

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

APPLICATION OF)
)
VIRGINIA ELECTRIC AND POWER COMPANY)
) Case No. PUR-2023-00217
For approval of its 2023 DSM Update)
pursuant to § 56-585.1 A 5 of the Code of Virginia)

APPLICATION

Virginia Electric and Power Company (“Dominion Energy Virginia” or the “Company”), by counsel, hereby files and requests approval of its 2023 Demand-Side Management update (“2023 DSM Update”). This 2023 DSM Update is filed pursuant to § 56-585.1 A 5 (“Subsection A 5”) of the Code of Virginia (“Va. Code”), Rules 10 (20 VAC 5-204-10) and 60 (20 VAC 5-204-60) of the State Corporation Commission of Virginia’s (“Commission”) Rules Governing Utility Rate Case Applications and Annual Informational Filings of Investor-Owned Electric Utilities (20 VAC 5-204-10, *et seq.*) (“Rate Case Rules”), the Commission’s Rules Governing Utility Promotional Allowances (20 VAC 5-303-10, *et seq.*) (“Promotional Allowances Rules”), the Commission’s Rules Governing Cost/Benefit Measures Required for Demand Side Management Programs (Rules 20 VAC 5-304-10, *et seq.*) (“Cost/Benefit Rules”), the Commission’s Rules Governing the Evaluation Measurement and Verification of the Effects of Utility-Sponsored Demand-Side Management Programs (20 VAC 5-318-10, *et seq.*) (“EM&V Rules”), and the directive contained in Ordering Paragraph (4) of the Commission’s August 4, 2023 Final Order (“2022 DSM Final Order”) in Case No. PUR-2022-00210¹ (“2022 DSM proceeding”). The 2023 DSM Update includes, among other things, the Company’s requests for:

¹*Petition of Virginia Electric and Power Company, For approval of its 2022 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia, Case No. PUR-2022-00210, Final Order (Aug. 4, 2023).*

- (i) Approval to implement Demand-Side Management programs (individually, “DSM Program” or “Program” and collectively with other DSM Programs, the “DSM Portfolio” or “Portfolio”) “Phase XII,” which includes new Programs to supplement the overall Portfolio; and an
- (ii) Annual update to continue rate adjustment clauses (“RACs”), designated Riders C1A, C2A, and C4A² (collectively, the “Application”).

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

In support of the Company’s 2023 DSM Update, the Company respectfully states the following:

I. BACKGROUND

1. Dominion Energy Virginia is a public service corporation organized under the laws of the Commonwealth of Virginia, furnishing electric service to the public within its certificated service territory. The Company also supplies electric service to non-jurisdictional customers in Virginia and to the public and businesses in portions of North Carolina. Dominion

² As a result of the VCEA, which established new parameters on customer exemptions and opt-outs, the Company proposed and was subsequently approved in the Company’s 2020 DSM proceeding, Case No. PUR-2020-00274, that the true-up for energy efficiency programs in Phases VII and VIII would fall under Rider C3A until August 31, 2021 and begin in Rider C4A as of September 1, 2021. The Company therefore seeks approval to recover the Phase VII and Phase VIII true-up calculated in this proceeding and related financing costs, as well as any ongoing financing costs related to previous Over/Under deferral balances pertaining to the Phase VII and Phase VIII Programs, in Rider C4A and ultimately end the C3A rate adjustment clause. *See infra* para. 29.

Energy Virginia's electric system, consisting of facilities for generation, transmission, and distribution of electric energy, as well as associated facilities, is interconnected with the electric systems of neighboring utilities and is part of the interconnected network of electric systems serving the continental United States. The Company is engaged in the business of generating, transmitting, distributing, and selling electric power and energy to the public for compensation. The Company is also a public utility under the Federal Power Act, and certain of its operations are subject to the jurisdiction of the Federal Energy Regulatory Commission. The Company is an operating subsidiary of Dominion Energy, Inc. By reason of its operation in Virginia and North Carolina and its interconnections with other electric utilities, the Company engages in interstate commerce.

