

September 1, 2021

VIA ELECTRONIC DELIVERY

Ms. Antonia Dunston, Interim Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603-5918

**Re: *Historical Review of 2017 REPS Plan*
Docket Nos. E-100, Sub 147 & E-100, Sub 165**

Dear Ms. Dunston:

Enclosed for filing is Virginia Electric and Power Company d/b/a Dominion Energy North Carolina's ("DENC" or "the Company") historical review of the 2017 North Carolina Renewable Energy and Energy Efficiency Portfolio Standard Compliance Plan ("2017 REPS Plan"), as originally filed on May 1, 2017, in Docket No. E-100, Sub 147. The Company has reviewed its 2017 REPS Plan in accordance with the Commission's directive in Ordering Paragraph (3) of the June 3, 2013, *Order Granting in Part and Denying in Part Motion for Disclosure* issued in Docket No. E-100, Sub 137 ("2013 Disclosure Order"). The Company has determined that certain information redacted from the 2017 REPS Plan and originally filed confidentially under seal should no longer be withheld from public disclosure. However, information identifying renewable energy credit ("REC") contract counter-parties and REC pricing for active REC contracts remains commercially sensitive. Public disclosure of this information could potentially harm the Company's ability to negotiate and procure cost-effective RECs for future REPS compliance. Accordingly, the Company continues to designate this information as confidential trade secret information pursuant to N.C. Gen. Stat. § 132-1.2. The Company will make this information available to other parties pursuant to an appropriate nondisclosure agreement.

The Company notes that its determination regarding disclosure of prior trade secret information in its historical 2017 REPS Plan should not be considered a waiver of DENC's right to continue its designation of similar information as confidential trade secret information in future REPS Compliance Plans and future historical REPS

Ms. Antonia Dunston, Interim Chief Clerk
September 1, 2021
Page 2

Compliance Plan confidentiality reviews. *See 2013 Disclosure Order* at 10 (holding that utility's determination that past REPS information is non-confidential information suitable for public disclosure does not constitute waiver of utility's right to claim same category of disclosed REPS information is confidential in future years).

Please do not hesitate to contact me if you have any questions. Thank you for your assistance in this matter.

Very truly yours,

/s/Andrea R. Kells

ARK/sjg

Enclosures

cc: Lucy Edmondson, Public Staff-North Carolina Utilities Commission
Layla Cummings, Public Staff-North Carolina Utilities Commission
Nadia Luhr, Public Staff-North Carolina Utilities Commission

VIRGINIA ELECTRIC AND POWER COMPANY 2017 REPS COMPLIANCE PLAN

Pursuant to N.C.G.S. § 62-133.8 and North Carolina Utilities Commission (“NCUC” or “Commission”) Rule R8-67(b), Virginia Electric & Power Company (“Dominion” or the “Company”) submits its annual Renewable Energy and Energy Efficiency Portfolio Standard (“REPS”) Compliance Plan. The REPS Compliance Plan covers the current calendar year (2017) and immediately subsequent two calendar years (2018-2019) (the “Planning Period”). The Company also presents REPS compliance information for Town of Windsor during the Planning Period.¹ This North Carolina REPS Compliance Plan is an addendum to the Company’s 2017 Integrated Resource Plan (“2017 Plan”).

The Company’s 2017 REPS Compliance Report, to be filed in August 2017, will indicate that the Company and Town of Windsor have satisfied all 2016 REPS compliance obligations.

1.1 RENEWABLE ENERGY REQUIREMENTS

An overview of North Carolina’s REPS requirements and Virginia’s Renewable Energy Portfolio Standard (“RPS”) goals are provided in Chapter 4, Sections 4.3.2 and 4.3.1 of the Company’s 2017 Plan, respectively.

1.2 COMPLIANCE PLAN

In accordance with Rule R8-67(b)(i), the Company describes its planned actions to comply with N.C.G.S. 62-133.8 (b),(c),(d),(e), and (f) for each year.

The Company

During the Planning Period, the Company plans to meet its statutory annual REPS obligations, as modified by the Commission², through the use of renewable energy certificates (“RECs”)³, energy efficiency (“EE”) savings and new company-generated renewable energy where economically feasible.

¹Town of Windsor is a wholesale customer of the Company, for which Dominion provides REPS compliance services.

² On October 17, 2016, the Commission issued an Order delaying the initial swine waste set-aside requirement until 2017 and delaying the scheduled increase in the poultry waste set-aside requirement by one year. *Order Modifying the Swine and Poultry Waste Set-Aside Requirement and Providing Other Relief*, Docket No. E-100, Sub 113 (October 17, 2016) (“2016 Delay Order”).

