

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-22, SUB 588

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of
Application of Virginia Electric and Power)
Company, d/b/a Dominion Energy North)
Carolina for Approval of Renewable Energy) NOTICE OF AFFIDAVIT
and Energy Efficiency Portfolio Standard Cost)
Rider Pursuant to N.C.G.S. § 62-133.8 and)
Commission Rule R8-67)

NOW COMES THE PUBLIC STAFF - North Carolina Utilities Commission,
by and through its Executive Director, Christopher J. Ayers, as constituted by
N.C. Gen. Stat. § 62-15, and gives notice that the Affidavit of:

Iris Morgan, Staff Accountant, Accounting Division
Public Staff - North Carolina Utilities Commission
430 North Salisbury Street - Dobbs Building
4326 Mail Service Center
Raleigh, North Carolina 27699-4300

will be used in evidence at the hearing in this docket scheduled for
November 17, 2020, pursuant to N.C.G.S. § 62-68. The affiant will not be called to
testify orally and will not be subject to cross-examination unless an opposing party
or the Commission demands the right of cross-examination by notice mailed or
delivered to the proponent at least five days prior to the hearing, pursuant to
N.C.G.S. § 62-68.

THEREFORE, the Public Staff moves that the Affidavit of Iris Morgan be
admitted into evidence in the absence of notice pursuant to N.C.G.S. § 62-68.

Respectfully submitted this the 26th day of October, 2020.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Dianna W. Downey
Chief Counsel

Electronically submitted
/s/ Nadia L. Luhr
Staff Attorney
nadia.luhr@psncuc.nc.gov

430 North Salisbury Street - Dobbs Building
4326 Mail Service Center
Raleigh, North Carolina 27699-4300
Telephone: (919) 733-6110

CERTIFICATE OF SERVICE

I certify I have this day served a copy of the foregoing Notice of Affidavit and Affidavit on each of the parties of record in this proceeding or their attorneys of record by causing a copy to be deposited in the United States Mail, postage prepaid, properly addressed to each or by electronic delivery upon agreement from the parties.

This the 26th day of October, 2020.

Electronically submitted
/s/ Nadia L. Luhr

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-22, SUB 588

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Application by Virginia Electric and Power) Company, d/b/a Dominion Energy North) Carolina, for Approval of Renewable Energy) and Energy Efficiency Portfolio Standard Cost) Recovery Rider Pursuant to G.S. 62-133.8 and) Commission Rule R8-67)	AFFIDAVIT OF IRIS MORGAN
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STATE OF NORTH CAROLINA

COUNTY OF WAKE

I, Iris Morgan, first being duly sworn, do depose and say:

I am a Staff Accountant with the Accounting Division of the Public Staff - North Carolina Utilities Commission. A summary of my education and experience is attached to this affidavit as Appendix A.

N.C. Gen. Stat. § 62-133.8(h) provides that the State's electric power suppliers may recover their reasonable and prudently incurred incremental costs of compliance with the Renewable Energy and Energy Efficiency Portfolio Standard (REPS) through an annual rider charge. Pursuant to Commission Rule R8-67, the REPS rider will be recovered over the same period as the utility's fuel cost rider. Rule R8-67 also provides for a REPS experience modification factor (REPS EMF) rider, which is utilized to "true-up" the recovery of reasonable and prudently incurred incremental REPS compliance costs incurred during the test period established for each annual rider proceeding.

The purpose of my affidavit is to present the results of the Public Staff's investigation of the REPS EMF rider proposed by Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (DENC or the Company), in this proceeding, based on incremental REPS compliance costs incurred and revenues recorded from July 1, 2019 through June 30, 2020 (REPS EMF period or test period).

On August 11, 2020, DENC filed its application, testimony, and exhibits related to the incremental costs incurred for compliance with the REPS. DENC witness Emilia L. Catron presented the Company's proposed annual and monthly REPS EMF Rider (Rider RPE) increments for each of the North Carolina retail customer classes. Company Exhibit ELC-1, Schedule 3 sets forth the proposed annual EMF decrement riders of (\$1.27), (\$6.93), and (\$48.00) per retail customer account, excluding the regulatory fee, for the residential, commercial, and industrial classes, respectively. Also set forth on Company Exhibit ELC-1, Schedule 3 are the proposed monthly EMF decrement riders of (\$0.11), (\$0.58), and (\$4.00) per retail customer account, excluding the regulatory fee, for the residential, commercial, and industrial classes, respectively.