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

Virginia Electric and Power Company
120 Tredegar Street
Richmond, Virginia 23219

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

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

5. In its 2022 DSM Final Order, the Commission approved the Company's Phase XI petition to implement five new DSM Programs (which were comprised of "energy efficiency" (EE) and "demand response" (DR) DSM Programs and one pilot program), four new Program Bundles, as well as previously approved DSM programs, without predetermined closure dates.³

6. The 2022 DSM Final Order also approved: (1) the Company's proposed Phase XI DSM Programs and Program Bundles cost cap of \$149.5 million and the ability to exceed such cap by no more than 15 percent; (2) the Company's request to offer the DSM Phase XI Agricultural Program to its residential customers, in addition to non-residential customers; and (3) the Company's proposed reorganization and consolidation of its DSM Portfolio consistent with the Company's Long-Term Plan ("LTP"). Finally, the Commission approved Riders C1A, C2A, C3A, and C4A effective for usage on and after September 1, 2023.⁴ The Commission directed the Company to file its next DSM update "no later than January 2, 2024."⁵

7. Lastly, the 2022 DSM Final Order adopted four recommendations from the Hearing Examiner's Report that referred certain issues to the Stakeholder Group for consideration and required a report from the Company on these issues. As explained in Company Witness David F. Walker's Direct Testimony, the four recommendations included the following:

³ 2022 DSM Final Order at 7, 9.

⁴ *Id.* at Ordering Paragraph (3).

⁵ *Id.* at Ordering Paragraph (4).

- Refer the issues regarding how the cost-effectiveness of DSM Programs is currently measured, including: (i) how the Inflation Reduction Act will reduce the cost of some DSM Programs; (ii) how the inclusion of non-energy benefits (e.g., the social cost of carbon) can better quantify the benefits for all programs and bundles; and (iii) how building codes impact the measurement of cost-effectiveness of DSM Programs, to the Stakeholder Group and require a report from the Company on these issues in next year's DSM case;
- Refer the issue of dual-fuel customers to the Stakeholder Group and require a report from the Company on the issue in next year's DSM case;
- Refer the issue of the LTP and DSM Program consolidation to the Stakeholder Group and require a report from the Company on the issue in next year's DSM case; and
- Refer the issue of leveraging the functionalities of AMI, including geo-targeting, in demand-response programs to the Stakeholder Group and require a report from the Company on the issue in next year's DSM case.⁶

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

- Provide an executive summary dashboard in the December filing and in June⁷ with the EM&V Report, which will present a summary of the Company’s 2022 DSM Portfolio performance;
- Provide a sample data chart for existing and proposed programs, which will present a mix of verified persistent savings and projections for future years; and

⁶ *Id.* at 7-9.

⁷ See *Commonwealth of Virginia, ex. rel. State Corporation Commission, Ex Parte: In the matter of baseline determination, methodologies for evaluation, measurement, and verification of existing demand-side management programs, and the consideration of a standardized presentation of summary data for Virginia Electric and Power Company*, Order on Motion at 2 (May 13, 2022) (granting the Company’s Motion to extend the EM&V Report filing date from on or before May 15 each year to on or before June 15 each year, effective in 2021).

- File the EM&V Report in the Company’s December DSM filing (in electronic form for the December filing) and in June⁸ of the docket of the prior complete DSM update case.

9. As detailed in the direct testimony of Company Witness David F. Walker, the Company has complied with the Commission directives and filing requirements relevant to this instant filing.

II. LEGISLATIVE OVERVIEW

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

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

⁸ *Id.*

12. The VCEA, through Va. Code § 56-596.2, also specifies total annual energy savings targets, starting in year 2022 through 2025, with savings targets to be set by the Commission thereafter.

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

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

savings targets, and requires a third-party evaluator to provide reports on its findings concurrently to the Commission and the utility.