³ For planning purposes, the Company notes that it has unique flexibility to use out-of-state RECs for REPS compliance. *Order on Dominion’s Motion for Further Clarification*, Docket No. E-100, Sub 113 (Sept. 22, 2009) (holding that the meaning of N.C.G.S. § 62-133.8(b)(2)(e) is to allow the Company to achieve up to 100% REPS general obligation and set-aside compliance using out-of-state RECs).

Figure 1.2.1 summarizes the Company's REPS compliance requirements and strategy for the Planning Period.

Figure 1.2.1 2017-2019 COMPANY'S REPS COMPLIANCE PLAN SUMMARY

	2017	2018	2019
Baseline Sales Forecast (MWh)	4,147,685	4,166,555	4,185,513
NC Total REPs Obligation %	6%	10%	10%
Total REPS Obligation (MWh) ¹	257,644	414,769	416,656
NC Solar Set-Aside Target %	0.14%	0.20%	0.20%
Total Solar Set-Aside (MWh) ¹	6,012	8,296	8,334
NC Total Swine Set-Aside %	0.07%	0.07%	0.14%
Total Swine Set-Aside (MWh) ¹	3,006	2,904	5,834
Projected Poultry Set-Aside %	3.31%	3.31%	3.31%
Total Poultry Set-Aside (MWh) ²	23,174	29,796	29,796
General Requirement (net of Solar, Swine and Poultry) (MWh)	225,452	373,773	372,692
Projected Energy Efficiency (MWh) ³	15,352	15,352	15,352
Projected Company Generated Renewables (MWh) ⁴	38,404	45,658	45,966

Notes: (1) 2017 target is based on actual 2016 retail sales of 4,294,053 MWh. 2018-2019 targets are based on baseline retail sales forecasts. The total target is the product of the previous year's baseline load and the current year target percentage. (2) 2017 target is based on the average of 2014-2016 retail sales. (3) For REPS reporting and compliance purpose, the Company will rely upon EE savings achieved by North Carolina customers. (4) Company Generated Renewables (MWh) are the North Carolina jurisdictional allocation of the Company's solar and biomass generation.

As shown in Figure 1.2.1, the Company's REPS requirements in the Planning Period include the solar energy resource requirement ("Solar Set-Aside"), swine waste resource requirement ("Swine Set-Aside"), and poultry waste resource requirement ("Poultry Set-Aside"). In addition, the Company must also ensure that, in total, the RECs that it produces or procures, combined with energy efficiency savings, is an amount equivalent to six percent (6%) of its prior year retail sales in compliance year 2017 and ten percent (10%) in compliance years 2018 and 2019 ("Total Obligation").⁴

⁴ The Company refers to its Total Obligation, net of the Solar, Swine, and Poultry Set-Aside requirements, as its General Requirement ("General Requirement").

The Town of Windsor

Planned REPS compliance for Town of Windsor during the Planning Period is outlined in Figure 1.2.2

Figure 1.2.2 2017-2019 TOWN OF WINDSOR REPS COMPLIANCE PLAN SUMMARY

	2017	2018	2019
Baseline Sales Forecast (MWh)	50,000	51,000	52,000
NC Total REPs Obligation %	6%	10%	10%
Total REPS Obligation (MWh) ¹	2,939	5,000	5,100
NC Solar Set-Aside Target %	0.14%	0.20%	0.20%
Total Solar Set-Aside (MWh) ¹	69	100	102
NC Total Swine Set-Aside %	0.07%	0.07%	0.14%
Total Swine Set-Aside (MWh)	35	35	72
NC Total Poultry Set-Aside % ²	0.04%	0.04%	0.04%
Total Poultry Set-Aside (MWh) ¹	265	340	340
General REPS Requirement (net of Solar, Swine and Poultry) (MWh)	2,570	4,525	4,586

Notes: (1) 2017 target is based on actual 2016 retail sales of 48,968 MWh reported by the Town of Windsor to the Company. 2018-2019 targets are based on forecasts reported by the Town of Windsor to the Company. The total target is a product of the previous year's baseline retail sales and the current year target percentage. (2) 2017 target is based on the average of 2014-2016 retail sales reported by the Town of Windsor to the Company.

Solar Set-Aside

Pursuant to N.C.G.S. § 62-133.8(d), the Company must produce or procure solar RECs equal to a minimum of fourteen hundredths of one percent (0.14%) of the prior year's total electric power in megawatt-hours ("MWh") sold to retail customers in North Carolina in 2017 and a minimum of twenty hundredths of one percent (0.20%) in 2018 and 2019.

