

August 26, 2022

VIA Electronic Filing

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

Re: *Reply 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* ("Order"), Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina ("DENC" or the "Company") provides the following Reply Comments.

The Company was provided an advance opportunity to review a draft of the Reply Comments of Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC, ("DEP" and, together with DEC "Duke Energy") and hereby adopts those Reply Comments by reference and provides two additional comments below.

First, DENC agrees with Duke Energy's position that the Public Staff's proposed revision to Rule R8-40(a), insofar as it would increase the reporting threshold for outages on facilities operating at a nominal voltage of 69 kV or higher to 44 kV or higher is not appropriate. DENC further supports Duke Energy's proposal to revise this threshold to 100 kV to align with existing North American Electric Reliability Corporation (NERC) reporting requirements and capture only those outages that occur on bulk electric system facilities. DENC would further note in this regard that 44 kV is considered a distribution-level voltage on the Company's electric system.

Second, DENC notes that it cannot comply with the Public Staff's proposed revision in Rule R8-40(a) insofar as it requires reporting on outages "anywhere within the public electric utility's . . . balancing authority, regardless of jurisdiction" because DENC does not have access to data outside of its own transmission system. Any data relating to

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outages outside of DENC's footprint would have to come directly from PJM as DENC's transmission operator.

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

Sincerely,

/s/Mary Lynne Grigg

MLG:sjg

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Reply 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 26th day of August, 2022.

/s/Mary Lynne Grigg

Mary Lynne Grigg

McGuireWoods LLP

501 Fayetteville Street, Suite 500

PO Box 27507 (27611)

Raleigh, North Carolina 27601

Telephone: (919) 755-6573

mgrigg@mcguirewoods.com

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

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