

**COMMONWEALTH OF VIRGINIA**  
**STATE CORPORATION COMMISSION**

**PETITION OF**

**CHICKAHOMINY PIPELINE, LLC**

**For a declaratory judgment**

**Case No. PUR-2021-00211**

**ANSWER AND MOTION FOR RULING**  
**OF HANOVER COUNTY, VIRGINIA**

Hanover County, Virginia (“Hanover County”), by counsel, pursuant to 5 VAC 5-20-80(B), the Procedural Orders entered in this matter dated September 3, 2021 and September 16, 2021, the September 22, 2021 Hearing Examiner's Ruling in this matter, files this Answer and Motion for Ruling as its response to the Petition for Declaratory Judgment and Request for Expedited Consideration (“the Petition”) filed by Chickahominy Pipeline, LLC (“Petitioner”).

**Answer**

In response to the allegations contained in the Petition, Hanover County responds as follows:

1. For those factual allegations set forth in Paragraphs 1, 16, 17, 18, and 19 of the Petition which relate to filings with, and proceedings before, the Commission, Hanover County is without knowledge or information sufficient to form a belief as to the truth of those allegations and respectfully refers the Commission to the records of the Commission for the full text and true meaning thereof.

2. For those factual allegations set forth in Paragraphs 9 and 13 of the Petition which refer to the provisions of the Code of Virginia, Hanover County respectfully refers the Commission to those provisions for the full text and true meaning thereof.

3. For those factual allegations set forth in Paragraphs 2, 3, 4, and 5 of the Petition, Hanover County is without knowledge or information sufficient to form a belief as to the truth of those allegations and calls for strict proof thereof.

4. The allegations set forth in Paragraphs 6, 7, 8, 10, 11, 12, 14, 15, and 20 of the Petition consist of legal argument and conclusions for which no response is required.

### **Motion for Ruling**

Hanover County concurs with, and joins in, the Motion for Ruling submitted by Henrico County in its Answer and Motion for Ruling filed on October 5, 2021.

Hanover County requests that:

- A. The Hearing Examiner enter a ruling to schedule discovery and an evidentiary hearing regarding the factual assertions in the Petition.
- B. The Commission enter an order declaring that it has the authority, pursuant to Section 56-257.2 of the Code of Virginia, to regulate the safety of the Pipeline to be constructed, owned, and operated by Petitioner;
- C. The Commission deny the Petition to the extent it seeks relief beyond the scope of the questions presented in the Petition, and
- D. The Commission grant such further relief as it deems appropriate.

Respectfully submitted,  
HANOVER COUNTY, VIRGINIA

By:   
Counsel

Dennis A. Walter (VSB No. 45977)  
County Attorney  
dawalter@hanovercounty.gov  
Rebecca B. Randolph (VSB No. 68564)  
Deputy County Attorney  
rbrandolph@hanovercounty.gov  
Office of the County Attorney  
P. O. Box 470  
7516 County Complex Road  
Hanover, Virginia 23069-0470  
(804) 365-6035  
(804) 365-6302 (Facsimile)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 6<sup>th</sup> day of October, 2021, the foregoing Notice of Participation will be filed electronically with the Clerk of the Commission using the electronic filing system of the State Corporation Commission, and that a copy was served by email, to counsel of record, as follows:

Eric M. Page, Esq.  
Cody T. Murphey, Esq.  
919 E. Main Street, Suite 1300  
Richmond, VA 23219  
epage@eckertseamans.com  
cmurphey@eckertseamans.com

J. T. Tokarz, County Attorney  
Ryan P. Murphy, Assistant County Attorney  
Office of the Henrico County Attorney  
P.O. Box 90775  
Henrico, Virginia 23273-0775  
Telephone: (804) 501-7961  
Facsimile: (804) 501-4140  
mur047@henrico.us

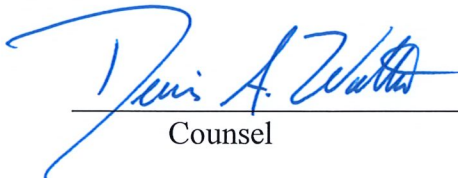
William H. Chambliss  
William Harrison.  
Aaron Campbell  
State Corporation Commission  
P.O. Box 1197  
Richmond, VA 23218  
william.chambliss@scc.virginia.gov  
william.harrison@scc.virginia.gov  
aaron.campbell@scc.virginia.gov

Elizabeth B. Wade  
Southern Company Gas  
Ten Peachtree Place, NE  
Atlanta, GA 30309  
ewade@southernco.com

Helen E. Phillips, County Attorney  
Sean Hutson, Assistant County Attorney  
Louisa County Attorney  
1 Woolfolk Avenue, Suite 306  
Louisa, VA 23093  
hphillips@louisa.org  
shutson@louisa.org

Joseph K. Reid, III, Esq.  
Elaine S. Ryan, Esq.  
McGuireWoods LLP  
Gateway Plaza  
800 E. Canal Street  
Richmond, VA 23219-3916  
jreid@mcguirewoods.com  
eryan@mcguirewoods.com

C. Meade Browder, Jr.  
Sr. Assistant Attorney General  
Division of Consumer Counsel  
Office of the Attorney General  
202 N. 9<sup>th</sup> Street, 8<sup>th</sup> Floor  
Richmond, VA 23219  
mbrowder@oag.state.va.us

  
\_\_\_\_\_  
Counsel