Based on the Company's actual retail sales in 2016, the Solar Set-Aside is approximately 6,012 RECs in 2017. Based on forecasted retail sales, the Solar Set-Aside is projected to be approximately 8,296 RECs and 8,334 RECs in 2018 and 2019.

The Company's Solar Set-Aside compliance strategy is consistent with Dominion's plan from the previous years, as described herein. Specifically, the Company plans to buy unbundled solar RECs. The Company has purchased, or entered into contracts to purchase, solar RECs for Dominion's compliance with N.C.G.S. § 62-133.8(d). These contracts will provide enough solar

RECs to satisfy the Company's compliance through 2018. The Company has also executed contracts with solar facilities located in North Carolina that will satisfy the in-state portion of the Town of Windsor's compliance requirements for 2017 through 2019. The Company continues to evaluate opportunities to purchase both in-state and out-of-state solar RECs, and will continue to make all reasonable efforts to satisfy Dominion's and Town of Windsor's solar set-aside requirements during the Planning Period.

Swine Waste Set-Aside

Pursuant to N.C.G.S. § 62-133.8(e) and the 2016 Delay Order, for calendar years 2017 and 2018, at least seven hundredths of one percent (0.07%) and for calendar year 2019, fourteen hundredths of one percent (0.14%) of prior year total retail electric power sold in aggregate by electric power suppliers in North Carolina must be supplied by energy derived from swine waste. As the Company's share of the State's total retail megawatt-hour sales is approximately 3.31 percent, the Company's Swine Set-Aside is estimated to be 3,006 RECs in 2017, 2,904 RECs in 2018 and 5,834 RECs in 2019.

The Company has spent considerable time and effort attempting to locate operational swine waste digesters in the continental United States. This exhaustive search has identified only two small and three large potential suppliers. Independently of the Swine Waste REC Buyers Group, the Company has executed contracts with two suppliers. As a result of these efforts, Town of Windsor has sufficient RECs in NC-RETs to meet the 2017-2019 requirements. The Company also has sufficient RECs under contract to meet compliance during the planning period. However, the Company notes that Dominion's compliance is primarily dependent on a single operational supplier.

The Company continues to evaluate all potential opportunities to purchase both in-state and out-of-state swine RECs, and will continue to make all reasonable efforts to satisfy Dominion's Swine Set-Aside requirements during the Planning Period. The Company continues to work with the Swine Waste REC Buyers Group. Due to the high default rate with swine waste to energy contracts, the Company intends to contract for RECs above and beyond the initial requirement to increase the probability of achieving compliance. The Company intends to bank any excess RECs to be used for future compliance.

Poultry Waste Set-Aside

Pursuant to N.C.G.S. § 62-133.8(f) and the 2016 Delay Order, for calendar year 2017, at least 700,000 MWhs, and for 2018 and thereafter, at least 900,000 MWhs of the prior year's total electric power sold to retail electric customers in the State or an equivalent amount of energy shall be produced or procured each year by poultry waste, as defined per the Statute and additional clarifying Orders. As the Company's retail sales share of the State's total retail megawatt-hour sales is approximately 3.31 percent, the Company's Poultry Set-Aside is estimated to be 23,174 RECs in 2017 and 29,796 RECs in 2018 and 2019.

Initially, the Poultry Waste REC Buyers Group executed two (2) long-term poultry waste contracts and the Company, as a part of this group, has executed two (2) long-term contracts to satisfy the Town of Windsor's in-state Poultry Set-Aside requirements. One (1) of these contracts was terminated by mutual agreement with the supplier in September 2013. In an attempt to locate and purchase additional poultry RECs, the Company joined with the Poultry Waste REC Buyers Group in requesting Commission approval for a RFP in Docket E-100 Sub 113. The RFP was conducted in 2013 and resulted in two (2) additional contracts. Despite executing three (3) contracts that could each, individually, provide sufficient RECs, the Company believes it is likely, but cannot guarantee, it will have enough in-state RECs for Town of Windsor compliance with the Poultry Set-Aside in 2017. At this time, the Company is reasonably confident that Town of Windsor will be in compliance with the Poultry Set-Aside in 2018 and 2019.

The Company has also continued to search for opportunities to purchase poultry waste RECs in North Carolina and throughout the continental United States. These efforts yielded multiple poultry waste REC contracts and sufficient delivered volume to comply with both the Company's and Town of Windsor's out-of-state requirements for years 2017, 2018 and 2019.

