

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

APPLICATION OF)	
)	
VIRGINIA ELECTRIC AND POWER COMPANY)	
)	Case No. PUR-2025-00210
For approval of its 2025 DSM Update)	
pursuant to § 56-585.1 A 5 of the Code of Virginia)	

APPLICATION

Virginia Electric and Power Company (“Dominion Energy Virginia” or the “Company”), by counsel, hereby files and requests approval of its 2025 Demand-Side Management update (“2025 DSM Update”). This 2025 DSM Update is filed pursuant to § 56-585.1 A 5 (“Subsection A 5”) of the Code of Virginia (“Va. Code”), Rules 10 (20 VAC 5-204-10) and 60 (20 VAC 5-204-60) of the State Corporation Commission of Virginia’s (“Commission”) Rules Governing Utility Rate Case Applications and Annual Informational Filings of Investor-Owned Electric Utilities (20 VAC 5-204-10, *et seq.*) (“Rate Case Rules”), the Commission’s Rules Governing Utility Promotional Allowances (20 VAC 5-303-10, *et seq.*) (“Promotional Allowances Rules”), the Commission’s Rules Governing Cost/Benefit Measures Required for Demand Side Management Programs (Rules 20 VAC 5-304-10, *et seq.*) (“Cost/Benefit Rules”), the Commission’s Rules Governing the Evaluation, Measurement, and Verification of the Effects of Utility-Sponsored Demand-Side Management Programs (20 VAC 5-318-10, *et seq.*) (“EM&V Rules”), and the directive contained in Ordering Paragraph (5) of the Commission’s August 13, 2024 Final Order (“2024 DSM Final Order”) in Case No. PUR-2024-00222 (“2024 DSM

proceeding”).¹ The 2025 DSM Update includes, among other things, the Company’s requests for:

- (i) Approval to implement Phase XIV Demand-Side Management programs (individually, “DSM Program” or “Program” and collectively with other DSM Programs, the “DSM Portfolio” or “Portfolio”), which includes new DSM Programs to supplement the overall portfolio;
- (ii) Extension of the Company’s DSM Phase XI Residential Income and Age Qualifying (“IAQ”) Bundle Program and Non-residential IAQ Bundle Program for three years; and,
- (iii) An annual update to continue rate adjustment clauses (“RACs”), designated Riders C1A² and C4A (collectively, the “Application”).

Additionally, pursuant to the recently enacted Community Energy Act (“CEA”), codified at Va. Code § 56-585.1:16, the Company is also filing its petition for approval of its proposed Virtual Power Plant Pilot (“VPP Pilot”) program concurrently with this filing. Several of the DSM XIV programs are also a part of the proposed VPP Pilot program, and the Company is seeking approval and cost recovery of those underlying programs in this proceeding.

The Company further requests limited waiver of certain Rate Case Rules. Specifically, pursuant to Rule 10 E of the Rate Case Rules, 20 VAC 5-204-10 E, and for the reasons stated herein, the Company requests a limited waiver of the requirements of Rules 60 and 90 of the Rate Case Rules, 20 VAC 5-204-60 and 20 VAC 5-204-90, with respect to hard copies of certain Filing Schedule 46 materials as it relates to the provision of “economic analyses, contracts,

¹ *Application of Virginia Electric and Power Company, For approval of its 2024 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia*, Case No. PUR-2024-00222, Final Order at Ordering Paragraph (5) (Aug. 13, 2025).

² The Company is seeking cost recovery of the Virtual Power Plant (“VPP”) Pilot programs in Rider C1A.

studies, investigations, results from requests for proposals, [and] cost benefit analyses . . . ,” which are voluminous.

In support of the Company’s 2025 DSM Update, the Company respectfully states the following:

I. BACKGROUND

1. Dominion Energy Virginia is a public service corporation organized under the laws of the Commonwealth of Virginia, furnishing electric service to the public within its certificated service territory. The Company also supplies electric service to non-jurisdictional customers in Virginia and to the public and businesses in portions of North Carolina. Dominion Energy Virginia’s electric system, consisting of facilities for generation, transmission, and distribution of electric energy, as well as associated facilities, is interconnected with the electric systems of neighboring utilities and is part of the interconnected network of electric systems serving the continental United States. The Company is engaged in the business of generating, transmitting, distributing, and selling electric power and energy to the public for compensation. The Company is also a public utility under the Federal Power Act, and certain of its operations are subject to the jurisdiction of the Federal Energy Regulatory Commission. The Company is an operating subsidiary of Dominion Energy, Inc. By reason of its operation in Virginia and North Carolina and its interconnections with other electric utilities, the Company engages in interstate commerce.

