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Andrea R. Kells



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September 1, 2022

VIA ELECTRONIC DELIVERY

Ms. A. Shonta Dunston, Chief Clerk North Carolina Utilities Commission **Dobbs Building** 430 North Salisbury Street Raleigh, North Carolina 27603-5918

> Historical Review of 2018 REPS Plan Re:

> > Docket Nos. E-100, Sub 157 & E-100, Sub 182

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 2018 North Carolina Renewable Energy and Energy Efficiency Portfolio Standard Compliance Plan ("2018 REPS Plan"), as originally filed on September 1, 2018, in Docket No. E-100, Sub 157. The Company has reviewed its 2018 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 2018 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 2018 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 Compliance Plan confidentiality reviews. See 2013 Disclosure Order at 10 (holding

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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 Robert Josey, Public Staff-North Carolina Utilities Commission Nadia Luhr, Public Staff-North Carolina Utilities Commission

VIRGINIA ELECTRIC AND POWER COMPANY 2018 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 d/b/a Dominion Energy North Carolina ("DENC" 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 (2018) and immediately subsequent two calendar years (2019-2020) (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 2018 Integrated Resource Plan ("2018 Plan").

The Company's 2018 REPS Compliance Report, to be filed in August 2018, will indicate that the Company and Town of Windsor have satisfied all 2017 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 2018 Plan, respectively.

1.2 COMPLIANCE PLAN

In accordance with Rule R8-67(b)(1)(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.

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

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

² On October 16, 2017, the Commission issued an Order delaying the initial swine waste set-aside requirement until 2018 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 16, 2017) ("2017 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 2018-2020 COMPANY'S REPS COMPLIANCE PLAN SUMMARY

	2018	2019	2020
Baseline Sales Forecast (MWh)	4,156,308	4,169,808	4,190,131
NC Total REPs Obligation %	10%	10%	10%
Total REPS Obligation (MWh)¹	416,745	415,631	416,981
NC Solar Set-Aside Target %	0.20%	0.20%	0.20%
Total Solar Set-Aside (MWh) ¹	8,335	8,313	8,340
NC Total Swine Set-Aside %	0.07%	0.07%	0.14%
Total Swine Set-Aside (MWh) ¹	2,918	2,910	5,838
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)	382,318	374,612	373,007
Projected Energy Efficiency (MWh) ³	18,432	18,432	18,432
Projected Company Generated Renewables (MWh) ⁴	76,265	61,354	58,786

Notes: (1) 2018 targets are based on actual 2017 retail sales of 4,167,444 MWh. 2019-2020 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) 2018 target is based on the average of 2013-2015 retail sales. (3) For REPS reporting and compliance purpose, DENC 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 ten percent (10%) of its prior year retail sales in compliance years 2018, 2019 and 2020 ("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 2018-2020 TOWN OF WINDSOR REPS COMPLIANCE PLAN SUMMARY

	2018	2019	2020
Baseline Sales Forecast (MWh)	47,400	48,150	49,000
NC Total REPs Obligation %	10%	10%	10%
Total REPS Obligation (MWh) ¹	4,693	4,740	4,815
NC Solar Set-Aside Target %	0.20%	0.20%	0.20%
Total Solar Set-Aside (MWh) ¹	94	95	97
NC Total Swine Set-Aside %	0.07%	0.07%	0.14%
Total Swine Set-Aside (MWh)	33	34	68
Projected Poultry Set-Aside %	0.04%	0.04%	0.04%
Total Poultry Set-Aside (MWh) ²	265	340	340
General REPS Requirement (net of Solar, Swine and Poultry) (MWh)	4,301	4,271	4,310

Notes: (1) 2018 targets are based on actual 2017 retail sales of 46,928 MWh reported by the Town of Windsor to DNCP. 2019-2020 targets are based on forecasts reported by the Town of Windsor to DNCP. The total target is a product of the previous year's baseline retail sales and the current year target percentage. (2) 2018 target is based on the average of 2013-2015 retail sales reported by the Town of Windsor to DNCP.

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 twenty hundredths of one percent (0.20%) of the prior year's total electric power in megawatt-hours ("MWh") sold to retail customers in North Carolina in 2018, 2019 and 2020.

Based on the Company's actual retail sales in 2017, the Solar Set-Aside is approximately 8,335 RECs in 2018. Based on forecasted retail sales, the Solar Set-Aside is projected to be approximately 8,313 RECs and 8,340 RECs in 2019 and 2020, respectively.

The Company's Solar Set-Aside compliance strategy is consistent with DENC'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 DENC'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 2020. 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 2018 through 2020. 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 DENC'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 2017 Delay Order, for calendar years 2018 and 2019, at least seven hundredths of one percent (0.07%) and for calendar year 2020, 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 2,918 RECs in 2018, 2,910 RECs in 2019 and 5,838 RECs in 2020.

