

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF MARYLAND**

**IN THE MATTER OF:** )  
 )  
**THE APPLICATION OF DOMINION** )  
**COVE POINT LNG, LP FOR A** )  
**CERTIFICATE OF PUBLIC** )  
**CONVENIENCE AND NECESSITY TO** )  
**CONSTRUCT A GENERATING STATION** )  
**WITH A NAME-PLATE CAPACITY OF** )  
**130 MW AT THE DOMINION COVE** )  
**POINT LIQUEFIED NATURAL GAS** )  
**TERMINAL IN CALVERT COUNTY,** )  
**MARYLAND** )

Case No. \_\_\_\_\_

**REQUEST OF DOMINION COVE POINT LNG, LP FOR A  
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**

Pursuant to Sections 7-207 and 7-208 of the Public Utility Companies Article (“PUC Article”) of the Annotated Code of Maryland, and Title 20, Subtitle 79 of the Code of Maryland Regulations (“COMAR”), Dominion Cove Point LNG, LP (“Dominion Cove Point”), by counsel, hereby files this Application for a Certificate of Public Convenience and Necessity (“CPCN”) with the Maryland Public Service Commission (“Commission”) to authorize the construction of an electric generating station with a name-plate capacity of 130 megawatts (“MW”) at Dominion Cove Point’s existing liquefied natural gas (“LNG”) terminal in Calvert County, Maryland (collectively, the “Application”).

Dominion Cove Point respectfully submits that this authorization is required by the public convenience and necessity because:

- (1) the proposed generating station will be used exclusively to provide additional on-site generated electricity for the LNG terminal;

- (2) the proposed generating station will exclusively support the LNG terminal's electric load consistent with the proposed Dominion Cove Point Liquefaction Project ("Liquefaction Project"), which is discussed more fully below, and will have no adverse impact on the stability and reliability of the state electric system;
- (3) all of the power produced will be consumed at the LNG terminal, meaning that no new transmission lines will be required;
- (4) the generating station will be constructed entirely on the site of the existing LNG terminal on land now owned by Dominion Cove Point, and should have minimal environmental or land use impacts in Maryland; and
- (5) the proposed generating station will provide needed power for the Liquefaction Project which, if approved by the Federal Energy Regulatory Commission ("FERC"), will enable the LNG terminal to export, as well as continue to import, LNG, and to provide natural gas liquefaction and LNG export services to customers that will provide their own gas supplies.

As explained in more detail below, Dominion Cove Point owns and operates a LNG import terminal and an interstate pipeline that extends approximately 88 miles from the LNG terminal to various interconnections with the interstate pipeline grid. The construction and operation of these existing facilities have been authorized by the FERC under the Natural Gas Act ("NGA"), 15 U.S.C. §§ 717, *et seq.*, including the existing electric generating capacity at the LNG terminal, and the Commission has previously approved and/or exempted the construction of generating stations at the LNG terminal. Contemporaneously with the filing of this Application, Dominion Cove Point is requesting FERC authorization to construct and operate new facilities – and expand existing facilities – as part of the Liquefaction Project, which includes the additional electric generating facilities that are the subject of this Application.

In the FERC application, Dominion Cove Point has requested federal approval of the Liquefaction Project by February 1, 2014, so that construction of the liquefaction facilities can begin in the first quarter of 2014. This approval date is critical to ensure that commercial operations will meet a targeted in-service date of June 2017. In anticipation of this 2017 in-service date, Dominion Cove Point is working to obtain all necessary permits, authorizations, and approvals. To ensure orderly coordination and timely completion of the permitting process, Dominion Cove Point respectfully requests that the Commission process this Application as expeditiously as possible. As discussed herein, Dominion Cove Point further respectfully requests that the Commission grant a waiver for good cause, pursuant to Section 7-208(b)(2) of the PUC Article, from the requirement in Section 7-208(b)(1) that an application to construct a generating station be filed at least two years before construction commences.

