

WITNESS DIRECT TESTIMONY SUMMARY

Witness: Courtney S. Young

Title: Director of Customer Energy Programs

Summary:

Company Witness Courtney S. Young introduces the Company's proposal in the current Application. First, she addresses updates to the Company's approach to DSM, including an overview of the Company's current Phase XIV request. In this overview, Mrs. Young notes the range of customer participation in the Company's DSM Programs, as well as cost and energy savings flowing from these programs.

Next, Mrs. Young explains the Virginia Clean Economy Act savings targets, the Commission ordered savings targets, as well as current efforts to enhance program performance. Consistent with the Commission's 2024 DSM Final Order directive, Mrs. Young addresses the specific steps the Company will take to comply with the 2026 – 2028 savings targets.

Mrs. Young further discusses the Company's participation in the independent moderator-led stakeholder group. Specifically, she explains the Company's compliance with the Commission's directives in the 2024 DSM proceeding that the Company: (i) refer the issue of leveraging the functionalities of AMI to improve benefit/cost ratios back to the Stakeholder Group, (ii) permit dual-fuel customers to participate in any DSM Program or measure that does not involve fuel-switching, and (iii) refer the proposed Phase XIII Residential Battery Storage Pilot to the Stakeholder Process and then file a report, concurrent with the proposed Virtual Power Plant ("VPP") Pilot, describing the results of that Stakeholder Process.

In addition, Mrs. Young outlines the Company's progress towards achieving recommendations outlined in the 2021 DSM Long-Term Plan before introducing the Company's 2025 Long-Term Plan ("LTP25"), also filed as part of this proceeding, in response to the Commission's 2024 DSM Final Order directive. Mrs. Young addresses the Company's approach to achieving the recommendations contained within the LTP25. She notes a key finding of the LTP25 that the Company has established a sound DSM planning process and a comprehensive portfolio of DSM programs, and is making all reasonable efforts to maximize cost-effective DSM energy and demand savings requirements.

Mrs. Young also provides an overview of the Company's cost recovery request for the September 1, 2026, through August 31, 2027, rate year through Riders C1A and C4A. Mrs. Young further summarizes the Company's compliance with the Commission's 2024, 2023, 2022, 2021, and 2020 DSM Final Order directives, as well as the 2020 EM&V proceeding directives.

Mrs. Young concludes by introducing other witnesses in this proceeding and summarizing the Company's requests in support of the current Application.

**DIRECT TESTIMONY
OF
COURTNEY S. YOUNG
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 Courtney S. Young, and my business address is 600 East Canal Street,
4 Richmond, Virginia 23219. I am the Director of Customer Energy Programs for
5 Dominion Energy Virginia’s New Business and Customer Solutions Group. A statement
6 of my background and qualifications is included as Appendix A.

7 **Q. Please describe your areas of responsibility with Dominion Energy Virginia.**

8 A. I am responsible for delivering Demand-Side Management (“DSM”) programs
9 (individually, “DSM Program” or “Program,” collectively, “DSM Portfolio” or
10 “Portfolio”) for the Company. In addition, I am responsible for program development,
11 design, and strategy for electrification efforts within the Company’s regulated service
12 territory in Virginia. Additional responsibilities include management and support of
13 customers’ Green Power, time of use (“TOU”) rate, and the Company’s Virtual Power
14 Plant initiatives.

15 **Q. Please describe the purpose of your testimony in this proceeding.**

16 A. My testimony supports the Company’s petition for approval to (1) implement DSM
17 “Phase XIV,” which includes new DSM Programs to supplement the overall Portfolio;
18 (2) extend the Company’s DSM Phase XI Residential IAQ Bundle Program and Non-

1 residential IAQ Bundle Program for three years; and, (3) update and continue rate
2 adjustment clauses (“RACs”) designated Riders C1A and C4A (collectively, the
3 “Application”).

4 Specifically, the purpose of my testimony is to:

- 5 (1) Provide an overview and updates to the Company’s approach to DSM;
- 6 (2) Address the recommendations from Cadmus in the DSM 2025 Long-Term Plan
7 Update (“LTP25”);
- 8 (3) Present an overview of the Company’s request for approval of DSM Phase XIV
9 programs;
- 10 (4) Address the Virginia Clean Economy Act (“VCEA”) energy savings targets, the
11 2026-2028 energy savings targets set by the Commission, including the
12 Commission’s 2024 DSM Final Order directive to provide a plan detailing the
13 specific steps the Company will take to comply with the 2026 – 2028 targets;
- 14 (5) Provide an overview of the Company’s cost recovery request for the rate year
15 period of September 1, 2026, through August 31, 2027 (“Rate Year”) through
16 Riders C1A and C4A;
- 17 (6) Describe the Company’s compliance with the Virginia State Corporation
18 Commission’s (the “Commission”) orders and directives in the 2024, 2023, 2022,
19 2021, and 2020 DSM proceedings, and the 2020 evaluation, measurement, and
20 verification (“EM&V”) proceedings; and
- 21 (7) Introduce the other witnesses presenting testimony and summarize the requests
22 presented by the Company in this Application.

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

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

2 A. Yes. Company Exhibit No. ___, CSY, consisting of Schedules 1 through 3 was prepared
3 under my direction and supervision, and is accurate and complete to the best of my
4 knowledge and belief.

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

6 A. My testimony is organized as follows:

7 I. Overview and Update to Company's DSM Approach

8 II. 2025 DSM Long-Term Plan Update

9 III. Request for Approval of Proposed Phase XIV Programs

10 IV. VCEA Targets & Efforts to Enhance Performance and Compliance with
11 2026-2028 Savings Targets

12 V. Cost Recovery Request

13 VI. Additional Compliance with the Commission's Orders

14 VII. Introduction of Company Witnesses and Summary of Requests

15 **I. OVERVIEW AND UPDATE TO COMPANY'S DSM APPROACH**

16 **Q. Please provide background on how the Company has conducted DSM Programs in**
17 **Virginia.**

18 A. In March 2007, a voluntary energy efficiency goal of 10% electricity savings was enacted
19 by the Virginia General Assembly. To achieve this goal, Dominion Energy Virginia
20 launched its DSM Programs, consisting of energy efficiency and peak shaving programs.
21 Dominion Energy Virginia offers voluntary energy conservation programs and useful
22 information to help residential and non-residential customers make energy efficient
23 improvements and reduce demand during peak periods.

1 Customers are required to meet specific eligibility criteria described in the program terms
2 and conditions specific to each DSM program, which are available on the Company's
3 website. The terms and conditions, Frequently Asked Questions, as well as other
4 program materials, are developed post-Commission approval to assist customers in
5 understanding eligibility and program expectations for the comprehensive offering of
6 DSM programs available to residential and non-residential customers.

7 The field implementation and administration services for the DSM Programs are
8 provided by third-party implementation vendors, which currently include Uplight,
9 CLEAResult, EnergyHub, Honeywell, ICF, Itron, Resource Innovations, PowerSecure,
10 TRC Solutions, and WeaveGrid. Each vendor is under contract with Dominion Energy
11 Virginia to implement and operate certain field-service-level functions for each DSM
12 Program or Pilot. Dominion Energy Virginia's Energy Conservation Department
13 program managers have oversight responsibility to ensure the third-party implementation
14 vendors are operating in accordance with the Commission's approval and contracted
15 responsibilities.

16 Energy savings associated with the Company's DSM Programs are determined by
17 EM&V each year by the Company's independent, third-party EM&V vendor, DNV. The
18 Company continues to file annual EM&V reports detailing energy and demand
19 reductions, as well as spending, participation, and other performance indicators, by
20 program via other performance reporting dashboards.

21 In 2024, over 696,000 residential and non-residential customers participated in the
22 Company's DSM Programs. Specifically, over 2,700 small business customers

1 participated in the Company's Small Business Improvement Enhanced Program, resulting
2 in approximately 15 million kilowatt hours net savings. The Company also provided
3 3,187 appliance rebates to our residential customers and issued 114,706 welcome kits.

4 Overall, approximately \$48 million were disbursed in rebate payments across the active
5 programs in 2024. This resulted in Dominion Energy Virginia customers saving
6 approximately 1,042 gigawatt-hours (excluding opt-out megawatt hours) of energy in
7 2024.

8 My Schedule 1 provides an executive summary of the Company's 2024 DSM Portfolio
9 performance and is provided as part of this filing, consistent with the Commission's
10 Orders in Case Nos. PUR-2024-00222, PUR-2023-00217, and PUR-2020-00156. This
11 executive summary or "dashboard" was created based on comments from stakeholders
12 regarding which metrics were of most interest to them. The data is for the prior calendar
13 year—here 2024—and has been fully audited via the Company's internal processes and
14 third-party external EM&V.

15 **Q. Please provide an overview of the VCEA as it relates to the Company's DSM**
16 **Programs.**

17 A. The VCEA became effective on July 1, 2020, and contains several provisions that
18 amended the laws related to DSM programs. According to Va. Code § 56-585.1 A 5 c of
19 the VCEA, a petition for energy efficiency programs shall include a "proposed budget for
20 the design, implementation, and operation of the energy efficiency program, including
21 anticipated savings from and spending on each program, and the Commission shall grant
22 a final order on such petitions within eight months of initial filing." This subsection also

1 includes provisions that the Commission shall allow a margin for recovery on operating
2 expenses for energy efficiency programs until January 1, 2022, after which a margin is
3 dependent on what the Company has proposed, what the Commission has approved, and
4 whether the Company has met its total annual savings targets.

5 The VCEA also amended which customers are required to pay for costs of, and by
6 extension participate in energy efficiency programs, by removing certain automatic
7 exemption language, redefining the definition of Large General Service (“LGS”)
8 Customer, and directing the Commission to establish an opt-out procedure for eligible
9 customers implementing energy efficiency on their own. This change allowed the
10 Company to offer its DSM Programs to a broader group of non-residential customers. In
11 its Final Order in the 2020 DSM proceeding issued on September 7, 2021, the
12 Commission approved expanding eligibility for existing programs to the LGS Customers.

13 Also, as part of the VCEA, Virginia Code § 56-596.2 provides that at least 15% of energy
14 efficiency program costs should be designed to benefit low-income and elderly, disabled
15 individuals, or veterans. Moreover, the VCEA specified total annual energy savings
16 targets for the Company to achieve, starting in year 2022 through 2025, with savings
17 targets to be set by the Commission thereafter. I will address these savings targets and
18 introduce the Company’s 2025 Long-Term Plan Update (“LTP25”), which details various
19 pathways that the Company may pursue to comply with the 2026-2028 energy savings
20 targets. I will also address the 2026-2028 energy savings targets below in Section IV.

21 Lastly, the VCEA expanded the scope of the stakeholder group to include feedback and
22 input on (i) the development of energy efficiency programs and portfolios of programs;

1 (ii) compliance with total annual energy savings targets and effect on integrated resource
2 plans; (iii) recommended policy reforms to ensure maximum and cost-effective energy
3 efficiency; and (iv) best practices for EM&V services. Section 56-596.2 also provides
4 that a utility must use a third-party evaluator to perform EM&V on total annual savings
5 targets and requires a third-party evaluator to provide reports on its findings concurrently
6 to the Commission and the utility.

7 **Q. Can you comment further on the Company's participation in the independent**
8 **moderator-led DSM stakeholder group process?**

9 A. Yes. The Company continues to participate in stakeholder group meetings led by the
10 Commission-hired independent moderator, and in subgroup meetings on a variety of
11 subject areas of most interest to stakeholders. During the meetings, stakeholders provide
12 input on areas of focus for energy efficiency programs and specific conservation
13 measures. The Company incorporates stakeholder input into its requests for proposals
14 ("RFP") and has adjusted the DSM process and planned administration of Programs in
15 line with stakeholder feedback. Company Witness Michael T. Hubbard addresses the
16 stakeholder and RFP processes further in his direct testimony and schedules, including
17 the process of moving from stakeholder idea to pilot or program proposal.

18 **Q. Are there any additional requirements regarding the stakeholder process following**
19 **the Company's 2024 DSM case?**

20 A. Yes, there were three additional requirements. First, the Commission adopted the
21 Hearing Examiner's recommendation to refer the issue of leveraging the functionalities
22 of AMI to improve benefit/cost ratios back to the Stakeholder Group for further analysis
23 or action. The 2024 DSM Final Order was issued at the end of July in 2025. Since that

1 time, the Company participated in the October 21, 2025, DSM Stakeholder Review
2 Process update meeting, and initiated the dialogue with the stakeholder group pertaining
3 to AMI functionalities and its potential impact on improving cost benefit scores. The
4 Company will continue to collaborate with the independent monitor and the numerous
5 stakeholders in an effort to continue this dialogue in the most appropriate stakeholder
6 subgroup over the next several months.

7 Prior to the 2024 DSM Final Order, the Company engaged stakeholders on this topic and
8 other programmatic ideas, including specifically seeking additional proposals in its
9 annual DSM RFP regarding AMI and geotargeting. This is in addition to having a
10 recently approved DSM Phase XI Peak Time Rebate Program (approved in Case No.
11 PUR-2022-00210) and enhanced EM&V capabilities, all due to the deployment of the
12 Company's AMI.

13 Dominion Energy Virginia has fully deployed AMI across its service territory, enabling
14 remote meter reading as well as command, inquiry, and upgrade functions to individual
15 smart meters. The Company's DSM Phase XI Residential Peak Time Rebate Program is
16 completely reliant on customer's AMI data. Thus, the Company has been proactive in
17 bringing forward a DSM program that is reliant on AMI data functionality.

