BEFORE THE

COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

APPLICATION OF

VIRGINIA ELECTRIC AND POWER COMPANY D/B/A DOMINION VIRGINIA POWER

CASE No. PUE-2005-00018

For a certificate of public convenience and necessity for facilities in Loudon County: Pleasant View-Hamilton 230 kV Transmission Line And 230kV-34.5kV Hamilton Substation

DIRECT TESTIMONY

AND EXHIBITS OF

DAVID A. SCHLISSEL

ON BEHALF OF

THE TOWN OF LEESBURG, VIRGINIA

Synapse Energy Economics, Inc. 22 Pearl Street Cambridge, MA 02139

November 30, 2005

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1	Q.	PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.
2	A.	My name is David A. Schlissel. I am a Senior Consultant with Synapse Energy
3		Economics, Inc. My business address is 22 Pearl Street, Cambridge,
4		Massachusetts 02139.
5	Q.	ON WHOSE BEHALF ARE YOU TESTIFYING?
6	A.	I am testifying on behalf of the Town of Leesburg, Virginia ("Leesburg").
7	Q.	PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND
8		PROFESSIONAL EXPERIENCE.
9	A.	I graduated from the Massachusetts Institute of Technology in 1968 with a
10		Bachelor of Science Degree in Engineering. In 1969, I received a Master of
11		Science Degree in Engineering from Stanford University. In 1973, I received a
12		Law Degree from Stanford University. In addition, I studied nuclear engineering
13		at the Massachusetts Institute of Technology during the years 1983-1986.

1		Since 1983, I have been retained by governmental bodies, publicly-owned
2		utilities, and private organizations in 24 states to prepare expert testimony and
3		analyses on engineering and economic issues related to electric utilities. My
4		clients have included the Staff of the California Public Utilities Commission, the
5		Staff of the Arizona Corporation Commission, the Staff of the Kansas State
6		Corporation Commission, the Arkansas Public Service Commission, municipal
7		utility systems in Massachusetts, New York, Texas, and North Carolina, and the
8		Attorney General of the Commonwealth of Massachusetts. I am currently a
9		Senior Consultant at Synapse Energy Economics.
10		I have testified before state regulatory commissions in Connecticut, Arizona, New
11		Jersey, Kansas, Texas, New Mexico, New York, Vermont, North Carolina, South
12		Carolina, Maine, Illinois, Indiana, Ohio, Massachusetts, Missouri, Wisconsin,
13		Rhode Island and Iowa and before an Atomic Safety & Licensing Board of the
14		U.S. Nuclear Regulatory Commission.
15		A copy of my current resume is attached as Exhibit DAS-1.
16	Q.	PLEASE DESCRIBE SYNAPSE ENERGY ECONOMICS.
17	A.	Synapse Energy Economics ("Synapse") is a research and consulting firm
18		specializing in energy and environmental issues, including electric generation,
19		transmission and distribution system reliability, market power, electricity market
20		prices, stranded costs, efficiency, renewable energy, environmental quality, and
21		nuclear power.
22	Q.	HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?
23	A.	No.
24	Q.	HAVE YOU PREVIOUSLY PRESENTED TESTIMONY CONCERNING
25		THE SITING OF PROPOSED TRANSMISSION LINES?
26	A.	Yes. I have presented testimony concerning proposed transmission lines in New
27		Mexico, West Virginia, Maine and Connecticut.
28	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS
29		PROCEEDING?

1 A. Synapse was retained by the Town of Leesburg to examine issues related to the 2 siting of Virginia Electric and Power Company's ("DVP" or the "Company") 3 proposed 230 kV transmission line. This testimony presents the results of our 4 investigations. 5 Q. PLEASE EXPLAIN HOW YOU CONDUCTED YOUR ANALYSES. 6 Α. I have reviewed the following information in our investigation: 7 DVP's April 14, 2005 Application, Appendix, Direct Testimony and 8 Exhibits (collectively, the "Application") 9 The Town's position with respect to the Application, as expressed through 10 its Resolution No. 2005-106, adopted by the Town Council on June 14, 11 2005 ("Resolution"); 12 The Comprehensive Plan of the Town of Leesburg and other documents that relate to the Washington & Old Dominion Regional Park and Trail 13 14 ("W&OD Trail"); and 15 DVP's responses to discovery questions submitted by the Town of 16 Leesburg. 17 In addition, I have visited the Town of Leesburg and the W&OD Trail and have 18 viewed proposed transmission line routes outside of the Town. 19 Q. WHAT ARE YOUR ULTIMATE CONCLUSIONS? 20 A. First, the route for the proposed transmission line should not follow any section of 21 the W&OD Trail, even if it is placed underground. Such a route would disturb or 22 destroy the scenic, recreational, & historical aspects of the Trail and the 23 surrounding communities. 24 Second, if any part of the approved route will be within or near to the municipal