## **I.**

### **INFORMATION REGARDING APPLICANT**

The exact legal name of the applicant is Dominion Cove Point LNG, LP, a limited partnership organized and existing under the laws of the State of Delaware. Dominion Cove Point's headquarters and principal place of business are located at 2100 Cove Point Road, Lusby, Maryland 20657.

The names, titles, and mailing addresses of the persons to whom communications concerning this Application should be addressed are:

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## II.

### **BACKGROUND AND DESCRIPTION OF EXISTING LNG TERMINAL OPERATIONS**

#### **A. Background and Existing Operations**

Dominion Cove Point owns and operates a federally-approved LNG terminal located on the western shore of the Chesapeake Bay near Cove Point in Lusby, Calvert County, Maryland. The LNG terminal was initially authorized in 1972 by FERC's predecessor agency, the Federal Power Commission, as part of a project to import LNG and transport natural gas to U.S. markets. The facility was designed to (1) receive imported LNG from ocean-going tankers, (2) provide storage of LNG in insulated tanks, (3) vaporize the LNG, and (4) transport the vaporized LNG as pipeline-quality natural gas on an 88-mile pipeline to the interstate pipeline grid for consumption in U.S. markets. The LNG terminal received shipborne LNG imports between 1978 and 1980, when the shipments ceased. In 2001, its previous owner sought and obtained authorization from

the FERC to recommence LNG imports by constructing new facilities, and by reactivating and operating existing facilities, at the LNG terminal.

In 2005, Dominion Cove Point sought FERC authorization for a major expansion of the LNG terminal and pipeline facilities to enable it to provide additional natural gas supplies to consumers in markets throughout the Mid-Atlantic and Northeastern states. As part of this then-proposed expansion, Dominion Cove Point requested FERC authorization to construct and operate two new gas-fired electric generating units at the terminal. Dominion Cove Point also requested that the Commission grant it an exemption pursuant to Section 7-207.1 of the PUC Article from the requirement to obtain a CPCN for the construction of these two units because all of the resulting power would be consumed at the LNG terminal, and because these additional generating units would be integrated with the terminal's existing electric system for a total on-site generating capacity below the statutory exemption level of 70 MW. In April 2005, the Commission granted the requested exemption,<sup>1</sup> and in June 2006, the FERC approved the requested expansion.

Over the years, the FERC has approved numerous other expansions and modifications of the LNG terminal and its related pipeline facilities that did not involve installation of additional generation. In June 2006, the FERC approved Dominion Cove Point's request to construct additional facilities, including a 12 MW nominal capacity electric generating unit at the LNG terminal. Because the added generation caused the total on-site generating capacity to exceed the 70 MW exemption threshold, Dominion Cove Point sought a CPCN from the Commission pursuant to Sections 7-207 and 7-208 of the PUC Article. On August 15, 2006, the Commission entered Order No. 80998 in Case No. 9055, granting the requested CPCN "as being in the public

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<sup>1</sup> Letter from O. Ray Bourland, Executive Secretary of the Commission, to Paul E. Ruppert, Vice President of Pipeline Engineering and Plant Operations for Dominion Cove Point LNG, LP, ML#96540, IR-723, advising that the Commission had approved this exemption at its April 6, 2005 Administrative Meeting (Apr. 6, 2005).

interest and best for the public convenience and necessity,” as well as a waiver pursuant to Section 7-208(b)(2) of the PUC Article.<sup>2</sup>

**B. Description of the Liquefaction Project Proposed for FERC Approval**

Dominion Cove Point is seeking authorization from the FERC to construct, modify, install, own, operate, and maintain the Liquefaction Project, which will involve construction of new facilities and expansion of existing Dominion Cove Point facilities to provide gas liquefaction services for the export of LNG to customers that will provide their own gas supply. The proposed liquefaction facilities, combined with existing facilities, will allow for the bi-directional service of receiving and gasifying imported LNG from LNG vessels, and liquefaction of natural gas for loading onto LNG vessels for export at the Dominion Cove Point LNG terminal.