III. PROPOSED PHASE XII PROGRAMS

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

- Residential New Construction (EE)
- Residential Smart Thermostat Purchase (EE)
- Residential Smart Thermostat (DR)
- Non-residential New Construction (EE)

16. The direct testimony and schedules of Company Witness Michael T. Hubbard provide details 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 these Programs.

17. The proposed Residential New Construction Program will provide incentives to home builders for the construction of new homes that are ENERGY STAR certified by directly recruiting existing networks of homebuilders and Home Energy Rating System (HERS) Raters to build and inspect ENERGY STAR certified new homes. This Program will expand its existing single path offering to encourage added builder participation through a flexible entry-level approach that appropriately incentivizes builders to invest in and promote deeper energy savings. Additionally, the re-design supports builders in constructing best in class above-code homes by offering a second tier to building eligibility. These two tiers consist of ENERGY STAR Version

3.1 and ENERGY STAR NextGen Tier. The proposed Residential Smart Thermostat Purchase Program provides an incentive to residential customers to purchase a qualifying smart thermostat through the Company's online marketplace platform and brick and mortar participating retailers.

18. The Residential Smart Thermostat Demand Response Program is a peak demand response program through which demand response is called by the Company during times of peak system demand throughout the year and thermostats of participating customers would be adjusted to achieve a specified amount of load reduction while maintaining reasonable customer comfort through a gradual change in home temperature and allowing customers to opt-out of specific events if they choose to do so. Customers receive a one-time enrollment incentive and an annual incentive for participating in the program.

19. Lastly, the Non-residential New Construction Program is a re-design of the DSM Phase VIII Residential New Construction Program in response to evolving builder codes and builder feedback within the Company's service territory. The updated design will differ from the Phase VIII Residential New Construction Program, by expanding the existing single path offering to encourage added builder participation through a flexible approach and promote deeper energy savings per house with a step-up approach in current ENERGY STAR certification offerings. Additionally, the DSM Phase XII proposed re-design supports more builders in constructing above-code homes by offering two tiers to building eligibility and increased incentive levels, both in an effort to further drive builder participation in the Residential New Construction Program. These two tiers consist of ENERGY STAR Version 3.1 and ENERGY STAR NextGen Tier.

20. In this filing, the Company also respectfully requests authorization to operate the Phase XII DSM Programs, without predetermined closure dates. Please see the direct testimony

the 100 kilowatts demand threshold are eligible to participate in the Program. As the Program has continued to gain momentum over the years, it has gained attention among local and small businesses, especially with certain small businesses that have more than five locations across the Company's service territory. As such, the Company is requesting the Commission to remove the locations cap to ensure more smaller business can partake in the incentives.

24. The Company also requests enhancements to the existing DSM Phase VIII Non-residential Energy Efficiency Midstream Program in order to offer the latest energy efficient program measures to our non-residential customers. The Company is requesting to add additional program measures such as ice makers and dishwashers in order to diversify its program measure portfolio and align with what the implementation vendor is currently observing operationally in the field.

B. Use of the Gross Savings Metric for VCEA Compliance

25. Lastly, the Company seeks Commission approval to use the gross savings metric to measure the Company's actual and projected compliance or noncompliance with the total energy savings requirements in Va. Code § 56-596.2, as recommended in the LTP.⁹

V. EXISTING PROGRAM CLOSURE

26. As addressed in the pre-filed direct testimony of Company Witness Michael T. Hubbard, the Company will work with the program vendor to explore options to wind down the DSM Phase II Non-residential Distribution Generation ("DG") Program. The Company's Phase II Non-residential DG Program was extended for a five-year period in the 2016 DSM proceeding, Case No. PUE-2016-00111 and subsequently for a two-year extension in the 2020 DSM proceeding, Case No. PUR-2020-00274. Although relatively modest in size, it has

⁹ The Company is filing a Legal Memorandum contemporaneously with this Application addressing this issue.

remained a called upon resource for the Company during periods of peak demand. Nonetheless, due to current modeling factors such as the low value of capacity, the program is no longer cost effective. As such, the Company is exploring options to wind down the Program.

