

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

APPLICATION OF)
)
VIRGINIA ELECTRIC AND POWER COMPANY)
) Case No. PUR-2024-00222
For approval of its 2024 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 2024 Demand-Side Management update (“2023 DSM Update”). This 2024 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 July 26, 2024 Final Order (“2024 DSM Final Order”) in Case No. PUR-2023-00217¹ (“2023 DSM proceeding”). The 2024 DSM Update includes, among other things, the Company’s requests for:

¹*Petition 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, 2023).*

- (i) Approval to implement Phase XIII Demand-Side Management programs (individually, “DSM Program” or “Program” and collectively with other DSM Programs, the “DSM Portfolio” or “Portfolio”), which includes one new program, one pilot, five redesigned programs, and a modification to the measure mix of the Phase XI Residential Income and Age Qualifying Bundled (EE) Program to supplement the overall Portfolio; and
- (ii) An annual update to continue rate adjustment clauses (“RACs”), designated Riders C1A, 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, [and] cost benefit analyses . . . ,” which are voluminous.

In support of the Company’s 2024 DSM Update, the Company respectfully states the following:

² As a result of the VCEA, which established new parameters on customer exemptions and opt-outs, the Company is proposing that any remaining trailing cost for Phase III, Phase IV, and Phase VI energy efficiency programs previously included in Rider C2A be recovered under Rider C4A. The Company therefore seeks approval to recover the Phase III, Phase IV, and Phase VI 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 III, Phase IV, and Phase VI Programs, in Rider C4A, and ultimately end the C2A rate adjustment clause. *See infra* para. 30. The Commission approved a similar request in the Company’s 2023 DSM proceeding where the Company sought approval to recover the Phase VII and Phase VIII true-up calculated in that 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, in addition to the Company’s request to withdrawal Rider C3A. *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).*

I. BACKGROUND

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

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

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

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

Paul E. Pfeffer
Lisa R. Crabtree
Dominion Energy Services, Inc.
120 Tredegar Street
Richmond, Virginia 23219
(804) 787-5607 (PEP)
(804) 819-2612 (LRC)

Vishwa B. Link
Jontille D. Ray
Briana M. Jackson
Alexis S. Hills
McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, Virginia 23219
(804) 775-4330 (VBL)
(804) 775-1173 (JDR)
(804) 775-1323 (BMJ)
(804) 775 4758 (ASH)

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 2023 DSM Final Order, the Commission approved the Company's Phase XII petition to implement four new DSM Programs (which were comprised of "energy efficiency" (EE) and "demand response" (DR) DSM Programs), without predetermined closure dates.³

6. The 2023 DSM Final Order also approved: (1) the Company's proposed Phase XII DSM Programs cost cap of \$102.4 million and the ability to exceed such cap by no more than 15 percent; (2) the Company's request to update the eligibility requirements for the Phase VIII Smart Business Improvement Enhanced Program, and the addition of ice maker and dishwasher measures to the Phase VIII Non-residential Midstream EE Products Program; (3) and the Company's commitment to continue using the stakeholder group to develop the implementation plans for the Four Stakeholder Group Issues and report on the progress of those plans. The Commission approved Riders C1A, C2A, and C4A effective for usage on and after

³ 2023 DSM Final Order at 10, 18.

September 1, 2024.⁴ The Commission directed the Company to file its next DSM update “no later than January 2, 2025.”⁵

7. Lastly, the 2023 DSM Final Order adopted the following Hearing Examiner’s findings and recommendations:

- Finding that net savings are the appropriate metric to determine the “total combined kilowatt-hour savings achieved by” the Company’s energy efficiency and demand response programs and measures.⁶
- The Company should continue to provide a Long-term Plan Project Management Report in future DSM filings until the Commission determines otherwise.
- 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.
- The Company should include two additions to the EM&V Dashboard: (i) the year’s projected cost per kWh, in terms of total projected costs, divided by total projected net energy savings; and (ii) the actual total cost, divided by the actual total net energy savings.

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:

⁴ *Id.* at Ordering Paragraph (3). The Commission also approved the Company’s request to withdraw Rider C3A.

⁵ *Id.* at Ordering Paragraph (4).

⁶ *Id.* at 15.

- 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
- 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

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).

⁸ *Id.*

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.