The Liquefaction Project will be constructed within the fenced area of the 131-acre operating industrial area at the existing LNG terminal in Calvert County, Maryland, and will utilize approximately 49 acres for its operation. The liquefaction facilities, which are described in more detail in the attached Environmental Report (Appendix A-3),<sup>3</sup> will consist of one LNG train expected to have a name-plate capacity of up to 5.75 million metric tons per annum (“mtpa”) of LNG; new natural gas-fired turbines to mechanically drive the main refrigerant

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<sup>2</sup> *In the Matter of the Application of Dominion Cove Point LNG, LP for a Certificate of Public Convenience and Necessity to Construct a Generating Station with a Nominal Capacity of 12 MW at Its Liquefied Natural Gas Import Terminal in Calvert County, Maryland*, Case No. 9055, Order No. 80998, Proposed Order of Hearing Examiner, at 11-12 (July 14, 2006) (quotation at 11); Notice from Kathleen Berends, Management Associate at the Commission, to all parties of record and interested persons that Order No. 80998 was entered as a final order of the Commission (Aug. 15, 2006).

<sup>3</sup> The Environmental Report (Appendix A-3) contains the environmental resource reports that Dominion Cove Point is filing with the FERC for approval of the Liquefaction Project, with one exception. The Air Permit Application being filed with the FERC is not included in this Appendix, and varies slightly from the version submitted herewith. Dominion Cove Point is in the process of filing a supplement with the FERC to reflect the updated version of the Air Permit Application, which is the version attached as Appendix A-2. The Environmental Report also includes FERC Resource Report No. 13, which contains approximately 9,000 pages of information related to FERC authorization of the Liquefaction Project. While Dominion Cove Point is including Resource Report No. 13 in Appendix A-3 for completeness, the bulk of this Resource Report does not relate to the proposed generating station that is before the Commission in this CPCN proceeding.

compressors; the generation of additional power on-site to meet the power demands of the Liquefaction Project; and equipment to remove impurities from the gas stream. Additionally, the Liquefaction Project will involve off-site temporary construction areas, as well as installation of additional compression in Virginia on the Cove Point Pipeline which is required to deliver the inlet gas to the LNG terminal.

### **III.**

#### **DESCRIPTION OF THE PROPOSED ELECTRIC GENERATING STATION**

As previously noted, Dominion Cove Point is requesting FERC authorization of the Liquefaction Project, which will enable Dominion Cove Point to provide liquefaction services for the export of LNG to customers providing their own gas supplies. If approved, the Liquefaction Project will enable the LNG terminal to function on a bi-directional basis, allowing Dominion Cove Point to provide bi-directional service of import and export of LNG to its customers.

In order to provide additional power needed for the Liquefaction Project, Dominion Cove Point is requesting authorization to construct and operate a generating station with a 130 MW name-plate capacity comprised of two highly efficient 65 MW steam turbine generating units. These generating units will operate in combined cycle mode with steam generated from the waste heat from gas turbines used to mechanically drive the compressors used for the liquefaction process. These steam turbines will be located at the LNG terminal and used to provide the additional power needed for the Liquefaction Project. All of the power from these units will be consumed on-site. The addition of these facilities at the LNG terminal will bring the total on-site name-plate generating capacity to 210.9 MW, which allows the facility to serve existing and new customers, and allows for sufficient backup to provide for the facility's

necessary reliability. Only those generating units needed to meet the LNG terminal's electric requirements would be operated at any one time.

The additional generation proposed here will be used exclusively to produce on-site generated electricity, and no electric power will be exported onto the grid from the LNG terminal. To ensure that no power leaves the LNG terminal, Dominion Cove Point will continue to maintain the protection equipment that prevents electricity produced at the LNG terminal from flowing to the Southern Maryland Electric Cooperative, Inc. ("SMECO"), which is the local electric service provider for the area.

