## **McGuireWoods**

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November 16, 2023

## **VIA Electronic Filing**

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

Re: Application for Approval of Demand-Side Management and Energy

Efficiency Cost Recovery Rider Docket No. E-22, Sub 676

Dear Ms. Dunston:

With this letter, Virginia Electric and Power Company d/b/a Dominion Energy North Carolina ("DENC" or the "Company") advises the North Carolina Utilities Commission ("Commission") that the Company is not filing rebuttal testimony in this proceeding.

On November 7, 2023, the Public Staff filed a Notice of Affidavit along with the affidavit of Hemanth Meda, Public Utilities Regulatory Analyst, Accounting Division and testimony of Tommy Williamson, Jr., Utilities Engineer, Energy Division. The affidavit describes the Public Staff's investigation of the Company's Demand-Side Management (DSM) and Energy Efficiency (EE) rider (DSM/EE rider or Rider C), and the DSM/EE Experience Modification Factor rider (DSM/EE EMF rider or Rider CE), as filed in this docket on August 15, 2023. Affiant Meda recommended that the Commission approve the Company's proposed Rider C and CE rates as set forth in the Company's Application, subject to any true-ups in future cost recovery proceedings. Witness Williamson testified as to the cost-effectiveness of the Company's DSM and EE programs and confirmed that the Company's DSM/EE rider calculations appropriately incorporate its evaluation, measurement, and verification (EM&V) support data. Carolina Industrial Group for Fair Utility Rates I and Carolina Utility Customers Association, Inc., whose petitions to intervene in this proceeding the Commission granted by order issued August 28, 2023, did not file any testimony with respect to the Company's filing.

In light of the Public Staff's recommendation to the Commission to approve the proposed DSM/EE Riders C and CE, the Company is filing this letter in lieu of rebuttal testimony in this proceeding.

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The Company would like to clarify the following as presented in witness Williamson's testimony. First, Table 1 on page 4 of witness Williamson's testimony inadvertently omitted the Company's Phase 7 Non-residential Lighting Systems & Controls program (Docket No. E-22, Sub 573) from the list of programs for which DENC is seeking cost recovery and utility incentives in this proceeding. Omission of this program from this table was inadvertent and did not impact the Public Staff's review of the Company's application and request. Second, the reference to the Residential Efficient Products Marketplace on page 6, line 8 of witness Williamson's testimony as a program that the Company received approval in Virginia to close and combine with similarly aligned measures in an appropriate bundle should be corrected, as the Residential Efficient Products Marketplace was filed and approved as a standalone program in Virginia and not as a bundle. Through discussions with the Public Staff, the Company determined that witness Williamson pulled this reference directly from page 15, line 4 of Company witness Michael Hubbard's direct testimony in this proceeding. To correct the record, the Company suggests that the words "or program" be added to page 15, line 1 at the end of the line following the word "program" to Company witness Hubbard's testimony, and that the words "or program" be added to witness Williamson's testimony on page 6, line 7, immediately after the word "bundle." The Company has discussed these items with the Public Staff and has been authorized by the Public Staff to represent that the Public Staff agrees with these clarifications.

If you have any questions, please do not hesitate to contact me. Thank you for your attention to this matter.

Very truly yours,

/s/Andrea R. Kells

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing <u>Letter in Lieu of Filing Rebuttal</u> <u>Testimony</u>, as filed in Docket No. E-22, Sub 676, was served electronically or via U.S. mail, first-class, postage prepaid, upon all parties of record.

This, the 16<sup>th</sup> day of November, 2023.

/s/ Andrea R. Kells
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