

April 19, 2024

**Via Electronic Filing**

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

Re: *Letter in Lieu of Sur-Reply Comments of Dominion Energy North Carolina  
Docket No. E-100, Sub 161*

Dear Ms. Dunston:

Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (“DENC” or the “Company”), respectfully submits this Letter in Lieu of Sur-Reply Comments in the above-referenced proceeding.

On February 19, 2024, the North Carolina Utilities Commission (“Commission”) granted Duke Energy Carolinas, LLC and Duke Energy Progress, LLC’s (“Duke Energy”) Joint Motion for Leave to File Sur-Reply Comments,<sup>1</sup> and pursuant to a subsequent order granting extension of time, allowed the parties to file sur-reply comments through and including April 19, 2024.<sup>2</sup>

The Company has reviewed a draft of Duke Energy’s sur-reply comments and is generally supportive of the conclusions therein. The Company also continues to maintain the positions included in its *Supplemental Reply Comments* filed on December 9, 2022. In those comments, the Company stated that it supports the Public Staff’s modifications to Commission Rule R8-51 in principle, but opposed two issues in the Public Staff’s proposal: that the Company (1) offer Green Button Connect My Data functionality and (2) maintain 24 months of customer data. To the extent other parties to this proceeding propose additional revisions to Commission Rule R8-51 in their sur-reply comments, the Company may request an opportunity to respond to those proposals once it reviews such new proposals in totality with the remainder of the proposed rule.

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<sup>1</sup> Order Allowing Sur-Reply Comments, Docket No. E-100, Sub 161 (Feb. 19, 2024).

<sup>2</sup> Order Granting Motion for Extension of Time to File Sur-Reply Comments, Docket No. E-100, Sub 161 (Apr. 5, 2024).

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

Sincerely,

/s/ Nick A. Dantonio

NAD/als

Enclosure

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing Letter in Lieu of Sur-Reply Comments of Dominion Energy North Carolina, as filed in Docket No. E-100, Sub 161 were served electronically or via U.S. mail, first-class, postage prepaid, upon all parties of record.

This, the 19<sup>th</sup> day of April, 2024.

/s/ Nick A. Dantonio

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

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