2. The Company’s name and post office address are:

Virginia Electric and Power Company
600 East Canal Street
Richmond, Virginia 23219

3. The names, post office addresses and telephone number of the attorneys for the Company are:

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4. Since 2009, the Company has annually filed updates to its DSM Portfolio, including requests to implement new DSM Programs, continue or expand existing DSM Programs, and/or update cost information.

5. In its 2024 DSM Final Order, the Commission approved the Company's Phase XIII application to implement two new DSM Programs and five redesigned programs (which were comprised of "energy efficiency" (EE) and "demand response" (DR) DSM Programs), without predetermined closure dates.³

6. The 2024 DSM Final Order also approved: (1) the Company's enhanced Phase XI Residential IAQ Bundle; (2) the Company's five-year aggregate cost cap for the Phase XIII Portfolio of \$218.47 million, or \$251.25 million with the 15% variance; and (3) the Company's

³ 2024 DSM Final Order at 7, 12.

proposal to recover Phase III, Phase IV, and Phase VI true-up and related financing costs with previous over/under deferral balances in Rider C4A and end Rider C2A.⁴ The Commission approved Riders C1A and C4A effective for usage on and after September 1, 2025.⁵

7. In its 2024 DSM Final Order, the Commission denied approval of the Company's proposed Residential Battery Storage Pilot and referred the Pilot to the Stakeholder Process.⁶ The Commission directed the Company to file, concurrent with the Company's proposed VPP Pilot, a report describing the results of the stakeholder process, including any proposed design features offered by stakeholders that were adopted or rejected.⁷

8. The 2024 DSM Final Order directed the Company to file with its next DSM update and each subsequent DSM update, a plan that details the specific steps the Company will take to comply with the statutory energy savings targets in 2026-2028, including how these steps will lead to achievement of the savings targets established by the Commission and how the Company will achieve the VCEA-mandated 15% budget proposal for the IAQ Programs.⁸

9. In addition, the Commission established the requirement that the Company incorporate the costs and benefits of an existing and unmodified program in the analysis of ongoing programs rather than in the portfolio of proposed programs to avoid future scenarios where the inclusion of an existing program may skew the cost-benefit results of the proposed programs.⁹

⁴ *Id.*, at 8, 10, 12.

⁵ *Id.*, at 8, 12.

⁶ *Id.* at 9-10.

⁷ *Id.* at 8, 10.

⁸ *Id.* at 11.

⁹ *Id.* at 12.

10. Lastly, the 2024 DSM Final Order adopted the following Hearing Examiner findings and recommendations:

- The Company and Staff shall include their respective analyses of the cost of energy saved in any future DSM update;
- The Company should adopt Consumer Counsel and Staff's recommendations regarding the Company's calculation of cost of conserved energy;
- The Company should measure battery performance at the device;
- Directed the Company to permit dual-fuel customers to participate in any DSM Program or measure that does not involve fuel switching.
- Referred the issue of leveraging the functionalities of AMI to improve benefit/cost ratios back to the DSM Stakeholder Group for further analysis or action; and
- Staff shall ensure that issues the Commission refers to the DSM Stakeholder Group are thoroughly analyzed and discussed, and that any recommendations from the group for Commission act, or non-action, represent the majority position of the group.¹⁰

11. On October 27, 2021, the Commission issued its Final Order in the EM&V proceeding in Case No. PUR-2020-00156 ("EM&V Final Order"). The Commission initiated the EM&V proceeding to determine, among other things, the baseline for each of the Company's currently active DSM Programs, and for each measure within programs that contain multiple DSM measures, as well as the basis for measuring energy savings related to each program and measure. In its EM&V Final Order, the Commission directed the Company to comply with, among other things, the following requirements applicable to the instant filing:

- Provide an executive summary dashboard in the December filing and in June¹¹ with the EM&V Report, which will present a summary of the Company's 2022 DSM Portfolio performance;

¹⁰ *Id.* at 9-12.

¹¹ See *Commonwealth of Virginia, ex. rel. State Corporation Commission, Ex Parte: In the matter of baseline determination, methodologies for evaluation, measurement, and verification of existing demand-side management programs, and the consideration of a standardized presentation of summary data for Virginia Electric and Power Company*, Order on Motion at 2 (May 13, 2022) (granting the Company's Motion to extend the EM&V Report filing date from on or before May 15 each year to on or before June 15 each year, effective in 2021).