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limits of the Town of Leesburg, the line should go underground.

1	TRA	NSMISSION LINE IMPACT ON THE TOWN'S COMPREHENSIVE PLAN
2	Q.	PLEASE DESCRIBE THE TOWN OF LEESBURG AND ITS INTERESTS
3		IN THIS PROCEEDING AS THEY RELATE TO ITS COMPREHENSIVE
4		PLAN AND THE W&OD TRAIL.
5	A.	On September 13, 2005, the Town culminated a two year process to revise its
6		1997 Town Plan. On that date, Town Council adopted the Revised 2005 Town
7		Plan ¹ by passing ordinance no. 2005-0-15.
8		The Town Plan comprises the goals and objectives to guide land development in
9		the Town and the Adjacent Urban Growth Area / Joint Land Management Area. A
10		presentation and analysis of existing conditions are contained in a set of separate
11		background reports, also available from the Town's web site. As expressed in the
12		Town Plan,
13 14 15 16 17 18 19		For 250 years, the Town of Leesburg has evolved from a rural hamlet to the commercial center of western Loudoun County, the fastest growing county in the nation. The pressures for growth in the Town are the result of the robust regional economy that will continue to draw more businesses, government jobs and residents. Leesburg's challenge and planning vision is to accommodate its share of that growth while retaining and enhancing the Town's
20 21 22 23 24 25 26 27 28		character and quality of life. Town character is of paramount importance to Leesburg. In particular, the Old and Historic District is the basis of Leesburg's identity. It is a compact, energizing mix of land uses; its blocks and buildings are pleasingly and conveniently human scaled; its streets, with automobiles tamed, glimpses of historic landmarks, and intimate views of architectural details, invite walking; its civic squares and rustic W & OD trail offer counterpoints of nature within a richly human environment.
29 30 31 32 33 34		Other portions of the Town have a different character. There is a strong residential component of the community that was designed and built upon the mid-20th century subdivision model where more uniform uses and large lots, curved streets and culs-de-sac dominate the landscape. These residential areas also need protection as growth continues.

Town of Leesburg, 2005 Town Plan, September 13, 2005 Revised Draft ("Town Plan"), included as Exhibit DAS-2.

The planning vision for the foreseeable future is to continue the diversity in economic and housing opportunities in a manner that reflects the best and essential qualities of the old and historic downtown. Leesburg will maintain a high quality of life by providing a full range of community facilities and services and diverse economic opportunities, protecting natural and heritage resources, and protecting against negative environmental impacts.²

The Town Plan further identifies the W&OD Trail, which passes through the heart of the Town and its Old & Historic District, as one of its most valuable offerings:

Perhaps one of Leesburg's most valuable assets is the W & OD Trail, which bisects the Town and provides both recreation and tourism benefits.³

Leesburg was founded in 1758. In recognition of its rich heritage, the Town Plan calls for Leesburg to identify, protect, and restore its historic and archaeological resources in recognition of their significance to the Town's identity.⁴

The Town has a Board of Architectural Review ("BAR"). Among its responsibilities are to administer the historic district Zoning Ordinance provisions and advise the Town Council in its efforts to preserve and protect historic structures and sites.⁵ In addition to the Town's H-1 historic overlay district, the Town has an H-2 architectural design control overlay district for the significant tourist routes to Leesburg and the surrounding area. The BAR decides on architecture and other design elements of proposed development in the corridors in order to help protect the heritage resources of the Town and the area. One objective is to designate new H-2 corridor districts and expand existing H-2 corridor districts that apply to significant routes of tourist access, including the Trail and key entry roads.

