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Nov 09 2021

November 9, 2021

VIA Electronic Filing

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

*Re: In the Matter of Rulemaking Proceeding to Implement Performance-Based
Regulation of Electric Utilities
Docket No. E-100, Sub 178
Letter in Lieu of Initial Comments*

Dear Ms. Dunston:

Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (“DENC” or the “Company”) is filing this *Letter in Lieu of Initial Comments* in response to the North Carolina Utilities Commission’s (“Commission”) October 14, 2021 *Order Requesting Comments and Proposed Rules*, issued in the above-captioned proceeding (“Order”). In the Order, the Commission requested comments and proposed rules on the implementation of performance-based regulation (“PBR”) as authorized in N.C. Gen. Stat. § 62-133.6. The Company has reviewed the proposed rule being filed today in this proceeding by Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (“Duke Utilities”), generally supports the Duke Utilities’ proposed rule, and does not have other initial comments to submit at this time. The Company reserves its right to file reply comments in response to the initial comments submitted by other parties in this proceeding.

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:kjg

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Letter in Lieu of Initial Comments* filed in Docket No. E-100, Sub 178 was served electronically or via U.S. mail, first class postage prepaid, upon all parties of record.

This, the 9th day of November, 2021.

/s/Andrea R. Kells

Andrea R. Kells

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