General REPS Requirements Net of Solar, Swine and Poultry

Pursuant to N.C.G.S. § 62-133.8(d), the Company is required to comply with its Total Obligation in the Planning Period by submitting for retirement a total volume of RECs equivalent to six percent (6%) in 2017 and ten percent (10%) in 2018 and 2019. This equates to approximately 257,644 RECs in 2017, 414,769 RECs in 2018, and 416,665 RECs in 2019. This General Requirement, net of the Solar, Swine, and Poultry Set-Aside requirements, is estimated to be 225,452 RECs in 2017, 373,773 RECs in 2018, and 372,692 RECs in 2019. The resource options available to the Company to meet the General Requirement are discussed below, as well as the Company's plan to meet the General Requirement with these resources.

The Company plans to comply with the General Requirement using a combination of EE savings generated by the Company's portfolio of approved North Carolina EE programs; purchasing out-of-state RECs; and using company-generated new renewable energy resources. For Town of Windsor, the Company plans to comply with the General Requirement using its Southeastern Power Administration ("SEPA") allocation of hydroelectric RECs, in-state solar RECs, in-state biomass RECs and out-of-state biomass RECs.

Pursuant to Commission Rule R8-67(b)(1)(iii), the Company has presented in Figure 1.4.1 below these EE measures that it plans to use toward REPS compliance, including projected impacts.

Company-generated new renewable energy includes generation from biomass fuel co-firing at the Company's Virginia City Hybrid Energy Center (VCHEC), which commenced commercial operations in 2012, as well as biomass fuel conversions at the Altavista, Hopewell and Southampton power stations, which commenced commercial operations in the second half of 2013. The Company is currently selling the RECs generated at these biomass facilities in PJM

Tier 1 markets at a significant premium to the out-of-state general RECs the Company is purchasing for compliance. Company-generated new renewable energy also includes generation from operational and planned Company-owned solar facilities in Virginia and North Carolina. The Company is selling the solar RECs generated at these facilities in the PJM markets at a substantial premium to the in-state and out-of-state solar RECs the Company is purchasing for REPS compliance.⁵

1.3 REC CONTRACTS

In accordance with Rule R8-67(b)(ii), the Company provides a list of executed contracts to purchase renewable energy certificates.

As mentioned in the previous section, the Company has purchased wind, biomass, hydro, poultry waste, swine waste and solar RECS and entered into long-term poultry waste, swine waste and solar REC to comply with N.C.G.S. § 62-133.8(b), (d), (e), and (f). Figures 1.3.1 through 1.3.4 provide summaries of the key terms (volume, term and price) of the Company's currently-executed REC purchase contracts.

⁵ On April 10, 2014, the Commission accepted the Company's Rule R8-66 REPS Facility Registration Statement for VCHEC in Docket No. E-22, Sub 489. The Company will file Rule R8-66 REPS Facility Registration Statements for Altavista, Hopewell and Southampton power stations and for Company-owned solar facilities prior to relying on these facilities for REPS compliance.

Figure 1.3.1 Solar REC Purchase Contract Summary¹

	Total Volume	Term	Price / REC	Total Expense
Solar Star California	15,000	6	\$9.60	\$144,000
Tioga Solar	729	1	\$8.00	\$5,832
Tioga Solar	392	1	\$5.00	\$1,960
ST Silver Bluff ²	4	1	\$85.00	\$340
NCMPA I ²	4	1	\$130.00	\$520
GE Aviation ²	50	1	\$85.00	\$4,250
Constellation Energy	2,000	2	\$11.00	\$22,000
DDM Mortgage ²	40	1	\$50.00	\$2,000
Carolina Solar Energy ²	24	1	\$40.00	\$960
Shoe Show ³	2,000	1	\$4.00	\$8,000
Aspre Energy	2,000	1	\$5.00	\$10,000
Ecos Energy	1,544	1	\$3.25	\$5,018
Solar Star California	664	2	\$2.50	\$1,660
Solar Star California ²	331	1	\$3.00	\$993
Duke Energy Renewable Services	2,000	1	\$2.75	\$5,500
Duke Energy Renewable Services	2,000	1	\$2.75	\$5,500
3Degrees Group, Inc.	5,000	1	\$2.50	\$12,500
STX Services, B.V.	2,932	2	\$2.50	\$7,330
3Degrees Group, Inc.	9,500	1	\$2.25	\$21,375
Total Volume	46,214		Total Expense	\$259,738

Notes: Contract counterparties and prices are confidential. (1) The Company plans to bank any surplus RECs from 2010-2017 for future compliance purposes. (2) Contracts for Town of Windsor compliance. (3) Contracts for Town of Windsor solar or general REPS compliance.