Exhibit DAS-2, at page, INT-1.

Exhibit DAS-2, at page PR-1.

Exhibit DAS-2, at page HR-1.

Exhibit DAS-2, at page HR-1.

In November 2002, the Town adopted its "Comprehensive 20-Year Parks,
Recreation, Open Space, Trails, and Greenways Master Plan." A continuing
objective of the Town Plan for its parks and recreation facilities is to protect and
connect the Town's extensive greenway corridors, including protecting the W &
OD Trail corridor from development, intrusion from the proposed power lines, or
other utilities. ⁷

The Trail is a central part of the Town's transportation vision as well. One objective is to "provide a safe, convenient, continuous, comfortable, and aesthetically pleasing transportation environment that promotes bicycling and walking as legitimate alternatives to the single-occupant automobile for trips less than one mile in length." Financially, the Town will emphasize within the capital improvements program (CIP) bicycle and pedestrian improvements that connect public parks, schools, the Trail, the C & O Canal path, and the Town's residential areas. The Plan also calls for the Town to re-submit a grant application for federal transportation enhancement funds to provide a multi-use path connection between the Trail and the C & O Canal via White's Ferry, and to coordinate with the County to ensure consistency with applicable portions of the "Loudoun County Bicycle and Pedestrian Mobility Master Plan."

In the maps accompanying the Town Plan, the Trail is identified variously as major open space, ¹⁰ an integral part of the Town's Old and Historic Districts, ¹¹ and a multi-use path for pedestrians and bicyclists. ¹²

Q. WHAT IS THE TOWN'S OFFICIAL POSITION WITH RESPECT TO THE APPLICATION?

A. The Resolution calls for the Town Council, on behalf of the citizens of Leesburg, to continue to support only an underground configuration of the proposed

⁶ Exhibit DAS-2, at page PR-1.

Exhibit DAS-2, at page, PR-2.

⁸ Exhibit DAS-2, at page, TR-6.

⁹ Exhibit DAS-2, at page TR-7.

Exhibit DAS-2, the Green Infrastructure Policy Map and Land Use Policy Map.

Exhibit DAS-2, the Heritage Resources Policy Map.

Exhibit DAS-2, the Bicycle/Pedestrian Facilities Policy Map.

transmission line if it is to be constructed within or in close proximity to the
Town's municipal limits; to oppose an overhead route within or in close
proximity to the Town's municipal limits; and to oppose the use of any part of the
W&OD Regional Park west of the Pleasant View substation as a route, regardless
of whether the line is overhead or underground.

6 Q. HAS DVP EXPLAINED WHY IT DECIDED NOT TO USE THE W&OD 7 TRAIL AS THE PROPOSED ROUTE FOR ITS NEW TRANSMISSION

8 LINE?

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A. Yes. DVP witness Bailey explained the reasons why DVP responded to the public and governmental opposition to the use of the W&OD Trail for its proposed transmission line:

In direct response to the public's request, the Company agreed to avoid utilizing a major portion of the 11-mile length of the W&OD Trail at issue due to the impacts on the scenic, recreational, and historical aspects of the W&OD Trail. Utilizing the W&OD Trail through Leesburg and west to the Hamilton Substation would cross through portions of the Leesburg Historical District and the Paeonian Springs Historical District. It would pass directly through the Town of Leesburg and the Village of Paeonian Springs. It would remove much of the vegetation that has grown up on the W&OD Trail in areas that have extensive canopies. Although the W&OD Trail could still be utilized for recreation after the line was installed, as it is in Arlington, Fairfax, and Loudon Counties where transmission lines presently exist, the character of this portion of the W&OD Trail would be changed as a result of the removal of trees. The Company specifically took into account the views of each of the localities who stand in opposition to the project on the W&OD Trail. For these reasons the Company decided not to use the nine miles of W&OD Trail easement between east Leesburg and the Hamilton Substation site. The two miles between Pleasant View Substation and the Route 7 bypass in Leesburg would remain in the study of alternatives. This position was communicated to area legislators in a September 2, 2004 letter from the Company.

