

### WITNESS DIRECT TESTIMONY SUMMARY

Witness: Michael T. Hubbard

Title: Manager – Energy Conservation

Summary:

Company Witness Michael T. Hubbard first provides a status update on the Company's approved DSM programs and bundles and addresses proposed updates to these programs. Mr. Hubbard also offers an overview of the development and design of the Company's proposed Phase XIV Programs, including the request for proposal process.

Mr. Hubbard first introduces and then describes in detail the following DSM Programs, including those that are also a part of the Company's proposed Virtual Power Plant ("VPP") pilot, the Company is seeking approval to implement in this proceeding:

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 Program (EE)	Non-residential Energy Services Program (EE)
Residential Battery Storage Pilot (DR/VPP)	Residential Income and Age Qualifying Battery Storage Purchase Pilot Demand Response (DR/VPP)
Residential Income and Age Qualifying Battery Storage Pilot (DR/VPP)	Non-residential HVAC for Small and Medium Sized Business Customers Program (DR/VPP)
Residential Electric Vehicle Managed Charging Pilot TOU (DR/VPP)	Residential Electric Vehicle Managed Charging Pilot (DR/VPP)
Bring your Own Device (BYOD) Aggregator Access Pilot (DR/VPP): <ul style="list-style-type: none"><li>i. Residential Bring your Own Device (BYOD) Aggregator Access</li><li>ii. Commercial Bring your Own Device (BYOD) Aggregator Access</li><li>iii. Industrial Bring your Own Device (BYOD) Aggregator Access</li><li>iv. Vendor Managed Bring your Own Device (BYOD) Aggregator Access</li></ul>	

Mr. Hubbard next describes the Company's launch efforts of the Phase XIII Programs, noting that all approved Phase XIII Programs are expected to be available to customers in the first quarter of 2026.

Furthermore, Mr. Hubbard provides an update on the Company's Customer Awareness Initiative, noting the Company's engagement in a data driven campaign to raise awareness around the Company's DSM portfolio.

Finally, Mr. Hubbard discusses updates to the Company's quality control and quality assurance processes. He outlines the Company's plans for future improvements to these measure controls, emphasizing the Company's commitment to continuously evaluating opportunities for system and process improvements. He concludes by describing the Company's compliance with previous DSM Update and EM&V proceeding directives related to these measure controls processes, including updates on the Company's controls surrounding the rebate approval process and any changes therein.

**DIRECT TESTIMONY  
OF  
MICHAEL T. HUBBARD  
ON BEHALF OF  
VIRGINIA ELECTRIC AND POWER COMPANY  
BEFORE THE  
STATE CORPORATION COMMISSION OF VIRGINIA  
CASE NO. PUR-2025-00210**

1   **Q.   Please state your name, business address, and position with Virginia Electric and**  
2       **Power Company (“Dominion Energy Virginia” or the “Company”).**

3   A.   My name is Michael T. Hubbard, and my business address is 600 East Canal Street,  
4       Richmond, Virginia 23219. I am Manager – Energy Conservation for Dominion Energy  
5       Virginia. A statement of my background and qualifications is attached as Appendix A.

6   **Q.   Please describe your areas of responsibility with the Company.**

7   A.   I am responsible for implementing the Company’s Demand-Side Management (“DSM”)   
8       programs (individually “DSM Program” or “Program,” collectively “DSM Portfolio” or   
9       “Portfolio”), which includes oversight of Program planning, the requests for proposals   
10      (“RFPs”) through which the Company selects vendors to help administer the Programs,   
11      and oversight of the vendors during Program implementation.

12   **Q.   What is the purpose of your testimony in this proceeding?**

13   A.   My testimony supports the Company’s petition for approval to (1) implement DSM   
14      “Phase XIV,” which includes new DSM Programs to supplement the overall Portfolio;   
15      (2) extend the Company’s DSM Phase XI Residential IAQ Bundle Program and Non-   
16      residential IAQ Bundle Program for three years; and, (3) update and continue rate   
17      adjustment clauses (“RACs”) designated Riders C1A and C4A (collectively, the   
18      “Application”).

1 Specifically, I will provide an update on the status of the Company's approved DSM  
2 Programs and address the proposed updates to those programs. My testimony will also  
3 provide an overview of the development and design of the proposed Phase XIV  
4 Programs, including the RFP process.

