



Arguments against Dominion Power's claims for using Transmission Towers vs. Underwater Cables on the Rappahannock River/Norris Bridge Project

Costs

- York River Project cost \$85 million for 3.5 miles of cable (Dominion's pre-estimate was \$235million).
- Rappahannock only requires 2.4 miles.
- Projected cost of the towers is \$30 million.
- Underwater option on the Rappahannock should be less than the York ~\$60-65 million.
- Difference in the costs of towers vs. underwater option using horizontal drilling is not 3-5 times more expensive only 2 times more than the towers ~\$35million.
- Minimal to zero impact on rates as costs for new/ upgraded infrastructure are amortized over Dominion's entire customer base over lifespan of new line.

Available land/easements

- Dominion already owns nearly 2 acres on the Middlesex side and their lot is adjacent to a vacant 9 acre parcel.
- Vacant parcel and easement exist on the Lancaster side.
- Switching stations could be disguised or hidden by a natural buffer.

Reliability Concerns

- Underwater cables are always done with redundant spare cables, any outages are quickly fixed by connecting spare. (Not weeks to months as Dominion Claims)!
- Transmission lines account for less than 1% of all outages.
- Underwater less likely to be damaged by storms or birds.
- Rappahannock line is a backup line and was turned off for 3 months while the bridge was painted.

Environmental

- Towers require loss of Baylor Oyster grounds.
- Towers will pose a hazard to navigation.
- Construction of towers requires extreme measures to protect marine species and could disrupt nesting peregrine falcons per VMRC. Disturbed sediments will bury oyster beds.
- Underwater option using Horizontal Directional Drilling as was done on the York River will go beneath the river bottom and will have no effect on marine species, oyster beds or disrupt the nesting peregrine falcons.

Dominion Power No Credibility!!

- Largest Campaign Donor in the State. Has Carte Blanch with General Assembly and SCC!
- Under investigation for overcharging customers millions of dollars and using ratepayer funds for their charity donations. (\$2 million to Landmark Theater)
- Overinflated York River HDD Line claimed \$235 million, only cost \$85 million, had to be forced by the Navy!

