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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 Dominion Energy North Carolina*
Docket No. M-100, Sub 163

Dear Ms. Dunston:

Pursuant to the North Carolina Utilities Commission's May 12, 2022, *Order Requesting Comments*, enclosed for filing in the above-referenced docket on behalf of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina ("Company") are the Company's Initial Comments.

Please feel free to contact me with any questions. Thank you for your assistance in this matter.

Sincerely,

/s/Mary Lynne Grigg

MLG:sjg

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
DOMINION ENERGY NORTH
CAROLINA**

NOW COMES Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (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 North Carolina's major electricity, natural gas, water, and wastewater utilities have taken appropriate steps to assure reliable operations during extreme cold weather events, and whether the Commission's rules, specifically Commission Rules R8-40 and R8-41, require revision in order to ensure reliable utility operations during extreme cold weather.

I. INTRODUCTION

On January 26, 2022, the Commission issued an *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. 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”).

On February 23, 2022, the Company filed its responses to the questions posed in the Scheduling Order (“Responses to Commission Questions”). In the Responses to Commission Questions, the Company explained that it continually works to improve the reliability of its generation and transmission assets during cold weather and did not need to make any updates directly in response to the ERCOT Outages due to the strong performance of these Company assets during the severe cold weather events similar to those observed in Texas. The Company also explained that it has reviewed the NERC Reliability Standard EOP-011 (effective April 1, 2023), drafted an Emergency Preparedness and Operations Program document, completed all existing cold weather preparedness procedures at its power generation facilities, and is performing a fleet-wide review to assess the existing facilities’ procedures to the NERC standard. The Company also outlined its process for extreme cold weather forecasting, the accuracy of those forecasts in the past, the curtailment process, if necessary, and communication with customers on the same.

On April 5, 2022, the Company filed its responses to Public Staff data requests focused on the Company’s PJM membership and extreme cold weather events, load forecasting, and customer communications during extreme cold weather events.

On April 19, 2022, the Company participated in a technical conference at the Commission and filed its PowerPoint presentation in the above-captioned docket on April 20, 2022 (“Presentation”). The Presentation outlined the Company’s investment in hardening its procedures and material condition of freeze infrastructure, the Company’s

current cold weather preparedness processes and NERC Reliability Standard EOP-011, load forecasting, customer communications, and its power plant performance and curtailment in past extreme cold weather events.

II. INITIAL COMMENTS

The Company believes that Commission Rules R8-40 and R8-41 do not need to be revised to ensure reliable utility operations during extreme cold weather. The Company's current preparedness process, load forecasting process, and investment in hardening its procedures and material condition of freeze prevention infrastructure have allowed the Company to reliably serve its customers during extreme cold weather, as evidenced by the performance of its generating facilities during such events. The Company also believes that its current reporting and customer communications procedures align with the Commission's current rules and have been effective.

A. Rule R8-40, Report of Impending Emergencies, Load Reductions and Service Interruptions in Bulk Electric Power Supply and Related Power Supply Facilities.

In general, Commission Rule R8-40, originally enacted in 1970 and most recently revised in 2013, requires electric public utilities and electric membership corporations to report to the Commission when certain events occur related to load reduction or outages. The Company believes that the reportable events, information to be included in such reports, and, as necessary, the special investigations and reports are effective and do not need to be modified.

The Company currently has e-mail contacts for individuals at the Commission who will be notified when there is a reportable event as defined in Rule R8-40. The Company has not had any actual reportable events in approximately the past 20 years, but prior to preparedness drills the Company sends e-mail notifications to these

contacts regarding an upcoming drill and then simulates sending notifications to these e-mail contacts during the drills. Pursuant to Rule R8-40(b), the Company also maintains telephone numbers for the Operations Division of the Commission Staff and the Electric Division of the Public Staff of the North Carolina Utilities Commission to provide notification of an actual reportable event.

B. Rule R8-41, Filing of Emergency Load Reduction Plans and Emergency Procedures.

The Company also contends that Commission Rule R8-41, which requires electric public utilities and electric membership corporations to file plans and emergency procedures annually with the Commission, has been effective and does not need to be modified. The Company has consistently filed its DENC-PJM Coordinated Emergency Plan in Docket No. E-100, Sub 10A and believes that this is an effective way to keep the Commission apprised of the Company's procedures during certain load reduction and emergency events. As explained in the Company's Responses to Commission Questions, the Company's Power Generation Regulatory Compliance ("PGRC") team has drafted an Emergency Preparedness and Operations Program document that outlines the NERC Reliability Standard EOP-011 and has been assessing existing facilities' conformance to such standard. Moreover, the Company's PGRC team is working with the Company's Power Generation Operations Excellence team to create a Cold Weather Preparedness Program that will ensure each of its power generation facilities has updated and uses its facility-specific cold weather procedure that will meet the NERC requirements that will be effective April 1, 2023. Specifically, the PGRC team is in the process of creating a station-specific procedure that will encompass a list of supplies needed for cold weather and equipment that needs cold weather supplies installed, along with a separate document

that details the specific information about each generating unit. Separately, the PGRC team will develop a training module to make sure all personnel are ready for cold weather. The Company is planning to have this station-specific procedure and training module in place for the 2022 winter season.

III. CONCLUSION

The Company appreciates the opportunity to provide these comments to the Commission and looks forward to providing reply comments as warranted by the other parties' initial comments.

Respectfully submitted,

DOMINION ENERGY NORTH CAROLINA

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Company, d/b/a Dominion Energy North Carolina*

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Initial Comments*, as filed in Docket No. M-100, Sub 163, were served electronically or via U.S. mail, first-class, postage prepaid, upon all parties of record.

This, the 29th day of June, 2022.

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