- Provide a sample data chart for existing and proposed programs, which will present a mix of verified persistent savings and projections for future years; and
- File the EM&V Report in the Company's December DSM filing (in electronic form for the December filing) and in June¹² of the docket of the prior complete DSM update case.

12. As detailed in the direct testimony of Company Witness Courtney S. Young, the Company has complied with the Commission directives and filing requirements relevant to this filing.

II. LEGISLATIVE OVERVIEW

13. The Virginia Clean Economy Act ("VCEA") became effective on July 1, 2020, and contains several provisions amending the laws related to DSM programs. According to Subsection A 5 c of the VCEA, a petition for energy efficiency programs shall include a "proposed budget for the design, implementation, and operation of the energy efficiency program, including anticipated savings from and spending on each program, and the Commission shall grant a final order on such petitions within eight months of initial filing." This subsection also includes provisions that the Commission shall allow a margin for recovery on operating expenses for energy efficiency programs until January 1, 2022, after which a margin is dependent on what the Company has proposed, what the Commission has approved, and whether the Company has met its total annual savings targets. Within this subsection, the VCEA also repealed the opportunity to seek lost revenues through RACs.

14. Va. Code § 56-596.2 further directs that at least 15% of costs be for programs designed to benefit low-income and elderly, disabled individuals, or veterans.

¹² *Id.*

15. The VCEA, through Va. Code § 56-596.2, also specifies total annual energy savings targets, starting in year 2022 through 2025, with savings targets to be set by the Commission thereafter. Accordingly, on February 27, 2025, the Commission issued its Final Order in the Company's energy efficiency savings targets proceeding, Case No. PUR-2023-00227, and established pursuant to Va. Code § 56-596.2 energy savings targets of 3% for 2026, 4% for 2027, and 5% for 2028. In addition, the Commission established pursuant to Va. Code § 56-596.2:2, energy savings targets of 39,400 MWh for 2025, 47,900 MWh for 2026, and 63,900 for 2027.

16. Additionally, the VCEA modified which customers are eligible to participate in and required to pay for costs associated with energy efficiency programs, by removing the automatic exemption under Subsection A 5 c for large commercial and industrial customers. More specifically, the VCEA redefined a Large General Service Customer ("LGS") as a customer that has a verifiable history of having used more than one megawatt of demand from a single site and directed the Commission to establish a qualification and opt-out process for eligible LGS Customers that implement energy efficiency measures at their own expense. Now, the VCEA allows LGS Customers to opt-out and request an exemption from the energy efficiency requirements provided for in Subsection A 5. The Commission initiated a rulemaking pursuant to this change in law in Case No. PUR-2020-00172. On January 29, 2021, the Commission issued its Order Adopting Regulations, which adopted rules governing the exemption process and exemption for LGS Customers (20 VAC 5-350-10, *et seq*). Through this process, LGS Customers requesting an exemption must submit notices of nonparticipation by March 1 of each year, and the Company, in turn, must accept or reject the notices.

17. Lastly, the VCEA through Va. Code § 56-596.2 expanded the scope of the stakeholder group to include feedback and input on (i) the development of energy efficiency programs and portfolios of programs; (ii) compliance with total annual energy savings targets and effect on integrated resource plans; (iii) recommended policy reforms to ensure maximum and cost-effective energy efficiency; and (iv) best practices for EM&V services. Section 56-596.2 also requires a utility to use a third-party evaluator to perform EM&V on total annual savings targets and requires a third-party evaluator to provide reports on its findings concurrently to the Commission and the utility.

18. In addition, in accordance with the recently enacted Community Energy Act (codified at Va. Code § 56-585.1:16), the Company has filed, concurrently with this application, its VPP Pilot Application in Case No. PUR-2025-00211. The Company's proposed Phase XIV Programs include demand response and energy efficiency programs that are also a part of the Company's VPP Pilot. As previously discussed, the Company is seeking cost recovery of the VPP Pilot programs through the revenue requirement in this case via Rider C1A. Accordingly, the Company has filed a Motion to Consolidate the 2025 DSM Update and VPP Pilot proceedings for procedural purposes.

