

May 1, 2023

VIA ELECTRONIC DELIVERY

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

Re: *Historical Review of 2019 REPS Plan*
Docket No. E-100, Sub 192
Docket No. E-100, Sub 157

Dear Ms. Dunston:

Enclosed for filing is Virginia Electric and Power Company d/b/a Dominion Energy North Carolina's ("DENC" or "the Company") historical review of the 2019 North Carolina Renewable Energy and Energy Efficiency Portfolio Standard Compliance Plan ("2019 REPS Plan"), as originally filed on August 29, 2019, in Docket No. E-100, Sub 157. The Company has reviewed its 2019 REPS Plan in accordance with the Commission's directive in Ordering Paragraph (3) of the June 3, 2013, Order Granting in Part and Denying in Part Motion for Disclosure issued in Docket No. E-100, Sub 137 ("2013 Disclosure Order"). The Company has determined that certain information redacted from the 2019 REPS Plan and originally filed confidentially under seal should no longer be withheld from public disclosure. However, 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.

The Company notes that its determination regarding disclosure of prior trade secret information in its historical 2019 REPS Plan should not be considered a waiver of DENC's right to continue its designation of similar information as confidential trade secret information in future REPS Compliance Plans and future historical REPS Compliance Plan confidentiality reviews. See 2013 Disclosure Order at 10 (holding that utility's determination that past REPS information is non-confidential information suitable for public disclosure does not constitute waiver of utility's right to claim same category of disclosed REPS information is confidential in future years).

Thank you for your assistance with this matter. Feel free to contact me with any questions about this filing.

Sincerely,

/s/Andrea R. Kells

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Enclosures

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May 01 2023

VIRGINIA ELECTRIC AND POWER COMPANY 2019 REPS COMPLIANCE PLAN

Pursuant to N.C.G.S. § 62-133.8 and North Carolina Utilities Commission (“NCUC” or “Commission”) Rule R8-67(b), Virginia Electric & Power Company d/b/a Dominion Energy North Carolina (“DENC” or the “Company”) submits its annual Renewable Energy and Energy Efficiency Portfolio Standard (“REPS”) Compliance Plan. The REPS Compliance Plan covers the current calendar year (2019) and immediately subsequent two calendar years (2020-2021) (the “Planning Period”). The Company also presents REPS compliance information for Town of Windsor (“Windsor”) during the Planning Period.¹

The Company’s 2019 REPS Compliance Report, filed in August 2019, indicates that the Company and Windsor have satisfied all 2018 REPS compliance obligations.

1.1 RENEWABLE ENERGY REQUIREMENTS

Figures 1.1.1 and 1.1.2 summarize the Company’s North Carolina REPS goals and Virginia’s Renewable Energy Portfolio Standard (“RPS”) goals for each year of the Planning Period. Figure 1.1.3 summarizes Windsor’s North Carolina REPS goals.

Figure 1.1.1 2019-2021 COMPANY’S NC REPS COMPLIANCE GOALS

	2019	2020	2021
NC Total REPs Obligation %	10.0%	10.0%	12.5%
NC Solar Set-Aside Target %	0.20%	0.20%	0.20%
NC Total Swine Set-Aside %	0.07%	0.07%	0.14%
Projected Poultry Set-Aside %	3.31% of 700,000	3.31% of 900,000	3.31% of 900,000

Figure 1.1.2 2019-2021 COMPANY’S VA RPS COMPLIANCE GOALS

	2019	2020	2021
VA Total RPs Obligation %	7.0%	7.0%	7.0%

The RPS goals are a percentage of the amount of electricity sold in 2007 (the "base year"), minus the average annual percentage of nuclear generators between 2004 and 2006.

Figure 1.1.3 2019-2021 TOWN OF WINDSOR NC REPS COMPLIANCE GOALS

	2019	2020	2021
NC Total REPs Obligation %	10%	10%	12.5%
NC Solar Set-Aside Target %	0.20%	0.20%	0.20%
NC Total Swine Set-Aside %	0.07%	0.07%	0.14%
Projected Poultry Set-Aside %	0.04% of 700,000	0.04% of 900,000	0.04% of 900,000

¹Town of Windsor is a wholesale customer of the Company, for which DENC provides REPS compliance services.

1.2 COMPLIANCE PLAN

In accordance with Rule R8-67(b)(1)(i), the Company describes its planned actions to comply with N.C.G.S. 62-133.8 (b),(c),(d),(e), and (f) for each year.

The Company

During the Planning Period, the Company plans to meet its statutory annual REPS obligations, as modified by the Commission², through the use of renewable energy certificates (“RECs”)³, energy efficiency (“EE”) savings and new company-generated renewable energy where economically feasible.

Figure 1.2.1 summarizes the Company’s REPS compliance requirements and strategy for the Planning Period.

