

McGuireWoods LLP
501 Fayetteville St.
Suite 500
Raleigh, NC 27601
Phone: 919.755.6600
Fax: 919.755.6699
www.mcguirewoods.com

Kristin M. Athens
Direct: 919.835.5909

McGUIREWOODS

kathens@mcguirewoods.com

OFFICIAL COPY

JUN 29 2022

June 29, 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: Initial Comments of Public Service Company of North Carolina, Inc.
Docket No. M-100, Sub 163*

Dear Ms. Dunston:

Enclosed for filing in the above-referenced proceeding on behalf of Public Service Company of North Carolina, Inc., d/b/a Dominion Energy North Carolina is its Initial Comments.

Please do not hesitate to contact me should you have any questions. Thank you for your assistance with this matter.

Very truly yours,

/s/Kristin M. Athens

KMA:kjg

Enclosure

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. M-100, SUB 163

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	
Investigation Regarding the Ability of North)
Carolina's Electricity, Natural Gas, and)
Water/Wastewater Systems to Operate)
Reliably During Extreme Cold Weather)

**INITIAL COMMENTS OF
PUBLIC SERVICE COMPANY
OF NORTH CAROLINA, INC.**

NOW COMES Public Service Company of North Carolina, Inc., d/b/a Dominion Energy North Carolina ("PSNC" or the "Company") and, pursuant to the North Carolina Utilities Commission's (the "Commission") Order Requesting Comments issued on May 12, 2022, in the above-captioned proceeding, submits these initial comments addressing the Commission's question of whether certain Commission rules require revision in order to ensure reliable utility operations during extreme cold weather. PSNC specifically provides initial comments on whether Commission Rule R6-19.2, regarding curtailment of natural gas service, requires revision in order to ensure reliable natural gas operations during extreme cold weather events.

BACKGROUND

On January 26, 2022, the Commission issued its Order Opening Investigation, Scheduling Technical Conferences, Requiring Responses, and Allowing Comments and Reply Comments ("Scheduling Order") establishing this proceeding to investigate whether North Carolina's major electricity, natural gas, and wastewater utilities have taken appropriate steps to assure reliable operations during extreme cold weather events. The Scheduling Order explained that this investigation was prompted by the outages and rolling

blackouts that occurred in Texas and other parts of the country in February 2021 due to Winter Storm Uri (“ERCOT Outages”), and requested the utilities respond to certain Commission questions relating to the ERCOT Outages and cold weather preparedness.

On February 23, 2022, PSNC filed its responses to the questions posed in the Scheduling Order to specific natural gas utilities (“Responses”). In the Responses, PSNC explained changes it had implemented due to lessons learned from the ERCOT Outages, and provided information on its weather and load forecasting, load shedding/curtailment planning, and plant performance.

On February 24, 2022, PSNC filed revisions to its Responses to correct a clerical error concerning the Company’s name.

On April 7, 2022, the Commission issued an Order Requiring Notice of Presenters at Technical Conference.

On April 19, 2022, PSNC participated in a technical conference at the Commission where the Company explained how it ensures natural gas reliability during cold weather periods and responded to additional Commission questions.

On April 20, 2022, PSNC filed its PowerPoint presentation given at the April 19, 2022, technical conference in the above-referenced proceeding.

On May 9, 2022, PSNC filed a Response to Commission Question, answering the Commission’s question at the April 19, 2022 technical conference concerning whether PSNC’s Cary liquified natural gas plant was on Duke Energy Progress, LLC’s “protected services list” in the context of an extreme weather event.

On May 12, 2022, the Commission issued its Order Requesting Comments, directing parties to file comments on or before June 29, 2022, and allowing parties to file

reply comments on or before July 27, 2022, on whether certain Commission rules required revision to ensure reliable utility service during extreme cold weather events.

INITIAL COMMENTS ON R6-19.2

Commission Rule R6-19.2, which was adopted in 1971, governs curtailment of natural gas service and generally requires the curtailment of customers based on margin paid. Because interruptible customers pay the lowest margins, they are the first customers to be curtailed. PSNC has had adequate supply in the winter months and has not had to curtail firm customers due to cold weather events, and therefore is not recommending any revisions to the Rule at this time. PSNC notes that there may be circumstances that occur which cause the Rule to be difficult to precisely implement, (for example, third-party damages to its system, or Transco's inability to deliver contracted supply), but, generally speaking, the Rule serves PSNC and its customers well.

CONCLUSION

WHEREFORE, Public Service Company of North Carolina, Inc., d/b/a Dominion Energy North Carolina respectfully submits to the North Carolina Utilities Commission the foregoing initial comments for consideration.

Respectfully submitted,

By: /s/Kristin M. Athens

B. Craig Collins
Dominion Energy Services, Inc.
MC-C222 220 Operation Way
Cayce, South Carolina 29033-3701
Telephone: (803) 217-7513
b.collins@dominionenergy.com

Mary Lynne Grigg
Kristin M. Athens
McGuireWoods LLP
501 Fayetteville Street, Suite 500
PO Box 27507 (27611)
Raleigh, North Carolina 27601
Telephone: (919) 755-6573 (MLG)
Telephone: (919) 835-5909 (KMA)
mgrigg@mcguirewoods.com
kathens@mcguirewoods.com

*Counsel for Public Service Company of North
Carolina, Inc., d/b/a Dominion Energy North
Carolina*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Initial Comments*, as filed in Docket No. M-100, Sub 163, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 29th day of June, 2022.

/s/Kristin M. Athens

Kristin M. Athens

McGuireWoods LLP

501 Fayetteville Street, Suite 500

Raleigh, North Carolina 27601

Telephone: (919) 835-5909

kathens@mcguirewoods.com

*Attorney for Public Service Company of
North Carolina, Inc., d/b/a Dominion
Energy North Carolina*