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 XIII PROGRAMS AND PILOT

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

- Residential Smart Thermostat (DR) (Redesigned)
- Non-residential Small Business Improvement (EE) (Redesigned)
- Non-residential Data Center (EE) (Redesigned)
- Non-residential Enhanced Prescriptive (EE) (Redesigned)
- Non-residential Curtailment (DR) (new Program)
- Non-residential Distributed Generation (DR) (Redesigned)
- Residential Battery Storage Pilot (DR)

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

17. The proposed Residential Smart Thermostat (DR) 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.

18. The proposed Non-residential Small Business Improvement program offers a comprehensive and flexible approach that includes an energy assessment to identify and prioritize energy-saving opportunities for qualifying small business customers under the 200 kW demand threshold, with financial incentives for the installation of specific energy efficiency measures.

19. The Non-residential Data Center Program will provide qualifying non-residential customers with incentives to install energy efficiency measures related to the equipment in and operation of data centers. The proposed Program would be a “one-stop-shop” for data center customers to implement energy efficiency measures such as computer and power distribution equipment, HVAC, chiller, lighting and controls upgrades, as well as economizers and other small, medium and large custom measures based on the customers’ needs. This whole-building analysis approach will allow flexibility for data center customers to pursue energy efficiency upgrades with a diverse set of program portfolio energy efficiency measures. Program services, as well as program measure installation, for this Program will be delivered through a network of qualified contractors and/or consultants with the appropriate specialization and experience to provide relevant, up-to-date advice on the measures included in the proposed program design.

20. The Non-residential Enhanced Prescriptive Program would provide qualifying non-residential customers with incentives for the installation of refrigeration, commercial kitchen equipment, HVAC improvements, window film installation and maintenance and installation of other program specific, energy efficiency measures.

21. The Non-residential Curtailment Program design targets medium- and large-sized commercial and industrial customers to curtail their energy usage using manual load curtailment during times of peak system demand. Each participating customer (*i.e.*, facility) will have a curtailment plan developed, also known as a load reduction plan (“LRP”), which is specific to the facility and guided by engineering assessments created by the program implementation vendor in collaboration with facility staff, factoring in the opportunity cost of participation, facility equipment and operations, and staff availability. The LRP is specific to each customer site and provides a specific plan on how the customer is to reduce their electric demand during a demand response event, detailing the measures (equipment) the customer can turn off or turn down during the DR event window. The LRP also provides an overview of the load shed potential associated with the specific measures along with the expected incentive the customer can expect to earn.

22. The Non-residential Distributed Generation Program will provide qualifying non-residential customers with an incentive to curtail load by operating backup generation when called upon during times of peak system demand throughout the year. The program implementation vendor is responsible for enabling remote operation and monitoring the customers’ generators.

23. Lastly, the proposed Residential Battery Storage Pilot will provide an incentive for residential customers to discharge their home battery storage system when called upon during

peak electrical demand. The pilot will target residential customers who have a battery storage system controlled by an approved original equipment manufacturer (OEM) with an incentive for participation in demand response events during times of peak system demand. During a demand response event, the battery will be remotely discharged without the customer's active participation. Customers can opt-out of events at any time.

24. Additionally, the Company is requesting a modification to the measure mix of the DSM Phase XI Residential Income and Age Qualifying Bundle (EE) as discussed in more detail in the direct testimony of Company Witness Michael T. Hubbard.

25. In this filing, the Company also respectfully requests authorization to operate the non-pilot Phase XIII DSM Programs, without predetermined closure dates. Please see the direct testimony of Company Witnesses David F. Walker and Michael T. Hubbard for details pertaining to the Company's request for authorization to operate the Phase XIII DSM Programs without predetermined closure dates.

26. The proposed cost cap for the Phase XIII Programs in the aggregate is approximately \$222.3 million. Information regarding the individual proposed cost caps for each Program, and the associated details, are provided by Company Witness Jarvis E. Bates. In this DSM Update, the Company requests the ability to exceed the spending cap by no more than 15%.

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

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

IV. APPROVAL OF UPDATED RIDERS C1A AND C4A

A. Rate Year

28. The Company presents a rate year of September 1, 2025 through August 31, 2026, ("Rate Year") for the updated Riders C1A and C4A.

B. Assignment and Allocation of Costs

29. 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 XIII 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 2023 DSM proceeding.

30. 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 Eleanor K.