#### **IV.**

### **APPLICATION FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**

Dominion Cove Point hereby applies for a CPCN to construct an electric generating station to service the electric power requirements of the proposed Liquefaction Project as described above. The following information is submitted in compliance with COMAR 20.79.03.01:

#### **1. Location**

Dominion Cove Point proposes to construct and install two steam turbine generators with a name-plate capacity of 65 MW each, for a combined total of 130 MW, on the existing LNG terminal site near Lusby in Calvert County, Maryland.

#### **2. Design Features**

The generating station is comprised of two steam turbines with name-plate ratings of 65 MW each. There will be two auxiliary boilers and two heat recovery steam generators ("HRSGs") supplying steam to the turbines. The HRSGs will recover heat from the two GE Frame 7 natural gas-fired turbines, which drive the two refrigeration compressor strings along



with helper motors. Both the auxiliary boilers and the HRSGs will have Selective Catalytic Reduction (“SCR”) systems and CO catalyst with Continuous Emissions Monitoring (“CEM”).

Each SCR system will utilize ammonia injection and a reaction catalyst to effectively reduce nitrogen oxide (“NO<sub>x</sub>”) emissions by 90 percent from the equipment which it serves, and NO<sub>x</sub> emissions are expected to be at or below 2.5 parts per million (“ppm”) by volume, dry as referenced to 15 percent oxygen, as discussed in Section 6.4.2 of the Air Permit Application (Appendix A-2). The planned CEM systems will monitor emissions levels and ensure that each SCR system is performing as designed.

The oxidation catalyst system will operate to reduce carbon monoxide (“CO”) and volatile organic compound (“VOC”) emissions. CO and VOC emissions are expected to be at or below 1.5 parts per million, volumetric dry (“ppmvd”) and 0.7 ppmvd, respectively, as discussed in Sections 6.4.4 (CO) and 6.4.3 (VOC) of the Air Permit Application (Appendix A-2).

The existing LNG terminal has equipment in place to prevent the backflow or provision of electricity from the terminal to an outside power distribution grid.<sup>4</sup> All electric power for LNG terminal operations is generated on-site. The Liquefaction Project will not change this mode of operation. Start-up power and back-up power (for the necessary reliability to meet customer requirements) will be provided by the existing, previously-approved generating facilities at the LNG terminal.

The generating station, for which Dominion Cove Point seeks Commission approval, that is associated with the Liquefaction Project has the following characteristics:

- Generator output: 13,800 volt, 3-phase, 60 hertz
- Maximum waveform deviation: 0.1%

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<sup>4</sup> As stated above, Dominion Cove Point will continue to maintain the protection equipment that prevents electricity produced at the LNG terminal from flowing to SMECO.

- Telephonic influence factor (“TIF”): balanced, residual
- Insulation conforming to NEMA Class F with Class B temperature rise of above ambient 40°C (104°F).

3. Operational Features, Including the Expected Capacity Factor

Although the generator name-plate ratings of the two steam turbines are a total of 130 MW, the condensing capability of the design will limit their output to approximately 90 MW. Although current load conditions indicate that approximately 80 MW of power will be needed for the Liquefaction Project under normal conditions, the customers require a high level of reliability, so the steam turbines are being sized to provide full service under a variety of conditions including loss of a single steam turbine, and a variety of ambient and upset conditions. The output power of the generators will supply power to the liquefaction process through a dedicated, on-site substation. In the event of loss of power from the proposed generating station, power will be supplied using existing, previously-approved generation facilities located on-site, if available.

The steam turbine system will provide for automatic starting, acceleration to operating speed, sequencing control, driven equipment monitoring during operation, and normal and malfunction shutdown. During operation, the control system, by means of automatic warning and shutdown devices, protects the combustion turbine and driven equipment from possible damage resulting from hazards such as turbine over-speed, high temperatures or vibration, low lubricating oil pressure, and excessive oil temperature.

4. Schedule for Engineering, Construction, and Operation

Construction of the liquefaction facilities is scheduled to begin in the first quarter of 2014, assuming timely FERC and Commission approvals by February 1, 2014 as requested.

Detailed engineering design is scheduled to be completed by the second quarter of 2015.

Targeted in-service is anticipated by June 2017.