Figure 1.2.1 2019-2021 COMPANY’S REPS COMPLIANCE PLAN SUMMARY

	2019	2020	2021
Baseline Sales Forecast (MWh)	4,265,000	4,307,650	4,350,727
NC Total REPs Obligation %	10.0%	10.0%	12.5%
Total REPS Obligation (MWh) ¹	440,079	426,500	538,457
NC Solar Set-Aside Target %	0.20%	0.20%	0.20%
Total Solar Set-Aside (MWh) ¹	8,802	8,530	8,616
NC Total Swine Set-Aside %	0.07%	0.07%	0.14%
Total Swine Set-Aside (MWh) ¹	3,081	2,986	6,031
Projected Poultry Set-Aside %	3.31%	3.31%	3.31%
Total Poultry Set-Aside (MWh) ²	23,174	29,796	29,796
General Requirement (net of Solar, Swine and Poultry) (MWh)	405,022	385,188	494,014
Projected Energy Efficiency (MWh) ³	27,551	27,551	27,551
Projected Company Generated Renewables (MWh) ⁴	72,395	190,655	234,455

Notes: (1) 2019 targets are based on actual 2018 retail sales of 4,400,784 MWh. 2020-2021 targets are based on baseline retail sales forecasts. The total target is the product of the previous year’s baseline load and the current year target percentage. (2) Targets are based on the average of 2013-2015 load share ratio. (3) For REPS reporting and compliance purpose, DENC will rely upon actual EE savings achieved by North Carolina customers. (4) Company Generated Renewables (MWh) are the estimated North Carolina jurisdictional allocation of the Company’s solar and biomass generation.

² On October 8, 2018, the Commission issued an Order reducing the initial swine waste set-aside requirement to 0.02% for the electric public utilities and delaying the swine waste set-aside requirement for municipalities. The Commission also modified the poultry waste set-aside aggregate requirement to 300,000 MWh. *Order Modifying the Swine and Poultry Waste Set-Aside Requirement and Providing Other Relief*, Docket No. E-100, Sub 113 (October 8, 2018) (“2018 Delay Order”).

³ For planning purposes, the Company notes that it has unique flexibility to use out-of-state RECs for REPS compliance. *Order on Dominion’s Motion for Further Clarification*, Docket No. E-100, Sub 113 (Sept. 22, 2009) (holding that the meaning of N.C.G.S. § 62-133.8(b)(2)(e) is to allow the Company to achieve up to 100% REPS general obligation and set-aside compliance using out-of-state RECs).

As shown in Figure 1.2.1, the Company's REPS requirements in the Planning Period include the solar energy resource requirement ("Solar Set-Aside"), swine waste resource requirement ("Swine Set-Aside"), and poultry waste resource requirement ("Poultry Set-Aside"). In addition, the Company must also ensure that, in total, the RECs that it produces or procures, combined with energy efficiency savings, is an amount equivalent to ten percent (10%) of its prior year retail sales in compliance years 2019 and 2020, and twelve and a half percent (12.5%) in 2021 ("Total Obligation").⁴

The Town of Windsor

Planned REPS compliance for Windsor during the Planning Period is outlined in Figure 1.2.2

Figure 1.2.2 2019-2021 TOWN OF WINDSOR REPS COMPLIANCE PLAN SUMMARY

	2019	2020	2021
Baseline Sales Forecast (MWh)	49,100	49,650	50,200
NC Total REPs Obligation %	10%	10%	12.5%
Total REPS Obligation (MWh) ¹	5,047	4,910	6,207
NC Solar Set-Aside Target %	0.20%	0.20%	0.20%
Total Solar Set-Aside (MWh) ¹	101	99	100
NC Total Swine Set-Aside %	0.07%	0.07%	0.14%
Total Swine Set-Aside (MWh)	36	35	70
Projected Poultry Set-Aside %	0.04%	0.04%	0.04%
Total Poultry Set-Aside (MWh) ²	265	340	340
General REPS Requirement (net of Solar, Swine and Poultry) (MWh)	4,645	4,436	5,697

Notes: (1) 2019 targets are based on actual 2018 retail sales of 50,462 MWh reported by Windsor to DNCP. 2020-2021 targets are based on forecasts reported by the Windsor to DNCP. The total target is a product of the previous year's baseline retail sales and the current year target percentage. (2) Targets are based on the average of 2013-2015 load share ratio.

Solar Set-Aside

Pursuant to N.C.G.S. § 62-133.8(d), the Company must produce or procure solar RECs equal to a minimum of twenty hundredths of one percent (0.20%) of the prior year's total electric power in megawatt-hours ("MWh") sold to retail customers in North Carolina in 2019, 2020 and 2021.

Based on the Company's actual retail sales in 2018, the Solar Set-Aside is 8,802 RECs in 2019. Based on forecasted retail sales, the Solar Set-Aside is projected to be approximately 8,530 RECs in 2020, and 8,616 RECs in 2021, respectively.

⁴ The Company refers to its Total Obligation, net of the Solar, Swine, and Poultry Set-Aside requirements, as its General Requirement ("General Requirement").

The Company's Solar Set-Aside compliance strategy is consistent with DENC's plan from the previous years, as described herein. Specifically, the Company plans to buy unbundled solar RECs. The Company has purchased, or entered into contracts to purchase, solar RECs for DENC's compliance with N.C.G.S. § 62-133.8(d). These contracts will provide enough solar RECs to satisfy the Company's compliance through 2021. The Company has also executed contracts with solar facilities located in North Carolina that will satisfy the in-state portion of the Windsor's compliance requirements for 2019 through 2021. The Company continues to evaluate opportunities to purchase both in-state and out-of-state solar RECs, and will continue to make all reasonable efforts to satisfy DENC's and Windsor's solar set-aside requirements during the Planning Period.