CONFIDENTIAL INFORMATION REDACTED

Figure 1.3.2 Poultry Waste REC Purchase Contract Summary¹

	Total Volume	Term	Price / REC	Total Expense
Sterling Planet ²	30,000	2	\$19.00	\$0
Northern States Power	25,000	2	\$23.25	\$581,250
██████████	████	█	████	████
Northern States Power	15,000	1	\$23.25	\$348,750
Duke Energy Carolinas ³	55	1	\$41.00	\$2,255
Northern States Power ³	699	1	\$23.00	\$16,077
Northern States Power	20,000	1	\$25.00	\$500,000
██████████	████	█	████	████
████████████████████	████	█	████	████
Northern States Power	59,400	1	\$24.00	\$1,425,600
Gettysburg Energy	1,576	3	\$30.00	\$47,280
██████████	████	█	████	████
Duke Energy Carolinas ³	50	1	\$46.00	\$2,300
Northern States Power	10,000	1	\$24.00	\$240,000
Duke Energy Carolinas ³	40	1	\$56.05	\$2,242
Northern States Power	12,000	1	\$28.00	\$336,000
Total Volume	324,260		Total Expense	\$8,673,947

Notes: Contract counterparties and prices are confidential. (1) The Company plans to bank any surplus RECs from 2010-2017 for future compliance purposes. (2) Seller defaulted on contract 2/16/15. (3) Contract for Town of Windsor compliance.

Figure 1.3.3 General REC Purchase Contract Summary¹

	Total Volume	Term	Price / REC	Total Expense
3Degrees Group	30,000	1	\$1.00	\$30,000
Renewable Choice Energy	20,000	1	\$1.00	\$20,000
Renewable Choice Energy	20,000	1	\$0.93	\$18,600
Capital Power ²	1,000	1	\$5.00	\$5,000
Aspre Energy	42,400	1	\$0.90	\$38,160
Aspre Energy	25,600	1	\$0.97	\$24,832
Aspre Energy	35,000	1	\$1.35	\$47,250
Aspre Energy	25,000	1	\$0.95	\$23,750
Aspre Energy	15,000	1	\$1.25	\$18,750
Northern States Power	64,746	1	\$1.25	\$80,933
Scenic View Dairy ²	10,943	5	\$1.70	\$18,583
Pattern Gulf Wind	25,000	1	\$1.15	\$28,750
EC&R Energy Marketing	25,000	1	\$1.10	\$27,500
Invenergy Renewables	25,000	1	\$1.05	\$26,250
Wyeth Holdings ²	27,587	3	\$0.75	\$20,690
Aspre Energy	50,000	1	\$0.95	\$47,500
EC&R Energy Marketing	50,000	1	\$0.90	\$45,000
Midway Power	12,265	2	\$0.70	\$8,586
EC&R Energy Marketing	50,000	1	\$0.83	\$41,500
Panhandle Wind	30,000	1	\$0.77	\$23,100
EC&R Energy Marketing	54,459	1	\$0.70	\$38,121
Invenergy Renewables	50,000	1	\$0.60	\$30,000
3Degrees Group	50,000	1	\$0.50	\$25,000
NCRP - Lumberton, LLC ²	11,000	20	\$18.43	\$202,730
NIPSCO	50,000	1	\$0.43	\$21,500
EC&R Energy Marketing	25,000	1	\$0.40	\$10,000
3Degrees Group	100,000	1	\$0.38	\$37,500
Blue Delta Energy	350,000	2	\$0.30	\$105,000
STX Services, B.V.	325,000	1	\$0.30	\$97,500
Total Volume	1,600,000		Total Expense	\$1,162,085

Notes: Contract counterparties and prices are confidential. (1) The Company plans to bank any surplus RECs from 2010-2017 for future compliance purposes. (2) Contract for Town of Windsor compliance.

CONFIDENTIAL INFORMATION REDACTED

Figure 1.3.4 Swine Waste REC Purchase Contract Summary¹

	Total Volume	Term	Price / REC ²	Total Expense
RES Agriculture NC 1 ³	6,480	20	\$55.00	\$493,063
RES Agriculture NC 2 ^{2,3}	16,200	20	\$48.50	\$1,043,900
RES Agriculture NC 3 ^{3,4}	0	20	\$50.57	\$0
Scenic View Dairy ^{3,5}	2,315	5	\$13.00	\$30,095
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total Volume	222,408		Total Expense	\$19,581,503

Notes: Contract counterparties and prices are confidential. (1) The Company plans to bank any surplus RECs from 2010-2017 for future compliance. (2) Reduced volumes in first year of contract. (3) Price escalates annually. Prices given are for initial year. (4) Contract terminated October 30, 2015. (5) Contract for Town of Windsor compliance.