18 **Q. Next, did the Company comply with the Commission's 2024 DSM Final Order**
19 **directive to permit dual-fuel customers to participate in any DSM Program or**
20 **measure that does not involve fuel-switching?**

21 **A.** Yes. The Company offers dual-fuel customers (*i.e.*, customers who use both gas and
22 electric appliances in their homes) the opportunity to participate in nearly all active DSM

1 Programs and Program Bundles. Specifically, dual-fuel customers may participate in
2 some aspect of all Residential and Non-residential programs offered in DSM Phases VIII,
3 IX, X, XI, XII and XIII, and in all Residential programs offered in those phases, except
4 for the Residential Smart Thermostat Purchase EE Program, which is only available to
5 all-electric customers. These are all Company programs and measures that do not
6 involve fuel switching.

7 My Schedule 2 provides a detailed report on current Stakeholder feedback regarding
8 dual-fuel program participation. The Company will continue to assess measures in
9 programs to be compliant with the Commission's directive.

10 **Q. Lastly, has the Company complied with the Commission's 2024 DSM Final Order**
11 **directive to refer the proposed Phase XIII Residential Battery Storage Pilot to the**
12 **Stakeholder Process and then file a report, concurrent with the proposed VPP Pilot,**
13 **describing the results of that Stakeholder Process?**

14 A. Yes, it did. The VPP Stakeholder Process commenced on September 15, 2025, and
15 began with an informational session providing a background and overview of the
16 proposed VPP Pilot. Stakeholders then had the opportunity to provide direct feedback
17 via the VPP Stakeholder portal. This feedback portal consisted of 26 questions across
18 five categories,¹ with 19 total stakeholders providing responses. Key insights from these
19 stakeholder submissions included a strong preference for performance-based incentives,

¹ The five categories included (1) Residential Batteries, (2) Aggregator Access, (3) Residential EV Managed Charging, (4) Residential Energy Service Program, and (5) Non-Residential Energy Service Program.

1 support for encouraging broad participation across distributed energy resource programs,
2 a preference for data transparency, and promoting flexible program designs.

3 As stated in Company Witness Hubbard's direct testimony, the Company also held a
4 collaborative Stakeholder engagement meeting on October 21, 2025, which prompted
5 numerous recommendations from Stakeholders. In response, the Company extended the
6 original DSM and VPP feedback portals deadline to October 24, 2025 to accommodate
7 this increase in stakeholder feedback on VPP-related pilot designs. For more details,
8 please see my Schedule 2, which provides a report on the stakeholders' analyses and
9 recommendations regarding the proposed VPP Pilot programs, including the Residential
10 Battery Storage Pilot.

11 II. 2025 DSM LONG-TERM PLAN UPDATE

12 **Q. Before you address the Company's LTP25, please provide an overview of the**
13 **Company's 2021 DSM Long-Term Plan ("LTP21").**

14 **A.** In the 2020 DSM Final Order (Case No. PUR-2020-00274), the Commission directed the
15 Company to present a long-term plan for DSM sufficient to comply with the total energy
16 savings targets in the VCEA and investment levels in the Grid Transformation Security
17 Act ("GTSA"). The Commission required that the long-term plan should include: (i)
18 proposed program savings and budgets for the five-year period beginning January 1,
19 2022, sufficient to comply with the total energy savings targets in the VCEA and
20 investment levels in the GTSA; (ii) a proposed plan and framework for consolidating,
21 streamlining, and marketing the public-facing aspects of the Company's approved and
22 proposed DSM Programs to facilitate participation at the levels required to achieve the
23 VCEA targets; and (iii) a detailed project management plan and risk management

1 strategy demonstrating that the Company has identified and planned for deployment of
2 the resources required to implement its revised Programs. The Commission also required
3 that the strategic plan should reflect short-term, medium-term, and long-term
4 recommendations for improvement of the Company's DSM Portfolio. As a result of this
5 directive, the Company filed LTP21 in its 2021 DSM proceeding.

6 **Q. Please introduce the LTP25 being filed as part of this proceeding.**

7 A. Most recently, in the 2024 DSM Final Order (Case No. PUR-2024-00222), the
8 Commission adopted the Hearing Examiner's recommendation to direct the Company to:

9 [P]repare and file with its next DSM update, and each
10 subsequent DSM update, a plan that details the specific steps
11 the Company will take to comply with the statutory energy
12 savings targets in 2026 - 2028, including how these proposed
13 steps will lead to achievement of the savings targets
14 established by the Commission and how the Company will
15 achieve the VCEA-mandated 15% budget proposal for IAQ
16 Programs.

17 In response to the Commission's directive in its 2024 DSM Final Order, the Company's
18 consultant, Cadmus, has prepared the LTP25, which is provided as Schedule 2 to
19 Company Witness Terry M. Fry's direct testimony.

20 The LTP25, represents an update to the LTP21 and presents new analyses of energy
21 savings pathways compared to the 2026-2028 VCEA targets, specifically focusing on two
22 scenarios, as described below. It further addresses changes in the legislative landscape
23 and Dominion Energy Virginia's portfolio since 2021, articulates new or evolving market
24 opportunities and challenges, and incorporates results of the Company's most recent
25 potential study.

1 To forecast energy savings scenarios, Cadmus conducted a modeling analysis that
2 accounts for (i) cumulative persistent annual savings resulting from historical program
3 activities and forecasted savings from recently approved DSM programs, (ii) estimated
4 contributions from redesigned DSM programs and increased portfolio marketing and
5 outreach investments recommended in this Plan, and (iii) contributions from voltage
6 optimization initiatives and self-directed savings from large commercial opt-out
7 customers toward the Company's statutory goals.

8 The two scenarios Cadmus modeled in the LTP25 include the following:

- 9 • **Maximize Cost-Effective Savings.** Scenario 1 reflects all achievable and cost-
10 effective savings found in the Company's 2024 Potential Study. While the
11 Potential Study provided savings estimates at three distinct incentive level
12 assumptions, Cadmus' modeling reflects the highest incentive scenario, at 75% of
13 measure incremental costs.
- 14 • **Achieve VCEA Goals.** To estimate the minimum cost theoretically possible for
15 the Company to achieve 2026-2028 VCEA targets, Scenario 2 integrates a
16 broader set of measures from the Potential Study's data set. Because Scenario 1
17 maximizes the achievement of cost-effective savings, Scenario 2 necessarily
18 includes additional savings that are not cost-effective and may not materialize or
19 be able to be achieved even with this material increase in costs.

20 **Q. Please briefly describe the findings and recommendations of the LTP25.**

21 A. The LTP25 outlines findings and recommendations and steps the Company can take to
22 optimize customers' participation and experience in future DSM programs. Specifically,
23 the LTP25 recommends that the Company:

- 24 • Pursue Scenario 1, which focuses on achieving the maximum feasible, cost-
25 effective savings.
- 26 • Collaborate with stakeholders and request that the Commission establish clear,
27 updated methods and inputs for cost-effective analysis, particularly in preparation
28 for the 2029-2031 goal setting.
- 29 • Collaborate with stakeholders and request the Commission to refine the metric for
30 savings targets during the goal-setting process for 2029-2031.

- Continue to strengthen internal planning and management systems to ensure optimized, reliable, and affordable delivery of DSM resources.
- Sustain its customer-centric approach; continue to streamline DSM offerings for operational efficiency; and actively manage program performance to ensure accountability and continuous improvement.

The findings of the LTP25 present several pathways to help the Company operationalize program design recommendations and prepare for a future in the long-term that prioritizes customer experience, grid resiliency, integrated DSM, and savings target achievement. For more details on the LTP25, please see the direct testimony of Company Witness Fry.

Q. How is the Company addressing the recommendations contained within the LTP25?

A. As recommended in the LTP21 and expanded upon in the LTP25, the Company continues to move towards a consolidated program structure to streamline DSM programs. The Company is actively formalizing a consolidated portfolio that offers 15 programs, bringing together nearly 40 previously approved programs. Please see Schedule 2 of Company Witness Fry's direct testimony for more information on the Company's streamlined DSM portfolio program structure.

Although we are still using the phased approach for purposes of cost caps, as noted in Company Witness Hubbard's direct testimony, the Company continues to improve its customer awareness campaign alongside enhancing its DSM program offerings. Moving forward, the Company will continue to expand marketing and awareness campaigns and implement LTP recommendations where feasible to improve performance of additional DSM programs.

1 **Q. Do you have any other comments on the Company's LTP25?**

2 A. I do. The LTP25 presented a key finding that the Company has established a sound DSM
3 planning process and a comprehensive portfolio of DSM programs and is making all
4 reasonable efforts to maximize cost-effective DSM energy and demand savings
5 requirements. Nonetheless, the Company maintains its commitment to continuously
6 assessing opportunities to strengthen and enhance systems, programs, and feedback
7 loops.

8 **III. REQUEST FOR APPROVAL OF PROPOSED PHASE XIV PROGRAMS**

9 **Q. What are the Programs for which the Company is seeking approval through this**
10 **Application?**

11 A. The Company requests the following new programs to be approved as part of the 2025
12 DSM proceeding.

- 13 • DSM Phase XI Residential Income and Age Qualifying Program Bundle
14 extension (EE)
- 15 • DSM Phase XI Non-residential Income and Age Qualifying Program
16 Bundle extension (EE)
- 17 • Residential Home Energy Services (EE)
- 18 • Non-residential Energy Services (EE)
- 19 • Residential Battery Storage (DR/VPP)
- 20 • Residential Electric Vehicle Managed Charging Pilot (DR/VPP)
- 21 • Residential Electric Vehicle Managed Charging Pilot TOU (DR/VPP)
- 22 • 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

The direct testimony and schedules of Company Witness Hubbard provide additional detail regarding these Programs 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 the Phase XIV Programs.

Q. With the addition of VPP Pilot programs in the Company's proposed Phase XIV Programs, is the Company seeking cost recovery of the VPP Pilot programs in this case?

A. Yes. The Company is seeking cost recovery of the VPP Pilot programs in the revenue requirement for this case via Rider C1A. Please see Company Witness Renee T. Lipscomb's direct testimony for additional details.

1 **Q. What is the proposed cost cap for the Phase XIV Programs?**

2 A. The proposed five-year cost cap for the Phase XIV Programs in the aggregate is
3 approximately \$220.6 million and \$253.7 million with the 15% variance allowance.
4 Information regarding the individual proposed cost caps for each Program, and the
5 associated details, are provided by Company Witness Jarvis E. Bates. Consistent with the
6 Commission's approval in the 2024 DSM Update Final Order, the Company requests the
7 Commission allow spending flexibility up to 15% above the proposed caps. Doing so
8 allows the Company to embrace popular and successful Programs and unlock greater
9 energy efficiency savings than otherwise may be achieved.

10 **Q. Why are there no closure dates proposed for the Phase XIV Programs?**

11 A. Consistent with the Commission's Orders in Case Nos. PUR-2021-00247, PUR-2022-
12 00210, PUR-2023-00217, and PUR-2024-00222, the Company is not proposing
13 predetermined program closure dates for non-pilot programs; however, five-year budgets
14 are being submitted for each program.

15 **III. VCEA TARGETS & EFFORTS TO ENHANCE PERFORMANCE AND**
16 **COMPLIANCE WITH 2026-2028 SAVINGS TARGETS**

17 **Q. Earlier you referenced the energy efficiency savings targets the VCEA established**
18 **for 2022 through 2025 and beyond. Could you please explain what those targets**
19 **are?**

20 A. With the passage of the VCEA, the General Assembly has set aggressive carbon
21 reduction targets through the expansion of renewable generation resources, storage, and
22 energy efficiency. Specifically with respect to energy efficiency, the General Assembly
23 established the following total annual energy savings targets:

1 a. In calendar year 2022, at least 1.25 percent of the average
2 annual energy jurisdictional retail sales by that utility in
3 2019;

4 b. In calendar year 2023, at least 2.5 percent of the average
5 annual energy jurisdictional retail sales by that utility in
6 2019;

7 c. In calendar year 2024, at least 3.75 percent of the average
8 annual energy jurisdictional retail sales by that utility in
9 2019;

10 d. In calendar year 2025, at least 5.0 percent of the average
11 annual energy jurisdictional retail sales by that utility in
12 2019; and

13 For the time period 2026 through 2028, and for every
14 successive three-year period thereafter, the Commission
15 shall establish new energy efficiency savings targets.

16 Per the 2023 DSM Final Order, the Commission found that a “net” savings metric, rather
17 than “gross” savings, is the appropriate metric required by Va. Code § 56-596.2.