Swine Waste Set-Aside

Pursuant to N.C.G.S. § 62-133.8(e) and the 2018 Delay Order, for calendar years 2019 and 2020, at least seven hundredths of one percent (0.07%) and for calendar year 2021, fourteen hundredths of one percent (0.14%) of prior year total retail electric power sold in aggregate by electric power suppliers in North Carolina must be supplied by energy derived from swine waste. As the Company's share of the State's total retail megawatt-hour sales is approximately 3.31 percent, the Company's Swine Set-Aside requirement is 3,081 RECs in 2019, 2,986 RECs in 2020, and 6,031 RECs in 2021.

Independently of the Swine Waste REC Buyers Group, the Company has executed swine waste to energy contracts with two suppliers. As a result of these efforts, both DENC and the Windsor have sufficient RECs in NC-RETs to meet the 2019-2021 requirements.

The Company continues to evaluate all potential opportunities to purchase both in-state and out-of-state swine RECs, and will continue to make all reasonable efforts to satisfy DENC's Swine Set-Aside requirements during the Planning Period. The Company continues to work with the Swine Waste REC Buyers Group. Due to the high default rate with swine waste to energy contracts, the Company intends to contract for RECs above and beyond the initial requirement to increase the probability of maintaining compliance. The Company intends to bank any excess RECs to be used for future compliance.

Poultry Waste Set-Aside

Pursuant to N.C.G.S. § 62-133.8(f) and the 2018 Delay Order, for calendar year 2019, at least 700,000 MWhs, and for 2020 and thereafter, at least 900,000 MWhs of the prior year's total electric power sold to retail electric customers in the State or an equivalent amount of energy shall be produced or procured each year by poultry waste, as defined per the Statute and additional clarifying Orders. As the Company's retail sales share of the State's total retail megawatt-hour sales is approximately 3.31 percent, the Company's Poultry Set-Aside is 23,174 RECs in 2019 and estimated to be 29,796 RECs in 2020 and 2021.

Initially, the Poultry Waste REC Buyers Group executed two (2) long-term poultry waste contracts and the Company, as a part of this group, has executed two (2) long-term contracts to satisfy the Town of Windsor's in-state Poultry Set-Aside requirements. One (1) of the in-state contracts was terminated by mutual agreement with the supplier in September 2013, the other was terminated in April 2018. In an attempt to locate and purchase additional poultry RECs, the Company joined with the Poultry Waste REC Buyers Group in requesting Commission approval for a RFP in Docket E-100 Sub 113. The RFP was conducted in 2013 and resulted in two (2) additional contracts. Based on the execution of two (2)

contracts that could each, individually, provide sufficient RECs, the Company has enough in-state RECs for Windsor compliance with the full Poultry Set-Aside in 2019 and 2020. At this time, the Company is reasonably confident that Town of Windsor will be in compliance with the full Poultry Set-Aside in 2021. The Company has also continued to search for opportunities to purchase poultry waste RECs in North Carolina and throughout the continental United States. These efforts yielded multiple poultry waste REC contracts and sufficient delivered volume to comply with both the Company's and Windsor's out-of-state requirements for years 2019, 2020 and 2021.

General REPS Requirements Net of Solar, Swine and Poultry

Pursuant to N.C.G.S. § 62-133.8(d), the Company is required to comply with its Total Obligation in the Planning Period by submitting for retirement a total volume of RECs equivalent to ten percent (10%) in 2019 and 2020, and twelve and a half percent (12.5%) in 2021. This equates to approximately 430,000 RECs in 2019 and 2020, and 540,000 RECs in 2020 and beyond. This General Requirement, net of the Solar, Swine, and Poultry Set-Aside requirements, is 405,022 RECs in 2019 and estimated to be approximately 400,000 in 2020, and approximately 500,000 RECs in 2021 and beyond. The resource options available to the Company to meet the General Requirement are discussed below, as well as the Company's plan to meet the General Requirement with these resources.

The Company plans to comply with the General Requirement using a combination of EE savings generated by the Company's portfolio of approved North Carolina EE programs; purchasing in-state and out-of-state RECs; and using company-generated new renewable energy resources. For Windsor, the Company plans to comply with the General Requirement using its Southeastern Power Administration ("SEPA") allocation of hydroelectric RECs, in-state biomass RECs, and out-of-state biomass RECs.

Pursuant to Commission Rule R8-67(b)(1)(iii), the Company has presented in Figure 1.4.1 below these EE measures that it plans to use toward REPS compliance, including projected impacts.

