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VIA ELECTRONIC FILING

December 6, 2022

Antonia Dunston, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

Re: Motion for Extension of Schedule LGS – RTP
Docket No. E-22, Sub 562

Dear Ms. Dunston:

Enclosed for filing in the above-reference proceeding is Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina's *Motion for Extension of Schedule LGS – RTP*.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/ s / Lauren W. Biskie

Lauren W. Biskie
Senior Counsel

Enclosure

cc: Robert Josey, Esq.
Jack Floyd
Service List

OFFICIAL COPY

Dec 06 2022

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-22, SUB 562

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))))))	MOTION FOR EXTENSION OF SCHEDULE LGS-RTP
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Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (“DENC” or the “Company”), through counsel and pursuant to Rule R1-7 of the Rules of Practice and Procedure of the North Carolina Utilities Commission (“Commission”) hereby moves the Commission for an extension of existing Schedule LGS – RTP from December 31, 2022 through and including the earlier of March 31, 2023, or the effective date of the Company’s revised Schedule LGS – RTP. Further, because the December 31, 2022 expiration date is quickly approaching, the Company respectfully requests expedited consideration of its request. In support of this motion, DENC respectfully shows unto the Commission the following:

1. On March 29, 2019, as part of Exhibit II to its Application to revise its base rates and charges pursuant to Sections 62-133, 62-133.2, 62-134, and 62-135 of the North Carolina General Statutes (“N.C.G.S.”) and Rule R1-17 of the regulations of the Commission in the above-referenced docket, DENC filed its request to update its Schedule LGS – RTP tariff, with a proposed effective date of May 1, 2019.
2. Pursuant to the Commission’s July 28, 2020 *Order Deciding Motions for Reconsideration and Clarification, and Requiring Implementation of New Rates*

(“Reconsideration Order”) issued in this docket, the Company made a compliance filing on August 7, 2020, which included “blackline” and “clean” versions of the rate schedules reflecting non-fuel and base fuel rates effective for usage on and after November 1, 2019, including Schedule LGS – RTP.

3. Pursuant to Section XI.C of Schedule LGS – RTP, the tariff shall be withdrawn from service and shall no longer be available on the latter of: (1) December 31, 2022, (2) the conclusion of any subscriber’s initial one-year term, or (3) the end of any subscriber’s then-current one-year term. Section XI.D further provides that notwithstanding the provisions of Paragraph XI, the Tariff “maybe extended upon Company request and Commission approval.”

4. Further, as part of the Agreement and Stipulation of Settlement entered into by DENC and CIGFUR, filed on September 23, 2019 in the instant docket (“Stipulation”), DENC and CIGFUR acknowledged that there were currently no subscribers on the version of Schedule LGS – RTP that was approved the Company’s previous rate case, filed in Docket No. E-22, Sub 532, but agreed to seek Commission approval to further modify the tariff if “CIGFUR indicates that at least one of its member customers is willing to take service under such rates” (as modified) within sixty (60) days of any such agreement between CIGFUR and DENC.

5. Schedule LGS – RTP currently has no subscribers. However, the Company has been engaged in discussions with the Carolina Industrial Group for Fair Utility Rates I (“CIGFUR I”) regarding substantive revisions to the tariff that may make it more appealing to CIGFUR I customers. Once the Company and CIGFUR agree on

the terms of the revised tariff, the Company will file for approval of a revised Schedule LGS – RTP.

6. Because these discussions remain ongoing as the holiday season approaches, the Company requests, out of an abundance of caution, that the Commission grant an extension of the existing Schedule LGS – RTP from December 31, 2022, through and including the earlier of March 31, 2023, or the effective date of the Company's revised Schedule LGS – RTP.

7. DENC is authorized to state that Counsel for CIGFUR I does not object to the requested extension of time and has authorized the Company to represent that CIGFUR I approves of this request.

8. DENC submits that the extension of time requested herein is reasonable and will not cause prejudice to any party in this matter.

WHEREFORE, DENC respectfully requests that the Commission grant an extension of the existing Schedule LGS – RTP from December 31, 2022 through and including the earlier of March 31, 2023, or the effective date of the Company's revised Schedule LGS – RTP. Further, because the December 31, 2022 expiration date is quickly approaching, the Company respectfully requests expedited consideration of its request.

Respectfully submitted, this the 6th day of December, 2022.

DOMINION ENERGY NORTH CAROLINA

By: /s/ Lauren W. Biskie

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*Attorney for Virginia Electric and Power
Company, d/b/a Dominion Energy North
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Motion for Extension of Schedule LGS-RTP, as filed in Docket No. E-22, Sub 562, were served electronically or via U.S. mail, first-class, postage prepaid, upon all parties of record.

This, the 6th day of December, 2022.

/s/ Lauren W. Biskie

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