Independently of the Swine Waste REC Buyers Group, the Company has executed swine waste to energy contracts with two suppliers. As a result of these efforts, both DENC and the Town of Windsor have sufficient RECs in NC-RETs to meet the 2018-2020 requirements.

The Company continues to evaluate all potential opportunities to purchase both in-state and outof-state swine RECs, and will continue to make all reasonable efforts to satisfy DENC'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 and maintaining 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 2017 Delay Order, for calendar year 2018, at least 700,000 MWhs, and for 2019 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 2018 and 29,796 RECs in 2019 and 2020.

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. Based on the execution of 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 2018. At this time, the Company is

reasonably confident that Town of Windsor will be in compliance with the Poultry Set-Aside in 2019 and 2020.

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 2018, 2019 and 2020.

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 ten percent (10%) in 2018, 2019 and 2020. This equates to approximately 416,000 RECs in 2018 through 2020. This General Requirement, net of the Solar, Swine, and Poultry Set-Aside requirements, is estimated to be approximately 380,000 RECs in 2018 through 2020. 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 instate and 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

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⁵ On April 10, 2014, the Commission approved 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.

1.3 REC CONTRACTS

In accordance with Rule R8-67(b)(1)(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 contracts 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.

Figure 1.3.1 Solar REC Purchase Contract Summary¹

Figure 1.3.1 Solar	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
Sun Energy 1	1,057	1	\$2.25	\$2,378
STX Services, B.V.	15,000	3	\$0.90	\$13,500
Total Volume	62,271		Total Expense	\$275,616

Notes: Contract counterparties and prices are confidential. (1) The Company plans to bank any surplus RECs from 2010-2018 for future compliance purposes. (2) Contracts for Town of Windsor compliance. (3) Contracts for Town of Windsor solar or general REPS compliance.

Figure 1.3.2 Poultry Waste REC Purchase Contract Summary1

	Total Volume	Term	Price / REC	Total Expense
Sterling Planet ²	0	2	\$19.00	\$0
Northern States Power	25,000	2	\$23.25	\$581,250
NCRP-Lumberton ^{2,3}	0	20	\$48.43	\$0
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
	4,860	15		
	6,480	15		
Northern States Power	59,400	1	\$24.00	\$1,425,600
Gettysburg Energy	1,576	3	\$30 00	\$47 280
	136,000	10		
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	291,160		Total Expense	\$8,523,814

Notes: Contract counterparties and prices are confidential. (1) The Company plans to bank any surplus RECs from 2010-2018 for future compliance purposes. (2) Contract terminated. (3) Contract for Town of Windsor compliance.

CONFIDENTIAL INFORMATION REDACTED

Figure 1.3.3 General REC Purchase Contract Summary¹

1 igure 1.3.3 dei	Total		ntract Summary	Total
	Volume	Term	Price / REC	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 ^{2,3}	0	20	\$18.43	\$0
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
International Paper	75,978	2	\$0.32	\$24,313
STX Services, B.V.	300,000	1	\$0.41	\$123,000
STX Services, B.V.	300,000	1	\$0.32	\$96,000
EC&R Energy Marketing	300,000	1	\$0.40	\$120,000
EC&R Energy Marketing	400,000	1	\$0.43	\$172,000
Total Volume	2,964,978		Total Expense	\$1,494,668

Notes: Contract counterparties and prices are confidential. (1) The Company plans to bank any surplus RECs from 2010-2018 for future compliance purposes. (2) Contract for Town of Windsor compliance. (3) Contract terminated.

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 ^{3,4}	0	20	\$48.50	\$0
RES Agriculture NC 3 ^{3,4}	0	20	\$50.57	\$0
Scenic View Dairy ^{3,5}	2,315	5	\$13.00	\$30,095
	108,500	15		
Greensboro Ecosystems, LLC ^{2,3,4,5}	0	20	\$115.00	\$0
RES Tar Heel, LLC ^{2,3,4}	0	20	\$97.25	\$0
NCRP - Lumberton, LLC ⁴	0	20	\$105.00	\$0
Orion Energy Marketing	1,000	1	\$100.00	\$100,000
Blue Mountain Biogas	1,672	1	\$50.00	\$83,600
Blue Mountain Biogas ⁴	0	10	\$63.00	\$2,268,000
Total Volume	155,967		Total Expense	\$11,654,758

Notes: Contract counterparties and prices are confidential. (1) The Company plans to bank any surplus RECs from 2010-2018 for future compliance. (2) Reduced volumes in first year of contract. (3) Price escalates annually. Prices given are for initial year. (4) Contract terminated. (5) Contract for Town of Windsor compliance.

CONFIDENTIAL INFORMATION REDACTED

1.4 ENERGY EFFICIENCY PROGRAMS

In accordance with Rule R8-67(b)(1)(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 2018 IRP.