Company-generated new renewable energy includes generation from biomass fuel co-firing at the Company's Virginia City Hybrid Energy Center (VCHEC), which commenced commercial operations in 2012, as well as biomass fuel conversions at the Altavista, Hopewell and Southampton power stations, which commenced commercial operations in 2013. The Company is currently selling the RECs generated at these biomass facilities in PJM Tier 1 markets at a significant premium to the out-of-state general RECs the Company is purchasing for compliance. Company-generated new renewable energy also includes generation from operational and planned Company-owned solar facilities in Virginia and North Carolina. The Company is selling the solar RECs generated at these facilities in the PJM markets at a substantial premium to the in-state and out-of-state solar RECs the Company is purchasing for REPS compliance.⁵

⁵ On April 10, 2014, the Commission approved the Company's Rule R8-66 REPS Facility Registration Statement for VCHEC in Docket No. E-22, Sub 489. The Company will file Rule R8-66 REPS Facility Registration Statements for Altavista, Hopewell and Southampton power stations and for Company-owned solar facilities prior to relying on these facilities for REPS compliance.

1.3 REC CONTRACTS

In accordance with Rule R8-67(b)(1)(ii), the Company provides a list of executed contracts to purchase renewable energy certificates.

As mentioned in the previous section, the Company has purchased wind, biomass, hydro, poultry waste, swine waste and solar RECS and entered into long-term poultry waste, swine waste and solar REC contracts to comply with N.C.G.S. § 62-133.8(b), (d), (e), and (f). Figures 1.3.1 through 1.3.4 provide summaries of the key terms (volume, term, price, current status, and expiration date) of the Company's executed REC purchase contracts.

Figure 1.3.1 Solar REC Purchase Contract Summary¹

	Full Term Total Volume	Term	Price / REC	Total Expense	Current Status	Expiration Date
Solar Star California	15,000	6	\$9.60	\$144,000	Expired	6/11/2018
Tioga Solar	729	1	\$8.00	\$5,832	Expired	6/15/2011
Tioga Solar	392	1	\$5.00	\$1,960	Expired	6/15/2011
ST Silver Bluff ²	4	1	\$85.00	\$340	Expired	2/22/2011
NCMPA I ²	4	1	\$130.00	\$520	Expired	8/15/2011
GE Aviation ²	50	1	\$85.00	\$4,250	Expired	12/7/2011
Constellation Energy	2,000	2	\$11.00	\$22,000	Expired	4/19/2011
DDM Mortgage ²	40	1	\$50.00	\$2,000	Expired	2/27/2012
Carolina Solar Energy ²	24	1	\$40.00	\$960	Expired	3/12/2012
Shoe Show ³	2,000	1	\$4.00	\$8,000	Expired	10/1/2014
Aspre Energy	2,000	1	\$5.00	\$10,000	Expired	2/28/2014
Ecos Energy	1,544	1	\$3.25	\$5,018	Expired	4/20/2015
Solar Star California	664	2	\$2.50	\$1,660	Expired	4/20/2015
Solar Star California ²	331	1	\$3.00	\$993	Expired	4/21/2015
Duke Energy Renewable Services	2,000	1	\$2.75	\$5,500	Expired	2/3/2016
Duke Energy Renewable Services	2,000	1	\$2.75	\$5,500	Expired	2/3/2016
3Degrees Group, Inc.	5,000	1	\$2.50	\$12,500	Expired	3/20/2018
STX Services, B.V.	2,932	2	\$2.50	\$7,330	Expired	3/1/2017
3Degrees Group, Inc.	9,500	1	\$2.25	\$21,375	Expired	3/20/2018
Sun Energy 1	1,057	1	\$2.25	\$2,378	Expired	6/5/2017
STX Services, B.V.	15,000	3	\$0.90	\$13,500	Active	3/31/2021
Duke Energy Renewable Services	15,000	3	\$0.80	\$12,000	Active	2/28/2022
Shift Equity	7,145	3	\$0.55	\$3,930	Expired	1/11/2019
Total Volume	84,416		Total Expense	\$291,546		

Notes: Contract counterparties and prices are confidential. (1) The Company plans to bank any surplus RECs from 2013-2018 for future compliance purposes. (2) Contracts for Windsor compliance. (3) Contracts for Windsor solar or general REPS compliance.

Figure 1.3.2 Poultry Waste REC Purchase Contract Summary¹

	Full Term Total Volume	Term	Price / REC	Total Expense	Current Status	Expiration Date
Sterling Planet ²	0	2	\$19.00	\$0	Terminated	NA
Northern States Power	25,000	2	\$23.25	\$581,250	Expired	10/31/2012
NCRP-Lumberton ^{2,3}	0	20	\$48.43	\$0	Terminated	NA
Northern States Power	15,000	1	\$23.25	\$348,750	Expired	4/28/2014
Duke Energy Carolinas ³	55	1	\$41.00	\$2,255	Expired	1/8/2015
Northern States Power ³	699	1	\$23.00	\$16,077	Expired	12/15/2014
Northern States Power	20,000	1	\$25.00	\$500,000	Expired	4/20/2015
██████████	4,860	15	██████████	██████████	██████████	██████████
██████████	6,480	15	██████████	██████████	██████████	██████████
Northern States Power	59,400	1	\$24.00	\$1,425,600	Expired	9/30/2015
Gettysburg Energy	1,576	3	\$30.00	\$47,280	Expired	8/5/2015
██████████	136,000	10	██████████	██████████	██████████	██████████
Duke Energy Carolinas ³	50	1	\$46.00	\$2,300	Expired	1/22/2016
Northern States Power	10,000	1	\$24.00	\$240,000	Expired	2/26/2016
Duke Energy Carolinas ³	40	1	\$56.05	\$2,242	Expired	2/16/2017
Northern States Power	12,000	1	\$28.00	\$336,000	Expired	3/1/2017
██████████	225,000	15	██████████	██████████	██████████	██████████
Total Volume	516,160		Total Expense	██████████		

Notes: Contract counterparties and prices are confidential. (1) The Company plans to bank any surplus RECs from 2012-2018 for future compliance purposes. (2) Contract terminated. (3) Contract for Windsor compliance.