1.4 ENERGY EFFICIENCY PROGRAMS

In accordance with Rule R8-67(b)(iii), the Company provides a list of planned or implemented energy efficiency measures, including a brief description of the measure and projected impacts.

The Company intends to apply North Carolina EE savings to meet the REPS requirements as permitted by law. Figure 1.4.1 lists energy efficiency programs and resulting potential savings projected to be achieved by North Carolina customers. A brief description of these EE programs can be found in Section 3.2 of the 2017 IRP.

Figure 1.4.1 FORECAST SAVINGS (MWh) NORTH CAROLINA ENERGY EFFICIENCY PROGRAMS

	2017	2018	2019
Air Conditioner Cycling Program ¹	0	0	0
Commercial HVAC Upgrade Program ¹	110	110	110
Commercial Lighting Program ¹	2,743	2,743	2,743
Residential Low Income Program ¹	615	615	615
Residential Lighting Program ¹	1,028	1,028	1,028
Non-residential Energy Audit Program ²	2,025	2,025	2,025
Non-residential Duct Testing and Sealing Program ²	3,069	3,069	3,069
Residential Home Energy Check-Up Program ²	747	747	747
Residential Duct Sealing Program ²	130	130	130
Residential Heat Pump Tune-Up Program ²	1,179	1,179	1,179
Residential Heat Pump Upgrade Program ²	275	275	275
Non-residential Heating and Cooling Efficiency Program ³	281	281	281
Non-residential Lighting Systems and Controls Program ³	3,065	3,065	3,065
Non-residential Window Film Program ³	0	0	0
Residential Income and Age Qualifying Home Improvement Program ⁴	85	85	85
Small Business Improvement Program ⁵	944	1,746	2,714
Residential Retail LED Lighting Program (NC Only) ⁵	2,256	7,132	9,621
Energy Efficiency Total⁶	18,552	24,230	27,687

Notes: (1) DSM I programs. (2) DSM II programs. (3) DSM III programs. (4) DSM IV programs. (5) DSM IV programs. (6) Forecast based on actual 2016 EM&V data, except for the Small Business Improvement Program (E-22, Sub 538) and the Residential Retail LED Lighting Program (E-22, Sub 539). The Company is using estimates for the first year of these programs, and will use actual savings in subsequent years. For REPS reporting and compliance purpose, DNCP will rely upon actual EE savings achieved by North Carolina customers.

1.5 RETAIL SALES & CUSTOMER ACCOUNTS

In accordance with Rule R8-67(b)(iv), the Company states the projected Company’s North Carolina retail sales and year-end number of customer accounts by customer class for each year.

The Company

Figure 1.5.1 summarizes the Company’s North Carolina retail sales and Figure 1.5.2 summarizes the year-end number of customer accounts by customer class for each year of the Planning Period.

Figure 1.5.1 COMPANY'S NORTH CAROLINA RETAIL SALES¹

Year	Residential Sales (MWh)	Commercial Sales (MWh)	Industrial Sales (MWh)	Total Sales (MWh)
2017 (projected)	1,581,743	833,702	1,732,240	4,147,685
2018 (projected)	1,588,939	837,495	1,740,121	4,166,555
2019 (projected)	1,596,169	841,306	1,748,038	4,185,513

Notes: (1) Excludes the Town of Windsor's wholesale customer load.

Figure 1.5.2 COMPANY'S NORTH CAROLINA CUSTOMER ACCOUNTS¹

Year	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
2017 (projected)	102,478	17,514	61	120,053
2018 (projected)	102,840	17,548	61	120,449
2019 (projected)	103,189	17,582	61	120,832

Notes: (1) Customer account totals are year-end forecasts. These differ slightly from Appendix 2F in the 2017 IRP which are average yearly amounts.

Town of Windsor

Figure 1.5.3 summarizes the Town of Windsor's retail sales and Figure 1.5.4 summarizes the year-end number of customer accounts by customer class for each year of the Planning Period.

Figure 1.5.3 TOWN OF WINDSOR'S RETAIL SALES¹

Year	Residential Sales (MWh)	Commercial Sales (MWh)	Industrial Sales (MWh)	Total Sales (MWh)
2017 (projected)	19,000	21,000	10,000	50,000
2018 (projected)	19,250	21,500	10,250	51,000
2019 (projected)	19,500	22,100	10,400	52,000

Note: (1) Sales are year-end forecasts reported by the Town of Windsor to the Company.

Figure 1.5.4 TOWN OF WINDSOR’S CUSTOMER ACCOUNTS¹

Year	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
2017 (projected)	1,390	409	1	1,800
2018 (projected)	1,395	414	1	1,810
2019 (projected)	1,400	419	1	1,820

Notes: (1) Customer account totals are year-end forecasts reported by the Town of Windsor to the Company.

