

McGuireWoods LLP  
501 Fayetteville Street  
Suite 500  
PO Box 27507 (27611)  
Raleigh, NC 27601  
Phone: 919-755-6600  
Fax: 919-755-6699  
www.mcguirewoods.com

Andrea R. Kells  
Direct: 919-755-6614

McGUIREWOODS

akells@mcguirewoods.com

OFFICIAL COPY

Sep 01 2021

September 1, 2021

**VIA ELECTRONIC DELIVERY**

Ms. Antonia Dunston, Interim Chief Clerk  
North Carolina Utilities Commission  
Dobbs Building  
430 North Salisbury Street  
Raleigh, North Carolina 27603-5918

**Re: *Historical Review of 2017 REPS Plan***  
**Docket Nos. E-100, Sub 147 & E-100, Sub 165**

Dear Ms. Dunston:

Enclosed for filing are Virginia Electric and Power Company d/b/a Dominion Energy North Carolina's ("DENC" or "the Company") Confidential pages of its historical review of the 2017 North Carolina Renewable Energy and Energy Efficiency Portfolio Standard Compliance Plan ("2017 REPS Plan"), as originally filed on May 1, 2017, in Docket No. E-100, Sub 147. These Confidential pages are being filed contemporaneously with the Public Redacted version of the historical review of the 2017 REPS Plan. While the Company has determined that certain information redacted from the 2017 REPS Plan and originally filed confidentially under seal should no longer be withheld from public disclosure, 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.

Ms. Antonia Dunston, Interim Chief Clerk  
September 1, 2021  
Page 2

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  
Layla Cummings, Public Staff-North Carolina Utilities Commission  
Nadia Luhr, Public Staff-North Carolina Utilities Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing Confidential Pages of the *Historical Review of 2017 REPS Plan* filed in Docket Nos. E-100, Sub 147 and E-100, Sub 165 were served electronically or via U.S. mail, first class postage prepaid, upon the following:

Lucy Edmondson  
Layla Cummings  
Nadia Luhr  
Public Staff – NC Utilities Commission  
4326 Mail Service Center  
Raleigh, North Carolina 27699-4300  
[lucy.edmondson@psncuc.nc.gov](mailto:lucy.edmondson@psncuc.nc.gov)  
[layla.cummings@psncuc.gov](mailto:layla.cummings@psncuc.gov)  
[nadia.luhr@psncuc.gov](mailto:nadia.luhr@psncuc.gov)

Peter H. Ledford  
NC Sustainable Energy Association  
4800 Six Forks Road  
Suite 300  
Raleigh, North Carolina 27609  
[peter.energync.org](http://peter.energync.org)

This 1<sup>st</sup> day of September, 2021.

/s/Andrea R. Kells  
Andrea R. Kells  
MCGUIREWOODS LLP  
501 Fayetteville Street, Suite 500  
Raleigh, North Carolina 27601  
(919) 755-6614 (Direct)  
(919) 755-6699 (Fax)  
[akells@mcguirewoods.com](mailto:akells@mcguirewoods.com)

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