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Figure 1.3.3 General REC Purchase Contract Summary¹

	Full Term Total Volume	Term	Price / REC	Total Expense	Current Status	Expiration Date
3Degrees Group	30,000	1	\$1.00	\$30,000	Expired	3/6/2012
Renewable Choice Energy	20,000	1	\$1.00	\$20,000	Expired	5/25/2012
Renewable Choice Energy	30,000	1	\$0.93	\$27,900	Expired	3/6/2012
Capital Power ²	1,000	1	\$5.00	\$5,000	Expired	9/18/2012
Aspre Energy	42,400	1	\$0.90	\$38,160	Expired	6/5/2013
Aspre Energy	25,600	1	\$0.97	\$24,832	Expired	10/5/2012
Aspre Energy	35,000	1	\$1.35	\$47,250	Expired	10/17/2013
Aspre Energy	25,000	1	\$0.95	\$23,750	Expired	8/2/2012
Aspre Energy	15,000	1	\$1.25	\$18,750	Expired	11/8/2013
Northern States Power	64,746	1	\$1.25	\$80,933	Expired	11/21/2013
Scenic View Dairy ²	10,943	5	\$1.70	\$18,583	Expired	1/31/2016
Pattern Gulf Wind	25,000	1	\$1.15	\$28,750	Expired	1/9/2015
EC&R Energy Marketing	25,000	1	\$1.10	\$27,500	Expired	11/3/2014
Invenergy Renewables	25,000	1	\$1.05	\$26,250	Expired	10/14/2014
Wyeth Holdings ²	27,587	3	\$0.75	\$20,690	Expired	1/15/2015
Aspre Energy	50,000	1	\$0.95	\$47,500	Expired	12/22/2014
EC&R Energy Marketing	50,000	1	\$0.90	\$45,000	Expired	1/23/2015
Midway Power	12,265	2	\$0.70	\$8,586	Expired	4/1/2015
EC&R Energy Marketing	50,000	1	\$0.83	\$41,500	Expired	3/6/2015
Panhandle Wind	30,000	1	\$0.77	\$23,100	Expired	4/21/2015
EC&R Energy Marketing	54,459	1	\$0.70	\$38,121	Expired	4/14/2015
Invenergy Renewables	50,000	1	\$0.60	\$30,000	Expired	5/18/2015
3Degrees Group	50,000	1	\$0.50	\$25,000	Expired	6/23/2015
NCRP - Lumberton, LLC ^{2,3}	0	20	\$18.43	\$0	Terminated	NA
NIPSCO	50,000	1	\$0.43	\$21,500	Expired	10/28/2015
EC&R Energy Marketing	25,000	1	\$0.40	\$10,000	Expired	9/14/2015
3Degrees Group	50,000	1	\$0.38	\$18,750	Expired	2/22/2016
Blue Delta Energy	350,000	2	\$0.30	\$105,000	Expired	1/18/2017
STX Services, B.V.	325,000	1	\$0.30	\$97,500	Expired	8/7/2017
International Paper	75,978	2	\$0.32	\$24,313	Expired	9/25/2017
STX Services, B.V.	150,000	1	\$0.12	\$18,000	Expired	10/24/2018
STX Services, B.V.	300,000	1	\$0.32	\$96,000	Expired	9/12/2017
EC&R Energy Marketing	300,000	1	\$0.40	\$120,000	Expired	2/20/2019
EC&R Energy Marketing	400,000	1	\$0.43	\$172,000	Active	2/15/2020
STX Services, B.V. ³	0	1	\$0.40	\$0	Terminated	NA
3Degrees Group	200,000	1	\$0.69	\$138,000	Expired	7/31/2019
3Degrees Group	200,000	1	\$0.73	\$145,000	Expired	3/27/2019
Adani Solar USA	1,796,716	10	\$0.65	\$1,167,865	Active	8/15/2030
Invenergy Renewables	154,505	1	\$0.70	\$108,154	Expired	4/15/2019
International Paper	47,589	2	\$0.60	\$28,553	Expired	2/7/2019
Fathom Energy	120,000	1	\$0.68	\$81,600	Expired	3/26/2019
Total Volume	5,293,788		Total Expense	\$3,049,390		

Notes: Contract counterparties and prices are confidential. (1) The Company plans to bank any surplus RECs from 2012-2018 for future compliance purposes. (2) Contract for Windsor compliance. (3) Contract terminated.