VI. APPROVAL OF UPDATED RIDERS C1A, C2A, AND C4A

A. Rate Year

27. The Company presents a rate year of September 1, 2024 through August 31, 2025, (“Rate Year”) for the updated Riders C1A, C2A, and C4A.

B. Assignment and Allocation of Costs

28. The costs for the DSM Programs may be viewed primarily in two categories: direct (Program costs) and indirect (Common costs). The estimated Program costs include costs primarily based on signed vendor contracts for the approved Programs and estimated costs based on updated vendor pricing information for the proposed Phase XII Programs. Costs that are part of the implementation of Programs that are not specifically associated with any individual DSM Program are Common costs and include certain customer communication costs, Energy Conservation department labor costs, dues and association costs, customer service, and external vendor costs. The Company proposes to determine cost responsibility in the same manner as the Commission approved in the 2022 DSM proceeding.

29. The approach for determining jurisdictional responsibility is first to assign Program costs to the jurisdiction based upon participation in the Programs, and second to allocate Common costs to the jurisdiction based on the jurisdiction’s Program costs, both capital and expenses, compared to total Program costs for the system. Customer class responsibility is determined by allocating costs to the customer classes on the basis of an average and excess production demand factor. The pre-filed direct testimony of Company Witness Emilia L. Catron

the Company during periods of peak demand. Nonetheless, due to current modeling factors such as the low value of capacity, the program is no longer cost effective. As such, the Company plans to wind down the Program.

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27. The Company presents a rate year of September 1, 2024 through August 31, 2025, (“Rate Year”) for the updated Riders C1A, C2A, and C4A.

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addresses how Program costs and Common costs will be assigned or allocated to the Virginia Jurisdiction using appropriate factors.

C. Revenue Requirement Request

30. As explained in the pre-filed direct testimony of Justin A. Wooldridge, the Company's revenue requirement presented in this proceeding is consistent with the calculations presented in the Company's 2022 DSM proceeding, with one exception. As a result of the VCEA, which established new parameters on customer exemptions and opt-outs, the Company proposed and was subsequently approved in the Company's 2020 DSM proceeding, Case No. PUR-2020-00274, that the true-up for energy efficiency programs in Phases VII and VIII would fall under Rider C3A until August 31, 2021 and begin in Rider C4A as of September 1, 2021.¹⁰ The Company now proposes to recover the Phase VII and Phase VIII true-up calculated in this proceeding and related financing costs, as well as any ongoing financing costs related to previous Over/Under deferral balances pertaining to the Phase VII and VIII Programs in Rider C4A, which will ultimately end the C3A rate adjustment clause.

31. The cost components of Riders C1A, C2A, and C4A are comprised of operating expenses projected to be incurred during the Rate Year and a Monthly True-Up Adjustment comparing actual costs for the 2022 calendar year to the actual revenues collected during the same period. Detailed costs were used to calculate the requested revenue requirement for Riders C1A, C2A, and C4A for the proposed Rate Year. The calculation of the revenue requirement is discussed in the pre-filed direct testimony of Company Witness Wooldridge.

¹⁰ *Application of Virginia Electric and Power Company for approval of its 2020 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia*, Case No. PUR-2020-00274, Direct Testimony of Elizabeth B. Lecky, Schedule 2 (Dec. 2, 2020).

32. The projected Rate Year operating expenses from September 1, 2024 through August 31, 2025, are included for recovery on a current basis during the Rate Year. A margin is authorized to be recovered effective for qualifying expenditures. For purposes of this Application and consistent with the Commission's November 18, 2021 Final Order in the Company's 2021 Triennial Review Proceeding in Case No. PUR-2021-00058, the Company is utilizing the approved ROE of 9.35% for the period November 18, 2021 to February 29, 2024. In addition, the capital structure used in the calculation of the revenue requirement reflects the methodology approved by the Commission in that proceeding. For the time period beyond February 29, 2024, the Company is utilizing an ROE of 9.7% as set forth in the 2023 Acts of the Virginia General Assembly Chapter 757 (Senate Bill 1265).