18 **Q. In its Final Order in the 2020 DSM proceeding, Case No. PUR-2020-00274, the**
19 **Commission directed that the Company’s future DSM filings include “[an] exhibit**
20 **measuring Dominion’s actual and projected compliance or noncompliance with the**
21 **total energy savings requirements in Va. Code § 56-596.2, using both net and gross**
22 **savings metrics.” Has the Company done so in this proceeding?**

23 **A.** Yes. My Schedule 3 presents the Company’s current estimation of energy efficiency
24 savings. It should be noted that this information reflects a snapshot in time and does not
25 yet incorporate all the improvements to energy efficiency savings that will result from the
26 Company’s continued implementation of the recommendations in the LTP25. The
27 Company remains committed to doing everything that is cost-effective and practicable, in
28 consultation with a full range of stakeholders, to identify additional programs and process

improvements to increase energy savings. As shown in my Schedule 3 and in Table 1 below, on a net basis, the energy savings achieved are below the 2025 target at 2.0%.²

Table 1

Net at Meter	YEAR	VCEA Target MWh*	VCEA Target %*	DSM Phases < 11 MWh	DSM Phase 11 MWh	DSM Phase 12 MWh	DSM Phase 13 MWh	DSM Phase 14 MWh	Opt-Outs MWh	Total DSM MWh	DSM %**
	2024	2,558,675	3.8%	1,022,493	19,786	-	-	-	63,977	1,106,256	1.6%
	2025	3,411,567	5.0%	1,229,392	53,248	19,748	-	-	64,446	1,366,834	2.0%
	2026	2,046,940	3.0%	1,509,128	82,721	53,564	54,358	-	64,915	1,764,685	2.6%
	2027	2,729,253	4.0%	1,692,742	108,266	95,464	148,136	27,193	65,384	2,137,184	3.1%
	2028	3,411,567	5.0%	1,769,416	135,398	150,430	243,814	79,757	65,853	2,444,667	3.6%

* The 2026-2028 savings targets were ordered by the Commission in Case No. PUR-2024-00120

** All values exclude NC and non-Jurisdictional DSM reductions

Q. Earlier in your testimony, you also referenced that the Commission set energy efficiency savings targets for 2026-2028 in Case No. PUR-2023-00227. What are those savings targets?

A. Pursuant to Va. Code § 56-596.2, the Commission set the Company's energy savings targets of 3% for 2026, 4% for 2027, and 5% for 2028.

Q. Is the Company entitled to a margin on energy efficiency operating expenses for 2024?

A. No, Va. Code § 56-585.1 provides the following:

Beginning January 1, 2022, and thereafter, if the Commission determines that the utility meets in any year the annual energy efficiency standards set forth in § 56-596.2, in the following year, the Commission shall award a margin on energy efficiency program operating expenses in that year, to be recovered through a rate adjustment clause, which margin shall be equal to the general rate of return on common equity determined as described in subdivision 2.

² Pursuant to the 2023 DSM Final Order, the Company has provided the achieved energy savings on a "net" basis only. See *Application of Virginia Electric and Power Company, For approval of its 2023 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia*, Case No. PUR-2023-00217, Final Order (July 26, 2024).

1 As explained in Company Witness Lipscomb's testimony, the Company did not meet the
2 energy savings targets on a "net" basis and therefore has not calculated a margin on
3 operations and maintenance ("O&M") expenses.

4 **Q. Please describe how the Company's customer awareness initiative is designed to**
5 **enhance program performance and increase energy savings.**

6 A. The LTP21 emphasized the significant impact of its broad customer awareness campaign
7 on the Company's ability to achieve the energy savings targets. To that end, the
8 Commission approved the Company's request to direct funding toward improving
9 customer awareness and marketing as well as program enrollment in the 2021 DSM Final
10 Order. This increased funding is expected to continue to drive greater awareness,
11 changes to improve customer experience, and enrollment in DSM Programs. Several
12 updates and additional enhancements have taken place throughout 2024. As discussed in
13 Company Witness Fry's Direct Testimony Schedule 1, the Company has made
14 considerable progress on the implementation of a portfolio marketing strategy aimed at
15 increasing overall awareness of its DSM programs and the benefits of adopting energy
16 conservation technologies and behaviors.

17 Notably, the Company's efforts thus far have led to the following results:

- 18 • Impressions: 3,000,000 in 2023 (partial marketing year) → 110,000,000 in
19 2024 → 170,000,000 year-to-date in 2025
- 20 • Clicks: 46,000 in 2023 → 409,000 in 2024 → 1,300,000 year-to-date in 2025
- 21 • Monthly Users of DSM Site Pages: Monthly users to DSM site pages continue to
22 increase (~17,000 in August 2023 to ~28,000 in August 2025)

1 This strong performance has been independently validated by Cadmus, confirming a 33%
2 increase in public awareness (39% aware in 2021 to 52% aware in 2024) of DSM in 2024
3 compared to the prior survey period.

4 In addition, as noted above, the Company has actively engaged with the DSM
5 stakeholder group by providing updates on the customer awareness campaign. The open
6 dialogue between the Company and stakeholders evolved into a customer awareness
7 subgroup that is administered by a Commission-hired independent moderator. Most
8 recently, the Company conducted a Voice of the Customer Survey of 2,118 Company
9 customers in June 2025, which found 59% awareness (among all customer groups) of
10 Company programs through awareness campaigns. The Company remains committed to
11 expanding efforts to improve customers' general awareness of the Company's energy
12 efficiency Programs and the benefits of energy efficiency to move towards the VCEA
13 and Commission-set energy savings targets.

14 **Q. Has the Company engaged its implementation vendors regarding ways to enhance**
15 **program performance and increase savings?**

16 A. Yes. The Company has continued to host vendor meetings and focused awareness
17 communications for its numerous program implementation vendors to ensure consistency
18 with its communication and the importance to cross-promote its DSM programs. The
19 intention of the vendor meetings and communications are to create a collaborative work
20 environment for all the Company's implementation vendors by providing ongoing
21 coordination and information to ensure that all parties involved are maximizing
22 opportunities to inform customers about the range of available energy efficiency options

1 available to them through the general awareness campaign and the Company's robust
2 DSM program portfolio offering.

3 **Q. The December 2021 LTP identified strengthening the continuous improvement**
4 **framework as a way to potentially enhance program participation and increase**
5 **savings. Please address the Company's efforts in this regard.**

6 A. Since publication of the LTP21, the Company has initiated the continuous improvement
7 framework for its programs, systems, and processes, and the updated LTP25 recognizes
8 the Company's ongoing commitment to continuous improvement. Strengthening the
9 continuous improvement framework requires the Company to assess, improve, and track
10 the effectiveness of our Programs' design and delivery. This helps the Company
11 optimize Programs over time. The Company is in regular and consistent communication
12 with its implementation providers to gauge performance of the Programs and discuss
13 opportunities for improvement where needed. The Company is also actively coordinating
14 with DNV to conduct several baseline reviews and impact evaluations.

15 Between 2023 and 2025, the Company completed process evaluations for the Small
16 Business Improvement, Home Energy Evaluation (Home Energy Assessment and Home
17 Retrofit), Non-residential Custom, and Residential New Construction programs. These
18 process evaluations have helped establish stronger feedback mechanisms to enhance
19 continuous improvement. The Company plans to expand its process evaluation in the
20 2026-2028 energy savings cycle. The Company will continue to work with Cadmus on
21 the next steps to incorporate the findings of these evaluations into its program operations,
22 where practicable. Additionally, the Company plans to adopt the industry standard
23 practice of conducting formal process evaluations on every program at least once per

1 compliance period. More information regarding these process evaluations is provided in
2 the LTP Project Management Report, which is provided as Schedule 1 to Company
3 Witness Fry's direct testimony.

4 The Company has further demonstrated its commitment to continuous improvement
5 practices through recurring vendor performance management meetings. These sessions
6 provide a routine cadence for the Company's program managers and vendors to meet and
7 assess forecasted versus reported program performance and additional steps that might
8 enhance these results.

9 **Q. Also, as part of the VCEA, Va. Code § 56-596.2 provides that at least 15% of energy**
10 **efficiency program costs should be designed to benefit low-income and elderly,**
11 **disabled individuals, or veterans. With the filing of this Application, what is the**
12 **Company's progress towards this goal?**

13 **A.** As detailed and supported by Company Witness Bates, the Company approximates
14 \$163.8 million of the proposed approximately \$1,090.9 million will be designated to
15 meet this statutory target requirement. The Company is progressing toward this statutory
16 goal with these program costs comprising 15.02% of its DSM Portfolio costs. This target
17 is constantly shifting as the market proposes programs in differing sectors for residential,
18 non-residential, as well as customers in need.

1 **Q. Separate from the VCEA energy efficiency savings targets, the GTSA requires the**
2 **Company to propose a minimum of \$870 million towards energy efficiency between**
3 **2018-2028. With the filing of this Application, what level of energy efficiency**
4 **specific spending has the Company proposed?**

5 A. As detailed by Company Witness Bates, and inclusive of the programs proposed in this
6 Application, the Company has proposed approximately \$1,090.9 million (including
7 \$157.1 million requested with this Application) of spending on energy efficiency
8 programs since the passage of the GTSA, meaning the Company has exceeded the
9 proposed spending target well ahead of 2028.

10 **IV. COST RECOVERY REQUEST**

11 **Q. Please provide an overview of the Company's cost recovery request.**

12 A. With this Application, the Company requests recovery through Riders C1A and C4A of
13 (i) Rate Year costs associated with its Phase II, III, IV, V, VI, VII, VIII, IX, X, XI, XII,
14 XIII, and XIV Programs; and (ii) True-up of actual costs and revenues for the period of
15 January 1, 2024 through December 31, 2024, for eligible programs through a Monthly
16 True-Up Adjustment.

17 The total revenue requirement requested in this proceeding is \$113,553,285 and is
18 detailed in Company Witness Lipscomb's direct testimony. Company Witness Eleanor
19 K. Keeton addresses the proposed allocation methodology for the revenue requirement,
20 which is consistent with the methodology previously approved by this Commission.
21 Lastly, Company Witness Jessica C. Powell presents the Riders C1A and C4A and
22 associated estimated customer bill impacts.

V. ADDITIONAL COMPLIANCE WITH THE COMMISSION'S ORDERS

Q. As applicable to this proceeding, please discuss the Commission's Final Order in the 2020 DSM proceeding, Case No. PUR-2020-00274, the Company's 2021 DSM proceeding, Case No. PUR-2021-00147, the Company's 2022 DSM proceeding, Case No. PUR-2022-00210, the Company's 2023 Proceeding, Case No. PUR-2023-00217, and the Company's 2024 DSM Proceeding, Case No. PUR-2024-00222 and how the Company has complied with the directives therein.

A. In the 2020 DSM Final Order, the 2021 DSM Final Order, the 2022 DSM Final Order, the 2023 DSM Final Order, and the 2024 DSM Final Order, the Commission directed the Company to comply with certain requirements. Please see the table below for a summary of how the Company complied with each filing requirement relevant to this instant filing.

Filing Requirement (Order)	Company Compliance
Provide an exhibit measuring the Company's actual and projected compliance or noncompliance with the total energy savings requirements in Va. Code § 56-596.2, using both net and gross savings metrics (2020 DSM Final Order).	My Schedule 3 provides the requested information using a net savings metrics consistent with Commission's 2023 DSM Final Order.
Provide information reflecting how EM&V plans are developed in conjunction with DSM program design rather than after such DSM programs are implemented (2020 DSM Final Order).	Please see the direct testimony of Company Witness Dan Feng.
Provide with its next DSM filing a chart that summarizes the following for all active programs through the end of the True-up period: (i) total incentives; (ii) incentive cost per participant; (iii) non-incentive cost per participant; (iv) margin cost per participant; (v) total cost per participant; and (vi) the percentage of margin and non-incentive costs in relation to total costs (2020 DSM Final Order).	Please see the direct testimony of Company Witness Jarvis E. Bates and his related schedules for the requested information.

Filing Requirement (Order)	Company Compliance
Provide detailed supporting cost information for the measures included in its IAQ Programs going forward (2020 DSM Final Order).	Please see the direct testimony of Company Witness Michael T. Hubbard and his related schedules for the requested information.
Calculate return on equity (“ROE”) only for purposes of the True-Up and do not include margin as part of the calculation for the Projected Cost Recovery Factor; exclude margin for Company’s O&M costs until the Commission determines the Company has met its annual energy efficiency standards and margin will be applied as part of the future true-up (2020 DSM Final Order).	Please see the direct testimony of Company Witness Renee T. Lipscomb and her related schedules for the requested information.
Provide additional information in future EM&V Reports to evaluate how programs are performing (2021 DSM Final Order).	Please see the direct testimony of Company Witness Feng.
Include updated cost/benefit analysis of the DSM programs, along with a comparison of the updated cost/benefit analysis to the original cost/benefit analysis when the Program was approved, as well as the results of cost/benefit analyses from prior EM&V Reports (2021 DSM Final Order).	Please see the direct testimony of Company Witness Rachel L. Hagerman and her related schedules.
Include the same health and safety measures in both the Residential and Non-Residential IAQ Bundles (2022 DSM Final Order).	Please see the direct testimony of Company Witness Hubbard.
Provide a Project Management Report as part of its annual DSM filing detailing what tasks were completed in the last twelve months, what tasks will be completed in the next twelve months, and what tasks remain to be completed to fully implement the Long-Term Plan. (2022 DSM Final Order).	Please see Company Witness Terry M. Fry’s Schedule 1 for the requested information.
The Company should continue to provide a Long-Term Plan Project Management Report in future DSM filings until the Commission determines otherwise. Such report should incorporate quantifiable data sets where feasible. (2023 DSM Final Order).	Please see Company Witness Fry’s Schedule 1 for the requested information

Filing Requirement (Order)	Company Compliance
The Company should report, as part of its annual DSM update filings, on the number of projects in the Phase XII Non-residential New Construction Program; the type of project (industrial, commercial, or data center); the projected energy savings of the projects; and each project's stage. (2023 DSM Final Order).	Please see Company Witness Hubbard's Direct Testimony Schedule 1 for the requested information.
The Company should continue to provide, in future DSM updates, a chart identifying its progress toward fulfilling the \$870 million proposed spending requirement. (2023 DSM Final Order).	Please see Company Witness Bates's direct testimony.
The Residential Battery Storage Pilot shall be referred to the stakeholder process. At the conclusion of this process, the Company shall file a report with the Commission concurrent with its proposed VPP Pilot that describes the results of the stakeholder process, including whether any proposed design features offered by the stakeholders were adopted or rejected and, if rejected, the reasons therefor. (2024 DSM Final Order).	Please see my Schedule 2.
The Company should 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 proposed steps will lead to the achievement of the savings targets established by the Commission and how the Company will achieve the VCEA-mandated 15% budget proposal for IAQ Programs. (2024 DSM Final Order).	Please see Company Witness Fry's Schedule 2 for the requested information.
The Company should permit dual-fuel customers to participate in any DSM Program or measure that does not involve fuel-switching. (2024 DSM Final Order).	Please see my direct testimony.
Refers the issue of leveraging the functionalities of AMI to improve benefit/cost ratios to the DSM Stakeholder Group for further analysis or action. (2024 DSM Final Order).	Please see my direct testimony.
The Company should 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, consistent with Staff Witness Little's recommendation. ³ (2024 DSM Final Order).	Please see the direct testimony of Company Witness Hagerman.
Directs the Company and Staff to include their respective analyses of the cost of energy saved in any future DSM update.	Please see Company Witness Feng's direct testimony.