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

	2018	2019	2020
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	1,386	1,386	1,386
Non-residential Duct Testing and Sealing Program ²	3,155	3,155	3,155
Residential Home Energy Check-Up Program ²	791	791	791
Residential Duct Sealing Program ²	133	133	133
Residential Heat Pump Tune-Up Program ²	1,208	1,208	1,208
Residential Heat Pump Upgrade Program ²	297	297	297
Non-residential Heating and Cooling Efficiency Program ³	324	324	324
Non-residential Lighting Systems and Controls Program ³	3,945	3,945	3,945
Non-residential Window Film Program ³	0	0	0
Residential Income and Age Qualifying Home Improvement Program ⁴	172	172	172
Small Business Improvement Program ⁵	154	154	154
Residential Retail LED Lighting Program (NC Only) ⁵	2,371	2,371	2,371
Energy Efficiency Total ⁶	18,432	18,432	18,432

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 2017 EM&V data. 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, DENC will rely upon actual EE savings achieved by North Carolina customers.

1.5 RETAIL SALES & CUSTOMER ACCOUNTS

In accordance with Rule R8-67(b)(1)(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

Voor	Residential	Commercial	Industrial	Total Sales
Year	Sales (MWh)	Sales (MWh)	Sales (MWh)	(MWh)
2018 (projected)	1,628,491	765,294	1,762,523	4,156,308
2019 (projected)	1,638,232	769,505	1,762,071	4,169,808
2020 (projected)	1,647,858	780,654	1,761,619	4,190,131

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

Figure 1.5.2 COMPANY'S NORTH CAROLINA CUSTOMER ACCOUNTS¹

Year	Residential	Commercial	Industrial	Total
rear	Customers	Customers	Customers	Customers
2018 (projected)	102,881	15,685	60	118,626
2019 (projected)	103,231	15,720	60	119,011
2020 (projected)	103,548	15,754	60	119,362

Note: (1) Customer account totals are year-end forecasts. These differ slightly from Appendix 2F in the 2018 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

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Year	Residential	Commercial	Industrial	Total Sales		
rear	Sales (MWh)	Sales (MWh)	Sales (MWh)	(MWh)		
2018 (projected)	18,000	20,300	9,100	47,400		
2019 (projected)	18,500	20,500	9,150	48,150		
2020 (projected)	19,000	20,800	9,200	49,000		

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

Figure 1.5.4 TOWN OF WINDSOR'S CUSTOMER ACCOUNTS1

Year	Residential	Commercial	Industrial	Total
Tear	Customers	Customers	Customers	Customers
2018 (projected)	1,380	400	1	1,781
2019 (projected)	1,390	405	1	1,796
2020 (projected)	1,400	410	1	1,811

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

1.6 AVOIDED COST RATES

In accordance with Rule R8-67(b)(1)(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 Energy North Carolina 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)1

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	On-Peak (\$/MWh)	Off-Peak (\$/MWh)	Capacity Price (\$/kW-Year)		
2018	33.13	25.91	0.00		
2019	29.15	24.80	0.00		
2020	31.04	26.72	0.00		

Note: (1) These rates were filed on 11/13/2017. Option A hours definition.

1.7 TOTAL & PROJECTED COSTS

In accordance with Rule R8-67(b)(1)(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

Figure 1.7.1 COMPANY'S REPS COMPLIANCE COST SUMMARY						
Type of REC	2018	2019	2020			
Solar						
Target (MWh)	8,335	8,313	8,340			
REC Cost (\$/MWh) ¹	\$2.50	\$2.25	\$2.25			
Projected Cost	\$20,838	\$18,704	\$18,765			
Swine						
Target (MWh)	2,918	2,910	5,838			
REC Cost (\$/MWh) ¹	\$73.00	\$73.00	\$73.00			
Projected Cost	\$213,014	\$212,430	\$426,174			
Poultry						
Target (MWh)	23,174	29,796	29,796			
REC Cost (\$/MWh) ¹	\$23.25	\$25.00	\$25.00			
Projected Cost	\$538,796	\$744,900	\$744,900			
General RECs						
Target (MWh)	382,318	374,612	373,007			
Less Energy Efficiency ²	18,432	18,432	18,432			
Net Target	363,886	356,180	354,575			
REC Cost (\$/MWh) ¹	\$0.50	\$0.40	\$0.35			
Projected Cost	\$181,943	\$142,472	\$124,101			
Administrative Costs ³	\$22,000	\$22,000	\$22,000			
Microgrid Research Project Cost⁴	\$50,000	\$50,000	\$50,000			
TOTAL PROJECTED COMPLIANCE COST	\$1,026,590	\$1,190,506	\$1,385,940			

Notes: (1) 2018-2020 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), DENC has developed a North Carolina Microgrid research and development (R&D) project. This figure represents research project projected costs prior to receiving any offsetting tax credits.