5. Statement of Reasons for the Selection of the Design and the Site of the Generating Station, Including Linear Facilities, or Generating Station Modification

The generating station will be located at the existing site of Dominion Cove Point's LNG terminal in Calvert County, Maryland in order to provide increased electric power for the operation of the proposed Liquefaction Project at the facility. The proposed generating station was selected to meet the projected power needs of the Liquefaction Project, and because its high efficiency takes advantage of the waste heat generated by the gas turbines installed for mechanical drive of refrigeration compressors.

6. Description of the Impact of the Project on the Economics of the State

The electricity generated by the proposed additional generation will be used exclusively to meet the requirements of the LNG terminal, and will have no impact on the economics of the State in the sense that this electricity will not be exported onto the grid, and that Maryland residents will not pay for this electricity through rates. However, the increased generation will make it possible for the LNG terminal to operate the Liquefaction Project, which, in turn, between 2011 and 2040 will spur the following economic development benefits (among others), while also enabling Dominion Cove Point to provide services to both export and import LNG:

- more than 12,000 job-years (with one job-year defined as the amount of work performed by one full-time individual in one year (typically 2,080 hours)) in Calvert County, plus more than 6,000 additional job-years in other Maryland jurisdictions (*see* Section 5.2.1.1 of the Environmental Report (Appendix A-3));<sup>5</sup>
- more than \$40 million per year in local property tax collections (a 27% increase from current property tax revenue from the LNG terminal) (*see* Section 5.2.4.1 of the Environmental Report (Appendix A-3)); and

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<sup>5</sup> Dominion Cove Point estimates that about 20-25% of the labor hours at peak will be committed to construction of the proposed generating station, with non-peak percentages at lower levels.

- more than \$2.6 billion in additional business sales in Calvert County, and more than \$1.1 billion in augmented business sales in other Maryland jurisdictions (see Section 5.2.2.1 of the Environmental Report) (Appendix A-3)).

7. Description of the Impact of the Project on the Stability and Reliability of the Electric System

The electric generating system at the LNG terminal, including the proposed generating station discussed in this Application, will remain isolated from the SMECO electric grid, and no power will be exported. The on-site electric system will continue to be used exclusively to meet the requirements of the LNG terminal. Under these circumstances, the construction of the proposed generating station will have no adverse impact on the stability and reliability of the utility electric system.

8. Location and Major Design Features of Any Required Major Electric System Upgrade, Including Any Associated Transmission Line, as a Result of the Project

Because all of the power produced at the LNG terminal will be consumed on-site and not exported, approval of the generating station will not require any upgrades to the electric system in Maryland, including the construction of any associated transmission lines.

**V.**

**ENVIRONMENTAL IMPACT**

Appendix A-1 contains a table which provides detailed cross-references between the COMAR requirements and the relevant information in the *PSD/NA NSR Air Permit Application Report* (Appendix A-2) (previously identified as the “Air Permit Application”), the *Federal Energy Regulatory Commission Environmental Report, Exhibit F(3)/F-1(7)* (Appendix A-3) (previously identified as the “Environmental Report”) which is being filed contemporaneously with the FERC for the Liquefaction Project, and the *Application to Appropriate and Use Waters*

*of the State* (Appendix A-4), which contains the information required by COMAR 20.79.03.02(B)(3)(e). Appendix A-1 further contains an overview summary of the information set forth in Appendices A-2, A-3, and A-4. The Environmental Report (Appendix A-3) contains all of the environmental information that is required by the provisions of COMAR 20.79.03.02.

As discussed in the attached Environmental Report (Appendix A-3), the proposed construction and operation of the generating station has been designed to minimize the environmental impact of the proposed facilities. The Environmental Report summarizes and contains the results filed with the FERC for the Liquefaction Project, including information regarding the general site conditions, the effect on air quality, the effect on water quality and appropriation, groundwater resources, surface water resources, water quality, wetlands, fish, wildlife and vegetation, aquatic and terrestrial resources, and cultural resources.