³ Ex. 24 (Little Direct) at 28 and 40.

Filing Requirement (Order)	Company Compliance
Directs the Company and Staff to include their respective analyses of the cost of energy saved in any future DSM update.	Please see Company Witness Feng's direct testimony.
Directs the Company to measure battery performance at the device.	Please see Company Witness Feng's testimony and related schedules.

Q. In Case No. PUR-2020-00156, which reviewed the Company's EM&V practices, the Commission directed additional filing requirements with respect to the Company's DSM updates. Has the Company adhered to these requirements?

A. Yes. Company Witness Dan Feng addresses the additional filing requirements issued by the Commission in the EM&V proceeding and how the Company complied with the necessary requirements for this DSM Update filing. Please see the table below for a summary of how the Company complied with each filing requirement relevant for this instant filing.

Filing Requirement	Company Compliance
Provide an executive summary dashboard in the December filing and in May with the EM&V Report, which will present a summary of the Company's 2024 DSM Portfolio performance.	As noted above, please see my Schedule 1 for the requested information.
Provide a sample data chart for existing and proposed programs, which will present a mix of verified persistent savings and projections for future years.	Please see the direct testimony of Company Witness Hubbard for the requested information. The data chart is provided as his Schedule 7.

Filing Requirement	Company Compliance
File the EM&V Report in the Company's December DSM filing (in electronic form for the December filing) and in May ⁴ of the docket of the prior complete DSM update case.	Please see the direct testimony of Company Witness Dan Feng. Ms. Feng sponsors the EM&V Report as her Appendix C. The EM&V Report is provided electronically in an eRoom designated for this proceeding.

1 **Q. Lastly, in the Commission's 2017 DSM Final Order (Case No. PUE-2016-00111), the**
2 **Company was directed to (i) conduct biennial internal audits of the controls**
3 **surrounding incentive and rebate payments with regard to each of the Company's**
4 **DSM programs, and (ii) provide to Staff the audit report with supporting**
5 **documentation, including a detailed description of how the audit findings have been**
6 **addressed. Please comment.**

7 **A.** The Company completed the most recent internal audit this year and results are being
8 finalized. The Company will provide the findings to Staff. Company Witness Bates
9 briefly describes the Company's compliance with this directive.

10 **VI. INTRODUCTION OF COMPANY WITNESSES AND SUMMARY OF** 11 **REQUESTS**

12 **Q. What other Company witnesses are filing direct testimony in this proceeding?**

13 **A.** The Company is presenting the direct testimony of the following eight witnesses in
14 addition to my own:

- 15 • Company Witness Michael T. Hubbard will present testimony regarding the status
16 of the Company's approved and active DSM Programs and address the
17 Company's efforts to bring forward cost-effective program designs in our current

⁴ On May 13, 2022, the Commission granted the Company's motion to extend the filing date of its EM&V Reports from May 15 to June 15 each year. *Petition of Virginia Electric and Power Company, For approval of its 2021 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia*, Case No. PUR-2021-00247, Order on Motion (May 13, 2022).

1 case. Company Witness Hubbard will also provide an update on the Company's
2 quality assurance and quality controls process for its DSM Programs.

- 3 • Company Witness Rachel L. Hagerman will discuss the Company's processes for
4 screening and selection of DSM Programs, including screening criteria for
5 evaluation of DSM Programs. Company Witness Hagerman will also present the
6 results of the cost/benefit test results for the Phase XIV Programs and provide
7 updated cost/benefit test results for the ongoing DSM Programs.

- 8 • Company Witness Jarvis E. Bates will provide cost projections for the Rate Year
9 and proposed cost caps for the Phase XIV Programs. Mr. Bates will also present
10 the actual costs of the approved DSM Programs.

- 11 • Company Witness Renee T. Lipscomb will present the revenue requirement for
12 Riders C1A and C4A over the Rate Year, including the True-up for calendar year
13 2024.

- 14 • Company Witness Eleanor K. Keeton will explain the Company's allocation and
15 assignment of costs for its DSM Programs to the Virginia Jurisdiction and
16 customer classes.

- 17 • Company Witness Jessica C. Powell will present the calculation of Riders C1A
18 and C4A.

- 19 • Company Witness Dan Feng of DNV will sponsor the EM&V Plans for the
20 proposed Phase XIV Programs.

- 21 • Company Witness Terry M. Fry of Cadmus presents the Company's LTP Project
22 Management Report and the Company's 2025 LTP Update.

23 **Q. Please summarize the requests the Company is making with this 2025 DSM**
24 **Application.**

25 **A.** The Company's Application in this proceeding requests the following approvals from the
26 Commission:

- 27 • Authorization to offer new Phase XIV DSM Programs; and extend the
28 Company's DSM Phase XI Residential IAQ Bundle Program and Non-residential
29 IAQ Bundle Program for three years;
- 30 • Approval of the aggregate Phase XIV DSM Program cost cap of \$220.6 million,
31 the individual cost caps presented by Company Witness Bates, and the ability to
32 exceed the cost cap by no more than 15%;

- 1 • Authorization to operate non-pilot Phase XIV DSM Programs without a
2 predetermined closure date;
- 3 • Approval of the Rate Year beginning September 1, 2026 and ending August 31,
4 2027;
- 5 • Approval of a revenue requirement of \$113,553,285 to be recovered through
6 revised Riders C1A and C4A over the Rate Year;
- 7 • Approval of the same allocation methodology as previously-approved in the 2024
8 DSM proceeding;
- 9 • Approval of the Company's request to continue Riders C1A and C4A to be
10 effective for billing purposes on the latter of September 1, 2026, or the first day of
11 the month which is at least 15 days following the date of any Commission order
12 approving Riders C1A and C4A; and
- 13 • Approval of Phase XIV Program EM&V Plans.

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

15 **A.** Yes, it does.

**BACKGROUND AND QUALIFICATIONS
OF
COURTNEY S. YOUNG**

Courtney S. Young is Director of Customer Energy Programs for Dominion Energy Virginia's New Business and Customer Solutions Group. She is responsible for delivering Demand-Side Management ("DSM") programs for the Company as well as program development, design, and strategy for electrification efforts within the Company's regulated service territory in Virginia. Additional responsibilities include management and support of customers' Green Power, time of use rate, and the Company's Virtual Power Plant initiatives.

Mrs. Young joined Dominion Energy Virginia in 2008 as a Customer Projects Designer in the Distribution Design organization and has held various roles in Electric Distribution Design and Customer Service. In July 2021, Mrs. Young was promoted to Director of Electrification and then the DSM portfolio was moved under her responsibility to form Customer Energy Programs in February 2025.

Mrs. Young holds a Bachelor of Science from Virginia State University and a Master of Business Administration from Virginia Commonwealth University.

DEV DSM Dashboard



2024 at a Glance

Total Programs	
Residential:	23
Business:	21
Residential / Business:	1

*Note - Phase XII Programs Launch '25

Total Participants	
Residential:	658,687
EE Products - Appliances	3,187
Business:	37,587

kWh Saved - Portfolio	
Net:	174,446,869
Gross:	201,059,431

* Annualized Savings

kW Saved - Portfolio	
Net:	322,942
Gross:	399,008

Cost Per kWh - Portfolio	
Planned:	\$0.26
Actual:	\$0.51

*Net Annualized Savings

Progress Towards \$870M GTSA Goal
 \$933.9 M Proposed

Progress Towards VCEA Savings Targets
 As a percentage of 2019 sales

2024 Net MWh	1,106,256	1.62%
2024 Gross MWh	1,603,317	2.35%
2019 VA Jurisdictional Sales MWh	68,231,332	

* Includes 63,977 MWh for Opt Out Customers

Annual Spend
Portfolio
 \$89.2 M

Annual Spend
IAQ Programs
 \$33.8 M

* Includes \$13.8M for HB2789 HVAC / Solar

Total Customer Bill Savings	
Residential:	\$9,349,216
Business:	\$9,594,898
Residential / Business:	\$2,311,589

DSM Related Emission Reductions (Matsco Tuna CO₂)	
Total	521,881

Energy Saved Since Inception	
Portfolio	
Net MWh:	7,546,101
Gross MWh:	11,112,834



Stakeholder Feedback Report

Virtual Power Plant (“VPP”) Pilot and Demand Side Management (“DSM”) XIV Programs

Table of Contents

1	Introduction and Background	3
1.1	VPP Pilot.....	3
1.2	DSM XIV Programs	3
2	Stakeholder Feedback on VPP Pilot	5
2.1	Stakeholder Engagement Activities	5
2.2	Summary of Feedback.....	7
3	Stakeholder Feedback Report on DSM XIV Programs	15
3.1	Summary and Survey Overview.....	15
3.2	Key Themes & Insights.....	15
3.3	Feedback by Category	16
3.4	Recommendations & Considerations	16
Appendix A.	DSM Stakeholder Feedback Details	17
A.1	Feedback Portal Respondents.....	17
A.2	Sample Stakeholder Quotes.....	17
A.3	Residential Battery Program Design Suggestions Report Out	17
A.4	Stakeholder Feedback Portal.....	18
A.5	RBS Feedback from Oct 21st Stakeholder Webinar	23
A.6	Emails received for battery suggestions.....	23
Appendix B.	Questions in VPP Stakeholder Feedback Portal	28
Appendix C.	Questions in DSM XIV Stakeholder Feedback Portal	30

1 Introduction and Background

Dominion Energy Virginia has actively solicited input from diverse stakeholders – including customers, local government, community organizations, trade groups, Distributed Energy Resources (“DER”) technology and service providers, program implementers, aggregators, and others – to help inform the following:

1. An innovative virtual power plant pilot (“VPP Pilot”) that will test new types of program structures to drive greater participation and maximize benefits to customers and the grid.
2. A portfolio of proposed demand side management (“DSM”) programs for the phase XIV program cycle, including multiple programs that fall within the VPP Pilot.

The following report describes how Dominion Energy Virginia (“the Company”) has engaged stakeholders, summarizes the feedback provided, and identifies how this feedback has been integrated into the Company’s plans for developing its VPP, both during and following the initial Pilot period.

1.1 VPP Pilot

Virginia’s Community Energy Act (“CEA”) (House Bill 2346 and Senate Bill 1100 of the 2025 General Assembly Session), Virginia Code § 56-585.1:16, requires the Company to submit a proposed VPP Pilot by December 1, 2025, and requires a stakeholder process to receive feedback on program design. The proposed VPP Pilot design, which is described in Schedule 1 of the pre-filed direct testimony of Courtney S. Young, the Virtual Power Plant Pilot white paper (“VPP White Paper”), incorporates stakeholder feedback that the Company garnered through the following stakeholder engagement activities, conducted after CEA passage and prior to filing the proposed VPP Pilot:

- Solicitation of stakeholder input through an online VPP Stakeholder Feedback Portal,
- Development of educational materials on its [VPP webpage](#),
- Establishment of a dedicated email, virtualpowerplant@dominionenergy.com, for questions and feedback, and
- Live discussion about the VPP Pilot and proposed DSM-XIV programs during a public stakeholder meeting (online forum).

Section 2 describes these stakeholder engagement activities, the feedback provided by stakeholders, and how this feedback has been incorporated into the Company’s plans.

1.2 DSM XIV Programs

On August 13, 2025, in Case No. PUR-2024-00222, the Virginia State Corporation Commission (“Commission”) issued its Final Order in the Company’s 2024 DSM proceeding and, among other things, adopted certain recommendations in the Report of Michael D. Thomas, Senior Hearing Examiner (“Report”). In relevant part, the Final Order adopted, in part, Recommendation (3) of the

Report and referred the DSM Phase XIII Residential Battery Storage Pilot to the stakeholder process and directed the Company to “file a report with the Commission concurrent with the Company’s proposed VPP Pilot that describes the results of the stakeholder process, including whether any proposed design features offered by the stakeholders were adopted or rejected and, if rejected, the reasons therefor.”