On September 28, 2020, DENC filed the Errata Testimony and Exhibits of Elizabeth B. Lecky and Emilia L. Catron. The purpose of DENC's errata testimony was to correct the exclusion of an interest component to the REPS Rider RPE overcollection amount per Commission Rule R8-67(e)(7) during the test year. The Company stated that the \$255,875 Rider RPE overcollection should have included \$40,513 of interest. The updated REPS Rider RPE was calculated to be \$296,387.

Exhibit ELC-1, Schedule 3 filed with the Company's errata testimony sets forth the proposed revised annual EMF decrement riders of (\$1.47), (\$8.03), and (\$55.60) per retail customer account, excluding the regulatory fee, for the residential, commercial, and industrial classes, respectively. Also set forth on the Company's updated Exhibit ELC-1, Schedule 3 are the proposed revised monthly EMF decrement riders of (\$0.12), (\$0.69), and (\$4.64) per customer account, including the regulatory fee, and proposed revised monthly EMF decrements of (\$0.12), (\$0.69), and (\$4.63), excluding the regulatory fee, for the residential, commercial, and industrial classes, respectively.

The Public Staff's investigation included procedures intended to evaluate whether the Company properly determined its per books incremental compliance costs and revenues, and complied with the annual REPS revenue cap during the test period. These procedures included a review of the Company's filings and other Company data provided to the Public Staff. Additionally, the procedures included a review of certain specific types of expenditures impacting the Company's costs, including research and development costs. Performing the Public Staff's investigation also required the review of responses to written data requests.

Based upon the Public Staff's investigation, I recommend that DENC's proposed revised annual and monthly REPS EMF decrement riders for each customer class, as set forth on Exhibit ELC-1, Schedule 3 of the Company's errata filing, be approved. These amounts produce annual decrement REPS EMF riders of (\$1.47), (\$8.03), and (\$55.60) per customer account, excluding the regulatory fee, and proposed monthly riders of (\$0.12), (\$0.69), and (\$4.64) per customer

account, including the regulatory fee, and proposed monthly riders of (\$0.12), (\$0.69), and (\$4.63), excluding the regulatory fee, for the residential, commercial, and industrial classes, respectively.

This completes my affidavit.

Iris Morgan
Iris Morgan

Sworn to and subscribed before me

On this the 26th day of October, 2020.

JOANNE M. BERUBE
(Printed Name)

Joanne M Berube
Notary Public

Joanne M. Berube
NOTARY PUBLIC
WAKE COUNTY, N.C.
My Commission Expires 12-17-2022.

My Commission Expires: 12/17/2022

QUALIFICATIONS AND EXPERIENCE

IRIS MORGAN

I graduated from North Carolina Wesleyan College with a Bachelor of Science in Accounting and Business Administration in 2007. Also, I graduated from Keller Graduate School of Management with a Master of Accounting and Financial Management (2011), Master of Business Administration (2013), and a Master of Public Administration (2014).

Prior to joining the Public Staff, I was employed by WorldCom, Inc., as a CORE Analyst. My duties included providing customer service support and addressing customer billing and reporting requirements.

I joined the Public Staff in September 2002, as an Administrative Assistant. In 2006, I was promoted to a Consumer Services Complaint Analyst where I resolved numerous consumer complaints and performed utility reporting analysis. Once I completed my Accounting degree, I was promoted to a Public Staff Accountant in December of 2008. I am responsible for the performance of the following activities: (1) the examination and analysis of testimony, exhibits, books and records, and other data presented by utilities and other parties under the jurisdiction of the Commission or involved in Commission proceedings; and (2) the preparation and presentation to the Commission of testimony, exhibits, and other documents in those proceedings. I have performed audits and filed testimony and exhibits in a number of water rate cases, and filed testimony and assisted in investigations

addressing a wide range of topics and issues related to the water, electric, and gas industries.