III. PROPOSED PHASE XIV PROGRAMS

19. In this proceeding, the Company seeks approval of the following Phase XIV Programs, which include EE and DR DSM Programs, as these terms are defined by Va. Code § 56-576:

- DSM Phase XI Residential Income and Age Qualifying Program Bundle extension (EE)

- DSM Phase XI Non-residential Income and Age Qualifying Program Bundle extension (EE)
- Residential Home Energy Services (EE)
- Non-residential Energy Services (EE)
- Residential Battery Storage Pilot (DR/VPP)
- Residential Electric Vehicle Managed Charging Pilot (DR/VPP)
- Residential Electric Vehicle Managed Charging Pilot TOU (DR/VPP)
- Residential Income and Age Qualifying Battery Storage Pilot (DR/VPP)
- Residential Income and Age Qualifying Battery Storage Purchase Pilot (DR/VPP)
- Non-residential HVAC for Small and Medium Sized Business Customers (DR/VPP)
- Bring your Own Device (BYOD) Aggregator Access Pilot (DR/VPP)
 - a. Residential Bring your Own Device (BYOD) Aggregator Access
 - b. Commercial Bring your Own Device (BYOD) Aggregator Access
 - c. Industrial Bring your Own Device (BYOD) Aggregator Access
 - d. Vendor Managed Bring your Own Device (BYOD) Aggregator Access

20. The pre-filed direct testimony and schedules of Company Witness Michael T. Hubbard provide details regarding these Programs and Pilots and the measures included therewith, as well as the projected participation and energy and demand savings. Additionally, the direct testimony of Company Witness Rachel L. Hagerman provides additional detail regarding the cost/benefit modeling and scores for these Programs and Pilots.

21. The DSM Phase XI Residential and Non-residential IAQ Program Bundles highlights that the Company is continuously evaluating the opportunity to provide energy efficiency upgrades to the income and age qualifying customer segment. As a result, the Company is requesting additional program funds for a three-year extension period for the DSM Phase XI Residential and Non-residential Income and Age Qualifying Program Bundles. The approved program measure mix will remain unchanged, but the Company is asking for additional program funding so that it can continue to provide seamless energy efficiency upgrade services to the Company's IAQ customer segment. Company Witness Jarvis E. Bates provides more detail on the projected three-year extension costs for the Phase XI Residential and Non-residential IAQ Program Bundles.

22. The proposed Residential Home Energy Services (EE) Program offers a comprehensive and unified residential home energy evaluation program offering, consisting of a no-cost introductory in-home energy audit, no-cost virtual audit, no-cost welcome kits, and an optional comprehensive Building Performance Institute audit. The proposed program will also be available for qualifying residential customers residing in manufactured housing and multi-family dwellings. The Residential Home Energy Services Program also consolidates five previously standalone program offerings, including Welcome Kits, Virtual Audit, Retrofit, Multi-family, and Manufactured Housing.

23. The proposed Non-Residential Home Energy Services (EE) Program integrates and expands upon the existing DSM IX Building Optimization, DSM IX Building Automation, and DSM IX Customer Engagement Programs. It offers customer segmentation and virtual commissioning services, featuring three new primary measures focused on HVAC and lighting

adjustment: (1) heating and cooling schedule and setpoint adjustments; (2) combined HVAC and lighting adjustments; and (3) lighting schedule adjustment.

24. The proposed Residential Battery Storage Pilot (DR/VPP) would offer residential customers an incentive to discharge their home battery storage system when called upon during peak electrical demand, as well as at other times when doing so can support grid reliability and services.

25. The Residential Electric Vehicle (“EV”) Managed Charging Pilots (DR/VPP) offers eligible residential customers who own an electric vehicle the opportunity to participate year-round in a managed charging strategy that reduces load during peak system demand. These Pilots apply to qualifying residential customers on both time-of-use (“TOU”) and non-TOU rate schedules.

26. The Residential Battery IAQ Storage Pilot (DR/VPP) would provide an incentive for IAQ residential customers to discharge their home battery storage system when called upon during peak electrical demand, as well as at other times when doing so can support grid reliability and services.

27. The Residential IAQ Battery Purchase Pilot (DR/VPP) would provide IAQ residential customers with a no-cost battery energy storage system installation by a qualified installer. The Pilot will target IAQ customers who previously participated in the Company’s DSM IX House Bill 2789 Solar Pilot and had photovoltaic solar panels installed at their residence.

28. The Non-residential HVAC for Small and Medium Business (“SMB”) customers (DR/VPP) applies to SMB customers with a demand of up to 400 kilowatts. The program is designed to allow participating customers to take part in demand response events initiated by the

Company during peak system demand. During peak events, the thermostats of participating SMB customers will be adjusted to achieve a specified amount of load reduction while maintaining reasonable facility comfort.