Section 3 describes stakeholder engagement activities associated with the proposed DSM XIV programs and a summary of the feedback provided by stakeholders, while Appendix A provides more details regarding stakeholder feedback and how the Company has incorporated it into its proposed DSM-XIV programs

2 Stakeholder Feedback on VPP Pilot

The following section describes how the Company has engaged stakeholders (see Section 2.1), as well as summarizes the feedback provided and identifies how this feedback has been integrated into the Company's plans for developing its VPP (see Section 2.2).

2.1 Stakeholder Engagement Activities

The Company sought input from a variety of stakeholders to help inform the development of plans for its VPP – including its proposed VPP Pilot – to ensure that proposed plans appeal to the interests of customers, communities, and partners that will be essential to delivering successful outcomes for customers and the grid. The Company's VPP-related stakeholder engagement activities have included the following:

- Solicitation of stakeholder input through an online VPP Stakeholder Feedback Portal,
- Development of educational materials on its [VPP webpage](#),
- Establishment of a dedicated email, virtualpowerplant@dominionenergy.com, for questions and feedback, and
- Live discussion about the VPP Pilot and proposed DSM-XIV programs during a public stakeholder meeting (online forum).

Furthermore, the Company plans to offer continued forums for stakeholder engagement regarding the VPP through established DSM stakeholder engagement processes. Details are provided below regarding both engagement activities to date and future engagement opportunities.

Stakeholder Feedback Portal

The Company established an online VPP Stakeholder Feedback Portal to help garner thoughtful input from a diverse group of stakeholders. Most questions were structured to solicit open-ended, text-based responses to allow for stakeholders to offer detailed, insightful perspectives. The Feedback Portal was launched publicly on Monday, September 15, 2025, and left open for three weeks until Monday, October 6, 2025. The Company solicited feedback from over 325 stakeholders – including government agencies, legislative contacts, environmental advocacy groups, non-profit organizations, industrial and trade associations, and implementation vendors. The Company received 48 responses from a diverse mix of stakeholders including energy technology and service providers, government agencies, non-governmental organizations ("NGOs"), and customers.

On Tuesday, October 21, 2025, the Company reopened the survey through Friday, October 24, 2025, in response to stakeholder requests during the meeting for an extension. However, no additional responses were submitted.

While this approach does not replace live, direct engagement with stakeholders, it has proven to be an effective forum where all voices (not just the most vocal) can be heard, each participant can provide thoughtful input, and inferences can be made about the level of stakeholder alignment on different topics.

VPP Webpage

In order to help stakeholders understand key context around the Company's planned VPP Pilot and its preliminary high-level plans, the Company developed a [VPP webpage](#) with a variety of informational resources. The website defines a VPP and other key terms, provides an overview of the enabling legislation and timeline, and includes an informational recorded webinar that describes the Company's vision for its VPP and plans for its VPP Pilot filing. The website also includes frequently asked questions and the stakeholder Feedback Portal. As of mid-November 2025, the webpage had over 1,600 page views from more than 900 unique users.

Dedicated VPP Email

Stakeholders expressed appreciation for the clarity and resources provided, noting that the VPP website and webinar were helpful in understanding the VPP Pilot and its objectives. Most stakeholders that contacted virtualpowerplant@dominionenergy.com wished to be included in the DSM XIV stakeholder meeting that took place on October 21 2025.

DSM-XIV Stakeholder Meeting

As part of the annual DSM stakeholder engagement process, a live public webinar was held on Tuesday, October 21, 2025, via WebEx and moderated by a third party (IMPACT Paradigm Associates). During this meeting, the Company presented a summary of the programs intended to be proposed in its upcoming DSM-XIV filing, including those the Company intends to include in the VPP Pilot.

A significant portion of the meeting time was allocated to VPP-related discussion, including an update from the Company, a summary of stakeholder feedback received through the Feedback Portal, a presentation from certain stakeholders (including representatives from Advanced Energy United, Tesla, and GoodLeap) regarding recommended best practices from other jurisdictions, and time for open Q&A.

The questions and comments raised during the meeting largely align with the feedback received through the Feedback Portal, and the Company's VPP and DSM-XIV filing materials address many of the questions received.

Continued Stakeholder Engagement

Moving forward, the Company will continue to both integrate existing stakeholder feedback into its VPP plans, subject to Commission approval, and provide additional forums for continued stakeholder engagement. These efforts will include the following:

- Program implementation following approval – The Company has already incorporated stakeholder feedback into its VPP Pilot and DSM-XIV filings. After approval of the proposed Pilot and DSM-XIV programs, the Company has and will continue to incorporate stakeholder input as it coordinates with program implementers to refine program design details, as well as develop and execute program implementation plans. See discussion below under "Implementation-related Feedback" for more details.

- DSM stakeholder process – The Company plans to provide additional forums for stakeholder engagement regarding the VPP through its established DSM stakeholder process. At a minimum, this would include incorporating updates about the VPP during two annual stakeholder meetings (typically conducted each spring and fall). These meetings will also be used to discuss programs that may be proposed for DSM-XV and subsequent filings, some of which may be incorporated into the VPP. Additionally, engagement outside of these meetings may be conducted as appropriate.
- Program evaluation – As the Company and its evaluation contractor evaluate the VPP Pilot and associated DSM programs, they will engage various stakeholders as appropriate to support learning objectives (see VPP White Paper, Section 4.3.5) and inform continued evolution of the VPP. Stakeholders to engage in evaluation may include participating customers and aggregators, non-participating customers, program implementers, and others. Insights from evaluation will be shared, at a minimum, in the Company’s annual DSM evaluation, measurement, and verification (“EM&V”) reports.

2.2 Summary of Feedback

The Company received valuable stakeholder input through this engagement, particularly through the VPP Stakeholder Feedback Portal. The Company received 48 responses from a diverse mix of stakeholders including energy technology and service providers, government agencies, NGOs, and customers. The Feedback Portal included 14 questions across four different categories: (i) Respondent Information, (ii) VPP Objectives & Outcomes, (iii) Customer, Partner & Community Participation, and (iv) General Feedback (see Appendix C). Nine (9) of the questions were structured to solicit open-ended, text-based responses, with the intention of gathering detailed, insightful perspectives from stakeholders. This approach was successful, as stakeholders were thorough in their responses. Although open-ended questions were optional, stakeholders responded to 93% of them, with a median response length of approximately 100 words.

The Company has worked to ensure that its VPP plans leverage and align with stakeholder input. Each respondent’s feedback to each question was analyzed to extract key points. These key points were then aggregated to identify overall themes and other common points of feedback. The content below summarizes the stakeholder feedback provided and identifies how the Company has incorporated the feedback into its proposed VPP plans.

Respondent Information

The stakeholder feedback reflects a diverse mix of organization types. Respondents were asked to select up to two categories that best represent their affiliations, and Figure 1 summarizes these self-reported organization types. As illustrated in Figure 2, Guidehouse assigned each respondent – based upon their organization name, self-reported organization type, and other information – to one of four primary organization types: prospective aggregator (11 respondents), other tech/service provider (11 respondents), government/NGO (17 respondents), and customer/other (9 respondents, including 8 customers and 1 respondent with unspecified affiliation).

Figure 1. Self- Reported Respondent Organization Type

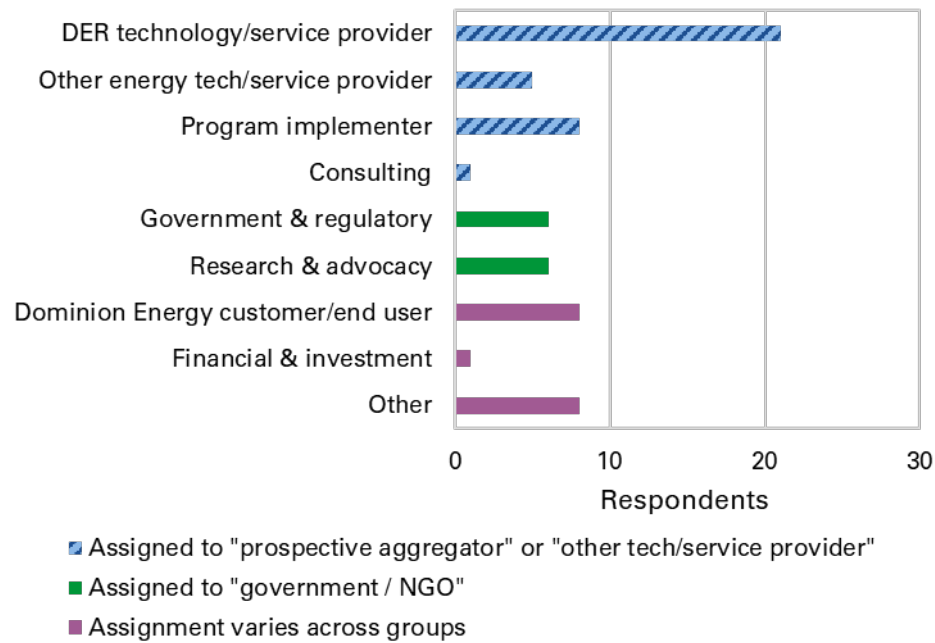
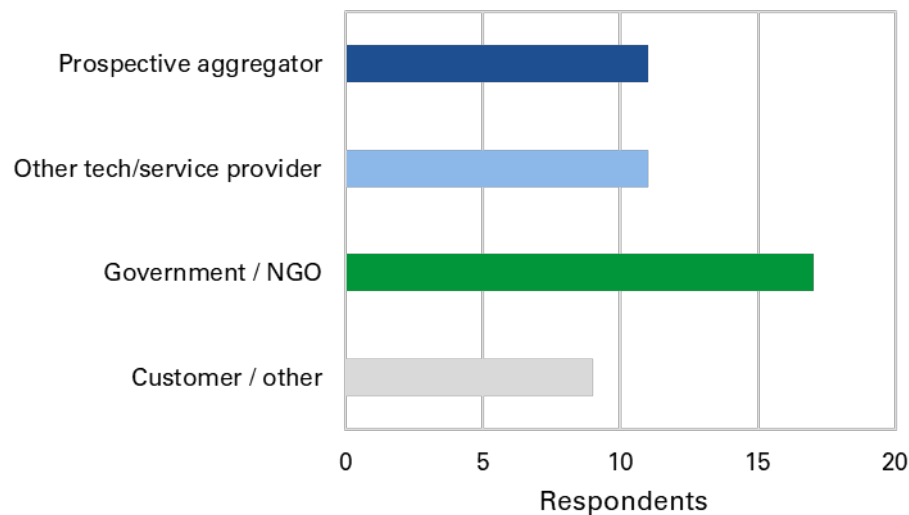


Figure 2. Primary Organization Type



VPP Benefits

Respondents recognized the value that VPPs offer to a variety of stakeholders, and they were supportive of the Company investing in VPP development. Benefits identified by respondents generally fell into 4 categories: customers, grid, communities, and businesses, with greatest emphasis on customer and grid benefits.

Respondents highlighted financial savings, reliability and resilience, and customer empowerment as key benefits for customers, while grid-related feedback focused on infrastructure deferral and system reliability. All programs proposed to be included in the VPP offer financial incentives, and

reliability, affordability, and customer empowerment are key objectives for the Company's VPP. The Company's initial Pilot will focus on leveraging the Distributed Energy Resource Management System ("DERMS") to achieve system peak reduction grid benefits, but the Company intends to utilize the VPP for additional grid services in the future (see VPP White Paper, Section 5).

Noted benefits for communities and businesses included environmental benefits, energy affordability, and economic development. The Company expects that the VPP will promote environmental benefits by supporting greater adoption of clean energy and electrification technologies. The VPP may also reduce commodity and infrastructure costs, resulting in a downward pressure on rates for all customers. The proposed VPP offers a portfolio of programs allowing for participation from a wide variety of industry players, promoting economic development.

The Company's stated VPP objectives (see below and VPP White Paper, Section 3), which help to guide decision-making, align with the benefits that stakeholders seek for the VPP to deliver:

- Leverage greater DER visibility, communication, and intelligence to enable greater adoption of DER while maintaining system reliability,
- Better utilize existing grid capacity to defer, reduce, or avoid the need for infrastructure upgrades and thereby help to keep rates affordable, and
- Provide programs that empower customers to better manage their power consumption and energy bills.

Learning & Evaluation

Stakeholders recognize that the VPP Pilot offers a valuable opportunity to learn, iterate, and inform the development of future VPP offerings that enable scaling and optimization to provide valuable benefits to all customers. The Company's proposed VPP Pilot design offers a diverse array of programs with different incentive structures and participation models, which will allow for insights and comparisons to be generated that will help to inform future VPP programs and operations following the initial Pilot period.

The Company solicited feedback from stakeholders on learning objectives and associated metrics for the VPP Pilot. Responses generally fell into four (4) main categories: participation, data/integration, grid impacts, and benefits, which align directly with the Company's proposed learning objectives for the Pilot.

The Company is approaching the Pilot with a structured framework that identifies key evaluation objectives, metrics, and methods associated with each high-level learning objective. The Company identified four overarching Pilot learning objectives, which are aligned with the insights that stakeholders hope the Pilot will generate:

- Support technology development – The Company seeks to demonstrate DERMS capabilities and integration to facilitate DER aggregation, as well as identify priorities for further technology development.
- Optimize grid service performance – The Company seeks to better understand how VPP resources perform in response to events, the drivers for variations in performance across

customers, devices, and/or aggregators, and opportunities to enhance the magnitude and predictability of event response.

