



March 16, 2017

The Honorable James Richard Perry
Secretary of the Energy
United States Department of Energy
1000 Independence Ave, SW
Washington, DC 20585

Re: Report on Yorktown Units 1 and 2 Revised Outage Schedule - Order No. 202-18-3

Dear Secretary Perry:

Pursuant to Order No. 202-18-3 (the “Renewal Order”) issued March 13, 2018, by the Secretary of Energy (“Secretary”), PJM Interconnection, L.L.C. (“PJM”) and Virginia Electric and Power Company (“Dominion Energy Virginia”) respectfully submit the attached Skiffes Creek Construction Transmission Outage Schedule and Yorktown Units 1 and 2 Emission Estimates as of March 12, 2018 (“March 2018 Outage Schedule”). This submission is in accordance with the Secretary’s directive that PJM and Dominion Energy Virginia provide updated outage schedules and associated Yorktown Units 1 and 2 emission estimates in the event the schedule or emission estimates change from those presented in the PJM Renewal Application Filing dated February 20, 2018 (“Renewal Application”) within two weeks of the change.¹

In the Renewal Application, PJM explained that construction of the Skiffes Creek Transmission Project began in July 10 2017 and was expected to take approximately 18-20 months.² As reported on October 12, 2017, the Skiffs Creek Transmission Project was scheduled to be completed May 12, 2019.³ The October 2017 Outage Schedule included a Skiffes Creek construction schedule and planned transmission outage sequence, and Yorktown run and emission estimates. The schedule also provided actual emissions from the Yorktown unit runs as directed by PJM, the current estimated planned

¹ Renewal Order at 2.

² Renewal Application at 6-7.

³ Report on Yorktown Units 1 and 2 Revised Construction Schedule (“October 2017 Outage Schedule”).

transmission outage time frames, transmission limiting contingencies, Dominion Zone load thresholds which trigger the need to operate Yorktown Units 1 and/or 2, estimated run time in days, and Dominion Energy Virginia's estimated emissions based on the run time estimates. The Renewal Application explained that PJM and Dominion Energy Virginia would provide DOE with revised construction schedules and estimated emissions.⁴

In the Renewal Order, the DOE determined that an emergency exists due to the shortage of electric energy and the shortage of facilities for the generation and transmission of electric energy.⁵ The Secretary found the issuance of the Renewal Order is necessary to address the emergency and serve the public interest in the North Hampton Roads area.⁶ The Renewal Order also directed PJM and Dominion Energy Virginia to provide an updated outage schedule and associated Yorktown Units 1 and 2 emission estimates in the event the outage schedule or emission estimates change from those presented in the PJM Renewal Application within two weeks of the change.⁷

The attached March 2018 Outage Schedule includes a revised construction schedule and planned transmission outage sequence, and Yorktown run and emission estimates. The March 2018 Outage Schedule extends the October 2017 Outage Schedule by 3 days (from May 12, 2019 to May 15, 2019) for the planned transmission outages associated with Skiffes Creek transmission project that may require Yorktown 1 & 2 units to run. The revised schedule also adds an estimated additional 28 run days for the dispatch of the Yorktown units for reliability. The Skiffes Creek transmission project is currently estimated to be complete by August 21, 2019, but under the revised schedule PJM is not expected to dispatch the units after May 15, 2019.

The planned transmission outages are coordinated between PJM and Dominion Energy Virginia to ensure the reliability of service in the area and to support the Skiffes Creek construction schedule. After numerous consultations between PJM and Dominion Energy Virginia, the construction schedule,

⁴ Renewal Application at 7, footnote 18.

⁵ Renewal Order at 1.

⁶ Renewal Order at 1.