Q. DOES DVP INCLUDE SEGMENTS OF ALTERNATIVE ROUTES THAT USE SECTIONS OF THE TRAIL, OR THAT ARE WITHIN OR IN CLOSE PROXIMITY TO THE TOWN'S MUNICIPAL LIMITS?

1	A.	Yes. The Company's Proposed Route, E7, has a segment (10c) that passes within
2		close proximity to the Woodlea Manor subdivision, located within Leesburg's
3		municipal limits. Alternate Routes D2 and D3 have multiple segments that are
4		within or in close proximity to the Town's municipal limits, and one proposed
5		segment (40) on Route D2 utilizes a portion of the Trail west of the Pleasant View
6		substation. The Town wants to assure that any route ultimately approved by the
7		Commission includes sufficient safeguards and mitigation measures to avoid any
8		potential adverse impact to the interests of its citizens, as well as the scenic,
9		recreational, & historical aspects of both the Town and the Trail.
10	Q.	HOW MANY RESIDENCES WOULD BE NEAR THE TRANSMISSION
11		LINE IF IT WERE CONSTRUCTED ALONG THE W&OD TRAIL OR
12		WITHIN THE TOWN'S MUNICIPAL LIMITS?
13		A. A transmission line in the W&OD Trail would be within 500 feet of 841
14		residences, according to data in DVP's Routing Study. 13 Based on aerial
15		photography, DVP found that there are 53 residences within 100 feet of the

W&OD Trail.¹⁴ . By way of comparison, only 38 residences would lie within 500

feet of DVP's Proposed Route, 15 and none within 100 feet. 16

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DVP Application, Volume I, at page 104.

Burns & McDonnell Routing Study and Environmental Report for Pleasant View to Hamilton 230kV Transmission Line Project, ("Routing Study") Table 3-9, at page 3-21

DVP Application, Volume I, at page 104.

Burns & McDonnell Routing Study and Environmental Report for Pleasant View to Hamilton 230kV Transmission Line Project, ("Routing Study") Table 3-9, at page 3-21

1		Only one other Alternative Route, D2, has more (874) residences within 500 feet
2		than a route along the W&OD Trail, followed closely by Route D3 (732).
3		Moreover, the overwhelming majority of the affected residences are within the
4		Town's municipal limits. Of the 874 residences identified by DVP on Route D2,
5		863 of these are within the Town, as are 721 of the 732 residences identified on
6		Route D3.
7	Q.	DOES THE PUBLIC CONSIDER MAXIMING THE DISTANCE OF A
8		PROPOSED TRANSMISSION LINE FROM RESIDENCES TO BE AN
9		IMPORTANT ROUTING ISSUE?
10	A.	Yes. Maximizing the distance of the proposed transmission line from residences
11		was the most important concern of the respondents to DVP's routing surveys. 17
12	Q.	HOW MUCH OF A ROUTE ALONG THE W&OD TRAIL WOULD BE
13		THROUGH FOREST LAND?
14	A.	According to DVP's Routing Study, 43,777 feet of the 58,928-foot stretch of the
15		W&OD Trail would be within forest land. 18
16	Q.	HAS THE PUBLIC EXPRESSED CONCERN ABOUT THE POTENTIAL
17		USE OF THE W&OD TRAIL IN AND AROUND LEESBURG FOR A
18		NEW TRANSMISSION LINE?
19	A.	Yes. The public has expressed great concern with using any part of the Trail for
20		the transmission line. Localities and others have expressed "unified opposition" to
21		using the W&OD corridor for this purpose and "considered it to be a top priority
22		to avoid use of the W&OD trail."19
23		- In Virginia Power's open-house survey, respondents prioritized
24		considerations for routing the line. Maximizing distance from public
25 26		facilities, including the W&OD trail, ranked 5 th (out of a total of 14 factors). Expressed in a weighted average, maximizing the line's distance
		, 1

Ibid, at page 3-21. Ibid.

DVP Application, Volume III, Direct Testimony of John D. Smatlak, at pages 4 and 5.

