

# SENATE OF VIRGINIA

**JENNIFER L. McCLELLAN**  
9TH SENATORIAL DISTRICT  
ALL OF CHARLES CITY COUNTY; PART OF  
HANOVER AND HENRICO COUNTIES; AND PART  
OF THE CITY OF RICHMOND  
  
P.O. Box 396  
RICHMOND, VIRGINIA 23218



COMMITTEE ASSIGNMENTS:  
AGRICULTURE, CONSERVATION AND  
NATURAL RESOURCES  
JUDICIARY  
FINANCE AND APPROPRIATIONS  
PRIVILEGES AND ELECTIONS  
TRANSPORTATION

June 8, 2020

Mr. Joel H. Peck, Clerk  
Virginia State Corporation Commission  
Document Control Center  
1300 East Main Street  
Richmond VA 23219

RE: Case No. PUR-2019-00207  
Header Improvement Project and Pipeline Transportation Service,

Dear Mr. Peck,

I write to share my concerns with and opposition to the Virginia Natural Gas (“VNG”) Header Improvement Project (“HIP”) as presented to and pending before the State Corporation Commission based on conversations with my constituents and review of the record in this case.

The main purpose of the HIP has been presented as fueling the proposed C4GT Power Plant in Charles City County. However, it is my understanding that there is significant opposition to the plant from area communities and that the C4GT has been unable to secure financing to move forward. Moreover, in the wake of the passage of the Virginia Clean Economy Act, there is even more uncertainty around the economic prospects for a new natural gas power plant as we move to a 100 percent clean electric generation by 2050 in Virginia. Local residents, VNG customers, and the environment should not bear the risk and cost of an infrastructure project whose purpose and future is uncertain.

I am also concerned that the HIP project includes pipeline segments and compressor stations that have not been vetted through an official state agency environmental justice review. Virginia Code Section § 67-102 establishes the policy of the Commonwealth to “*Ensure that development of new, or expansion of existing, energy resources or facilities does not have a disproportionate adverse impact on economically disadvantaged or minority communities.*” It is unclear how that policy can be met absent an environmental justice review prior to project

approval. Given the demographics of the community in which the HIP and related infrastructure will be placed, any decision surrounding the project will have a potentially significant and adverse impact on economically disadvantaged and minority communities who historically have been disproportionately impacted by these utility infrastructure projects.

Moreover, as outlined in the April 28, 2020 letter submitted by Delegate Delores McQuinn and I, I am concerned that due to the COVID-19 health pandemic, our constituents in the area, as well as other interested parties across the Commonwealth have not had an adequate opportunity to voice their concerns and engaging in public hearings on this project to make their opposition known.

For the foregoing reasons, I ask you to deny the Certificate of Public Necessity for the Header Improvement Project at this time.

Sincerely,



Jennifer L. McClellan  
Virginia Senate  
9th District