- Enhance customer programs – The Company seeks to assess the effectiveness of its programs in driving customer and aggregator participation, as well as identify opportunities to enhance program design to increase customer enrollment and deliver greater performance.
- Deliver grid and customer benefits – The Company seeks to better understand the value that its VPP can deliver for the grid and customers – including both VPP participants and non-participants – and identify drivers of cost-effectiveness to help inform grid service optimization and program design.

Suggested participation metrics include tracking participation levels and segmentation, opt-out rates, customer retention, and customer satisfaction. Capacity metrics focused on both enrolled capacity and actual resource performance, while reliability metrics primarily emphasized avoided outages. Benefit metrics included cost-effectiveness and environmental benefits. Data/integration metrics included devices integrated and data reliability. The Company has incorporated many of these evaluation metrics into its proposed evaluation approach (see VPP White Paper, Section 4.3.5).

Incentives

In relation to motivations, barriers, and concerns, stakeholders placed significant emphasis on incentive design and up-front cost barriers. As is common with DR programs, the VPP programs focus primarily on providing ongoing participation incentives more than one-time rebates. However, some VPP programs do offer up-front incentives, including the Residential Income and Age Qualifying (IAQ) Battery Storage Purchase Pilot, which provides eligible customers with a no-cost battery energy storage system.

Regarding ongoing incentives, some stakeholders encouraged pay-for-performance incentives, others emphasized the importance of utilizing simple incentives that are easy for customers to understand, and others highlighted the importance of testing incentives to better understand their impacts on customer participation. The DSM programs within the VPP Pilot each offer different types of incentive structures depending upon the measure (e.g., battery vs. thermostat), as well as pay-for-performance incentives for the device-agnostic Bring Your Own Device (“BYOD”) Aggregator Access Pilot. These differing approaches will help the Company to gain a better understanding of how different incentives impact customer and aggregator participation.

Notably, many stakeholders cited financing solutions as an option to mitigate up-front cost barriers, and the Company intends to consider the potential for incorporating third-party financing offerings in the near-term and/or providing Company financing (e.g., on-bill financing) for future DSM programs.

Another aspect of incentives that some stakeholders addressed was protections for customers and aggregators. In particular, some stakeholders suggested that aggregator penalties (e.g., clawback provisions) should be avoided, while others suggested that protections be put in place to ensure that aggregators fairly share benefits with customers. The Company will consider each of these

items as it coordinates with program implementers to define detailed program rules for approved programs, particularly in relation to the BYOD Aggregator Access Pilot, and based on learnings after Pilot implementation.

Furthermore, the Company will seek to leverage insights from the VPP Pilot to inform incentive design for future VPP programs.

Other Design Considerations

In addition to incentives, stakeholders addressed a variety of other program design considerations, as summarized below:

- **Measures** – Stakeholders commonly voiced support for a VPP that is inclusive of a diverse array of DER, which the Company is addressing through a portfolio of programs covering batteries, electric vehicles, smart thermostats, commercial and industrial (C&I) curtailment, and behavioral measures, as well as the device-agnostic BYOD Aggregator Access Pilot (see VPP White Paper, Section 4.3.3).
- **Customers** – The most commonly cited feedback around customer eligibility and engagement related to the importance of building equity into design, which is addressed further below under “Equity”. Additionally, some stakeholders expressed an interest in engaging large energy users such as data centers within the Pilot. The VPP does include programs for which large customers may be eligible (e.g., Non-Residential Curtailment). However, the CEA excludes resources greater than 5 MW from the VPP, which de-emphasizes focus on the largest energy users. Nonetheless, the Company will continue to consider opportunities to help these users manage their consumption to provide benefits to all customers.
- **Grid Services** – In line with the Company’s vision for its VPP, stakeholders expressed an interest in leveraging DER for multiple grid services, including both system and local peak reduction. Due to time constraints, the Company will primarily focus on system peak reduction during the initial Pilot period. To the extent feasible, the Company may test other grid services during the initial Pilot period. Regardless, the Company will conduct a Value of DER study for the Pilot and intends to expand the scope of grid services that the VPP provides following the initial Pilot period (see VPP White Paper, Section 4.3.2).

Battery-related Feedback

While most stakeholders voiced support for a device-agnostic approach to the VPP, some stakeholders provided feedback specific to battery storage and other battery technologies (e.g., electric vehicles and vehicle-to-grid capabilities), as summarized below:

- **Resiliency** is a key driver for adoption of residential battery storage. As such, the Company intends to measure the impact of participating batteries on mitigating outage impacts.
- A minority of stakeholders seem to view a VPP as being focused primarily on batteries. However, the Company and other stakeholders view the VPP as being more holistic and inclusive of a wide variety of DER.

- Some of the feedback reiterated concerns that were raised previously during the Company's DSM-XIII proceeding in Case No. PUR-2024-00222 (e.g., net metering restrictions, device-level telemetry, allocation of incentives, aggregator participation, etc.). The Company has incorporated this feedback into proposed DSM-XIV programs including both the Residential Battery Storage Pilot and the BYOD Aggregator Access Pilot. Details regarding the Company's response to these points are addressed in Section 3.
- One respondent also submitted a set of detailed recommended program terms and conditions. Many of these recommendations align with what the Company has proposed for both the Residential Battery Storage program and the BYOD Aggregator Access program. Other fine details will be considered as the Company coordinates with its program implementers to define specific program terms & conditions.
- Many stakeholders voiced support for providing significant up-front incentives for batteries for low-income and other disadvantaged customers, which the Company is addressing with its proposed Residential IAQ Battery Storage Purchase Pilot.

Implementation-related Feedback

Much of the stakeholder feedback regarding participation motivations and barriers is associated less with the proposed program design that is submitted for approval and more with how approved programs are implemented, as well as some granular design considerations that are developed in coordination with the Company's program implementers, which are selected through a competitive bidding process. Following approval of the Company's proposed VPP Pilot and DSM-XIV programs, the Company will coordinate with its program implementation vendors to incorporate stakeholder feedback into their program implementation plans, as well as detailed terms and conditions for customer and aggregator participation.

Key common points of stakeholder feedback that will be addressed in coordination with the Company's program implementation vendors include the following:

- **Simplicity** – A common theme of stakeholder feedback is the recommendation to make participation simple and easy. The Company recognizes the importance of this consideration from its experience implementing a diverse portfolio of DSM programs. While the Company will coordinate with its program implementation vendors to provide a simple and effective customer journey, the CEA requires certain complexities (e.g., pay for performance incentives, direct and aggregator enrollment options). The Company intends to coordinate with its program implementers to ease the participation process during the course of the Pilot, as well as coordinate with its program evaluator to garner insights about how participation may be simplified further moving forward.
- **Customer Awareness, Education, & Trust** – Stakeholders expressed concerns that customers may not be aware of the VPP and related programs and they may have concerns that impede their participation – including skepticism of third-party control of devices and concerns about comfort. These issues can be addressed through effective marketing and outreach, which is done in coordination with program implementation vendors. Notably,

most programs allow for opt-outs, and the program portfolio offers options for both automation and customer control.

- Program Terms and Conditions – While certain aspects of incentive design are addressed within the Company’s DSM filings, detailed terms and conditions must be developed in coordination with program implementation vendors following program approval. For example, while the magnitude of pay-for-performance incentives for the BYOD Aggregator Access Pilot are defined in the DSM-XIV filing, specific details regarding calculation of performance will be defined following program approval. Nonetheless, some terms and conditions that are of most interest to stakeholders, particularly for the Residential Battery Storage Pilot and BYOD Aggregator Access Pilot, are addressed in Section 3.
- Technology and Data – Stakeholders recognize the essential role that technology (e.g., DERMS) can provide in scaling the VPP and optimizing grid operations. Some stakeholders, particularly prospective aggregators, want open standards to support diverse DER and limit integration/compatibility issues. The Company intends to leverage open standards to facilitate diverse aggregator and DER participation, and it will coordinate with its program implementation vendors to help ensure effective and secure integration between Company and third-party systems. Aggregators also want access to customer data, including to support outreach and enrollment, but this can conflict with customer privacy concerns. The Company will be coordinating with its program implementation vendors, particularly for the BYOD Aggregator Access Pilot, to address these technology considerations in program rules and implementation plans.

Equity

Equitable access to the VPP is a common concern among stakeholders. Some suggested offering additional incentives for disadvantaged customers, which the Company plans to do through its proposed Residential IAQ Battery Storage Pilot. Others suggested more of a focus on low-cost devices (e.g., thermostats) to drive inclusive participation, which the Company is offering through programs such as Residential Smart Thermostat and Residential Peak Time Rebate.

Some stakeholders indicated that engagement with local government and community groups can be helpful in providing targeted outreach to hard-to-reach customer segments. Other recommendations included equity participation targets/carve-outs, providing tailored offerings for certain segments (e.g., renters, multifamily), supporting community/shared DER, and providing financing resources. As discussed below, the Company will continue to provide forums for stakeholder engagement that can help to identify opportunities to implement these recommendations, which the Company may consider for implementation of approved programs and/or proposals for new programs for DSM-XV and beyond.

Stakeholder Engagement

Many stakeholders are eager to continue engagement, not only to inform the design of the VPP Pilot, but also to support successful implementation. Feedback indicated that stakeholders such as

local government and community organizations are well-positioned to support in various ways including:

- Provide trusted outreach & education through established communication channels
- Coordinate on complementary programs (e.g., state, local, housing, financing, non-profit)
- Facilitate direct engagement with VPP (e.g., leverage public building/fleets, community/shared DER, non-profit cooperatives as aggregators)

The Company intends to leverage the existing DSM stakeholder engagement process to provide forums for continued stakeholder input and collaboration, as discussed in Section 2.1. Furthermore, the Company will coordinate with its program implementers to encourage active engagement with interested stakeholders to facilitate successful program implementation.

3 Stakeholder Feedback Report on DSM XIV Programs

This report summarizes stakeholder feedback received through the DSM XIV feedback portal. The feedback portal was distributed to over 300 stakeholder participants by the DSM independent monitor. The feedback portal was open from October 6, 2025 through October 24, 2025. The content below includes key themes (Section 3.2), feedback by category (Section 3.3), and recommendations for program design and implementation (Section 3.4).

Additional details regarding stakeholder feedback on DSM XIV programs are provided in Appendix A.

3.1 Summary and Survey Overview

Stakeholder feedback for Dominion Energy's DSM XIV programs and pilots reveals strong support for performance-based incentives, broad participation across DER types, transparent data sharing, and flexible program and pilot design. Participating stakeholders emphasize the need for device-level measurement, open standards, and customer protections, with a particular focus on enabling multiple program and pilot participation and fair compensation for grid services.

Nineteen (19) stakeholders provided feedback. The feedback portal includes 26 questions across 5 categories: (i) Residential Batteries, (ii) Aggregator Access, (iii) Residential EV Managed Charging, (iv) Residential Energy Service Program, and (v) Non-Residential Energy Service Program. Appendix D provides the complete list of questions.

3.2 Key Themes & Insights

Below are four key themes that stakeholders addressed and insights associated with each theme.

Incentive Structures

- Strong preference for performance-based models combined with upfront or enrollment bonuses.
- Support for stackable compensation reflecting full value stack (energy, capacity, environmental, societal).

Participation & Eligibility

- Broad participation across DER types and programs is encouraged.
- Support for third-party aggregators with transparency and customer protections.

Data, Measurement, and Transparency

- Consensus on device-level measurement using open standards.
- Transparent access to event data and audit mechanisms requested.

Program Design & Customer Experience

- Preference for simple, understandable incentive models.
- Flexibility in participation options and business models.

3.3 Feedback by Category

Below is a summary of feedback across each of the five categories of questions.

Batteries

- Export to Grid: Supported with fair compensation and interconnection agreements.
- Performance Measurement: Use device-level telemetry and open standards.
- Incentive Models: Hybrid approaches with upfront, monthly, and event-based bonuses.

Aggregator Access

- Locational Dispatch: Supported with clear utility guidance and open standards.
- Roles & Responsibilities: Aggregators manage enrollment and M&V; utility validates and pays.
- Payment Structures: Performance-based with capacity floors and event bonuses.

EV Managed Charging

- Incentives: Enrollment bonuses, monthly credits, and event rewards.
- Program Design: Simplicity, hardware cost minimization, and transparent billing.

Energy Service Programs

- Bundling Services: Simplifies participation and improves marketing.
- Non-Residential Feedback: Upfront incentives and aggregator support preferred.

3.4 Recommendations & Considerations

Across all categories, the following are key recommendations that the Company has considered for the design and implementation of DSM XIV programs

1. Enable Broad Participation: Allow multiple DER types and dual program participation.
2. Adopt Transparent, Performance-Based Incentives: Reflect full value stack.
3. Prioritize Device-Level Measurement & Open Standards: Ensure fairness and trust.
4. Support Third-Party Aggregators: Facilitate competitive markets and customer choice.
5. Streamline Program Design & Communication: Favor simplicity and clarity.
6. Regular Review & Reporting: Include quarterly and annual performance reports.