1.6 AVOIDED COST RATES

In accordance with Rule R8-67(b)(v), the Company provides the following statement regarding the current and projected avoided cost rates for each year.

For facilities eligible for the Company’s avoided cost standard offer contract, see Dominion North Carolina Power Schedule 19 for currently available energy and capacity rates. Figure 1.6.1 shows the Company’s projected avoided energy and capacity rates.

Figure 1.6.1 PROJECTED AVOIDED ENERGY AND CAPACITY COST (from E-100 Sub 148)

	On-Peak (\$/MWh)	Off-Peak (\$/MWh)	Capacity Price (\$/kW-Year)
2017	31.80	24.96	0.00
2018	33.13	25.91	0.00
2019	29.15	24.80	0.00

Notes: (1) These rates were filed on November 15, 2016, and are currently pending Commission approval. Option A hours definition. No avoided capacity value was proposed as part of the Schedule 19 rate design.

1.7 TOTAL & PROJECTED COSTS

In accordance with Rule R8-67(b)(vi), the Company provides the projected total and incremental costs anticipated to implement REPS Compliance plan for each year of the Planning Period

The Company

The Company’s Planning Period incremental costs to comply with the Solar Set-Aside, Swine Set-Aside, Poultry Set-Aside and General Requirements are presented in Figure 1.7.1 below.

Figure 1.7.1 COMPANY’S REPS COMPLIANCE COST

SUMMARY

Type of REC	2017	2018	2019
Solar			
Target (MWh)	6,012	8,296	8,334
REC Cost (\$/MWh) ¹	\$5.50	\$5.25	\$3.50
Projected Cost	\$33,066	\$43,554	\$29,169
Swine			
Target (MWh)	3,006	2,904	5,834
REC Cost (\$/MWh) ¹	\$80.00	\$81.20	\$82.42
Projected Cost	\$240,480	\$235,805	\$480,838
Poultry			
Target (MWh)	23,174	29,796	29,796
REC Cost (\$/MWh) ¹	\$24.00	\$24.00	\$27.00
Projected Cost	\$556,176	\$715,104	\$804,492
General RECs			
Target (MWh)	225,452	373,773	372,692
Less Energy Efficiency ²	15,352	15,352	15,352
Net Target	210,100	358,421	357,340
REC Cost (\$/MWh) ¹	\$1	\$1	\$1
Projected Cost	\$210,100	\$268,816	\$214,404
Administrative Costs³	\$20,000	\$20,000	\$20,000
Microgrid Research Project Cost⁴	\$58,757	\$70,212	\$70,212
TOTAL PROJECTED COMPLIANCE COST	\$1,118,579	\$1,353,491	\$1,619,115

Notes: (1) 2017-2019 projected REC costs are based on market estimates, signed contracts and/or ongoing negotiations. (2) Projected EE savings represents a projected system allocation. (3) Administrative costs include, but are not limited to: NC-RETs fees, broker fees and miscellaneous expenses. (4) As permitted by NCGS § 62-133.8 (h)(1) and (4), the Company has developed a North Carolina Microgrid research and development (R&D) project. This figure represents research project costs prior to receiving any offsetting tax credits.

The Town of Windsor’s projected Planning Period REPS costs are expected to consist of the sum of the costs required to comply with the Solar Set-Aside, Swine Set-Aside, Poultry Set-Aside and other General Requirements Figure 1.7.2 outlines the Town of Windsor’s Compliance Cost Summary from 2017 to 2019.

Figure 1.7.2 TOWN OF WINDSOR’S COMPLIANCE COST SUMMARY

Type of REC	2017	2018	2019
Solar			
Target (MWh)	69	100	102
REC Cost (\$/MWh) ¹	\$3.75	\$3.75	\$3.75
Projected Cost	\$259	\$375	\$383
Swine			
Target (MWh)	35	35	72
REC Cost (\$/MWh) ¹	\$80.00	\$81.20	\$82.42
Projected Cost	\$2,800	\$2,842	\$5,934
Poultry			
Target (MWh)	265	340	340
REC Cost (\$/MWh) ¹	\$70.00	\$75.00	\$80.00
Projected Cost	\$18,550	\$25,500	\$27,200
General REPs			
Target (MWh)	2,570	4,525	4,586
REC Cost (\$/MWh) ¹	\$2.00	\$1.50	\$1.25
Projected Cost	\$5,140	\$6,788	\$5,733
TOTAL PROJECTED COMPLIANCE COST	\$26,749	\$35,505	\$39,249

Notes: (1) 2017-2019 projected REC costs are based on market estimates, signed contracts and/or ongoing negotiations.