29. Lastly, the proposed Bring Your Own Device (“BYOD”) Aggregator Access Pilot (DR/VPP) provides qualified aggregators the opportunity to enroll residential, commercial and industrial customers with eligible distributed energy resource technologies, which include EV chargers, smart thermostats, and water heaters across the Company’s customer segments. This Pilot was designed to advance the Company’s strategic goals for grid reliability, customer engagement, and integration of distributed energy resources.

30. In this filing, the Company also respectfully requests authorization to operate the non-pilot Phase XIV DSM Programs, without predetermined closure dates. Please see the direct testimonies of Company Witnesses Young and Hubbard for details pertaining to the Company’s request for authorization to operate the Phase XIV DSM Programs without predetermined closure dates.

31. The proposed cost cap for the Phase XIV Programs in the aggregate is approximately \$220.6 million. Information regarding the individual proposed cost caps for each Program, and the associated details, are provided by Company Witness Bates. In this DSM Update, the Company requests the ability to exceed the spending cap by no more than 15%.

32. The Company’s Application, through the pre-filed direct testimony and exhibits of its witnesses and Filing Schedule 46, demonstrates that the Company’s proposed Programs meet the guidelines specified in the Cost/Benefit Rules as well as the standards specified in the Promotional Allowances Rules. In accordance with the Cost/Benefit Rules, the Company has analyzed each of the proposed DSM Programs individually and as a portfolio, using the four

required cost/benefit tests: the Participant Test, the Utility Cost Test, the Ratepayer Impact Measure Test, and the Total Resource Cost Test. The results of each of the tests are set forth in Company Witness Hagerman's pre-filed direct testimony and schedules.

IV. APPROVAL OF UPDATED RIDERS C1A AND C4A

A. Rate Year

33. The Company presents a rate year of September 1, 2026 through August 31, 2027, ("Rate Year") for the updated Riders C1A and C4A.

B. Assignment and Allocation of Costs

34. The costs for the DSM Programs may be viewed primarily in two categories: direct (Program costs) and indirect (Common costs). The estimated Program costs include costs primarily based on signed vendor contracts for the approved Programs and estimated costs based on updated vendor pricing information for the proposed Phase XIV Programs. Costs that are part of the implementation of Programs that are not specifically associated with any individual DSM Program are Common costs and include certain customer communication costs, Energy Conservation department labor costs, dues and association costs, customer service, and external vendor costs. The Company proposes to determine cost responsibility in the same manner as the Commission approved in the 2024 DSM proceeding.

35. The approach for determining jurisdictional responsibility is first to assign Program costs to the jurisdiction based upon participation in the Programs, and second to allocate Common costs to the jurisdiction based on the jurisdiction's Program costs, both capital and expenses, compared to total Program costs for the system. Customer class responsibility is determined by allocating costs to the customer classes on the basis of an average and excess ("A&E") production demand factor.

36. The Company proposes to modify the Virginia customer class allocation factor used in this proceeding to reflect the Company's forecasted customer growth. Consistent with its approach to allocating costs for the 2026 and 2027 Rate Years pending in the Company's 2025 Biennial Review proceeding, Case No. PUR-2025-00058, the Company proposes to modify its A&E methodology calculation to adjust these 2024 allocation determinants based on the Company's forecast for the Rate Year in this proceeding, September 1, 2026 through August 31, 2027. The pre-filed direct testimony of Company Witness Eleanor K. Keeton addresses how Program costs and Common costs will be assigned or allocated to the Virginia Jurisdiction using appropriate factors.

C. Revenue Requirement Request

37. As explained in the pre-filed direct testimony of Company Witness Renee T. Lipscomb, the Company's revenue requirement presented in this proceeding is consistent with the calculations presented in the Company's 2024 DSM proceeding. The cost components of Riders C1A and C4A are comprised of operating expenses projected to be incurred during the Rate Year and a Monthly True-Up Adjustment comparing actual costs for the 2024 calendar year to the actual revenues collected during the same period. Detailed costs were used to calculate the requested revenue requirement for Riders C1A and C4A for the proposed Rate Year. The calculation of the revenue requirement is discussed in the pre-filed direct testimony of Company Witness Lipscomb.

