed pipe from Charlottesville where it will connect with the largest existing natural gas trunkline owned and operated by Transco and traverse approximately 83 miles, through five Counties and ultimately to the Chickahominy Power project site in Charles City County. To clarify some of the misinformation, we share some facts below.

- Chickahominy Pipeline is not a “Regulated Utility” as we understand that definition - it is proposing to simply provide natural gas transportation service to Chickahominy Power
- The proposed pipeline has been designed to carry the exact quantity of the daily needs of the power plant and there are no other exiting or intended customers
- Chickahominy Pipeline, LLC is a stand-alone entity that will charge Chickahominy Power a fee for its transportation service under a 30-year contract – that expected revenue will enable the financing of the pipeline
- Chickahominy Pipeline, LLC is a non-regulated private entity that has no “eminent domain” condemnation rights and as such, has approached private landowners along the entire length of the proposed route to seek permission to perform surveys and if suitable, to negotiate easement agreements with the individual landowners
- Chickahominy Pipeline, LLC has engaged companies with over four decades of pipeline construction experience and these entities will be adhering to all Federal and State safety and environmental regulations in the construction of the pipeline
- The pipeline will be buried and, for over 40% of the entire route, existing utility rights of ways and easements are to be followed
- Electric compression will be used at the Transco interconnect.

As the Commission is aware, Charles City County is economically distressed, and the Chickahominy Power project will assist Charles City economically and diversify revenues. Once in service, the Chickahominy Power project will eliminate the financial difficulties our county faces. Additionally, the power project will bring jobs to our county as will the work to maintain and manage the pipeline on a long-term basis.

While environmental groups have been actively opposing this project in Charles City County, we find it hypocritical that they cite “environmental justice”. The advanced technology to be deployed by the Chickahominy Power project will put immediate pressure on older and far more polluting power plants to retire earlier than they would otherwise. We all share the air in Virginia so that is a desirable outcome.

Additionally, we take note of the term used by environmental groups: “stranded assets”. This term is often used to make the point that when Virginia “transitions to net zero” this power plant will be a “stranded asset”. This is a false argument. Chickahominy Power’s gas turbines have a built-in capability to transition to 100% Hydrogen. A great deal of DOE and private research is going into Hydrogen technologies intending to make that fuel with zero carbon emissions. Finally, in our dealings with the principals of Balico, LLC, the firm providing development services to both Chickahominy Power and Chickahominy Pipeline, we have been kept informed and they have been fully transparent.

Sincerely,



Michelle Johnson
County Administrator