33. In addition to the margin on operation and maintenance ("O&M") expenses related to Rider C2A and Rider C4A energy efficiency programs for the period of January 1, 2022 through December 31, 2022, using the 9.35% ROE, the Company has calculated a bonus margin on O&M expenses of 1.2%. As stated in Company Witness David F. Walker's pre-filed direct testimony, the Company achieved 1.9% of energy savings on a gross basis, which is 65% in excess of the savings target of 1.25%. Therefore, the Company has added an additional 20 basis points for each additional incremental 0.1 percent in annual savings, resulting in the 1.2% adder for the True-Up. Company Witness Justin A. Wooldridge provides additional support on the Company's calculated margin in his pre-filed direct testimony.

34. The revenue requirement also includes recovery of the True-up of actual costs and revenues for the period of January 1, 2022 through December 31, 2022, for eligible programs through a Monthly True-Up Adjustment. The actual 2022 calendar year expenditures are used to calculate a 2022 actual revenue requirement and then compared to the actual 2022 revenues to

produce the Monthly True-Up Adjustment. For purposes of the margin authorized to be recovered for qualifying expenditures during the 2022 calendar year, the Company utilized the ROEs described above.

35. Company Witness Wooldridge's pre-filed direct testimony details the projected Subsection A 5 costs, differentiated between capital and expense, and Riders C2A, and C4A costs qualifying for the margin as provided for under Subsection A 5. In addition, Company Witness Wooldridge depicts the revenue requirement separately for Riders C1A, C2A, and C4A.

36. The Company requests recovery of the Rate Year Projected Revenue Requirement for Rider C1A in the amount of \$9,870,090. This amount, combined with the Monthly Rider C1A True-Up Adjustment of (\$1,994,686), provides the Rider C1A total revenue requirement of \$7,875,404. For Rider C2A, the Rate Year Projected Revenue Requirement of (\$56,946) is combined with the Monthly Rider C2A True-up Adjustment of (\$1,877,336) to provide the Rider C2A total revenue requirement of (\$1,934,282). For Rider C4A, the Rate Year Projected Revenue Requirement of \$106,743,020 is combined with the Monthly Rider C4A True-Up Adjustment of (\$20,241,433) and the monthly C3A True-up Adjustment of \$180,036 for a total C4A True-up Adjustment of (\$20,061,397), to provide the Rider C4A total revenue requirement of \$86,681,623. For Riders C1A, C2A, and C4A, the combined revenue requirement in this proceeding totals \$92,622,744.

D. Rate Design

37. The Riders C1A, C2A, and C4A, which are sponsored by Company Witness Casey R. Lawson, identify the rates, in cents per kilowatt-hour ("kWh"), that will apply to each Company Rate Schedule. If approved as proposed, the Riders C1A, C2A, and C4A will be applicable for billing purposes with a rate effective date for usage on or after the latter of

September 1, 2024, or the first day of the month which is at least fifteen (15) days following the date of any Commission order approving Riders C1A, C2A, and C4A.

38. The implementation of the proposed Riders C1A, C2A, and C4A, and the withdrawal of Rider C3A once effective, will decrease the typical residential customer's monthly bill, based on 1,000 kWh usage per month, by \$0.16. Company Witness Lawson's testimony provides typical bill changes for customers served under Residential Schedule 1, General Service Rate Schedules GS-1 and GS-2, and Church Rate Schedule 5C, showing the impact that the updated Riders C1A, C2A, and C4A will have on customer bills, at representative levels of consumption. This is because exempt customers would likely not receive service under one of these rate schedules and, therefore, all riders will apply. However, for customers served under Rate Schedules GS-3 and GS-4, typical bill changes are provided to show the impact of the Rider C1A alone, and the impact of Riders C1A, C2A, and C4A combined. Typical bill changes that reflect only the impact of Rider C1A alone would be applicable to customers opted out of C2A and C4A.