5 In this DSM filing, the Company is seeking approval to implement the following DSM  
6 Programs, including those the Company intends to incorporate in its Virtual Power Plant  
7 ("VPP") Pilot:

- 8 • DSM Phase XI Residential Income and Age Qualifying Program Bundle  
9 extension (EE)
- 10 • DSM Phase XI Non-residential Income and Age Qualifying Program  
11 Bundle extension (EE)
- 12 • Residential Home Energy Services Program (EE)
- 13 • Non-residential Energy Services Program (EE)
- 14 • Residential Battery Storage Pilot (DR/VPP)
- 15 • Residential Electric Vehicle Managed Charging Pilot (DR/VPP)
- 16 • Residential Electric Vehicle Managed Charging Pilot TOU (DR/VPP)
- 17 • Residential Income and Age Qualifying Battery Storage Pilot (DR/VPP)
- 18 • Residential Income and Age Qualifying Battery Storage Purchase Pilot  
19 Demand Response (DR/VPP)
- 20 • Non-residential HVAC for Small and Medium Sized Business Customers  
21 Program (DR/VPP)
- 22 • Bring your Own Device (BYOD) Aggregator Access Pilot (DR/VPP)  
23 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

Moreover, I will discuss the quality assurance process and give an update on the Company's controls surrounding the rebate approval process and any changes therein. Lastly, I will address compliance with applicable provisions of the State Corporation Commission's (the "Commission") Rules Governing Utility Promotional Allowances ("Promotional Allowances Rules") (20 VAC 5-303-10, *et seq.*).

**Q. Are you sponsoring an exhibit in this proceeding?**

A. Yes, Company Exhibit No. \_\_, MTH, consisting of Schedules 1 through 7, was prepared under my supervision, and is accurate and complete to the best of my knowledge and belief. Schedule 1 includes fact sheets for each of the Company's existing and active DSM programs, excluding Phase XIII, which was recently approved by the Commission on August 13, 2025. Schedule 2 was prepared at the direction of Ordering Paragraph (5) of the Commission's Final Order in the Company's 2019 DSM Proceeding, Case No. PUR-2019-00201. It summarizes the DSM Programs proposed by the Company in Phases I through XIII, with information regarding each Program's approval status, costs requested, costs approved, actual costs and participation through December 31, 2024, among other content.

Schedule 3 provides a description of the proposed Phase XIV Programs. Extraordinarily Sensitive Schedule 4 contains additional program details for the Phase XIV Programs. Schedule 5 provides an overview of the Company's rebate review and approval process.

Schedule 6 illustrates the pre-approval operational procedure utilized by the Company's implementation vendor for the non-residential Programs. Schedule 7 is a sample data chart for existing and proposed Programs, which presents a mix of verified persistent savings and projections for future years.

Finally, I also sponsor Filing Schedule 46C, Statement 1.

**Q. How is your testimony organized?**

A. My testimony is organized as follows:

- I. Status of Existing and Active Programs and Program Bundles
- II. Proposed Phase XIV Programs
- III. Launch Efforts of Phase XIII Programs
- IV. Customer Awareness Initiative Update
- V. Quality Assurance and Controls and Compliance with Commission Orders and Rules

**I. STATUS OF EXISTING AND ACTIVE PROGRAMS  
AND PROGRAM BUNDLES**

**Q. Mr. Hubbard, please provide an update on the Company's existing and active DSM Programs.**

A. Fact sheets for each of these Programs, with the exception of the recently approved DSM Phase XIII Programs, are attached collectively as my Schedule 1. Each fact sheet contains detailed information, including a Program description, eligibility requirements, approved measures, budget, participation, and energy savings. Program participation, energy savings, demand savings, and Program spend values as of December 31, 2024, are sponsored by Company Witness Dan Feng of DNV, the Company's Evaluation,

1 Measurement, and Verification (“EM&V”) expert witness. Please also see my Schedule  
2 2, which summarizes the DSM Programs, proposed by the Company in Phases I through  
3 XIII, with information regarding each Program’s approval status, costs requested, costs  
4 approved, actual costs and participation through December 31, 2024, among other  
5 content.

## 6 II. PROPOSED PHASE XIV PROGRAMS

7 **Q. Could you please summarize the Company’s request in this proceeding with respect**  
8 **to new DSM Programs including the VPP Pilot Programs?**

9 A. Certainly. The Company requests the following new programs be approved as part of the  
10 2025 DSM proceeding:

- 11 • DSM Phase XI Residential Income and Age Qualifying Program Bundle  
12 extension (EE)
- 13 • DSM Phase XI Non-residential Income and Age Qualifying Program  
14 Bundle extension (EE)
- 15 • Residential Home Energy Services (EE)
- 16 • Non-residential Energy Services (EE)
- 17 • Residential Battery Storage (DR/VPP)
- 18 • Residential Electric Vehicle Managed Charging Pilot (DR/VPP)
- 19 • Residential Electric Vehicle Managed Charging Pilot TOU (DR/VPP)
- 20 • Residential Income and Age Qualifying Battery Storage Pilot (DR/VPP)
- 21 • Residential Income and Age Qualifying Battery Storage Purchase Pilot  
22 (DR/VPP)
- 23 • Non-residential HVAC for Small and Medium Sized Business Customers

