

Dominion Resources Services, Inc.
Law Department
120 Tredegar St.- Riverside 2, Richmond, VA 23219



dom.com

Horace P. Payne, Jr.
Senior Counsel
Direct (804) 819-2682
Fax: (804) 819-2183
horace.p.payne@dom.com

VIA ELECTRONIC FILING

May 26, 2015

Mrs. Gail Mount, Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, North Carolina 27603

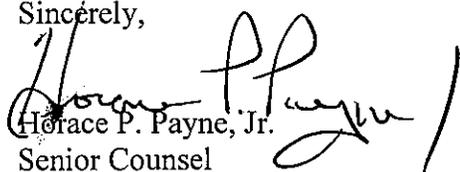
Re: Docket No. E-100, Sub 140 – In the Matter of Biennial Determination of Avoided Cost Rates for Electric Utility Purchases from Qualifying Facilities - 2014

Dear Mrs. Mount:

Enclosed for filing are the objections of Dominion North Carolina Power to North Carolina Sustainable Energy Association's Third Set of Data Requests dated May 8, 2015 (Phase II).

Should you have any questions, please do not hesitate to call.

Sincerely,


Horace P. Payne, Jr.
Senior Counsel

Enclosures

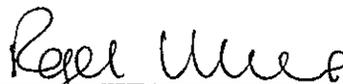
cc: Charlotte A. Mitchell, Esq.
Andrea R. Kells, Esq.

OFFICIAL COPY

May 26 2015

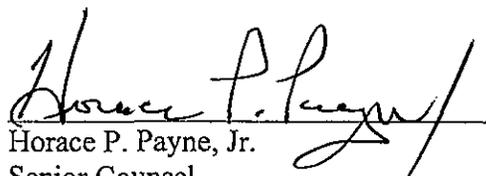
Dominion North Carolina Power
NC Avoided Cost Case – Docket No. E-100, Sub 140 (Phase II)
North Carolina Sustainable Energy Association
Data Request No. 3

The following response to Question No. 3-2 of North Carolina Sustainable Energy Association Data Request No. 3 dated May 8, 2015, has been prepared under my supervision.



Roger Williams
Director Power Contracts

The following response to Question No. 3-2 of North Carolina Sustainable Energy Association Data Request No. 3 dated May 8, 2015, has been prepared under my supervision as it pertains to legal matters.



Horace P. Payne, Jr.
Senior Counsel

Question No. 3-2:

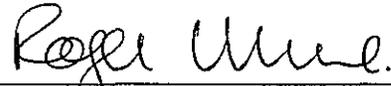
Is an indirectly connected project eligible for Schedule 19-FP or Schedule 19-LMP where all other requirements of QF status are met and the relevant projects are owned and operated independently?

Response:

DNCP objects to this question to the extent that it calls for a legal conclusion and also on the basis that it is vague and ambiguous. Specifically, DNCP requires clarification as to the meaning of the phrase “indirectly connected” and what NCSEA means by the phrase “the relevant projects are owned and operated independently” in order to further evaluate its response and or objections to this request.

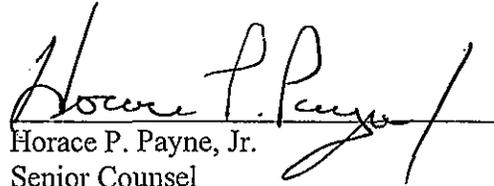
Dominion North Carolina Power
NC Avoided Cost Case – Docket No. E-100, Sub 140 (Phase II)
North Carolina Sustainable Energy Association
Data Request No. 3

The following response to Question No. 3-4 of North Carolina Sustainable Energy Association Data Request No. 3 dated May 8, 2015, has been prepared under my supervision.



Roger Williams
Director Power Contracts

The following response to Question No. 3-4 of North Carolina Sustainable Energy Association Data Request No. 3 dated May 8, 2015, has been prepared under my supervision as it pertains to legal matters.



Horace P. Payne, Jr.
Senior Counsel

Question No. 3-4:

How do you reconcile the provision in your proposed Offer to Sell Form that it becomes effective upon receipt by the Company with the Commission's position that action by the QF determines the effective date of the legally enforceable obligation?

Response:

The Company objects to this question because it is premised on a legal conclusion with respect to the "Commission's position" for which no basis is provided. Notwithstanding the foregoing objection, under the LEO Form, whether and when an LEO is established is determined by the actions of the QF; specifically (1) being a QF, (2) delivery of the LEO Form to the Company thereby making a commitment to sell the output of the Facility to the Company and (3) having a CPCN or having filed a Report of Proposed Construction.