38. The projected Rate Year operating expenses from September 1, 2026 through August 31, 2027, are included for recovery on a current basis during the Rate Year. For purposes of this Application and consistent with the Commission's November 18, 2021 Final Order in the Company's 2021 Triennial Review Proceeding in Case No. PUR-2021-00058, the

Company is utilizing the approved ROE of 9.35% for the period November 18, 2021 to February 27, 2024. In addition, the capital structure used in the calculation of the revenue requirement reflects the methodology approved by the Commission in that proceeding. For the time period beyond February 27, 2024, the Company is utilizing an ROE of 9.7% as set by the Commission in the 2023 Biennial Review, Case No. PUR-2023-00101. The ROE determined by the Commission in the Company's 2025 Biennial Review proceeding (Case No. PUR-2025-00058) will be applicable to Riders C1A and C4A as of the date of the Final Order in that case. Any revenue requirement impacts resulting from a change in ROE will be addressed in a future true-up proceeding.

39. The revenue requirement includes recovery of the True-up of actual costs and revenues for the period of January 1, 2024 through December 31, 2024, for eligible programs through a Monthly True-Up Adjustment. The actual 2024 calendar year expenditures are used to calculate a 2024 actual revenue requirement and then compared to the actual 2024 revenues to produce the Monthly True-Up Adjustment.

40. Company Witness Lipscomb's pre-filed direct testimony details the projected Subsection A 5 costs, differentiated between capital and expense. In addition, Company Witness Lipscomb depicts the revenue requirement separately for Riders C1A and C4A. The Company is requesting recovery of the Rate Year Projected Revenue Requirement for Rider C1A in the amount of \$31,852,397. This amount, combined with the Monthly Rider C1A True-up Adjustment of (\$2,211,131) provides the Rider C1A total revenue requirement of \$29,641,265. For Rider C4A, the Rate Year Projected Revenue Requirement of \$115,833,428 is combined with the Monthly Rider C4A True-up Adjustment of (\$31,563,608), the monthly C2A True-up Adjustment of (\$140,899) and the monthly C3A True-up Adjustment of (\$216,901), for a total

C4A True-up Adjustment of (\$31,921,408), to provide the Rider C4A total revenue requirement of \$83,912,020. For Riders C1A and C4A, the combined revenue requirement in this proceeding totals \$113,553,285.

D. Rate Design

41. The Riders C1A and C4A, which are sponsored by Company Witness Jessica C. Powell, identify the rates, in cents per kilowatt-hour (“kWh”), that will apply to each Company Rate Schedule. If approved as proposed, the Riders C1A and C4A will be applicable for billing purposes with a rate effective date for usage on or after the latter of September 1, 2026, or the first day of the month which is at least 15 days following the date of any Commission order approving Riders C1A and C4A.

42. The implementation of the proposed Riders C1A and C4A, once effective, will increase the typical residential customer’s monthly bill, based on 1,000 kWh usage per month, by \$0.20. For Residential Rate Schedule 1, General Service Rate Schedules GS-1 and GS-2, and Church Rate Schedule 5C, Company Witness Powell provides the respective typical monthly bill differences reflecting the impact of Riders C1A and C4A together. This is because exempt customers would likely not receive service under one of these rate schedules and, therefore, all riders will apply. However, for customers served under Rate Schedules GS-3 and GS-4, typical bill changes are provided to show the impact of the Rider C1A alone, and the impact of Riders C1A and C4A combined. Typical bill changes that reflect only the impact of Rider C1A alone would be applicable to customers opted out of C4A.

**V. SUPPORTING TESTIMONY, FILING SCHEDULES,
AND REQUEST FOR LIMITED WAIVER**

43. The Company's Application is supported by the pre-filed direct testimonies of Company Witnesses Courtney S. Young, Michael T. Hubbard, Rachel L. Hagerman, Jarvis E. Bates, Renee T. Lipscomb, Eleanor K. Keeton, Jessica C. Powell, Dan Feng, and Terry M. Fry.

44. Section 20 VAC 5-204-60 of the Rate Case Rules provides that an application filed pursuant to Subsection A 5 "shall include Schedules 46 as identified and described in 20 VAC 5-204-90, which shall be submitted with the utility's direct testimony. Additionally, applications requiring an overall cost of capital shall include Schedules 3, 4, 5, and 8."¹³

