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VIA ELECTRONIC FILING

March 28, 2023

A. Shonta Dunston, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

Re: Motion for Additional Extension of Schedule LGS – RTP
Docket No. E-22, Sub 562

Dear Ms. Dunston:

Enclosed for filing in the above-referenced proceeding is Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina's *Motion for Additional Extension of Schedule LGS – RTP*.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Lauren W. Biskie

Lauren W. Biskie
Senior Counsel

Enclosure

cc: Robert Josey, Esq.
Jack Floyd
Service List

OFFICIAL COPY

Mar 28 2023

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-22, SUB 562

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Application of Dominion Energy North Carolina for Adjustment of Rates and Charges Applicable to Electric Service in North Carolina)))))	MOTION FOR ADDITIONAL EXTENSION OF SCHEDULE LGS-RTP
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Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (“DENC” or the “Company”), through counsel and pursuant to Rule R1-7 of the Rules of Practice and Procedure of the North Carolina Utilities Commission (“Commission”) hereby moves the Commission for approval of revisions to the Company’s Schedule LGS-RTP and for an additional extension of the existing Schedule LGS-RTP from March 31, 2023 through June 30, 2023. Further, because the March 31, 2023 expiration date is quickly approaching, the Company respectfully requests expedited consideration of its request. In support of this motion, DENC respectfully shows unto the Commission the following:

1. On March 29, 2019, as part of Exhibit II to its Application to revise its base rates and charges pursuant to Sections 62-133, 62-133.2, 62-134, and 62-135 of the North Carolina General Statutes (“N.C.G.S.”) and Rule R1-17 of the regulations of the Commission in the above-referenced docket, DENC filed its request to update its Schedule LGS-RTP tariff, with a proposed effective date of May 1, 2019.

2. Pursuant to the Commission’s July 28, 2020 *Order Deciding Motions for Reconsideration and Clarification, and Requiring Implementation of New Rates* issued in

this docket, the Company made a compliance filing on August 7, 2020, which included “blackline” and “clean” versions of the rate schedules reflecting non-fuel and base fuel rates effective for usage on and after November 1, 2019, including Schedule LGS-RTP.

3. On December 6, 2022, the Company filed a Motion for Extension of Schedule LGS-RTP (“Motion for Extension”) and explained that pursuant to Section XI.C of Schedule LGS-RTP, the tariff shall be withdrawn from service and shall no longer be available on the latter of: (1) December 31, 2022, (2) the conclusion of any subscriber’s initial one-year term, or (3) the end of any subscriber’s then-current one-year term. Section XI.D further provides that notwithstanding the provisions of Paragraph XI, the Tariff “may be extended upon Company request and Commission approval.”

4. In the Motion for Extension, the Company also explained that as part of the Agreement and Stipulation of Settlement entered into by DENC and Carolina Industrial Group for Fair Utility Rates I (“CIGFUR I”), filed on September 23, 2019 in the instant docket (“Stipulation”), DENC and CIGFUR I acknowledged that there were currently no subscribers on the version of Schedule LGS-RTP that was approved in the Company’s previous rate case, filed in Docket No. E-22, Sub 532, but agreed to seek Commission approval to further modify the tariff if “CIGFUR indicates that at least one of its member customers is willing to take service under such rates” (as modified) within sixty (60) days of any such agreement between CIGFUR and DENC. The Company indicated in the Motion that it was engaged in discussions with CIGFUR I regarding substantive revisions to the tariff that may make it more appealing to CIGFUR I customers.

5. On December 21, 2022, the Commission issued its Order Extending Rate Schedule, allowing Schedule LGS-RTP to remain in effect through the earlier of March 31, 2023, or the effective date of a revised Schedule LGS-RTP.

6. The Company and CIGFUR I have continued to work diligently on revisions to Schedule LGS-RTP to make it more appealing to industrial customers, but need additional time to consider potential changes to Schedule LGS-RTP.

7. As a result, the Company requests that the Commission extend the effective date of the currently effective Schedule LGS-RTP through June 30, 2023.

8. DENC is authorized to state that Counsel for CIGFUR I supports the requested extension of time.

9. DENC submits that the extension of time requested herein is reasonable and will not cause prejudice to any party in this matter.

WHEREFORE, DENC respectfully requests that the Commission grant an extension of the existing Schedule LGS-RTP through June 30, 2023. Further, because the March 31, 2023 date is quickly approaching, the Company respectfully requests expedited consideration of its request.

Respectfully submitted, this the 28th day of March, 2023.

/s/ Lauren W. Biskie

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*Attorney for Virginia Electric and Power
Company, d/b/a Dominion Energy North
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Motion for Additional Extension of Schedule LGS-RTP*, as filed in Docket No. E-22, Sub 562, were served electronically or via U.S. mail, first-class, postage prepaid, upon all parties of record.

This, the 28th day of March, 2023.

/s/ Lauren W. Biskie

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