All of the construction activities associated with the proposed generating station will take place at the existing LNG terminal site and the designated off-site temporary construction areas. There will be no need to acquire any additional property for the proposed electric generating station. Because all of the power produced at the terminal will be consumed on-site, there will be no need to construct any off-site interconnection or transmission facilities. Accordingly, no landowners will be affected and no right-of-way or condemnation issues are raised by this proposal. Construction of the generating station will also involve only minimal soil disruption to land already within the fenced boundary of the existing LNG terminal site, and minimal impact on water quality and availability associated with the construction and operation of the proposed generating station. Finally, the proposed generating station will provide positive cumulative economic benefits, can be constructed and operated without any unacceptable socioeconomic impacts, and will comply with all applicable federal and state air quality regulations.

## VI.

### PUBLIC CONVENIENCE AND NECESSITY

Construction of the proposed electric generating station is required by the public convenience and necessity. When evaluating an application for a CPCN to construct an electric generating unit, the Commission is charged by Section 7-207(e) of the PUC Article to consider a number of specific factors, including the effect of the proposed generating station on the stability and reliability of the electric system, the economy of the state, esthetics, historic sites, aviation safety, and the environment – particularly air and water pollution, and the disposal of wastes produced by the generating station. As discussed above, the construction of the proposed generating station at the LNG terminal should have no adverse impact on the stability and reliability of the electric system or the Maryland economy. The Environmental Report (Appendix A-3) also demonstrates that the construction and operation of the proposed generating station on previously-disturbed land at the existing LNG terminal site should have minimal effects on air or water quality, aviation safety, and the esthetics of the terminal site or surrounding areas. As described in more detail in the Air Permit Application (Appendix A-2), the proposed generating station will be constructed and operated in compliance with all applicable federal and state air quality regulations. It is also not anticipated that construction of the generating station will have any adverse socio-economic effects or adverse impacts on any known historic, archeological, or architectural resources.

The construction and operation of the additional generating capacity at the LNG terminal is an integral part of the proposed Liquefaction Project, and will enable Dominion Cove Point to operate the facilities proposed in the Liquefaction Project and continue to meet the power needs of the LNG terminal. Sufficient on-site generated power is essential to the efficient and reliable

operation of the LNG terminal. Because the generating capacity at the LNG terminal is exclusively dedicated to meeting those power needs, the electrical system is prudently designed with back-up (spare) capacity on-site to enable Dominion Cove Point to meet its federally-authorized service obligations without interruption. The electricity requirements of the LNG terminal will be satisfied by operating various combinations of existing and new generating units to ensure that this objective is achieved and maintained.

All necessary federal, regional, state, and local permits, approvals, and consultations required for the Liquefaction Project are listed in Table 1-5 starting on page 1-64 of Resource Report 1 of the Environmental Report (Appendix A-3). No permits have been obtained as shown therein; however, federal, state, and local agencies have been informed about the proposed Liquefaction Project. Consultations with the Maryland Historical Trust are underway, and the results of the consultations will be forwarded to the FERC and the Commission.

## **VII.**

### **REQUIRED STATEMENTS AND INFORMATION**

Dominion Cove Point submits the following statements and information required by COMAR 20.79.01.04 (“Application Filing Requirements”). In addition, Appendix A-1 contains a detailed table identifying where COMAR-required information may be found in Appendices A-2, A-3, and A-4 to the Application.

#### **1. Information Regarding Applicant**

Information regarding Dominion Cove Point is set forth at p. 3 of the Application.

#### **2. Address and Principal Office of Applicant and Names and Addresses of the Persons to Receive Notice and Communications**

This information is set forth at pp. 3-4 of the Application.

**3. Location Where Public May Inspect Application**

A copy of the Application will be available for inspection at:

Calvert Library – Calvert County  
20 Appeal Lane  
Lusby, Maryland 20657

**4. List of Each Local, State, or Federal Agency Having Authority to Approve or Disapprove the Project and Status of Approval Process**

This information is included in Table 1-5 starting on page 1-64 of Resource Report 1 of the Environmental Report (Appendix A-3).