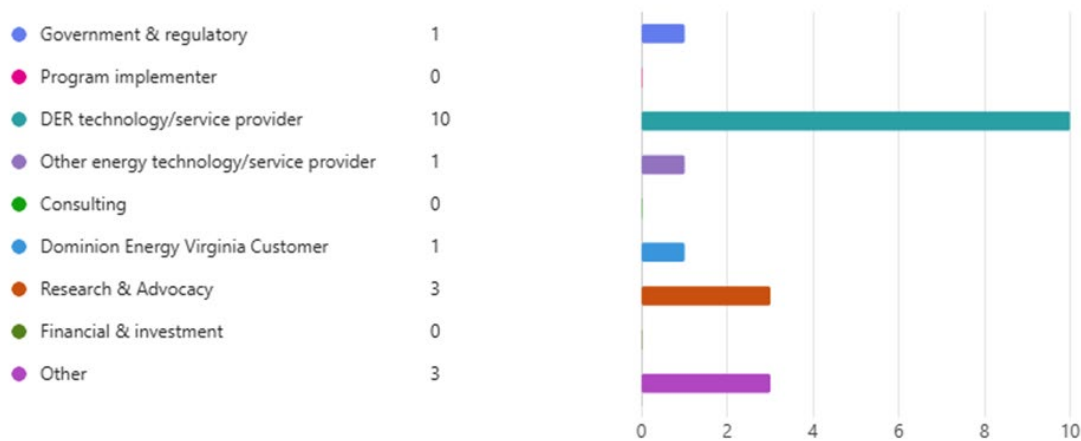
Appendix A. DSM Stakeholder Feedback Details

Sections A.1 and A.2 provide information regarding respondents and example quotes from responses to the DSM XIV Feedback Portal. Sections A.3 through A.6 outline specific points of stakeholder feedback and, for each point, provide an summary of whether and how the Company plans to incorporate the feedback.

A.1 Feedback Portal Respondents

Organization Types: DER providers, consulting, customers, advocacy, finance.

Figure A-1. Self-reported Respondent Organization Type



A.2 Sample Stakeholder Quotes

“Performance-based incentives are transparent and better aligned with grid benefits.”

“Allow broad participation and dual enrollment; restrictions discourage engagement.”

“Device-level measurement and open standards are essential for fairness and trust.”

“Third-party aggregators simplify participation and should be supported.”

“Bundling services under one program streamlines participation and increases uptake.”

A.3 Residential Battery Program Design Suggestions Report Out

In compliance with the Commission’s DSM Phase XIII Final Order directive (see Section 1.2), the Company provides the proposed design features offered by stakeholders and the Company’s response.

Allow Pilot participants to export power to the grid.

- **Adopted** in new Residential Battery Program. See Company Witness Hubbard's Schedule 3 for details.

Measure battery performance at the battery itself.

- **Adopted** in new Residential Battery Program. See Company Witness Hubbard's Schedule 3 for details.

Allow third-party owned solar and battery storage systems to participate in the Pilot through the third-party owner.

- **Adopted** in new Residential Battery Program. See Company Witness Hubbard's Schedule 3 for details.

Allow customers the option to participate through an aggregator of their choice, either the OEM, a third-party owner, or another third-party.

- **Adopted** in new Residential Battery Program. See Company Witness Hubbard's Schedule 3 for details.

Direct the Company to allow customers to assign program payments to a third-party, either the third-party owner or aggregator.

- **Adopted**. If approved, customers will be able to participate through the new Residential Battery Pilot, or through the Bring Your Own Device Aggregator Access Pilot.

Allow customers to participate in both the Residential Battery Pilot and other DR programs, such as Residential Smart Thermostat Program.

- **Adopted** in new Residential Battery Program.

The Company and DNV reevaluate the plan to operate RBS Pilot for proposed three-year period and then conduct a post-facto impact evaluation.

- **Adopted**. If approved, DNV will conduct an impact evaluation as outlined in Appendix B to Company Witness Feng's testimony, which documents the Evaluation, Measurement and Verification plans for each of the Phase XIV programs.

A.4 Stakeholder Feedback Portal

Exporting Power to the Grid

Allow residential battery owners to export power to the grid if they have completed interconnection, with compensation based on their agreement.

- **Adopted**. See Company Witness Hubbard's Schedule 3 for details.

Bidirectional EV charging systems should be eligible for the residential battery program, as EV batteries offer much larger capacity than stationary home batteries.

- We are open to including this within the Pilot but will need to coordinate with the Company's implementation vendor to confirm functionality. If allowed, customers with bidirectional EV systems would be required to complete an appropriate interconnection study and approval with the Company.

Compensate participants at the retail rate for electricity exported, including adjustments for TOU pricing and riders.

- **Rejected.** The Company looks to keep program incentives simple to understand for its customers for the duration of the pilot. The Company will take feedback for future program improvements.

Clearly communicate eligibility, technical requirements, and protocols for disconnecting during outages or maintenance.

- The Company will communicate eligibility and technical requirements to participate in the Pilot. Protocols for disconnecting during outages and maintenance would be directed to battery OEMs.

Provide customer education on impacts to energy bills, battery lifespan, and system performance.

- This recommendation is better directed to third-party ownership or aggregators.

Announce grid events with sufficient warning (ideally 24 hours) so customers can prepare their storage assets.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Address grid security and consumer protection against hacking or disruption.

Consider the impact on backup power availability for participants.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Net Metering vs. Performance Incentives

Separate net metering credits for incidental exports from performance-based incentives for dispatchable reliability.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Use transparent, locational, and time-varying metrics for VPP event compensation.

- **Rejected.** The Company aims to keep program incentives simple to understand for its customers for the duration of the pilot. The Company will take feedback for future program improvements.

Consider hybrid models allowing net metering while maintaining reserves for resiliency.

- **Adopted.** Customers will be allowed to be on net metering while reserving battery reserve.

Device-level measurement (e.g., inverter readings) should be used to calculate incentive payments and ensure NEM credits apply only to eligible sources.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Compensation should reflect the full value stack: energy, capacity, environmental impacts, societal benefits, and additional compensation for energy burden areas.

- **Rejected.** The Company aims to keep program incentives simple to understand for its customers for the duration of the pilot. The Company will take feedback for future program improvements. The Company notes the formation of new cost benefit standards for the state effective in 2029, including the DSM stakeholder process in 2026 to further discuss the sources for these inputs in the future Virginia Jurisdictional Test.

Stackable revenue streams: net metering and performance incentives should be available together, not as an either/or choice.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Incentive Structure Preferences

Favor simple, transparent pay-for-performance models, but allow for advanced structures with clear communication.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Consider multi-tiered programs with base compensation and locational adders.

- **Rejected.** The Company aims to keep programs simple to understand for its customers. The Company will take feedback for future program improvements.

Technology-neutral performance payments to create a level playing field for all devices.

- The Company will allow multiple OEMs to participate in the pilot. They will be required to integrate with the Company's implementation vendor to participate in the pilot.

Tiered participation structures to balance simplicity and optimized incentives.

- **Rejected.** The Company aims to keep programs simple to understand for its customers. The Company will take feedback for future program improvements.

Hybrid approaches: base incentives plus additional layers for differentiated value contributions.

- **Rejected.** The Company aims to keep programs simple to understand for its customers. The Company will take feedback for future program improvements.

A/B testing of compensation models (e.g., flat monthly vs. TOU export credit) for pilot programs.

- **Rejected.** The Company aims to keep programs simple to understand for its customers. The Company will take feedback for future program improvements.

Measuring Battery Performance

Measure at the device/inverter level using revenue-grade accuracy (ANSI C12.20) or inverter data.

- **Adopted.** The implementation vendor for the pilot will receive device level data.

Use open standards (IEEE 2030.5/OpenADR) to avoid vendor lock-in.

- **Adopted.** The implementation vendor supports open standards but also maintains integrations with individual OEMS' proprietary APIs.

Apply privacy-by-design principles and require UL 9540/IEEE 1547 compliance.

- **Rejected.** This suggestion is related to battery safety standards and interconnection standards and the Company has proposed this questions to OEMs or third-party vendors.

Minimum 15-minute telemetry for accurate calculation and timely resolution of data issues.

- **Adopted.** The implementation vendor will receive <15-minute data with <24-hour latency.

Track metrics such as battery availability, energy exported, power output, and round-trip efficiency.

- **Adopted.** The implementation vendor can track metrics as long as they are provided by the OEMs and are available. The Company can track energy exported and power output with the telemetry data it receives; however, battery availability and round-trip efficiency may not be available data. The proxy for battery availability metrics could be event participation.

Finance Options and Incentive Structures

Offer low-friction, no-money-down options (lease/PPA, on-bill financing) plus upfront rebates or equipment buy-downs.

- **Rejected.** The Company, at this time, is not putting forth a finance option through any program that it is proposing in the instant proceeding. However, by leaving the option open for third parties to participate in these programs, it provides a customer pathway to assign payments directly to the third-party or aggregator.

Pair predictable monthly reservation payments (capacity floor) with event-based bonuses for actual kW delivered.

- **Rejected.** The Company aims to keep program incentives simple to understand for its customers for the duration of the Pilot. The Company is open to receiving feedback for future program improvements. See Company Witness Hubbard Schedule 3 for more details.

Contracts should be short, transferable, and include warranty/performance guarantees.

- This question is better directed to third-party ownership and aggregators.

Incentives should be disbursed at least quarterly, with a preference for nonprofit or municipal aggregators for transparency.

- **Rejected.** The program will distribute incentives at the end of each season as defined in Company Witness Hubbard's Schedule 3.

Greater incentives and support for income-qualified customers (subsidized devices, higher performance incentives).

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details regarding IAQ battery program.

Revenue sharing and performance-based financing models should be explored.

- **Rejected.** The Company would need to be educated more on what a performance-based finance model is. As part of the Company's program, third-party owners and aggregators can participate in the residential battery program.

Third-Party Ownership and Aggregator Roles

Give customers the choice to receive payments directly or assign them to third-party owners/aggregators.

- **Adopted** in new Residential Battery Program. See Company Witness Hubbard's Schedule 3 for details.

Ensure transparency, customer protections, and the ability to switch payment assignment.

- **Adopted** in new Residential Battery Program. See Company Witness Hubbard's Schedule 3 for details.

Aggregators should manage administrative tasks, but there should be a ceiling on fees and clear communication of financial arrangements.

- This question is better directed to third-party ownership and aggregators

Participation through third-party aggregators should streamline administration and simplify participation, especially for low-income and disadvantaged communities.

- **Adopted** in new Residential Battery Program. See Company Witness Hubbard's Schedule 3 for details.

Participation in Multiple Programs

Allow customers to participate in multiple demand response programs simultaneously to maximize benefits.

- **Adopted** in new Residential Battery Program. See Company Witness Hubbard's Schedule 3 for details.

Use simple controls to prevent double compensation and manage risks (e.g., single coordinator for measuring results, clear priority windows).

- **Adopted** in new Residential Battery Program. See Company Witness Hubbard's Schedule 3 for details.

Avoid restrictions that force customers to choose only one program.

- **Adopted** in new Residential Battery Program. See Company Witness Hubbard's Schedule 3 for details.

A.5 RBS Feedback from Oct 21st Stakeholder Webinar

Include light-duty V2X as an eligible technology.

- The Company is open to including this with in the Pilot but will need to coordinate with the Company's implementation vendor to confirm functionality. If allowed, customers with bidirectional EV systems would be required to complete an appropriate interconnection application with the Company.

Allow owners of multifamily properties to act as aggregators for their residents and include community/shared solar.

- If multifamily properties can serve as aggregators and successfully meet the eligibility requirements by collaborating with the Company's implementation vendor, they will be eligible to participate in the Company's Pilot.

Double LMI incentives, upfront incentives to drive battery adoption, no cap on number of enrolled customers are things I'd like to see be included.

- **Rejected.** The Company is currently not planning to double incentives for LMI participants, however, the Company will be proposing an IAQ battery storage program where customers will receive batteries at no cost, and can receive on going performance incentives.

This may have been mentioned in the presentations. To confirm are there warranty guarantees for residential participants? To help derisk VPP participation for batteries and EVs?

- This question is better directed to aggregators and OEMs for warranties on batteries and EVs.

A.6 Emails received for battery suggestions

Enrollment

Customers may enroll directly through an aggregator, including at time of installation of battery storage equipment.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Enrollment should be on a rolling basis throughout the year, through a standard offer "walk up" tariff design

- Customers can enroll in the Program throughout the year. The Company would need additional clarification on what is meant by a "walk up" tariff design before providing further comments.

No penalties for leaving the program

- **Adopted.** However, customers must participate in 80% of events to receive enrollment incentive. See Company Witness Hubbard's Schedule 3 for details.

No enrollment capacity limit, but the company should exceed statutory goals of 15 MW for residential battery storage, and should establish capacity and participation goals for income-qualified residential battery storage.

- **Adopted.** Although there is not enrollment capacity limit, enrollment is limited by the budget approved by the Commission. See Company Witness Hubbard's Schedule 3 for details. Also see VPP White Paper.

The company should develop with stakeholders a package of brand guidelines for third-party implementors, including aggregators, which will provide guidance around marketing and branding.

- **Rejected.** We do not plan to develop a separate package of brand guidelines with stakeholders. Instead, the company will work directly with the implementation vendor to manage marketing outreach to customers and aggregators. This approach ensures consistent messaging, streamlined processes, and alignment with program objectives without requiring additional stakeholder-driven branding documentation.

A customer may assign and transfer their Customer Agreement to a new customer with written or digital notice provided thirty (30) days prior to the date of transfer without terminating the Customer Agreement

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

During enrollment in the program, customers remain eligible to co-participate in other grid service programs.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Incentive structure

Upfront enrollment incentive at time of enrollment in the program

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Higher upfront enrollment incentive for income-qualified customers

- **Rejected.** The Company is currently not planning to double incentives for LMI participants; however, the Company will be proposing an IAQ battery storage program where customers will receive batteries at no cost and be able to receive on going performance incentives.