1 (DR/VPP)

- 2 • Bring your Own Device (BYOD) Aggregator Access Pilot (DR/VPP)
  - 3 a. Residential Bring your Own Device (BYOD) Aggregator Access
  - 4 b. Commercial Bring your Own Device (BYOD) Aggregator Access
  - 5 c. Industrial Bring your Own Device (BYOD) Aggregator Access
  - 6 d. Vendor Managed Bring your Own Device (BYOD) Aggregator
  - 7 Access

8 Although the Company is still using the phased approach for purposes of cost caps,  
9 implementation and marketing, the Company continues to transition, where practicable,  
10 to a consolidated program structure as recommended in the Company's initial Long-Term  
11 Plan ("DSM LTP" or "LTP"). It is important to note that the Company continues to work  
12 on its customer awareness campaign while also enhancing its DSM program portfolio  
13 offering, including updates to the seven categories suggested in the LTP that has evolved  
14 and will continue to evolve to adapt to customer needs and the latest market trends.  
15 Nonetheless, the Company will continue to use the consolidated program structure to  
16 streamline its DSM program portfolio where feasible and present and report on its DSM  
17 program performance metrics, such as the annual EM&V report.

18 Moreover, as detailed in the Application and consistent with the Commission's approval  
19 of the Phase XIII Programs, the Company requests approval, like in recent cases, to  
20 operate the proposed non-pilot Phase XIV Programs without a predetermined closure  
21 date (*i.e.*, no expiration dates until discontinuation is proposed by the Company and/or  
22 the programs are found to be no longer cost-effective after a reasonable time period to  
23 adjust operations).



1 **Q. First, do you have any comments regarding the DSM Phase XI Residential and Non-**  
2 **residential IAQ Program Bundles?**

3 A. Yes. The Company is continuously evaluating the opportunity to continue providing  
4 energy efficiency upgrades to the income and age qualifying customer segment. As a  
5 result, the Company is requesting additional program funds for a three-year extension  
6 period for the DSM Phase XI Residential and Non-residential Income and Age  
7 Qualifying Program Bundles. The approved program measure mix will remain  
8 unchanged, but the Company is asking for additional program funding so that it can  
9 continue to provide seamless energy efficiency upgrade services to the Company's IAQ  
10 customer segment. Company Witness Jarvis E. Bates provides more detail on the  
11 projected 3-year extension costs for the Phase XI Residential and Non-residential IAQ  
12 Program Bundles.

13 **Q. Why is the Company requesting approval of new programs in this proceeding?**

14 A. The proposed Programs and Pilots include program measures that have been suggested to  
15 the Company through various channels, including DSM stakeholders, DSM Market  
16 Potential Studies, the Stakeholder Review Process, RFPs, and most recently, as a direct  
17 result of the recently enacted § 56-585.1:16 of the Code of Virginia ("Va. Code"), the  
18 Community Energy Act. Essentially, these programs incorporate vital program design  
19 updates to ensure the Company offers the latest energy efficient technologies for its  
20 residential and non-residential customers based on stakeholder input, while also ensuring  
21 it is complying with the most recent legislative mandate and the most recently issued  
22 2025 DSM Final Order pertaining to the Residential Battery Storage Pilot (DR).



1 Below are brief descriptions of the new Phase XIV Programs. Detailed Program sheets  
2 including descriptions, eligibility, measure lists, projected participation and energy  
3 savings, and cost caps are provided in my Schedule 3, with additional design details also  
4 provided in my Schedule 4. Cost/benefit results for the Programs are discussed and  
5 provided by Company Witness Rachel L. Hagerman's direct testimony and schedules.

6 **Residential Home Energy Services**  
7 **(Energy Efficiency)**

8 This Program is a comprehensive and unified residential home energy evaluation  
9 program offering, consisting of a no-cost introductory in-home energy audit, no-cost  
10 virtual audit, no-cost welcome kits, and an optional comprehensive Building Performance  
11 Institute audit. This proposed program will also be available for qualifying residential  
12 customers residing in manufactured housing and multi-family dwellings and consolidates  
13 five previous standalone program offerings (Welcome Kits, Virtual Audit, Retrofit,  
14 Multi-family, and Manufactured Housing) under one single program to provide  
15 customers greater flexibility and ease of finding energy savings solutions.