Figure 1.3.4 Swine Waste REC Purchase Contract Summary¹

	Full Term Total Volume	Term	Price / REC	Total Expense	Current Status	Expiration Date
RES Agriculture NC 1 ³	6,480	20	\$55.00	\$493,063	Active	1/15/2033
RES Agriculture NC 2 ^{3,4}	0	20	\$48.50	\$0	Terminated	NA
RES Agriculture NC 3 ^{3,4}	0	20	\$50.57	\$0	Terminated	NA
Scenic View Dairy ^{3,5}	2,315	5	\$13.00	\$30,095	Expired	1/31/2016
██████████	108,500	15	██████████	██████████	██████████	██████████
Greensboro Ecosystems, LLC ^{2,3,4,5}	0	20	\$115.00	\$0	Terminated	NA
RES Tar Heel, LLC ^{2,3,4}	0	20	\$97.25	\$0	Terminated	NA
NCRP - Lumberton, LLC ⁴	0	20	\$105.00	\$0	Terminated	NA
Orion Energy Marketing	1,000	1	\$100.00	\$100,000	Expired	8/21/2017
Blue Mountain Biogas	1,672	1	\$50.00	\$83,600	Expired	4/10/2018
██████████	36,000	10	██████████	██████████	██████████	██████████
Total Volume	155,967		Total Expense	██████████		

Notes: Contract counterparties and prices are confidential. (1) The Company plans to bank any surplus RECs from 2010-2018 for future compliance. (2) Reduced volumes in first year of contract. (3) Price escalates annually. Prices given are for initial year. (4) Contract terminated. (5) Contract for Windsor compliance.

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1.4 ENERGY EFFICIENCY PROGRAMS

In accordance with Rule R8-67(b)(1)(iii), the Company provides a list of planned or implemented energy efficiency measures, including a brief description of the measure and projected impacts.

The Company intends to apply North Carolina EE savings to meet the REPS requirements as permitted by law. Figure 1.4.1 lists energy efficiency programs and resulting potential savings projected to be achieved by North Carolina customers. A description of these EE programs can be found in the 2019 EM&V Report filed on May 1, 2019, in Docket No. E-22, Sub 556.

Figure 1.4.1 FORECAST SAVINGS (MWh) NORTH CAROLINA ENERGY EFFICIENCY PROGRAMS

	2019	2020	2021
Air Conditioner Cycling Program ¹	0	0	0
Commercial HVAC Upgrade Program ¹	110	110	110
Commercial Lighting Program ¹	2,743	2,743	2,743
Residential Low Income Program ¹	615	615	615
Residential Lighting Program ¹	1,028	1,028	1,028
Non-residential Energy Audit Program ²	1,386	1,386	1,386
Non-residential Duct Testing and Sealing Program ²	3,155	3,155	3,155
Residential Home Energy Check-Up Program ²	791	791	791
Residential Duct Sealing Program ²	133	133	133
Residential Heat Pump Tune-Up Program ²	1,208	1,208	1,208
Residential Heat Pump Upgrade Program ²	297	297	297
Non-residential Heating and Cooling Efficiency Program ³	0	0	0
Non-residential Lighting Systems and Controls Program ³	7,565	7,565	7,565
Non-residential Window Film Program ³	0	0	0
Income and Age Qualifying Home Improvement Program ⁴	173	173	173
Small Business Improvement Program ⁵	1,085	1,085	1,085
Residential Retail LED Lighting Program (NC Only) ⁵	6,913	6,913	6,913
Non-Residential Prescriptive Program ⁶	350	350	350
Energy Efficiency Total⁷	27,552	27,552	27,552

Notes: (1) DSM I programs. (2) DSM II programs. (3) DSM III programs. (4) DSM IV programs. (5) DSM V programs. (6) DSM VI program. (7) Forecast based on initial 2018 EM&V data. The Company is using estimates for the first year of these programs, and will use actual savings in subsequent years. For REPS reporting and compliance purpose, DENC will rely upon actual EE savings achieved by North Carolina customers.

1.5 RETAIL SALES & CUSTOMER ACCOUNTS

In accordance with Rule R8-67(b)(1)(iv), the Company states the projected Company's North Carolina retail sales and year-end number of customer accounts by customer class for each year.

The Company

Figure 1.5.1 summarizes the Company's North Carolina retail sales and Figure 1.5.2 summarizes the year-end number of customer accounts by customer class for each year of the Planning Period.

Figure 1.5.1 COMPANY'S NORTH CAROLINA RETAIL SALES¹

Year	Residential Sales (MWh)	Commercial Sales (MWh)	Industrial Sales (MWh)	Total Sales (MWh)
2019 (projected)	1,645,000	858,000	1,762,000	4,265,000
2020 (projected)	1,655,000	863,000	1,762,000	4,307,650
2021 (projected)	1,665,000	867,000	1,761,000	4,350,727

Notes: (1) Excludes the Town of Windsor's wholesale customer load.

Figure 1.5.2 COMPANY'S NORTH CAROLINA CUSTOMER ACCOUNTS¹

Year	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
2019 (projected)	103,177	15,698	56	118,931
2020 (projected)	103,496	15,730	56	119,282
2021 (projected)	103,847	15,763	56	119,666

Notes: (1) Customer account totals are year-end forecasts.