⁷ Renewal Order at 2.

the transmission outage schedule, and the estimated run days were revised due to complications encountered in the construction of the Skiffes Creek transmission project. A one month delay to the Skiffes Creek construction schedule was initially proposed due to a manufacturer's defect in the Y Clevis which holds the wire to the insulator used on the line rebuild sections. A failure of the Y Clevis could result in the wire dropping from the transmission tower. With the manufacturer's help Dominion Energy Virginia identified the defect parts and replaced them, however the work required climbing each structure and replacing this part on all three phases. Also, several additional transmission towers will need to be replaced that were not in the original plan due to deterioration found in the field. These additional construction delays pushed the outages of the 292 and 285 lines to peak loading periods which created operational concerns. Therefore, PJM and Dominion Energy Virginia agreed to rearrange the construction schedule and the outage schedule to minimize the impact of transmission outages of the 285 line during the 2018 summer peak and the 2019 winter peak periods. This resulted in an estimated additional 28 run days for the dispatch of the Yorktown units for reliability and rearranging certain transmission outages. While under the revised schedule PJM is not expected to dispatch the units after May 15, 2019, construction of the Skiffes Creek transmission project has been extended and is currently estimated to be complete by August 21, 2019.

The March 2018 Outage Schedule provides actual emissions from the July 2017, August 2017, and January 2018 Yorktown unit runs. The schedule also shows the current estimated planned transmission outage time frames, transmission limiting contingencies, Dominion Zone load thresholds which trigger the need to operate Yorktown Units 1 and/or 2, estimated run time in days, and Dominion Energy Virginia's estimated emissions for the remainder of the schedule based on the run time estimates.

The construction schedule may change again. PJM and Dominion Energy Virginia will provide an updated outage schedule and associated Yorktown Units 1 and 2 emission estimates in the event the outage schedule or emission estimates changes as directed by the Renewal Order.

REQUEST FOR CEII DESIGNATION

The filing includes the following attachments:

1. Non Public version of Creek Construction Transmission Outage Schedule and Yorktown Units 1 and 2 Emission Estimates as of March 12, 2018 (password protected containing Critical Energy Infrastructure (“CEII”) material); and

2. Public version of Creek Construction Transmission Outage Schedule and Yorktown Units 1 and 2 Emission Estimates as of March 12, 2018 (public version with CEII material redacted).

In regard to the Non Public version, PJM and Dominion Energy Virginia respectfully requests the transmission outage and limited contingency information submitted to the DOE be designated as CEII pursuant Federal Power Act (“FPA”) Section 215A(d) and the implementing regulations, 18 C.F.R. Section 388.113.

In Fixing America's Surface Transportation Act (“FAST”) Section 215A(a)(3), CEII is specifically defined as information “designated as critical electric infrastructure information by ... the Secretary of the Department of Energy pursuant to subsection (d).”⁸ Under FPA Section 215A(a)(3), CEII includes information that is submitted to the DOE, and designated as such by DOE.⁹ The regulations define CEII in pertinent part as follows:

“1) Critical electric infrastructure information means information related to critical electric infrastructure ... Provided to the Commission or other Federal agency ... that is designated as critical electric infrastructure information by the Commission or the Secretary of the Department of Energy pursuant to section 215A(d) of the Federal Power Act. Such term includes information that qualifies as critical energy infrastructure information under the Commission's regulations. Critical Electric Infrastructure Information is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552(b)(3) and shall not be made available by any Federal, State, political subdivision or tribal authority pursuant to any Federal, State, political subdivision or tribal law requiring public disclosure of information or records pursuant to section 215A(d)(1)(A) and (B) of the Federal Power Act.”

2) Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about ... existing critical infrastructure that:

- (i) Relates details about the production, generation, transportation, transmission, or distribution of energy;*
 - (ii) Could be useful to a person in planning an attack on critical infrastructure;*
 - (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552;*
- and*

⁸ FAST Act, Pub. L. No. 114-94, section 61,003, 129 Stat. 1312, 1776.

⁹ FAST Act, Pub. L. No. 114-94, section 61,003, 129 Stat. 1312, 1773 (“critical electric infrastructure information means information ... generated by or provided to the Commission or other Federal agency ... that is designated as critical electric infrastructure information by the Commission or the Secretary pursuant to subsection (d)”).

(iv) Does not simply give the general location of the critical infrastructure.”¹⁰

PJM and Dominion Energy Virginia submits the redacted information is CEII because it provides details about the production, generation and transportation of energy, which if publically available could be useful in planning an attack on critical infrastructure in the North Hampton Road area of the Commonwealth of Virginia, namely the electric transmission system.

Respectfully submitted,

/s/ Michael C. Regulinski

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¹⁰ 18 C.F.R. Section 388.113(c)(1) and (2).