16 **Non-residential Energy Services**  
17 **(Energy Efficiency)**

18 The Non-residential Energy Services (EE) Program is a comprehensive energy services  
19 program which integrates and expands upon the existing DSM IX Building Optimization,  
20 DSM IX Building Automation, and DSM IX Customer Engagement Programs. With  
21 streamlining the three programs into the Non-residential Energy Services program, it  
22 introduces new program pathways, such as strategic energy management and virtual  
23 commissioning while also incorporating new program measures as part of the new  
24 program design. In particular, the virtual commissioning pathway is a data driven

1 analytical segmentation tool that virtually targets high usage commercial customers. It  
2 offers customer segmentation and virtual commissioning services, featuring three new  
3 primary measures focused on HVAC and lighting adjustment: 1) heating and cooling  
4 schedule and setpoint adjustments; 2) combined HVAC and lighting adjustments; and 3)  
5 lighting schedule adjustment. The intent of the unified program approach is to provide  
6 non-residential customers with additional energy savings opportunities in their daily  
7 targeted maintenance operations.

8 **Residential Battery Storage Pilot**  
9 **(Demand Response/VPP)**

10 This proposed Pilot would provide an incentive for residential customers to discharge  
11 their home battery storage system when called upon during peak electrical demand, as  
12 well as at other times when doing so can support grid reliability and services.

13 **Q. Can you please provide additional comments on the Company's proposed**  
14 **Residential Battery Storage Pilot?**

15 A. Yes. The Company has continued to evaluate the latest market trends and market  
16 adaptation of battery storage solutions for backup power among its residential customers.  
17 As such, the Company is proposing a four-year pilot as part of this proceeding with the  
18 intent to better understand the benefits to the system of this behind-the-meter asset during  
19 load curtailment events. The proposed four-year Pilot will allow for enough time for the  
20 Company to launch the Pilot, capture appropriate participation and load curtailment data,  
21 and conduct EM&V to fully evaluate the potential for transitioning the pilot to a full  
22 program. Company Witness Courtney Young's testimony Schedule 2 provides a detailed  
23 overview of the 2024 DSM Final Order Proceeding recommendations and how these

1 were incorporated into the proposed DSM Phase XIV Residential Battery Storage Pilot.

2 **Residential Electric Vehicle Managed Charging Pilots**  
3 **(Demand Response/VPP)**

4 These Pilots offer qualifying residential customers, both those on time-of-use (“TOU”)  
5 and non-TOU rate schedules, who own an electric vehicle (“EV”) the opportunity to  
6 participate year-round in a managed charging strategy that will ensure their EV charging  
7 load is optimized both for peak and non-peak demand needs, as well as other localized  
8 demand needs or constraints.

9 **Q. Do you have any additional comments pertaining to the Residential Managed**  
10 **Charging Pilots (DR/VPP)?**

11 A. Yes. The Company is excited to bring forward a Residential Managed Charging Pilot for  
12 both its TOU and non-TOU rate customers. The proposed Pilots are based on lessons  
13 learned from the Company’s DSM Phase VIII Residential Electric Vehicle Charger  
14 Rewards (DR) Program and the DSM Phase XI Residential Electric Vehicle Telematics  
15 Pilot. Although the Phase VIII Residential EV Charger Rewards Program has continued  
16 to see success in achieving its projected program participant count, the program and the  
17 pilot realized minimal demand reduction during peak demand response events. In fact,  
18 the most recent EM&V report showed an average of 0.20 kW per participant versus the  
19 filed and anticipated 1 kW per customer.

20 In short, the enrolled customers are not home during the peak event days and thus are not  
21 charging their electric vehicles during those times, which has resulted in limited demand  
22 reduction. Furthermore, based on the 2025 EM&V report, the program delivery metrics  
23 show that evening event hours had higher load reduction in comparison to earlier event



1 hours, indicating that the EVs are charging later in the day when enrolled participants are  
2 at home. The Company incorporated these lessons learned and molded it into an  
3 opportunity to bring forward a managed charging pilot, with additional support for such a  
4 program by intervenors in the most recent Transportation Electrification Plan proceeding  
5 in Case No. PUR-2025-00022. Details on the modeling assumptions for TOU and non-  
6 TOU customers are in my Schedule 3.

7 **Q. Can you provide more detail on what the Company anticipates the proposed**  
8 **Residential Managed Charging Pilots (DR/VPP) will accomplish?**

9 A. The proposed Pilots will utilize the managed charging software as real time data to  
10 determine the right time to distribute electricity to the electric vehicle's battery. Enrolled  
11 participants will be expected to charge during off-peak hours during the called demand  
12 events. The managed charging strategies can shift charging from peak periods while also  
13 potentially targeting specific localities across the Company's service territory. The intent  
14 of the Pilots is to enhance and balance the timing of charging while ensuring grid  
15 reliability.