Town of Windsor

Figure 1.5.3 summarizes the Windsor's retail sales and Figure 1.5.4 summarizes the year-end number of customer accounts by customer class for each year of the Planning Period.

Figure 1.5.3 TOWN OF WINDSOR'S RETAIL SALES¹

Year	Residential Sales (MWh)	Commercial Sales (MWh)	Industrial Sales (MWh)	Total Sales (MWh)
2019 (projected)	19,000	21,000	9,100	49,100
2020 (projected)	19,300	21,200	9,150	49,650
2021 (projected)	19,500	21,500	9,200	50,200

Note: (1) Sales are year-end forecasts reported by the Town of Windsor to DENC.

Figure 1.5.4 TOWN OF WINDSOR'S CUSTOMER ACCOUNTS¹

Year	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
2019 (projected)	1,360	400	1	1,761
2020 (projected)	1,365	405	1	1,771
2021 (projected)	1,375	410	1	1,786

Notes: (1) Customer account totals are year-end forecasts reported by the Town of Windsor to DENC.

1.6 AVOIDED COST RATES

In accordance with Rule R8-67(b)(1)(v), the Company provides the following statement regarding the current and projected avoided cost rates for each year.

For facilities eligible for the Company's avoided cost standard offer contract, see Dominion Energy North Carolina Schedule 19 for currently available energy and capacity rates. Figure 1.6.1 shows the Company's projected avoided energy and capacity rates.

Figure 1.6.1 PROJECTED AVOIDED ENERGY AND CAPACITY COST (from E-100 Sub 158)¹

	On-Peak (\$/MWh)	Off-Peak (\$/MWh)	Capacity Price (\$/kW-Year)
2019	32.83	24.97	0.00
2020	30.83	23.73	0.00
2021	31.13	24.52	0.00

Note: (1) These rates were filed on November 1, 2018 and will likely change in a future compliance filing pursuant to the North Carolina Utilities Commission final order in Docket E-100, Sub 158.

1.7 TOTAL & PROJECTED COSTS

In accordance with Rule R8-67(b)(1)(vi), the Company provides the projected total and incremental costs anticipated to implement REPS Compliance plan for each year of the Planning Period.

The Company

The Company's Planning Period incremental costs to comply with the Solar Set-Aside, Swine Set-Aside, Poultry Set-Aside and General Requirements are presented in Figure 1.7.1 below.

Figure 1.7.1 COMPANY'S REPS COMPLIANCE COST SUMMARY

Type of REC	2019	2020	2021
Solar			
Target (MWh)	8,802	8,530	8,616
REC Cost (\$/MWh) ¹	\$2.25	\$3.10	\$1.00
Projected Cost	\$19,805	\$26,443	\$8,616
Swine			
Target (MWh)	3,081	2,986	6,031
REC Cost (\$/MWh) ¹	\$81.00	\$75.00	\$82.00
Projected Cost	\$249,561	\$223,950	\$494,542
Poultry			
Target (MWh)	23,174	29,796	29,796
REC Cost (\$/MWh) ¹	\$24.00	\$24.25	\$24.25
Projected Cost	\$556,176	\$722,553	\$722,553
General RECs			
Target (MWh)	405,022	385,188	494,014
Less Energy Efficiency ²	27,875	27,875	27,875
Net Target	377,147	357,313	466,139
REC Cost (\$/MWh) ¹	\$0.31	\$0.50	\$0.70
Projected Cost	\$116,916	\$178,657	\$326,297
Administrative Costs³	\$22,000	\$22,000	\$22,000
Microgrid Research Project Cost⁴	\$564	\$564	\$564
TOTAL PROJECTED COMPLIANCE COST	\$965,021	\$1,174,167	\$1,574,572

Notes: (1) 2019-2021 projected REC costs are based on market estimates, signed contracts and/or ongoing negotiations. (2) Projected EE savings represents a projected system allocation. (3) Administrative costs include, but are not limited to: NC-RETs fees, broker fees and miscellaneous expenses. (4) As permitted by NCGS § 62-133.8 (h)(1) and (4), DENC has developed a North Carolina Microgrid research and development (R&D) project. This figure represents research project projected costs prior to receiving any offsetting tax credits.

The Town of Windsor

The Town of Windsor's projected Planning Period REPS costs are expected to consist of the sum of the costs required to comply with the Solar Set-Aside, Swine Set-Aside, Poultry Set-Aside and other General Requirements Figure 1.7.2 outlines Windsor's Compliance Cost Summary from 2019 to 2021.

Figure 1.7.2 TOWN OF WINDSOR'S COMPLIANCE COST SUMMARY

Type of REC	2019	2020	2021
Solar			
Target (MWh)	101	99	100
REC Cost (\$/MWh) ¹	\$3.75	\$3.75	\$3.75
Projected Cost	\$379	\$371	\$375
Swine			
Target (MWh)	36	35	70
REC Cost (\$/MWh) ¹	\$47.00	\$48.00	\$49.00
Projected Cost	\$1,692	\$1,680	\$3,430
Poultry			
Target (MWh)	265	340	340
REC Cost (\$/MWh) ¹	\$70.00	\$71.00	\$72.00
Projected Cost	\$18,550	\$24,140	\$24,480
General REPs			
Target (MWh)	4,645	4,436	5,697
REC Cost (\$/MWh) ¹	\$1.50	\$1.50	\$1.50
Projected Cost	\$6,968	\$6,654	\$8,546
TOTAL PROJECTED COMPLIANCE COST	\$27,588	\$32,845	\$36,831

Notes: (1) 2019-2021 projected REC costs are based on market estimates, signed contracts and/or ongoing negotiations.

