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Apr 14 2022

April 14, 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: Joint Letter in Lieu of Reply Comments
Docket No. M-100, Sub 164*

Dear Ms. Dunston,

Pursuant to the North Carolina Utilities Commission's ("Commission") February 1, 2022, *Order Allowing Comments Regarding Federal Funding for Utility Services in North Carolina* in Docket No. M-100, Sub 164 ("Order"), Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina ("DENC") and Public Service Company of North Carolina ("PSNC", and together, the "Companies") respectfully submit their Joint Letter in Lieu of Reply Comments in response to the Order.

Very truly yours,

/s/Mary Lynne Grigg

MLG:sbc

April 14, 2022

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

*Re: Docket No. M-100, Sub 164
Joint Letter in Lieu of Reply Comments*

Dear Ms. Dunston:

Virginia Electric and Power Company, Inc., d/b/a Dominion Energy North Carolina (“DENC”), and Public Service Company of North Carolina, Inc. (“PSNC”, and together, the “Companies”) respectfully submit this joint letter in lieu of reply comments in response to the North Carolina Utilities Commission’s (“Commission”) February 1, 2022 *Order Allowing Comments Regarding Federal Funding for Utility Service in North Carolina* (“Order”) issued in the above-captioned docket. Ordering Paragraph Four (4) of the Order directs that the parties may file reply comments in this proceeding on or before April 14, 2022. Including the Companies, eleven parties filed initial comments on March 15, 2022, responding to the five questions presented in the Order related to the recently enacted Infrastructure Investment and Jobs Act (the “Act”) and how funding opportunities under the Act can be taken advantage of to the benefit of North Carolina customers.

As noted in their initial comments, as well as the initial comments of the intervenors, the Companies agree with the Commission that it is “in the public interest for the public utilities of this State to fully and carefully consider taking advantage of these available federal grants and loans” provided for under the Act. Order at 2. The Companies also agree with the Commission and many of the intervenors’ initial comments that these opportunities under the Act should be used in order to promote adequate, reliable, and economical utility service to the citizens and residents of North Carolina. The Companies intend to implement funds received through the Act in a manner to ensure greater customer options and access while supporting the Companies’ growth to the benefit of customers.

The Companies file this joint letter in lieu of reply comments because they believe the initial comments filed in this proceeding provide the Commission with the information requested in the Order. The Companies do, however, acknowledge and agree with Duke Energy Carolinas, LLC's and Duke Energy Progress, LLC's ("Duke") and Piedmont Natural Gas Company, Inc.'s ("Piedmont") identification of additional federal programs under the Act that are available to North Carolina public utilities. Duke Initial Comments at 5-8; Piedmont Initial Comments at 5.

The Companies also specifically note CIGFUR's recommendation that utilities file a report every six months "detailing their respective efforts to obtain federal funding under the [Act] for the direct benefit of ratepayers." CIGFUR Initial Comments at 4. The Companies disagree with this recommendation and contend that such update reports could impede efforts of North Carolina utilities and agencies to obtain funding under the Act for the State given that many of the funding opportunities under the Act are competitive.

Finally, with respect to the initial comments filed by ChargePoint, Inc. ("ChargePoint") and EVgo Services, LLC ("EVgo"), the Companies note that a significant portion of these comments focus on issues such as how to spend funds obtained under the Act, establishing new rate designs, and other operational concerns that seem to be outside the scope of this proceeding. The Companies also note, however, that the National Electric Vehicle Infrastructure Formula Funding, which is part of the Act, provides funding to states to deploy electric vehicle charging infrastructure. According to the guidance released by the United States Department of Transportation on February 10, 2022, states are required to submit plans for implementing the funding by August 1, 2022. These state plans will require input from stakeholders and utilities, and the Companies are fully prepared to support the appropriate North Carolina state agencies in developing their plan and deploying the funds to expand access to electric vehicle charging and maximize the benefits of electrification for all customers. As customers and technologies evolve, the Companies will consider appropriate rates and programs, such as those referenced in EVgo's and ChargePoint's comments.

Should you have any questions, please do not hesitate to contact me. Thank you for your assistance in this matter.

Very truly yours,

/s/Mary Lynne Grigg

MLG:sbc

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing Joint Letter in Lieu of Reply Comments, filed in Docket No. M-100, Sub 164, has been served this day upon all parties of record via U.S. mail, postage paid, hand delivery, or electronically.

This, the 14th day of April, 2022.

/s/Mary Lynne Grigg

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