16 **Residential Income and Age Qualifying Battery Storage Pilots**  
17 **(Demand Response/VPP)**

18 These proposed Pilots would provide income and age qualifying ("IAQ") residential  
19 customers with a no-cost battery energy storage system installation by a qualified  
20 installer. The Pilots will target IAQ customers who previously participated in the  
21 Company's DSM IX House Bill 2789 Solar Pilot and had photovoltaic solar panels  
22 installed at their residence. Qualifying customers who receive a no cost installation of

1 the battery storage system must also participate in the demand response Pilot. For  
2 additional details regarding this pilot, please refer to Schedule 3.

3 **Non-residential HVAC for Small Business (“SMB”) Customers**  
4 **(Demand Response/VPP)**

5 This Program is designed for SMB customers with a demand of up to 400 kW. Under the  
6 proposed program design, participating customers will take part in demand response  
7 events initiated by the Company during peak system demand. During these events, the  
8 thermostats of participating SMB customers will be adjusted to achieve a specified  
9 amount of load reduction while maintaining reasonable facility comfort.

10 **Bring Your Own Device (BYOD) Aggregator Access Pilot**  
11 **(Demand Response/VPP)**

12 The proposed BYOD Aggregator Access Pilot is designed to advance the Company’s  
13 strategic goals for grid reliability, customer engagement, and integration of distributed  
14 energy resources (“DERs”). The Pilot provides qualified aggregators the opportunity to  
15 enroll residential, commercial, and industrial customers with eligible DER technologies  
16 which will include EV chargers, smart thermostats, and water heaters across the  
17 Company’s diverse customer segments.

18 **Q. Before you provide more detail on the proposed BYOD Aggregator Access Pilot**  
19 **(DR/VPP), can you please discuss how the Company incorporated stakeholder**  
20 **feedback into the proposed Pilot Program?**

21 **A.** Yes, I can. The Company has incorporated stakeholder feedback into the proposed VPP  
22 Pilot programs, and specifically the BYOD Aggregator Access Pilot, through two  
23 primary pathways. The first pathway was the VPP Stakeholder Process, which  
24 commenced on September 15, 2025. This process included an informational session

1 providing an overview of the VPP, followed by solicitation of direct feedback from  
2 stakeholders via the VPP Stakeholder portal. Per the requirement in the Commission's  
3 most recent DSM proceeding, Company Witness Young describes this input process in  
4 greater detail and summarizes the key stakeholder recommendations and feedback and  
5 the Company's responses thereto.

6 In addition, the Company engaged stakeholders in the DSM Stakeholder processes,  
7 which included a collaborative meeting on October 21, 2025. During this meeting,  
8 numerous stakeholders presented their recommendations, and the Company extended the  
9 DSM and VPP stakeholder feedback portals deadline to accommodate additional  
10 stakeholder feedback on VPP-related pilot designs, as requested by the DSM stakeholder  
11 group. Company Witness Young's Schedule 2 provides a detailed report on the  
12 stakeholders' recommendations and outlines the Company's action items.

13 **Q. Please describe the components of the BYOD Aggregator Access Pilot (DR/VPP).**

14 A. Utilizing vendor industry expertise and stakeholder recommendations, the Company is  
15 bringing forward in this 2025 DSM proceeding a BYOD Aggregator Access Pilot  
16 (DR/VPP) that consists of four components:

- 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

17 For more detailed information on the proposed BYOD Pilot, as part of the VPP  
18 Pilot program design, please see my Schedule 3.



1 **Q. Please describe the eligibility requirements for the proposed Phase XIV DSM**  
2 **Programs.**

3 A. Details regarding eligibility for each of the proposed Phase XIV DSM Programs are  
4 included within the Schedule 3 program sheets. The proposed Programs are designed for  
5 specific segments of residential and non-residential customers. Customers may enroll if  
6 they meet the eligibility requirements and agree to the applicable terms and conditions for  
7 each program. The Company has quality control processes that the program managers  
8 utilize during rebate approvals, as well as field quality assurance checks to provide  
9 protection against multiple payments for the same measure. These restrictions are  
10 necessary to avoid incentivizing a customer multiple times for the same measure or  
11 action, as well as to avoid compensating customers not intended for the program and  
12 reducing overall measured savings.

13 Finally, customers over 1 MW must not have opted out of paying the DSM rider in order  
14 to participate in an approved DSM program offered by Dominion Energy Virginia.

