

December 9, 2022

Via Electronic Filing

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

Re: *Supplemental Reply Comments of Dominion Energy North Carolina
Docket No. E-100, Sub 161*

Dear Ms. Dunston:

Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (“DENC” or the “Company”), pursuant to the Commission’s October 7, 2022 Order Granting Motion for Extension of Time, respectfully submits its Supplemental Reply Comments.

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

Very truly yours,

/s/Nicholas A. Dantonio

NAD:sjg

Enclosures

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-100, SUB 161

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)))))	SUPPLEMENTAL REPLY COMMENTS
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NOW COMES Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (“DENC” or the “Company”), pursuant to the North Carolina Utilities Commission’s (“Commission”) April 22, 2022 *Order Requiring Filing of Supplemental Comments* issued in the above-captioned docket (“Order”), and hereby submits these Supplemental Reply Comments for the Commission’s consideration. The Company’s Supplemental Reply Comments continue to support, in principle, modifications to Commission Rule R8-51 proposed by the Public Staff as described in the Company’s Supplemental Comments.

The Company incorporates by reference its procedural history in the Company’s Supplemental Comments describing the filings in this docket related to the initial proposed revisions to Commission Rules R8-7, R8-8, and R8-51 addressing electric utility customer billing information, as well as procedures for customers to access their usage and other customer data collected by the Company in its provision of electric service.

As explained in the Company’s Supplemental Comments, the Company remained generally supportive of the Public Staff’s proposed revisions in its 2020 initial and reply

comments, filed on July 17, 2020 and February 10, 2020, respectively, with two notable exceptions that remain with Public Staff's Supplemental Comments.

First, the Public Staff's proposed revision to Commission Rule R8-51(d) would require the utility to maintain 24 months of customer data "to assist customers in understanding their energy usage."¹ Subsections (g) and (h) would also mandate an electronic consent process for customers to authorize third party access to their customer data. The Company continues to maintain that it would be inefficient and impractical for DENC to implement these requirements prior to deployment of the Company's planned Customer Information Platform ("CIP") in 2023. As noted in the Company's Supplemental Comments, the Public Staff has agreed to support a waiver of these requirements, if ultimately adopted by the Commission, until the Company can incorporate these functionalities into the CIP after the CIP has been deployed. The Company notes that while the Public Staff's proposed revisions accompanying its Supplemental Comments now propose making subsection (d), (g), and (h) of Rule R8-51 effective immediately upon adoption of the rule versus effective on January 1, 2022, the Public Staff continues to support "any waivers necessary to DENC to complete an orderly implementation of its AMI and CIP systems and incorporate the relevant functionalities into those systems."²

The second concern remains the Public Staff's proposal in Commission Rule R8-51(d) to require that customer data be maintained and made available to customers and authorized third parties "in electronic machine-readable format that conforms to the latest version of the North American Energy Standard Board's (NAESB) Req. 21, the Energy

¹ Public Staff Supplemental Comments, Appendix B at 2.

² Public Staff Supplemental Comments at 7.

Services Provides Interface (ESPI), or a Commission approved electronic machine-readable format that conforms to nationally-recognized standards and best practices.”³

The Company opposes this proposal to the extent it effectively requires the Company to offer Green Button Connect My Data functionality.⁴ The Company continues to believe that its offering of the Green Button Download My Data functionality, which has only received limited customer interest, is sufficient at this time. DENC has still not observed any demand from its customers for the Company to invest in implementation of a platform such as Green Button Connect which would come at a significant cost both monetarily and resource-wise.

The Company is also amenable to the Public Staff’s recommendation of future discussions to continue to refine Commission Rule R8-51.⁵ The Company agrees that to the extent such discussions lead to further refinements of Commission Rule R8-51, such revisions should be focused on providing a straightforward process for ensuring that the Company’s customers are able to access their data in a safe and efficient manner. The Company believes that as currently proposed, and as compared to the proposed revisions offered in the AGO’s Supplemental Comments, the Public Staff’s revisions strike an appropriate balance of providing customers access to their data while also prioritizing that data’s safety. Depending on the extent of additional proposed revisions submitted in the parties’ Supplemental Reply Comments, the Company may request an opportunity to respond to those new proposals.

³ Public Staff Supplemental Comments, Appendix B at 2.

⁴ Similarly, the Company opposes similar recommendations in the AGO’s Supplemental Comments to require Green Button Connect My Data functionality.

⁵ Public Staff Supplemental Comments at 8.

WHEREFORE, DENC respectfully requests that the Commission accept these
Supplemental Reply Comments.

Respectfully submitted, this the 9th day of December, 2022.

DOMINION ENERGY NORTH CAROLINA

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Supplemental Reply Comments, as filed in Docket No. E-100, Sub 161, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 9th day of December , 2022.

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