- from public facilities was more than twice as important to respondents as 1 the lowest respondent priority, minimizing cost.²⁰ 2 3 If the line were sited along the W&OD, another three of the top five
- 4 criteria identified by respondents also would be violated, including minimizing visibility of line (2nd), minimizing amount of tree clearing 5 (3rd), and maximizing distance from historic sites (4th). 6
- 7 The results of the survey show that the public prioritizes minimizing amount of tree clearing (3rd). The line would require an 80' clearing if 8 sited on the W&OD trail, plus additional trees outside of right-of-way if 9 they pose a threat of falling on the line.²¹ The transmission line would 10 require felling of approximately 26,000 trees according to the Northern 11 Virginia Regional Commission.²² 12

HOW MANY PEOPLE USE THE W&OD TRAIL? Q.

- An evaluation by the USDA Forest Service, the University of Georgia and the 14 A. 15 National Park Service, The Washington & Old Dominion Trail: An Assessment of User Demographics, Preferences, and Economics, prepared for the Virginia 16 Department of Conservation ("2004 W&OD Trail Assessment") has estimated 17 18 that there are approximately 2 million users of the W&OD Trail corridor each year.²³ 19
- 20 Q. WHAT ARE THE MAIN REASONS PEOPLE USE THE W&OD TRAIL?

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Ibid, at pages 1-6 and 1-7. 22

²⁰ Burns & McDonnell Routing Study and Environmental Report for Pleasant View to Hamilton 230kV Transmission Line Project, Table 3-1, at page 3-5

²¹

DVP Application, Attachment II.A.7.a, Northern Virginia Regional Commission Resolution in Opposition to the Dominion Virginia Power's Proposed 230 kV Transmission Line Corridor in the W&OD Regional Trail.

²³ Exhibit DAS-3, The Washington & Old Dominion Trail: An Assessment of User Demographics, Preferences, and Economics, dated December 9, 2004 ("W&OD Trail Assessment"), at page 26.

1	A.	According to the 2004 W&OD Trail Assessment, recreation and fitness-related
2		uses comprise the primary reason people use the W&OD Trail, at 84 percent. ²⁴
3		The other reasons given for using the Trail, as listed in survey results, include
4		training for an upcoming event (7 percent), commuting (6 percent), and pets,
5		nature and other (3 percent). ²⁵
6	Q.	DO TRAIL USERS CONSIDER THE SCENERY ALONG THE W&OD
7		TRAIL TO BE IMPORTANT?
8	A.	Yes. As noted in the 2004 W&OD Trail Assessment, respondents rated scenery as
9		highly important. ²⁶ The amount of shade, which would be reduced significantly
10		by the clearing of trees along the Trail for the life of an above- or under-ground
11		line, also was rated as important.
12	Q.	HAVE YOU SEEN ANY ESTIMATES OF THE VALUE THAT THE
13		ESTIMATED 2 MILLION USERS PER YEAR CURRENTLY DERIVE
14		FROM USE OF THE TRAIL?
15	A.	Yes. The 2004 W&OD Trail Assessment determined that while access to the
16		W&OD Trail is free, there is nevertheless considerable economic value that
17		accrues to Trail users:

Exhibit DAS-3, at page 11. <u>Ibid</u>. Exhibit DAS-3, at page 14.

1 2 3 4 5 6 7 8 9 10 11 12		This net economic value or consumer surplus is a dollar measure of the amount of welfare that users would lose if the trail were unavailable. Using conventional economic methods, it was determined that, on average, a trip to the W&OD was worth between \$9 and \$14 dollars per person more than the average cost to use the trail. Extrapolating this net economic benefit across 1.7 million adult visits, of which 93 percent were for the primary purpose of visiting the W&OD, leads to an annual net economic benefit of trail access to users of between \$14.4- and \$21.6 million. Because the W&OD is primarily a local resource (95% of visits are by locals) rather than a destination trail, the vast majority of these net economic benefits accrue to northern Virginia residents. ²⁷
13	Q.	HAVE YOU SEEN ANY ESTIMATES OF THE ECONOMIC BENEFITS
14		THAT SURROUNDING COMMUNITIES RECEIVE FROM TRAIL
15		USERS?
16	A.	Yes. The 2004 W&OD Trail Assessment found that surrounding communities
17		earned significant economic benefits from the Trail:
18 19 20 21 22 23		An estimated 1.7 million adult W&OD users spent in total about \$12 million annually related to their use recreational use of the trail. Of this amount, about \$7 million was spent directly in the northern Virginia economy by locals and nonlocals using the trail. The estimated 1.6 million local visits accounted for about \$5.3 million of spending directly related to the use of the W&OD.
24 25 26 27 28 29 30		Nonlocal visitors spent about \$199 per group trip and \$74 per person to visit the W&OD. Of this amount, \$41.50 per group and \$15 per person was spent in the northern Virginia economy directly related to trail use. Overall, the estimated \$1.4 million in nonlocal spending generated about \$1.8 million in local economic impacts and supported 34 full time job equivalents and about \$642 thousand of personal income. ²⁸
31	Q.	THERE ARE TRANSMISSION LINES ON OTHER SECTIONS OF THE
32		W&OD TRAIL TO THE EAST OF THE COMPANY'S PLEASANT VIEW
33		SUBSTATION. WHY IS IT REASONABLE TO EXPECT THAT
34		BUILDING A TRANSMISSION LINE IN THE W&OD TRAIL
35		CORRIDOR WEST OF THE PLEASANT VIEW SUBSTATION WOULD