15 **Q. Are there any other eligibility requirements you wish to address?**

16 A. Yes. While not applicable to all Phase XIV programs because some of the proposed  
17 Programs are energy efficiency programs, the Company does have certain restrictions in  
18 place regarding simultaneous participation in its demand response programs with other  
19 curtailment rate schedules to avoid paying for the same benefit from one customer more  
20 than once. Specifically, a non-residential customer that participates in the Company's  
21 DSM Phase XIII Non-residential Distributed Generation Program is unable to participate  
22 simultaneously in the dynamic pricing rate schedule, the standby generation/curtailable  
23 service rate schedules, the Schedule 10 rate schedule, or the Phase XIII Non-residential

1       Curtailed Program. Similarly, customers that participate in the Company's DSM  
2       Phase VIII Residential Electric Vehicle Program DR Program and peak-shaving  
3       components are prohibited from participating in the dynamic pricing rate schedule. In  
4       addition, customers that participate in the Phase XI Telematics Pilot are prohibited from  
5       participating in the Company's DSM Phase VIII Residential Electric Vehicle DR  
6       Program, as well as the dynamic pricing rate schedule.

7       **Q.     Please describe the RFP process that led to the development of the Phase XIV**  
8       **Programs.**

9       A.     The proposed DSM Phase XIV Program concepts often originate or stem from the energy  
10       efficiency stakeholder process, as directed by Chapter 397 of the 2019 Virginia Acts of  
11       Assembly, as required by Va. Code § 56-596.2. To date, the Company has participated in  
12       21 stakeholder group meetings since early 2019, all led by the Commission-appointed  
13       independent moderator. In addition to the Company being an active participant in the  
14       stakeholder meetings, the Company has continued to be actively involved and continues  
15       to meet with stakeholders in sub-group meetings, which take place outside the larger  
16       scheduled stakeholder meetings on more specific topic areas.

17       During these sub-group meetings, stakeholders provided input on areas of focus for  
18       energy efficiency programs and specific conservation measures, which is part of my  
19       Filing Schedule 46C, Statement 1. Statement 1 consists of the Company's DSM Update  
20       presentations that were shared with the stakeholders in the last two Stakeholder Review  
21       Process meetings, which took place in 2025. The presentations contain updates on  
22       potential RFP program concepts and ideas received from various stakeholders. The  
23       Company then, to the best of its ability, incorporates the stakeholders' ideas and

1 recommendations into an RFP to solicit proposals for program designs based on those  
2 concepts developed at the stakeholder meetings. Specifically, this resulted in an RFP  
3 issued in June 2025, soliciting bids for energy efficiency and demand response programs.

4 Additionally, some of the stakeholders include implementation firms who participate in  
5 the RFP process and / or provide programmatic ideas, sometimes throughout the year,  
6 with these firms sometimes requesting meetings with the Company to discuss program  
7 ideas and discuss their company's strengths and experience.

8 A copy of the 2025 RFP is included in Filing Schedule 46C, Statement 1. Proposed  
9 program designs requested through the RFP process included, but were not limited to:  
10 development of specific program measures, incentives, parameters and assumptions;  
11 projected participation; projected costs; load profiles; projected energy and demand  
12 savings; and eligibility requirements. The RFP process, as well as the subsequent  
13 evaluation of proposals received, resulted in the Program proposals in this filing.

14 **Q. How were the results from the RFP used for purposes of this application?**

15 A. The Company used the RFP responses to define measures that would be included in  
16 Programs and to develop the estimated penetrations, costs, as well as the energy and load  
17 reductions associated with the proposed Programs for purposes of the cost/benefit  
18 evaluations.

19 **Q. How does the Company propose to implement the Phase XIV Programs?**

20 A. The Company plans to implement the proposed Phase XIV Programs through fully  
21 outsourced implementation vendors, similar to the approach successfully used in  
22 previously approved DSM Programs and Phases. The implementation vendor(s) often



1 utilize a contractor network to assist in delivering the program in the field, similar to  
2 previous phases. Final implementation details will be negotiated with the selected  
3 implementation contractor(s) upon Program approval.

4 **Q. When does the Company anticipate the Phase XIV Programs will be available to**  
5 **customers?**

6 A. With Commission approval, the Company anticipates the Phase XIV Programs will be  
7 available to customers in the first quarter of 2027, with launch activities beginning  
8 shortly after the Commission's final order in this proceeding.