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

C. Revenue Requirement Request

31. 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 2023 DSM proceeding, with one exception. The Company is introducing a cost assumption change for the Projected Cost Recovery factor, effecting only the Phase X – Voltage Optimization Program. The change consists of projecting rate base and related amortization expense of the Voltage Optimization software into the rate year. In doing so, the Company is required to prorate accumulated deferred income taxes ("ADIT") in accordance with Internal Revenue Service ("IRS") normalization rules. This change is consistent with the methodology used in the Company's Rider Gen and Rider OSW filing, Case Nos. PUR-2024-00097 and PUR-2023-00195 respectively. The cost components of Riders C1A, and C4A are comprised of operating expenses projected to be incurred during the Rate Year and a Monthly True-Up Adjustment comparing actual costs for the 2023 calendar year to the actual revenues collected during the same period. Detailed costs were used to calculate the requested revenue requirement for Riders C1A and C4A for the proposed Rate Year. The calculation of the revenue requirement is discussed in the pre-filed direct testimony of Company Witness Wooldridge.

32. The cost components of Riders C1A and C4A are comprised of operating expenses projected to be incurred during the Rate Year and a Monthly True-Up Adjustment comparing actual costs for the 2023 calendar year to the actual revenues collected during the same period. Detailed costs were used to calculate the requested revenue requirement for Riders

C1A and C4A for the proposed Rate Year. The calculation of the revenue requirement is discussed in the pre-filed direct testimony of Company Witness Wooldridge.

33. The projected Rate Year operating expenses from September 1, 2025 through August 31, 2026, 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 by the Commission in the 2023 Biennial Review, Case No. PUR-2023-00101.

34. The revenue requirement includes recovery of the True-up of actual costs and revenues for the period of January 1, 2023 through December 31, 2023, for eligible programs through a Monthly True-Up Adjustment. The actual 2023 calendar year expenditures are used to calculate a 2023 actual revenue requirement and then compared to the actual 2023 revenues to produce the Monthly True-Up Adjustment. For purposes of the margin authorized to be recovered for qualifying expenditures during the 2023 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 and C4A. The

Company requests recovery of the Rate Year Projected Revenue Requirement for Rider C1A in the amount of \$17,649,875. This amount, combined with the Monthly Rider C1A True-Up Adjustment of (\$2,373,647) provides the Rider C1A total revenue requirement of \$15,276,228. For Rider C4A, the Rate Year Projected Revenue Requirement of \$112,206,233 is combined with the Monthly Rider C4A True-Up Adjustment of (\$30,106,178) and the monthly C2A True-up Adjustment of \$65,856 and the monthly C3A True-up Adjustment of (\$794,512), for a total C4A True-up Adjustment of (\$30,834,833), to provide the Rider C4A total revenue requirement of \$81,371,400. For Riders C1A and C4A, the combined revenue requirement in this proceeding totals \$96,647,628.

D. Rate Design

36. The Riders C1A, and C4A, which are sponsored by Company Witness Jessica C. Powell, identify the rates, in cents per kilowatt-hour (“kWh”), that will apply to each Company Rate Schedule. If approved as proposed, the Riders C1A and C4A will be applicable for billing purposes with a rate effective date for usage on or after the latter of September 1, 2025, or the first day of the month which is at least fifteen (15) days following the date of any Commission order approving Riders C1A C4A.

37. The implementation of the proposed Riders C1A and C4A, and the withdrawal of Rider C2A once effective, will increase the typical residential customer’s monthly bill, based on 1,000 kWh usage per month, by \$0.04. For Residential Rate Schedule 1, General Service Rate Schedules GS-1 and GS-2, and Church Rate Schedule 5C, Company Witness Powell provides the respective typical monthly bill differences reflecting the impact of Riders C1A and C4A together. This is because exempt customers would likely not receive service under one of these rate schedules and, therefore, all riders will apply. However, for customers served under Rate

Schedules GS-3 and GS-4, typical bill changes are provided to show the impact of the Rider C1A alone, and the impact of Riders C1A and C4A combined. Typical bill changes that reflect only the impact of Rider C1A alone would be applicable to customers opted out of C4A.

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

38. 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, Eleanor K. Keeton, Jessica C. Powell, Dan Feng, and Terry M. Fry.

39. 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

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

- e. Filing Schedule 46D, consisting of Statements 1 through 4, is sponsored by two Company witnesses. Company Witness 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 Keeton sponsors Filing Schedule 46D, Statement 4, which provides the annual revenue requirement by class for the duration of the proposed RACs.
- f. Filing Schedule 46E, consisting of Statements 1 through 2, is sponsored by two Company witnesses. Company Witness Keeton sponsors Filing Schedule 46E, Statement 1, which addresses the methodology for allocating the revenue requirements among rate classes. Company Witness Powell sponsors Filing Schedule 46E, Statement 2, which addresses the design of class rates.
- g. Filing Schedule 46F, consisting of Statements 1 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