**5. General Description of the Generating Station**

This information is set forth at pp. 7-12 of the Application and in Section 2.3.5 of the Air Permit Application (Appendix A-2), and pp. 1-10 and 1-13 of Section 1.4 of Resource Report 1 of the Environmental Report (Appendix A-3).

**6. Implementation Schedule for Project**

This information is set forth at p. 3 of the Application and in Section 1.6.1 of Resource Report 1 of the Environmental Report (Appendix A-3).

**7. Environmental Information Required by COMAR 20.79.03.02**

This information is contained in the Air Permit Application (Appendix A-2) and Environmental Report (Appendix A-3), which are summarized in Appendix A-1.

**VIII.**

**REQUEST FOR WAIVER OF SECTION 7-208(b)(1)  
AND EXPEDITED REVIEW**

Section 7-208(b)(1) of the PUC Article requires that an application to construct a generating station be filed at least two years before the construction of the facility commences, but the Commission may waive this two-year notice requirement on a showing of good cause



pursuant to Section 7-208(b)(2).<sup>6</sup> Dominion Cove Point respectfully submits that good cause exists here to waive this requirement.

The generating station is an integral component of the Liquefaction Project, which is pending approval at the FERC. As previously noted, Dominion Cove Point has requested FERC authorization by February 1, 2014, so that construction may commence in the first quarter of 2014. The timely commencement of construction is essential to meet the targeted June 2017 in-service date for the Liquefaction Project. Without a waiver of the two-year notice period by the Commission, Dominion Cove Point will not be able to start construction of the generation facilities at the same time as the other components of the Liquefaction Project. Construction of the Liquefaction Project requires significant coordination with the FERC and substantial organization and the management of a detailed construction work plan which entails the coordinated ordering of material and scheduling of workers. Dominion Cove Point respectfully submits that a waiver is appropriate to ensure the orderly coordination and completion of the permitting process, so that construction of the Liquefaction Project may commence and be completed in time to meet the projected in-service date.

The Commission's regulations also establish a 12-month deadline for a decision on an application for a CPCN, unless otherwise directed by the Commission. Given the exclusive on-site location and use of the generating station, the lack of need for new transmission lines, and the lack of any impact on the reliability of the state electric system, Dominion Cove Point requests that the Commission review this Application as expeditiously as possible so that Dominion Cove Point can receive the necessary authorizations from the FERC and the Commission by February 1, 2014. Finally, Dominion Cove Point requests any other waivers that

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<sup>6</sup> See, e.g., *supra* text accompanying n.2.

the Commission may deem necessary for purposes of processing and authorizing this Application.

**IX.**

**CONCLUSION**

Dominion Cove Point respectfully requests the Commission to issue a CPCN as expeditiously as possible authorizing Dominion Cove Point to construct, own, and operate the generating station described herein to support the proposed Liquefaction Project, so that Dominion Cove Point can receive necessary authorizations from both the FERC and the Commission by no later than February 1, 2014. Dominion Cove Point also requests that the Commission waive the requirements of Section 7-208(b)(1), and grant any other necessary waivers to allow the Commission to process this Application as requested. Dominion Cove Point respectfully submits that waiver of the two-year pre-construction notice requirement will ensure the orderly coordination and completion of the permitting process, and facilitate the installation and the commencement of operation of the facilities by the targeted in-service date of June 2017.

Respectfully submitted,



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April 1, 2013

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*Attorneys for Applicant Dominion Cove Point LNG, LP*

## CERTIFICATE OF SERVICE

On this 1<sup>st</sup> day of April, 2013, copies of the foregoing Application were sent to the below-listed entities in accordance with COMAR 20.79.02.02:

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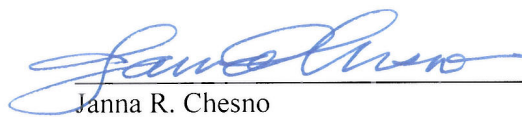
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