9 **Q. How will the Company oversee the vendors selected to implement and manage these**  
10 **proposed Programs?**

11 A. As with the currently approved Programs, the Company will use internal Program  
12 Managers to monitor vendor performance, program success, and customer satisfaction.  
13 In addition, the Program Managers will ensure vendor compliance with contractual  
14 requirements and performance targets through regular reporting, and the proper  
15 coordination with the Company's systems and processes. Such monitoring and oversight  
16 should go unnoticed by the customer and will help to ensure successful and efficient  
17 interaction between the Company and its vendors.

18 As with the previously approved DSM Programs, the Company will require detailed  
19 reporting from its implementation vendors to help ensure that each Program meets its  
20 desired performance levels and participation targets. The Company will conduct EM&V  
21 on each Program and will include those results in its annual EM&V filing with the

1 Commission, as discussed further in the pre-filed direct testimony of Company Witness  
2 Dan Feng of DNV.

3 **III. LAUNCH EFFORTS OF PHASE XIII PROGRAMS**

4 **Q. Please provide the status on the launch efforts of the recently approved Phase XIII**  
5 **Programs.**

6 A. Since the Final Order in Case No. PUR-2024-00222 (“2024 DSM Final Order”) was  
7 issued on August 13, 2025, the Company has begun to work diligently with the various  
8 program implementation vendors to finalize contracts and launch activities. The  
9 Company began its Program launch activities promptly after the 2024 DSM Final Order,  
10 including contractor background checks; cyber risk assessment and development of  
11 mitigation plans; development of data security specifications, data pipelines,  
12 transmission, and access protocols; program terms and conditions; program web  
13 development and deployment; call center scripts and staffing; interactive voice response  
14 system programming; design and production of program specific marketing materials;  
15 development of program data collection specifications for EM&V; secure data exchange  
16 rollout and testing; and development of contractor network and/or subcontractors.

17 The Company expects all approved Phase XIII Programs to be available to customers in  
18 the first quarter of 2026.

1 **IV. PORTFOLIO CUSTOMER AWARENESS**

2 **Q. Please explain how the Company plans to increase customer awareness for its DSM**  
3 **program portfolio offering.**

4 A. The Company, in coordination with its Corporate Communications Department and other  
5 communication partners, will continue to assist with the customer awareness initiative for  
6 its DSM portfolio. The Company is currently engaged in a data driven campaign to raise  
7 awareness around the Company's DSM portfolio, utilizing information from the initial  
8 LTP, as well as from the DSM stakeholder group. Further details regarding the  
9 awareness initiative are discussed and provided by Company Witness Young's direct  
10 testimony.

11 **V. QUALITY ASSURANCE AND CONTROLS AND COMPLIANCE WITH**  
12 **COMMISSION ORDERS AND RULES**

13 **Q. Please describe the difference between the Company's quality control and quality**  
14 **assurance processes.**

15 A. The Company has a quality control process that utilizes internal automated queries and  
16 staff to track and flag measures installed in its programs. Rebate application information  
17 and installation work must be completed before rebates are funded and approved during  
18 the weekly review process. Each measure is tracked for accuracy in the Company's  
19 DSM tracking systems (the official systems of record through which rebate approvals are  
20 processed) and checked against the Program's applicable eligibility criteria for each  
21 program.

22 The final information is also submitted to DNV, the Company's EM&V vendor, to  
23 calculate energy savings and check data quality on a monthly basis. The DSM tracking



1 system validates measures and prevents acceptance of measures previously installed  
2 under the same customer account. Company personnel work closely with the  
3 implementation vendors to help ensure that rebates and supporting application data are  
4 accurate. Any errors that are identified in the Company's weekly exception process are  
5 captured and corrected by the appropriate program manager and analyst prior to being  
6 processed. The rebate back-up documentation is stored in the Company's  
7 implementation vendor's systems, as with the quality assurance field work when  
8 performed. This supporting documentation can be matched with completed work once a  
9 completed rebate application is submitted and approved for payment.

10 In addition to the quality control processes discussed above, the Company's field and  
11 quality assurance process is used to check and verify the quality of work in the field on a  
12 percentage of each vendor's projects. It should also be noted that the program  
13 implementation vendor often meets with customers and participating contractors to  
14 address work to be performed, via a pre-approval process, particularly on larger projects,  
15 to discuss qualifying measures and associated recommendations. All these ongoing  
16 quality controls and quality assurance observations help to ensure that legitimate work is  
17 rebated and not duplicated.

18 **Q. Please elaborate on the Company's quality assurance process for DSM Program**  
19 **measure installations.**

20 **A.** As outlined in my Schedules 5 and 6, the Company has detailed guidelines and processes  
21 to confirm that approved Programs are being implemented as planned and tracked closely  
22 as to participation levels and spending. Data quality control and field inspections are

1 done by our implementation vendors, EM&V vendor, and the Company's Energy  
2 Conservation department staff.