1.8 ANNUAL COST CAPS

In accordance with Rule R8-67(b)(1)(vii), the Company provides the following comparison of projected costs to the annual cost caps contained in N.C.G.S. § 62-133.8(h)(4).

Figure 1.8.1 provides a comparison of the Company's projected costs to the annual cost caps for each year of the Planning Period. Compliance costs are allocated to the Customer Classes based on the percentage of each of the Customer Class Cost Caps to the Total Cost Cap.

Figure 1.8.1 COMPANY'S COMPARISON TO ANNUAL CAPS

Compliance Year 2019	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Actual Year-End Annual Customers (2018)	103,159	18,227	50	121,436
Annual Cost Cap per Customer	\$27	\$150	\$1,000	-
Annual Cost Cap, Total	\$2,785,293	\$2,734,050	\$50,000	\$5,569,343
Projected Cost of Compliance ¹	\$482,618	\$473,739	\$8,664	\$965,021

Compliance Year 2020	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Projected Year-End Annual Customers (2019)	103,177	15,698	56	118,931
Annual Cost Cap per Customer	\$27	\$150	\$1,000	-
Annual Cost Cap, Total	\$2,785,779	\$2,354,700	\$56,000	\$5,196,479
Projected Cost of Compliance ¹	\$629,459	\$532,054	\$12,653	\$1,174,167

Compliance Year 2021	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Projected Year-End Annual Customers (2020)	103,496	15,730	56	119,282
Annual Cost Cap per Customer	\$27	\$150	\$1,000	-
Annual Cost Cap, Total	\$2,794,392	\$2,359,500	\$56,000	\$5,209,892
Projected Cost of Compliance ¹	\$844,542	\$713,106	\$16,925	\$1,574,572

Notes: (1) Projected costs were allocated to the customer classes based on customer percentage of total cost cap.

Figure 1.8.2 provides a comparison of Windsor's projected costs to the annual cost caps for each year of the Planning Period. Compliance costs are allocated to the Customer Classes based on the percentage of each of the Customer Class Cost Caps to the Total Cost Cap.

Figure 1.8.2 TOWN OF WINDSOR'S COMPARISON TO ANNUAL CAPS

Compliance Year 2019	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Actual Year-End Annual Customers (2018)	1,359	395	1	1,755
Annual Cost Cap per Customer	\$27	\$150	\$1,000	-
Annual Cost Cap, Total	\$36,693	\$59,250	\$1,000	\$96,943
Projected Cost of Compliance¹	\$10,442	\$16,861	\$285	\$27,588

Compliance Year 2020	Residential Customers	Commercial Customers	Industrial Customers	Total Customers
Projected Year-End Annual Customers (2019)	1,360	400	1	1,761
Annual Cost Cap per Customer	\$27	\$150	\$1,000	-
Annual Cost Cap, Total	\$36,720	\$60,000	\$1,000	\$97,720
Projected Cost of Compliance¹	\$12,342	\$20,167	\$336	\$32,845

Compliance Year 2021	Residential Customers²	Commercial Customers	Industrial Customers	Total Customers
Projected Year-End Annual Customers (2020)	1,365	405	1	1,771
Annual Cost Cap per Customer	\$27	\$150	\$1,000	-
Annual Cost Cap, Total	\$36,855	\$60,750	\$1,000	\$98,605
Projected Cost of Compliance¹	\$13,766	\$22,691	\$374	\$36,831

Notes: (1) The Town of Windsor is to determine the allocation among the different customer classes.

1.9 REPS RIDER

In accordance with Rule R8-67(b)(1)(viii), the Company provides an estimate of the amount of the REPS rider and the impact on the cost of fuel and fuel-related costs rider necessary to fully recover the projected costs.

	2019	2020	2021
Total Projected REPS Compliance Costs	\$965,021	\$1,174,167	\$1,574,572
Costs recovered through the Fuel Rider	\$0	\$0	\$0
Total Incremental Cost	\$965,021	\$1,174,167	\$1,574,572
Annual REPS Rider - Residential	\$837,191	\$1,018,775	\$1,366,425
Annual REPS Rider - Commercial	\$127,376	\$154,840	\$207,410
Annual REPS Rider - Industrial	\$454	\$551	\$737
Projected Annual Cost Caps (REPS Rider)	\$5,569,343	\$5,196,479	\$5,209,892

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing 2019 NC REPS Plan PUBLIC REDACTED, as filed in Docket Nos. E-100, Sub 157 and E-100, Sub 192, were served electronically or via U.S. mail, first-class, postage prepaid, upon all parties of record.

This, the 1st day of May, 2023.

/s/Andrea R. Kells

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