1.8 ANNUAL COST CAPS

In accordance with Rule R8-67(b)(vii), the Company provides the following comparison of projected costs to the annual cost caps contained in N.C.G.S. § 62-133.8(h)(4).

Figure 1.8.1 provides a comparison of the Company's projected costs to the annual cost caps for each year of the Planning Period. Compliance costs are allocated to the Customer Classes based on the percentage of each of the Customer Class Cost Caps to the Total Cost Cap.

Figure 1.8.1 COMPANY'S COMPARISON TO ANNUAL CAPS

Compliance Year 2017	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Actual Year-End Annual Customers (2016)	102,258	17,620	52	119,930
Annual Cost Cap per Customer	\$34	\$150	\$1,000	-
Annual Cost Cap, Total	\$3,476,772	\$2,643,000	\$52,000	\$6,171,772
Projected Cost of Compliance¹	\$630,134	\$479,020	\$9,425	\$1,118,579

Compliance Year 2018	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Projected Year-End Annual Customers (2017)	102,478	17,514	61	120,053
Annual Cost Cap per Customer	\$34	\$150	\$1,000	-
Annual Cost Cap, Total	\$3,484,252	\$2,627,100	\$61,000	\$6,172,352
Projected Cost of Compliance¹	\$764,036	\$576,078	\$13,376	\$1,353,491

Compliance Year 2019	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Projected Year-End Annual Customers (2018)	102,840	17,548	61	120,449
Annual Cost Cap per Customer	\$34	\$150	\$1,000	-
Annual Cost Cap, Total	\$3,496,560	\$2,632,200	\$61,000	\$6,189,760
Projected Cost of Compliance¹	\$914,629	\$688,530	\$15,956	\$1,619,115

Notes: (1) Projected costs were allocated to the customer classes based on customer percentage of total cost cap.

Figure 1.8.2 provides a comparison of the Town of Windsor's projected costs to the annual cost

caps for each year of the Planning Period. Compliance costs are allocated to the Customer Classes based on the percentage of each of the Customer Class Cost Caps to the Total Cost Cap.

Figure 1.8.2 TOWN OF WINDSOR'S COMPARISON TO ANNUAL CAPS

Compliance Year 2017	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Actual Year-End Annual Customers (2016)	1,385	405	1	1,791
Annual Cost Cap per Customer	\$34	\$150	\$1,000	-
Annual Cost Cap, Total	\$47,090	\$60,750	\$1,000	\$108,840
Projected Cost of Compliance¹	\$11,573	\$14,930	\$246	\$26,749

Compliance Year 2018	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Projected Year-End Annual Customers (2017)	1,390	409	1	1,800
Annual Cost Cap per Customer	\$34	\$150	\$1,000	-
Annual Cost Cap, Total	\$47,260	\$61,350	\$1,000	\$109,610
Projected Cost of Compliance¹	\$15,308	\$19,872	\$324	\$35,505

Compliance Year 2019	Residential Customers ²	Commercial Customers	Industrial Customers	Total Customers
Projected Year-End Annual Customers (2018)	1,395	414	1	1,810
Annual Cost Cap per Customer	\$34	\$150	\$1,000	-
Annual Cost Cap, Total	\$47,430	\$62,100	\$1,000	\$110,530
Projected Cost of Compliance¹	\$16,842	\$22,052	\$355	\$39,249

Notes: (1) The Town of Windsor is to determine the allocation among the different customer classes.

1.9 REPS RIDER

In accordance with Rule R8-67(b)(viii), the Company provides an estimate of the amount of the

REPS rider and the impact on the cost of fuel and fuel-related costs rider necessary to fully recover the projected costs.

Figure 1.9.1 REPS Rider Costs

	2017	2018	2019
Total Projected REPS Compliance Costs	\$1,118,579	\$1,353,491	\$1,619,115
Costs recovered through the Fuel Rider	\$0	\$0	\$0
Total Incremental Cost	\$1,118,579	\$1,353,491	\$1,619,115
Annual REPS Rider - Residential	\$954,826	\$1,155,617	\$1,382,704
Annual REPS Rider - Commercial	\$163,185	\$197,188	\$235,594
Annual REPS Rider - Industrial	\$568	\$685	\$817
Projected Annual Cost Caps (REPS Rider)	\$6,171,772	\$6,172,352	\$6,189,760

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Historical Review of 2017 REPS Plan* filed in Docket No. E-100, Sub 147 and E-100, Sub 165 was served electronically or via U.S. mail, first class postage prepaid, upon all parties of record.

This 1st day of September, 2021.

/s/Andrea R. Kells

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