A. Filing Schedules

45. With this Application, the Company files the following Filing Schedules:
- a. Filing Schedule 8, sponsored by Company Witness Lipscomb, provides information regarding the Company's cost of capital.
 - b. Filing Schedule 46A, Statements 1 through 9, are sponsored by Company Witness Bates. These Statements address the projected and actual costs by type of cost and year and by month, to the extent applicable, associated with the RACs.
 - c. Filing Schedule 46B, Statement 1, is sponsored by Company Witness Bates and addresses the transaction-level details of the RACs.
 - d. Filing Schedule 46C, Statements 1 and 2, are sponsored by two Company witnesses. Company Witness Hubbard sponsors Filing Schedule 46C, Statement 1, which provides key documents supporting the projected and actual program costs for all programs. Company Witness Hagerman sponsors Filing Schedule 46C, Statement 2, which provides key documents supporting the projected and actual costs for cost-benefit analyses. In total, these Statements address the key documentation supporting the costs of the RACs.
 - e. Filing Schedule 46D, consisting of Statements 1 through 4, is sponsored by two Company witnesses. Company Witness Lipscomb sponsors Filing Schedule 46D, Statements 1 through 3, which provide the annual revenue requirement for the

¹³ The Company is requesting a waiver for supporting cost of capital schedules, Filing Schedules 3 through 5. The 2024 year-end capital structures were litigated in the Company's Biennial Review proceeding, Case No. PUR-2025-00058. As such, the Company has omitted Filing Schedules 3 through 5 from this Petition, and to the extent necessary requests a waiver of the requirement to submit Filing Schedules 3 through 5 in this proceeding.

Rate Year and duration of the proposed RACs, as well as the supporting calculations. Company Witness Keeton sponsors Filing Schedule 46D, Statement 4, which provides the annual revenue requirement by class for the duration of the proposed RACs.

- f. Filing Schedule 46E, consisting of Statements 1 and 2, is sponsored by two Company witnesses. Company Witness Keeton sponsors Filing Schedule 46E, Statement 1, which addresses the methodology for allocating the revenue requirements among rate classes. Company Witness Powell sponsors Filing Schedule 46E, Statement 2, which addresses the design of class rates.
- g. Filing Schedule 46F, consisting of Statements 1 and 2, is sponsored by two Company witnesses. Through the EM&V Report, Company Witness Feng sponsors Filing Schedule 46F, Statement 1, which provides evidence of the actual energy and demand savings achieved as a result of each specific program for which cost recovery is sought. Company Witness Hagerman sponsors Filing Schedule 46F, Statement 2, which provides revised cost-benefit tests that incorporate actual utility-specific energy and demand savings and cost data.
- h. Filing Schedule 46G, Statement 1, is sponsored by Company Witness Lipscomb. This Statement provides a description of the significant accounting procedures and internal controls in place for each energy efficiency program that is administered by either a third-party or by the Company.

B. Request for Limited Waiver of Filing Schedule 46 Requirements

The Company, for good cause shown and pursuant to Rate Case Rule 10 E, respectfully request that the Commission waive, in part, the requirements under Rule 60 to Filing Schedules 3 through 5. Pursuant to 20 VAC 5-204-60, the Company is required to submit Filing Schedules 3 through 5 and 8 for each rate adjustment clause proceeding supporting each overall cost of capital used in the application. In the interest of judicial economy, and consistent with the Commission's order granting similar limited waivers in the Company's 2025 RPS Development Plan proceeding,¹⁴ the Company is only submitting Filing Schedule 8 for the 2024 year-end capital structures. To the extent necessary, the Company requests a waiver of the requirement to

¹⁴ See *Petition of Virginia Electric and Power Company, For approval of its 2025 RPS Development Plan under § 56-585.5 D4 of the Code of Virginia and related requests*, Case No. PUR-2025-00148, Order on Waiver Requests (Aug. 29, 2025).

file Filing Schedules 3 through 5 for these year-end capital structures. Further, to the extent necessary, the Company requests a waiver of the requirement to file Filing Schedules 3 through 5 for these year-end capital structures, as the 2024 year-end capital structure were litigated in the Company's 2025 Biennial Review proceeding, Case No. PUR-2025-00058. This request for waiver is consistent with the Commission's recent order granting a similar limited waiver.¹⁵