Event-based performance payments, using average performance per event over the course of the capability period (e.g., summer season) to calculate the performance payment.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Allow customers to assign program payments to aggregators* (to facilitate third-party leasing and other contracting arrangements that support customer participation)

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Allow customers flexibility to set minimum battery reserve levels based on personal needs or opt entire capacity into the program.

- **Rejected.** The Company will set for a 20% battery reserve level.

Batteries can be used to offset customer onsite load and export energy to the grid.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Device-level measurement; for inverter-based resources, the company will only require an additional production meter if the inverter is not capable of providing revenue grade data.

- **Adopted.**

Payments should be made on no less than a quarterly basis (could alternatively consider monthly or bi-monthly payments during the summer season)

- **Rejected.** Pilot incentives will be paid out twice a year after each season. See Company Witness Hubbard's Schedule 3 for details.

The utility company should issue the upfront payment within fifteen (15) days of customer enrollment and performance payments within fifteen (15) days of receipt of performance data for the capability period.

- **Rejected.** Payments will be made within thirty (30) days.

No aggregator service fees or other additional charges, fees, or penalties to customers or aggregators.

- **Adopted.**

The company should consider locking in compensation for an initial period of five years to provide certainty for performance-based compensation.

- Pilot incentives will be locked in for the length of the pilot period (4 years).

Number of expected events per year

The program should have between 20-60 events over the course of the summer season (June 1 - September 30) and 10-20 events over the course of the winter season (December 1 - March 31)

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details on seasons.

The company should evaluate and amend, if necessary, the number of expected events in its annual report.

- **Adopted.** If approved, DNV will conduct an impact evaluation as outlined in Appendix B to Company Witness Feng's testimony, which documents the Evaluation, Measurement and Verification plans for each of the Phase XIV programs. Those results will be provided to the Company and filed with the Commission.

Duration of events

Event durations to call upon battery resources shall be no more than 3 hours.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Quarterly reporting will analyze events, including alignment between performance and expectations.

- **Rejected.** The results will be reported annually in the annual evaluation, measurement and verification report.

Dispatch window & notification Incentive structure

The company shall designate a window of time of the day in which to call events that corresponds to the company's coincident peak (e.g. 5CP) – most likely 5-9 p.m. during summer months and 6-10 a.m. during winter months. The company shall provide a 6-month notice of any changes to the dispatch window based on shifts in peak.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details. Company will not change dispatch windows during the 4-year pilot.

The company will make best efforts to call events with a notification period of 24 hours. If events need to be called on an emergency basis (less than 24-hour notice), underperformance of those events will not be counted against the customer's average performance for the purpose of calculating participant compensation.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

The company will make reasonable attempts to not call events within 48 hours of extreme weather events capable of causing grid outages.

- **Rejected.** The Company will not call events within 24-hours of weather events. See Company Witness Hubbard's Schedule 3 for details.

The company will evaluate the need for additional dispatch windows for ancillary and other grid services after program launch.

- **Adopted.** The Company has a Grid Emergency clause to call on devices.

The company will call an event by communication from the company or DERMS provider to aggregators via email, API, or through OEM portal. Integration via API or otherwise with utility or DERMS provider optional but not required.

- **Adopted.**

Company participation

The company should not participate as an aggregator of BTM residential storage resources but can contract with a DERMS platform provider to interface with aggregators and manage distributed power plant program operations for the utility.

- The Company does not plan to participate in the battery program as an aggregator.

Aggregator enrollment

Prospective aggregators must apply and be qualified by the company.

- **Adopted.** See Company Witness Hubbard's Schedule 3 for details.

Approved aggregators will be added to an up-to-date list, updated once per month, of publicly available list of participating aggregators.

- **Adopted.**

Aggregators should be encouraged to transparently display their compensation rates and enrollment requirements.

- This recommendation is better directed to aggregators.

Aggregator data access

Aggregators should have access to geospatial or other data that the company has to identify feeders where locating aggregated DERs would be most beneficial.

- **Rejected.** Providing geospatial or feeder-level data to aggregators is not supported at this time. The Company must protect sensitive grid infrastructure information to ensure system security and customer privacy. Sharing such data could introduce risks related to cybersecurity, competitive fairness, and operational reliability. Additionally, feeder-level planning and dispatch decisions are managed internally to maintain grid stability and compliance with regulatory requirements.

Customer data portability

Customers should be able to authorize the company to share their energy data (i.e. energy use and billing information, etc.) with aggregators. This includes access and use of data from the customer's battery, solar PV, inverter, site electric load, and such other data necessary to verify eligibility and performance of enrolled devices and otherwise facilitate participation in the program

- The Company follows a standard process to obtain customer authorization for sharing usage data. For additional device data such as from batteries, this responsibility typically falls to the implementation vendor or the aggregator, who must secure rights to access and report this information. This aligns with existing practices for eligibility verification, terms and conditions, and EM&V, while also addressing operational aspects needed to demonstrate program benefits beyond the pilot phase.

Appendix B. Questions in VPP Stakeholder Feedback Portal

The VPP Stakeholder Feedback Portal included 14 questions across 4 categories: (i) Respondent Information, (ii) VPP Objectives and Outcomes, (iii) Customer, Partner, and Community Participation, and (iv) General Feedback. Table B-1 provides the complete list of questions, along with the answer format for each question. Most questions were structured to solicit open-ended, text-based responses to allow for stakeholders to offer detailed, insightful perspectives.

Table B-1. Questions in VPP Stakeholder Feedback Portal

ID ¹	Question	Answer Format
RESPONDENT INFORMATION		
1*	Please enter your full name:	Text
2	What is your email address?	Text
3*	Which organization do you represent? (If none, type "NA")	Text
4*	Select your organization type:	Multiple choice (up to 2 selections) a. Government & regulatory b. Program implementer c. DER technology/service provider d. Other energy technology/service provider e. Consulting f. Dominion Energy customer/end user g. Research & advocacy h. Financial & investment i. Other (text field)
VPP OBJECTIVES AND OUTCOMES		
5	What benefits do you see a VPP bringing to customers, businesses, and communities?	Text

¹ An asterisk (*) indicates that a response to the question was required. Other questions were optional.

ID ¹	Question	Answer Format
6	What should Dominion Energy Virginia seek to demonstrate and/or learn from this pilot?	Text
7	What metrics should be used to measure pilot outcomes?	Text
8	Do you have any concerns about how a VPP may impact customers, businesses, and communities?	Text
CUSTOMER, PARTNER, AND COMMUNITY PARTICIPATION		
9	What should motivate you (or your customers/constituents) to participate in a VPP?	Text
10	What barriers might prevent participation (e.g., cost, complexity, trust)?	Text
11	How can Dominion Energy Virginia ensure that low-income or underserved households are able to access VPP benefits?	Text
12	What role should local governments or community groups play in a VPP?	Text
13	What is the best way to communicate changes or opportunities regarding engagement in Dominion Energy Virginia's VPP?	Multiple choice (up to 2 selections) <ul style="list-style-type: none"> a. Email b. Community meetings c. Webinars d. Newsletters e. Text messages f. Bill inserts g. Other (text field)
GENERAL FEEDBACK		
14	Please provide any additional feedback or recommendations that you would like Dominion Energy Virginia to consider for its VPP.	Text

Appendix C. Questions in DSM XIV Stakeholder Feedback Portal

The DSM XIV Stakeholder Feedback Portal included 19 questions across 5 categories: (i) Residential Batteries, (ii) Aggregator Access, (iii) Residential EV Managed Charging, (iv) Residential Energy Service Program, and (v) Non-Residential Energy Service Program. Table C-1 provides the complete list of questions, along with the answer format for each question.

Table C-1. Questions in VPP Stakeholder Feedback Portal

ID ²	Question	Answer Format
RESPONDENT INFORMATION		
1*	Please enter your full name:	Text
2	What is your email address?	Text
3*	Which organization do you represent? (If none, type "NA")	Text
4*	Select your organization type:	Multiple choice (up to 2 selections)
RESIDENTIAL BATTERY		
5	What considerations or concerns should the Company address to responsibly allow participants to export power from their batteries to the grid?	Text
6	As a participant considering injecting power back into the grid, how should the Company weigh the value for a participant receiving net metering credits for exporting excess energy versus earning battery performance incentives that reflect a participants system's contribution to grid reliability and responsiveness?	Text

² An asterisk (*) indicates that a response to the question was required. Other questions were optional.

ID ²	Question	Answer Format
7	As the Company considers an incentive structure that scales based on the different benefits participating customers provide, would stakeholders prefer a simple and easily understandable incentive model based off performance, or a more advanced structure that reflects differentiated value contributions?	Text
8	What are your expectations for how the Company should measure battery performance directly at the device level, and what data or standards should be prioritized?	Text
9	What finance options or incentive structures are customers looking for to participate via a third party?	Text
10	For customers participating through third-party-owned battery systems, would you prefer to receive program payments directly, or would you rather have those payments assigned to your third-party owner or aggregator to manage compensation and services on your behalf?	Text
11	How should the Company structure participation options for customers who prefer to engage through third-party aggregators, and what roles or responsibilities should be defined?	Text
12	As the Company designs this pilot, how important is it to stakeholders that customers be allowed to participate in multiple demand response programs simultaneously, and what concerns or benefits do you foresee if participation is limited to one program at a time?	Text
AGGREGATOR ACCESS		
13	Do you have capabilities to support locational dispatch for aggregated DERs?	Text

ID ²	Question	Answer Format
14	What would you require from the Company to support locational dispatch?	Text
15	What resources should be permitted to participate in the program and why?	Text
16	Should any technologies be excluded and why?	Text
17	<p>What payment structure would you recommend for aggregators?</p> <ul style="list-style-type: none"> • Should incentives be paid directly to aggregators, or routed through a program vendor implementor? • What models (e.g., performance-based, fixed fee, tiered) would best support participation and impact? 	Text
18	<p>What requirements should be in place to measure aggregator performance for settlement purposes?</p> <ul style="list-style-type: none"> • What metrics or data should be used? • How frequently should performance be reviewed? 	Text
19	What controls should be implemented to prevent dual participation?	Text
20	What types of data should be shared with aggregators to support program delivery and transparency?	Text
21	What types of penalties or consequences should be included for non-compliance or underperformance?	Text

ID ²	Question	Answer Format
22	Are there any additional considerations the Company should take into account regarding aggregator access to utility programs that have not been addressed above?	Text
RESIDENTIAL MANAGED CHARGING (DR) PROGRAM		
23	What type of incentive structure do you believe would entice our residential customers to participate in a Res. Managed Charging (DR) program? Please include any general thoughts on incentives and eligibility for those on TOU rates versus non-TOU rates.	Text
RESIDENTIAL ENERGY SERVICES PROGRAM		
24	What are stakeholder's thoughts on continuing to offer the more complex diagnostic audit, and thoughts on out-of-pocket costs for customers under such an umbrella in the future? Are there any additional services that should be considered for this program?	Text
NON-RESIDENTIAL ENERGY SERVICES PROGRAM		
25	What benefits do you see of combining these services under one larger program and what essential services do you consider most important in such a program?	Text
GENERAL FEEDBACK		
26	If you'd like to share any general feedback or thoughts on topics not covered in this DSM XIV feedback portal, please let us know below.	Text

**Data based on the 2025 DSM EM&V Report, including 2024 actuals and DSM Projections
as of 11/12/2025**

Table 1

Net at Meter	YEAR	VCEA Target MWh*	VCEA Target %*	DSM Phases < 11 MWh	DSM Phase 11 MWh	DSM Phase 12 MWh	DSM Phase 13 MWh	DSM Phase 14 MWh	Opt-Outs MWh	Total DSM MWh	DSM %**
	2024	2,558,675	3.8%	1,022,493	19,786	-	-	-	63,977	1,106,256	1.6%
	2025	3,411,567	5.0%	1,229,392	53,248	19,748	-	-	64,446	1,366,834	2.0%
	2026	2,046,940	3.0%	1,509,128	82,721	53,564	54,358	-	64,915	1,764,685	2.6%
	2027	2,729,253	4.0%	1,692,742	108,266	95,464	148,136	27,193	65,384	2,137,184	3.1%
	2028	3,411,567	5.0%	1,769,416	135,398	150,430	243,814	79,757	65,853	2,444,667	3.6%

Table 2

Gross at Meter	YEAR	VCEA Target MWh*	VCEA Target %*	DSM Phases < 11 MWh	DSM Phase 11 MWh	DSM Phase 12 MWh	DSM Phase 13 MWh	DSM Phase 14 MWh	Opt-Outs MWh	Total DSM MWh	DSM %**
	2024	2,558,675	3.8%	1,516,726	22,614	-	-	-	63,977	1,603,317	2.3%
	2025	3,411,567	5.0%	1,737,631	63,205	23,943	-	-	64,446	1,889,224	2.8%
	2026	2,046,940	3.0%	2,016,083	96,333	64,850	62,226	-	64,915	2,304,405	3.4%
	2027	2,729,253	4.0%	2,160,472	125,114	115,729	169,904	31,845	65,384	2,668,448	3.9%
	2028	3,411,567	5.0%	2,205,284	155,752	182,778	279,695	92,980	65,853	2,982,341	4.4%

* The 2026-2028 savings targets were ordered by the Commission in Case No. PUR-2024-00120

** All values exclude NC and non-Jurisdictional DSM reductions