



COMMONWEALTH of VIRGINIA

Office of the Attorney General

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October 15, 2020

The Honorable David K. Paylor, Director
Virginia Department of Environmental Quality
1111 East Main Street
Richmond, Virginia 23219

Re: Periodic Review of the State Water Control Board's Virginia Water Protection General Permit for Facilities and Activities of Utility and Public Service Companies Regulated by the Federal Energy Regulatory Commission or the State Corporation Commission and Other Utility Line Activities (9 VAC 25-670 *et seq.*)

Dear Director Paylor:

I have reviewed the above-referenced regulation. It is my opinion that the State Water Control Board has the statutory authority for the regulation pursuant to Chapter 3.1 of Title 62.1 of the Code of Virginia.

This certification addresses legal matters only and is not intended to serve, nor should it be construed, as a comment for or against the merits of the regulation.

If I may be of any further assistance to you relating to this matter, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads 'David C. Grandis'.

David C. Grandis
Senior Assistant Attorney General