46. The Company, for good cause shown and pursuant to 20 VAC 5-204-10 E, respectfully requests that the Commission waive, in part, the requirements under Rules 60 and 90 of the Rate Case Rules with respect to paper copies of certain Filing Schedule 46 materials. Specifically, the Rate Case Rules require the Company to provide key documents supporting the projected and actual costs recovered through the RAC, such as: economic analyses, support used by senior management for major cost decisions as determined by the applicant, contracts, results from requests for proposals, cost-benefit analyses, and other items supporting the costs that have not been provided in previous applications. The supporting documentation responsive to this requirement is voluminous and, often, not easily viewed in hard copy (*i.e.*, paper) format. Accordingly, the Company seeks a waiver of the requirement to file 16 hard copies of this information. Instead, the Company proposes to provide this documentation to Staff and any other future case participant in electronic format, and to provide the Commission with one hard copy and three electronic copies on compact discs. The Company will make these documents available via an electronic discovery site ("eRoom") contemporaneously with the filing of the Application, with immediate access available to Staff. This request for waiver is consistent with recent Commission orders granting similar limited waivers.¹⁶ Should the Commission deny this request, the Company asks for a reasonable allowance of time to print the requisite filing copies

¹⁵ *Id.* at 7.

¹⁶ *See e.g., id.*

of this material and submit it to the Commission prior to the Company's Application being deemed incomplete.

**VI. REQUEST FOR CONFIDENTIAL TREATMENT AND
ADDITIONAL PROTECTIVE TREATMENT OF
EXTRAORDINARILY SENSITIVE INFORMATION**

47. The Company's Application contains, at points so designated, confidential and extraordinarily sensitive information, which is being filed under seal and subject to the Company's Motion for Protective Ruling and Additional Protective Treatment filed coincident hereto. Because portions of the Company's Application contain such confidential and extraordinarily sensitive information, in compliance with Rule 10 F of the Rate Case Rules and Rule 170 of the Commission's Rules of Practice and Procedure, 20 VAC 5-204-10 F and 5 VAC 5-20-170, this filing is accompanied by a separate Motion for Protective Ruling and Additional Protective Treatment, including a form Proposed Protective Ruling, filed contemporaneously with this Application.

VII. COMPLIANCE WITH RULE 10 OF THE RATE CASE RULES

48. The Company's Application complies with the requirements contained in Rule 10 of the Rate Case Rules. In accordance with Rule 10 A, the Company filed with the Commission on October 1, 2025, the Company's notice of intent to file this Application under Va. Code § 56-585.1 A 5. The Company has included all information required by Rule 10 B in its Application, including a table of contents, direct testimonies with one-page summaries, and properly labeled exhibits and schedules.

49. In accordance with Rule 10 H, the Company will make a searchable PDF version of the Application, direct testimonies, and Filing Schedules available via an eRoom contemporaneously with this filing, with immediate access available to (i) Commission Staff,

including identified members of the Divisions of Utility Accounting and Finance and Public Utility Regulation and (ii) identified members of the Office of the Attorney General's Division of Consumer Counsel ("Consumer Counsel"). Also in accordance with Rule 10 H, the Company will make electronic spreadsheets supporting the schedules that contain calculations available via an eRoom contemporaneously with this filing, with immediate access available to Commission Staff.

50. Copies of this Application, to the extent required by Rule 10 J of the Rate Case Rules, along with the additional information required by Rule 10 J, are simultaneously with this filing being served upon persons addressed in that Rule. A complete copy of the public version of this Application, along with testimony and supporting schedules, has been served upon Consumer Counsel, in conformity with Rule 10 J.

WHEREFORE, Dominion Energy Virginia respectfully requests that the Commission grant the Company:

- (1) Authorization to offer new Phase XIV DSM Programs and VPP Pilot Programs to eligible customers as set forth herein;
- (2) Approval of the aggregate Phase XIV DSM Program cost cap of \$220.6 million, the individual cost caps presented by Company Witness Bates, and the ability to exceed the cost cap by no more than 15%;
- (3) Authorization to operate the non-pilot Phase XIV DSM Programs without a predetermined closure date;
- (4) Approval of the Rate Year beginning September 1, 2026 and ending August 31, 2027;

- (5) Approval of a revenue requirement of \$113,553,285 to be recovered through revised Riders C1A and C4A over the Rate Year;
- (6) Approval of the cost allocation, rate design, and accounting treatment for services rendered on or after September 1, 2026;
- (7) Approve the Company's request to continue Riders C1A and C4A to be effective for billing purposes on the latter of September 1, 2026, or the first day of the month which is at least 15 days following the date of any Commission order approving Riders C1A and C4A;
- (8) Approval of Phase XIV Program EM&V Plans;
- (9) Approval of the Company's request for limited waiver of Filing Schedule 46; and
- (10) Any other relief as deemed appropriate and necessary.

Respectfully submitted,

VIRGINIA ELECTRIC AND POWER COMPANY

By: /s/ Vishwa B. Link
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December 1, 2025