VII. SUPPORTING TESTIMONY, FILING SCHEDULES, AND REQUEST FOR LIMITED WAIVER

39. The Company's Application is supported by the pre-filed direct testimonies of Company Witnesses David F. Walker, Michael T. Hubbard, Rachel L. Hagerman, Jarvis E. Bates, Justin A. Wooldridge, Emilia L. Catron, Casey R. Lawson, Dan Feng, and Terry M. Fry.

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

A. Filing Schedules

41. With this Application, the Company files the following Filing Schedules:
- a. Filing Schedules 3 through 5 and Filing Schedule 8, sponsored by Company Witness Wooldridge, provide information regarding the Company's cost of capital.
 - b. Filing Schedule 46A, Statements 1 through 9, are sponsored by Company Witness Bates. These Statements address the projected and actual costs by type of cost and year and by month, to the extent applicable, associated with the RACs.
 - c. Filing Schedule 46B, Statement 1, is sponsored by Company Witness Bates and addresses the transaction-level details of the RACs.
 - d. Filing Schedule 46C, Statements 1 and 2, are sponsored by two Company witnesses. Company Witness Hubbard sponsors Filing Schedule 46C, Statement 1, which provides key documents supporting the projected and actual program costs for all programs. Company Witness Hagerman sponsors Filing Schedule 46C, Statement 2, which provides key documents supporting the projected and actual costs for cost-benefit analyses. In total, these Statements address the key documentation supporting the costs of the RACs.
 - e. Filing Schedule 46D, consisting of Statements 1 through 4, is sponsored by two Company witnesses. Company Witness Wooldridge sponsors Filing Schedule 46D, Statements 1 through 3, which provide the annual revenue requirement for the Rate Year and duration of the proposed RACs, as well as the supporting calculations. Company Witness Catron sponsors Filing Schedule 46D, Statement 4, which provides the annual revenue requirement by class for the duration of the proposed RACs.
 - f. Filing Schedule 46E, consisting of Statements 1 through 2, is sponsored by two Company witnesses. Company Witness Catron sponsors Filing Schedule 46E, Statement 1, which addresses the methodology for allocating the revenue requirements among rate classes. Company Witness Lawson sponsors Filing Schedule 46E, Statement 2, which addresses the design of class rates.
 - g. Filing Schedule 46F, consisting of Statements 1 through 2, is sponsored by two Company witnesses. Through the EM&V Report, Company Witness Feng sponsors Filing Schedule 46F, Statement 1, which provides evidence of the actual energy and demand savings achieved as a result of each specific program for which cost recovery is sought. Company Witness Hagerman sponsors Filing Schedule 46F, Statement 2, which provides revised cost-benefit tests that incorporate actual utility-specific energy and demand savings and cost data.
 - h. Filing Schedule 46G, Statement 1, is sponsored by Company Witness Wooldridge. This Statement provides a description of the significant accounting

procedures and internal controls in place for each energy efficiency program that is administered by either a third-party or by the Company.

B. Request for Limited Waiver of Filing Schedule 46 Requirements

42. The Company, for good cause shown and pursuant to 20 VAC 5-204-10 E, additionally respectfully requests that the Commission waive, in part, the requirements under Rules 60 and 90 of the Rate Case Rules with respect to paper copies of certain Filing Schedule 46 materials. Specifically, the Rate Case Rules require the Company to provide key documents, including economic analyses, contracts, studies, investigations, results from requests for proposals, and cost benefit analyses that support projected costs proposed to be recovered via the rate adjustment clause. The supporting documentation responsive to this requirement is voluminous and not easily reviewed in hard copy (paper) format. Accordingly, the Company seeks waiver of the requirement to file 12 hard copies of this information. Instead, the Company proposes to provide this documentation to Commission Staff and any other future case participants in electronic format, and provide the Commission with one hard copy and three electronic copies on compact discs (“CDs”). The Company will make the electronic documents available via an e-room contemporaneously with this filing, with immediate access available to Commission Staff. This request is consistent with the Commission’s recent orders granting similar limited waivers.¹¹ Should the Commission deny this request, the Company asks for a reasonable allowance of time to print the requisite filing copies of this material and submit it to the Commission prior to the Company’s application being deemed incomplete.