The Town of Windsor

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 2018 to 2020.

Figure 1.7.2 TOWN OF WINDSOR'S COMPLIANCE COST SUMMARY

Type of REC	2018	2019	2020
Solar			
Target (MWh)	94	95	97
REC Cost (\$/MWh) ¹	\$3.75	\$3.75	\$3.75
Projected Cost	\$353	\$356	\$364
Swine			
Target (MWh)	33	34	68
REC Cost (\$/MWh) ¹	\$48.00	\$50.00	\$53.00
Projected Cost	\$1,584	\$1,700	\$3,604
Poultry			
Target (MWh)	265	340	340
REC Cost (\$/MWh) ¹	\$68.00	\$73.00	\$77.00
Projected Cost	\$18,020	\$24,820	\$26,180
General REPs			
Target (MWh)	4,301	4,271	4,310
REC Cost (\$/MWh) ¹	\$1.50	\$1.75	\$0.75
Projected Cost	\$6,452	\$7,474	\$3,233
TOTAL PROJECTED COMPLIANCE COST	\$26,408	\$34,351	\$33,380

Notes: (1) 2018-2020 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)(1)(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	Residential	Commercial	Industrial	Total
2018	Customers	Customers	Customers	Customers
Actual Year-End Annual Customers (2017)	102,620	18,088	51	120,759
Annual Cost Cap per Customer	\$27	\$150	\$1,000	-
Annual Cost Cap, Total	\$2,770,740	\$2,713,200	\$51,000	\$5,534,940
Projected Cost of Compliance ¹	\$513,902	\$503,229	\$9,459	\$1,026,590

Compliance Year	Residential	Commercial	Industrial	Total
2019	Customers	Customers	Customers	Customers
Projected Year-End Annual Customers (2018)	102,881	15,685	60	118,626
Annual Cost Cap per Customer	\$27	\$150	\$1,000	-
Annual Cost Cap, Total	\$2,777,787	\$2,352,750	\$60,000	\$5,190,537
Projected Cost of Compliance ¹	\$637,116	\$539,629	\$13,762	\$1,190,506

Compliance Year 2020	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Projected Year-End Annual Customers (2019)	103,231	15,720	60	119,011
Annual Cost Cap per Customer	\$27	\$150	\$1,000	-
Annual Cost Cap, Total	\$2,787,237	\$2,358,000	\$60,000	\$5,205,237
Projected Cost of Compliance ¹	\$742,126	\$627,838	\$15,976	\$1,385,940

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	Residential	Commercial	Industrial	Total
2018	Customers	Customers	Customers	Customers
Actual Year-End Annual Customers (2017)	1,373	395	1	1,769
Annual Cost Cap per Customer	\$27	\$150	\$1,000	1
Annual Cost Cap, Total	\$37,071	\$59,250	\$1,000	\$97,321
Projected Cost of Compliance ¹	\$10,059	\$16,077	\$271	\$26,408

Compliance Year 2019	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Projected Year-End Annual Customers (2018)	1,380	400	1	1,781
Annual Cost Cap per Customer	\$27	\$150	\$1,000	-
Annual Cost Cap, Total	\$37,260	\$60,000	\$1,000	\$98,260
Projected Cost of Compliance ¹	\$13,026	\$20,975	\$350	\$34,351

Compliance Year	Residential	Commercial	Industrial	Total
2020	Customers ²	Customers	Customers	Customers
Projected Year-End Annual Customers (2019)	1,390	405	1	1,796
Annual Cost Cap per Customer	\$27	\$150	\$1,000	-
Annual Cost Cap, Total	\$37,530	\$60,750	\$1,000	\$99,280
Projected Cost of Compliance ¹	\$12,618	\$20,426	\$336	\$33,380

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)(1)(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

	2018	2019	2020
Total Projected REPS Compliance Costs	\$1,026,590	\$1,190,506	\$1,385,940
Costs recovered through the Fuel Rider	\$0	\$0	\$0
Total Incremental Cost	\$1,026,590	\$1,190,506	\$1,385,940
Annual REPS Rider - Residential	\$890,333	\$1,032,654	\$1,202,320
Annual REPS Rider - Commercial	\$135,738	\$157,252	\$182,923
Annual REPS Rider - Industrial	\$519	\$600	\$697
Projected Annual Cost Caps (REPS Rider)	\$5,534,940	\$5,190,537	\$5,205,237

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Historical Review of 2018 REPS Plan* filed in Docket Nos. E-100, Sub 157 and E-100, Sub 182 was served electronically or via U.S. mail, first class postage prepaid, upon all parties of record.

This 1st day of September, 2022.

/s/Andrea R. Kells

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