3 **Q. Does the Company have plans for any other future improvements or changes to its**  
4 **DSM Program and measure controls?**

5 A. The Company is continually looking for system and process improvements. As an  
6 example, in addition to continuing enhancements to the pre-approval processes, one of  
7 the Company's program implementation vendors has launched an electronic rebate  
8 tracking system, which will continue to safeguard and securely transfer data between the  
9 implementation vendor and the Company while processing rebate applications more  
10 swiftly. The program implementation vendor has successfully integrated its new  
11 electronic rebate tracking system into numerous programs and phases enabling  
12 opportunities to streamline field data collection and quality control mechanisms while  
13 safeguarding and securely transferring data between the implementation vendor and the  
14 Company. The enhanced tracking system and reporting tools improved the Company's  
15 and its program implementation vendor's ability to analyze data, monitor trends, and  
16 make more informed business decisions more quickly, thereby enhancing overall  
17 program performance.

18 **Q. In the Commission's 2020 DSM Update Final Order, the Commission directed the**  
19 **Company to provide detailed supporting cost information for the measures included**  
20 **in its IAQ Programs going forward. (2020 DSM Final Order at 9). Has the**  
21 **Company complied with this requirement?**

22 A. Yes. Please see my Schedules 1 through 4 for the requested information, which, in total,  
23 provides the supporting cost information for the measures included in the Company's

1       IAQ Programs. Accordingly, the Company believes it has complied with this  
2       requirement through the information presented in these schedules.

3       **Q.    In the EM&V Proceeding (Case No. PUR-2020-00156), which reviewed the**  
4       **Company’s EM&V practices, the Commission directed the Company to provide a**  
5       **sample data chart for existing and proposed programs, which will present a mix of**  
6       **verified persistent savings and projections for future years. Has the Company**  
7       **complied with this directive?**

8       A.    Yes. Please see my Schedule 7 for the requested information.

9       **Q.    Do the proposed Programs promote appliances and equipment subject to the federal**  
10       **standards contained in the National Appliance Energy Conservation Act**  
11       **(“NAECA”) in accordance with Rule 40(1)(d) of the Promotional Allowance Rules**  
12       **(20 VAC 5-303-40(1)(d))?**

13       A    Yes. The NAECA standards establish minimum energy efficiency requirements for  
14       certain types of residential appliances sold in the United States. The Residential Home  
15       Energy Services Program promotes appliances or equipment that fall within the scope of  
16       NAECA.

17       **Q.    Has the Company considered whether the proposed DSM Phase XIV Programs will**  
18       **have any significant effect on the sales levels of an alternative energy supplier in**  
19       **accordance with Rule 40(1)(e) of the Promotional Allowances Rules (20 VAC 5-303-**  
20       **40(1)(e))?**

21       A.    As required by Rule 40(1)(e), the Company has considered this issue and does not  
22       believe the proposed DSM Phase XIV Programs will have a significant effect on the sales



1 levels of alternative energy suppliers. The proposed Programs are not designed or  
2 expected to influence the use of one energy source over another but are designed to  
3 specifically target and reduce electric applications and consumption.

4 **Q. How will the proposed DSM Programs conform to Rule 40(1)(c) of the Promotional**  
5 **Allowances Rules (20 VAC 5-303-40(1)(c)), which requires that the DSM Programs**  
6 **be designed to minimize the potential for placing private businesses at an undue**  
7 **competitive disadvantage?**

8 A. The RFP issued for the potential Phase XIV Programs requested information regarding  
9 how each contractor plans to use other small and/or diverse businesses or subcontractors.  
10 When evaluating the bids, the Company favorably considered the bidders' affirmative  
11 responses and responsive examples to these questions. This requirement is further  
12 embodied in the Company's implementation contracts. Additionally, there are private  
13 businesses that serve as the delivery mechanism for services and the installation of  
14 energy saving measures within the Programs. This approach directly supports local and  
15 private businesses.

16 **Q. Has the Company defined customer classes in compliance with Rule 40(1)(b) of the**  
17 **Promotional Allowances Rules (20 VAC 5-303-40(1)(b))?**

18 A. Yes. The Company has defined the residential, commercial, and industrial customer  
19 classes in compliance with Rule 40(1)(b). The Company uniformly extends the DSM  
20 Programs to all customers in each defined class as allowed by statute, provided they meet  
21 the Program eligibility requirements.

1    **Q.**    **Does this conclude your pre-filed direct testimony?**

2    **A.**    Yes, it does.