¹¹ See e.g., *Petition of Virginia Electric and Power Company, For revision of a rate adjustment clause, designated Rider GT, under § 56-585.1 A 6 of the Code of Virginia*, Case No. PUR-2023-00136, Order for Notice and Hearing at 19 (Aug. 30, 2023); *Petition of Virginia Electric and Power Company, For approval of its 2023 RPS Development Plan under § 56-585.5 D 4 of the Code of Virginia and related requests*, Case No. PUR-2023-00142 Order on Waiver Requests at 6 (Aug. 29, 2023).

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

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

IX. COMPLIANCE WITH RULE 10 OF THE RATE CASE RULES

44. The Company's Application complies with the requirements contained in Rule 10 of the Rate Case Rules. In accordance with Rule 10 A, 20 VAC 5-204-10 A, the Company filed with the Commission on October 5, 2021, the Company's notice of intent to file this Application under Va. Code § 56-585.1 A 5. The Company has included all information required by Rule 10 B in its Application, including a table of contents, direct testimonies with one-page summaries, and properly labeled exhibits and schedules.

45. In accordance with Rule 10 H, the Company will make a searchable PDF version of the Application, direct testimonies, and Filing Schedules available via an eRoom contemporaneously with this filing, with immediate access available to (i) Commission Staff, including identified members of the Divisions of Utility Accounting and Financing and Public Utility Regulation and (ii) identified members of the Office of the Attorney General's Division

of Consumer Counsel (“Consumer Counsel”). Also in accordance with Rule 10 H, the Company will make electronic spreadsheets supporting the schedules that contain calculations available via an eRoom contemporaneously with this filing, with immediate access available to Commission Staff.

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

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

(1) Authorization to offer four new redesigned Phase XII DSM Programs to eligible customers as set forth herein;

(2) Approval of the aggregate Phase XII DSM Program cost cap of \$102.4 million, the individual cost caps presented by Company Witness Bates, and the ability to exceed the cost cap by no more than 15%;

(3) Authorization to operate Phase XII DSM Programs without a predetermined closure date;

(4) Authorization for the Company to update the eligibility requirements for the DSM Phase VIII Small Business Improvement Enhanced Program;

(5) Approval of the Company’s request to include additional program measures to the existing DSM Phase VIII Non-residential Energy Efficiency Midstream Program;

(6) Approval to use only the gross savings metric to measure the Company's actual and projected compliance or noncompliance with the total energy savings requirements in Va. Code § 56-596.2, as recommended by the Company's LTP;

(7) Approval of the Rate Year beginning September 1, 2024 and ending August 31, 2025;

(8) Approval to recover the Phase VII and Phase VIII true-up calculated in this proceeding and related financing costs, as well as any ongoing financing costs related to previous Over/Under deferral balances pertaining to the Phase VII and VIII Programs in Rider C4A and ultimately end the C3A rate adjustment clause;

(9) Approval of a revenue requirement of \$92,622,744 to be recovered through revised Riders C1A, C2A, and C4A over the Rate Year;

(10) Approval of the same allocation methodology as previously approved in the 2022 DSM proceeding;

(11) Approve the Company's request to continue Riders C1A, C2A, and C4A to be effective for billing purposes on the latter of September 1, 2024, or the first day of the month which is at least 15 days following the date of any Commission order approving Riders C1A, C2A, and C4A;

(12) Approval of Phase XII Program EM&V Plans;

(13) Approval of the Company's request for limited waiver of Filing Schedule 46; and

(14) Any other relief as deemed appropriate and necessary.