41. The Applicants, for good cause shown and pursuant to Rate Case Rule 10 E, respectfully request that the Commission waive, in part, the requirements under Rule 60 to Filing Schedules 3 through 5. Pursuant to 20 VAC 5-204-60, the Applicants are required to submit Filing Schedules 3 through 5 and 8 for each rate adjustment clause proceeding supporting each overall cost of capital used in the application. However, after consultation with Staff, and in the interest of judicial economy, the Applicants are only submitting Filing Schedule 8 for the 2023 year-end capital structure as Filing Schedules 3-5 are being reviewed by the Commission in the

Company's 2024 Rider GEN proceeding, Case No. PUR-2024-00097.⁹ To the extent necessary, the Applicants request a waiver of the requirement to file Filing Schedules 3 through 5 for the year-end 2023 capital structure. Further, to the extent necessary, the Applicants request a waiver of the requirement to file Filing Schedules 3 through 5 for the year-end 2022 capital structures, as those have already been reviewed and approved by the Commission in the Company's 2023 biennial review proceeding, Case No. PUR-2023-00101. The Applicants are submitting Filing Schedule 8 for the year 2022. This request for waiver is consistent with the Commission's recent order granting a similar limited waiver.¹⁰

42. The Applicants, for good cause shown and pursuant to 20 VAC 5-204-10 E, respectfully request 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 Applicants to provide key documents supporting the projected and actual costs of the Project, such as: economic analyses, support used by senior management for major cost decisions as determined by the applicant, contracts, results from requests for proposals, cost-benefit analyses, and other items supporting the costs that have not been provided in previous applications. The supporting documentation responsive to this requirement is voluminous and, often, not easily viewed in hard copy (*i.e.*, paper) format. Accordingly, the Applicants seek a waiver of the requirement to file 15 hard copies of this information. Instead, the Applicants propose to provide this documentation to Staff and any

⁹ See *Petition of Virginia Electric and Power Company, For approval of a rate adjustment clause, designated Rider GEN, under § 56-585.1 A 6 of the Code of Virginia and the consolidation of Riders B, BW, GV, US-2, US-3, and US-4 pursuant to § 56-585.1 A 7 of the Code of Virginia*, Case No. PUR-2024-00097, Application at 10 (June 4, 2024).

¹⁰ *Petition of Virginia Electric and Power Company, For approval of its 2024 RPS Development Plan under § 56-585.5 D 4 of the Code of Virginia and related requests*, Case No. PUR-2024-00147, Order on Motions at 9 (Sept. 12, 2024).

other future case participant in electronic format, and to provide the Commission with one hard copy and three electronic copies on compact discs. The Applicants will make these documents available via an electronic discovery site (“eRoom”) contemporaneously with the filing of the Application, with immediate access available to Staff. This request for waiver is consistent with recent Commission orders granting similar limited waivers.¹¹ Should the Commission deny this request, the Applicants ask for a reasonable allowance of time to print the requisite filing copies of this material and submit it to the Commission prior to the Applicants’ Application being deemed incomplete.

**VI. 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.

VII. 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

¹¹ See e.g., *id.*

with the Commission on October 1, 2024, 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 one new Phase XIII DSM Program, five redesigned Phase XIII DSM Programs, one pilot program to eligible customers as set forth herein;

- (2) Approval to make a modification to the measure mix of the DSM Phase XI Residential Income and Age Qualifying Bundle (EE);
- (3) Approval of the aggregate Phase XIII DSM Program cost cap of \$222.3 million, the individual cost caps presented by Company Witness Bates, and the ability to exceed the cost cap by no more than 15%;
- (4) Authorization to operate the non-pilot Phase XIII DSM Programs without a predetermined closure date;
- (5) Approval of the Rate Year beginning September 1, 2025 and ending August 31, 2026;
- (6) Approval to recover the Phase III, Phase IV, and Phase VI 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 III, Phase IV, and Phase VI Programs in Rider C4A and ultimately end the C2A rate adjustment clause;
- (7) Approval of a revenue requirement of \$96,647,628 to be recovered through revised Riders C1A and C4A over the Rate Year;
- (8) Approval of the same allocation methodology as previously approved in the 2023 DSM proceeding;
- (9) Approve the Company's request to continue Riders C1A and C4A to be effective for billing purposes on the latter of September 1, 2025, or the first day of the month which is at least 15 days following the date of any Commission order approving Riders C1A and C4A;
- (10) Approval of Phase XIII Program EM&V Plans;
- (11) Approval of the Company's request for limited waiver of Filing Schedule 46; and
- (12) Any other relief as deemed appropriate and necessary.