Exhibit DAS-2, at pages 26-27. Exhibit DAS-2, at page 26.

REDUCE THE VALUE THAT USERS AND SURROUNDING COMMUNITIES CURRENTLY DERIVE FROM THE TRAIL?

A.

A. It is my understanding that the section of the Trail west of Pleasant View is the
only section that retains most of its natural wooded character with mature trees
providing a natural shade canopy, whereas other sections of the Trail east of the
Pleasant View substation have been subjected to clear-cutting by DVP. Thus,
while the W&OD Trail Assessment covers the entire length of the Trail, this final
section is unique and highly valued for its remaining natural beauty.

Q. HAVE YOU SEEN ANY EVIDENCE THAT THE PLACEMENT OF A TRANSMISSION LINE IN THE W&OD TRAIL CORRIDOR COULD AFFECT ECONOMIC DEVELOPMENT IN LEESBURG?

Yes. I understand that there are economic plans for new developments along and near to the W&OD Trail in the Leesburg Crescent District. As explained in a recent Strategic Assessment for the Town of Leesburg, a Crescent District Master Plan is being developed that would cover an area of about 275 acres adjoining and including part of the Old and Historic District of Leesburg.²⁹ The district includes a wide variety of uses and design components ranging from the core of Leesburg characterized by mixed uses, high density historic development and a pedestrian oriented street network to suburban style commercial strip retail developments.

As explained in the Strategic Assessment, the Crescent District is notable for several key components that will have a significant impact on the future development of the Town of Leesburg. These include: the W&OD Trail, the Town Branch, Dodona Manor, the Barber and Ross Site, and Market Station and other properties that are expected to be "ripe" for development over the coming decade.³⁰ The placement of a new transmission line along the W&OD Trail corridor running right through the heart of the Crescent District can be expected to have an adverse impact on future development in this area.

Exhibit DAS-4, at page 2.

Exhibit DAS-4, at page 3.

1	Q.	WHAT IS THE BASIS FOR YOUR RECOMMENDATION THAT ANY
2		PORTION OF THE PROPOSED LINE THAT COMES IN OR NEAR TO
3		THE TOWN OF LEESBURG SHOULD BE UNDERGROUND?

4 A. My recommendation represents an attempt to minimize the impact of a new 5 transmission line on existing and potential residential development, economic 6 development and the scenic, recreational, & historical aspects of both the Town of 7 Leesburg and the W&OD Trail. The Town Plan establishes a vision for the Town 8 that is incompatible with an overhead transmission line. I believe that the 9 testimony of Peter Lanzalotta, submitted on behalf of the Town of Leesburg and 10 Loudoun County, establishes that an underground transmission solution is a 11 reasonable and appropriate means for DVP to provide adequate facilities and 12 service to the Hamilton/Purcellville load area. While the route proposed by Mr. 13 Lanzalotta does not include the Town of Leesburg, Mr. Lanzalotta's testimony 14 concerning the feasibility of underground transmission technology as a solution to 15 meet the needs of the Hamilton/Purcellville load area applies with equal force for 16 any route ultimately approved by the Commission.

17 Q. DOES THIS COMPLETE YOUR TESTIMONY?

18 A. Yes.