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June 1, 2020

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Joel H. Peck, Clerk
State Corporation Commission
c/o Document Control Center
Tyler Building – First Floor
1300 East Main Street
Richmond, Virginia 23219

*Application of Virginia Electric and Power Company
For revision of a rate adjustment clause: Rider U, new underground distribution facilities
for the Rate Year Commencing April 1, 2021
Case No. PUR-2020-00096*

Dear Mr. Peck:

Please find enclosed for filing in the above-captioned proceeding, an unbound original and one copy of the **public version** of the *Application of Virginia Electric and Power Company For revision of a rate adjustment clause: Rider U, new underground distribution facilities for the Rate Year Commencing April 1, 2021* (“Application”). A confidential version of the Application and a Motion for Entry of a Protective Ruling are being filed under separate cover.

Please do not hesitate to call if you have any questions in regard to the enclosed.

Highest regards,

/s/ Lisa R. Crabtree

Lisa R. Crabtree

Enclosure

cc: William H. Chambliss, Esq.
C. Meade Browder, Jr., Esq.
Paul E. Pfeffer, Esq.
Joseph K. Reid, III, Esq.
Jontille D. Ray, Esq.



**Dominion
Energy®**

Application, Direct
Testimony, Exhibits and
Schedules of Virginia
Electric and Power
Company

Before the State Corporation
Commission of Virginia

For revision of a rate adjustment
clause: Rider U, new underground
distribution facilities for the Rate
Year Commencing April 1, 2021

Volume 1 of 1
PUBLIC VERSION

Case No. PUR-2020-00096

Filed: June 1, 2020

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For revision of a rate adjustment clause: Rider U, new underground distribution facilities,
for the Rate Year Commencing April 1, 2021

Case No. PUR-2020-00096

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Application

Direct Testimony of Karen M. Kinslow

Company Exhibit No. __, KMK, Schedule 1 – Tap Line Reliability Prior to/Subsequent to Conversion

Company Exhibit No. __, KMK, Schedule 2 – Grid Map of SUP Projects

Company Exhibit No. __, KMK, Schedule 3 – Contractors by Area

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Company Exhibit No. __, LMC, Schedule 1 – Phase Five Actual and Projected Capital Expenses (Contains Confidential Information)

Company Exhibit No. __, LMC, Schedule 2 – Phase Five Actual Capital Expenses by Month (Contains Confidential Information)

Company Exhibit No. __, LMC, Schedule 3 – Phase Five Projected Capital Expenses by Month (Contains Confidential Information)

Company Exhibit No. __, LMC, Schedule 4 – Phase Four Actual Capital Expenses (Contains Confidential Information)

Direct Testimony of C. Alan Givens

Company Exhibit No. __, CAG, Schedule 1 – Revenue Requirement for Rider U for the Rate Year

Direct Testimony of George G. Bousley

Company Exhibit No. __, GGB, Schedule 1 – Virginia Jurisdiction Allocation Factors

Company Exhibit No. __, GGB, Schedule 2 – Class Allocation Factors

Company Exhibit No. __, GGB, Schedule 3 – Rate Design

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Filing Schedule 46A**Sponsored by Company Witness Leslie M. Carter**

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PUBLIC VOLUME 1 of 1**Application****Direct Testimony of Karen M. Kinslow**

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Statement 2	SAP Backup for Actual Costs (Entirely Redacted)
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Filing Schedule 46B

Sponsored by Company Witness C. Alan Givens

- Statement 1 Revenue Requirement for Rider U for the Rate Year
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Filing Schedule 46C

Sponsored by Company Witness George G. Beasley

- Statement 1 Methodology for Allocating Revenue Requirement among Rate Classes
- Statement 2 Long Term Annual Revenue Requirements by Class

APPLICATION
200610097

COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

APPLICATION OF)
)
 VIRGINIA ELECTRIC AND POWER COMPANY)
) Case No. PUR-2020-00096
 For revision of a rate adjustment clause: Rider U,)
 new underground distribution facilities,)
 for the Rate Year Commencing April 1, 2021)

**VIRGINIA ELECTRIC AND POWER COMPANY'S
 RIDER U ANNUAL UPDATE FILING AND WAIVER REQUEST**

Virginia Electric and Power Company (“Dominion Energy Virginia” or the “Company”), by counsel, pursuant to clause (iv) of § 56-585.1 A 6 (“Subsection A 6”) of the Code of Virginia (“Va. Code” or “Code”), and Rules 10 (20 VAC 5-201-10) and 60 (20 VAC 5-201-60) of the Virginia State Corporation Commission’s (“Commission”) Rules Governing Utility Rate Case Applications and Annual Informational Filings (20 VAC 5-201-10 *et seq.*) (“Rate Case Rules”), hereby submits its third annual update filing with respect to its rate adjustment clause (“RAC”), Rider U, for cost recovery associated with phase one (“Phase One”), phase two (“Phase Two”), phase three (“Phase Three”), and phase four (“Phase Four”) (collectively, the “Previously Approved Phases”) of the Company’s Strategic Underground Program (“SUP”) and its request for Commission approval to recover costs associated with phase five (“Phase Five”) of the SUP through Rider U, for the rate year commencing April 1, 2021 through March 31, 2022 (“Rate Year”) (the “Application”). In support of this Application, the Company respectfully shows as follows:

200610097

GENERAL INFORMATION

1. Dominion Energy Virginia is a public service corporation organized under the laws of the Commonwealth of Virginia furnishing electric service to the public within its certificated service territory. The Company also supplies electric service to Non-jurisdictional customers in Virginia and the public in portions of North Carolina. The Company is engaged in the business of generating, transmitting, distributing, and selling electric power and energy to the public for compensation. The Company is also a public utility under the Federal Power Act, and certain of its operations are subject to the jurisdiction of the Federal Energy Regulatory Commission. The Company is an operating subsidiary of Dominion Energy, Inc.

2. The Company's name and post office address is:

Virginia Electric and Power Company
120 Tredegar Street
Richmond, Virginia 23219

3. The names, post office addresses, and telephone numbers of the attorneys for the Company are:

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APPLICABLE VIRGINIA CODE

4. The current version of Virginia Code § 56-585.1 A 6 (“Subsection A 6”), provides that the annual incremental increase in investment level pursuant to a petition under clause (iv) of this subdivision shall not exceed five percent of the Company’s distribution rate base, as such rate base was determined for the most recently ended 12-month test period in the Company’s latest biennial review proceeding. The statute provides that the replacement of any subset of a utility’s existing overhead distribution tap lines that have, in the aggregate, an average of nine or more total unplanned outage events-per-mile over a preceding 10-year period with new underground facilities in order to improve electric service reliability is in the public interest.

5. The statute further provides that the conversion of any such facilities on or after September 1, 2016, is deemed to provide local and system-wide benefits and to be cost beneficial, and that the costs associated with such new underground facilities are deemed to be reasonably and prudently incurred.

6. Lastly, so long as the aggregated costs associated with the replacement of overhead distribution tap lines with underground facilities do not exceed an average cost per customer of \$20,000, including customers served directly by or down line of the tap lines proposed for conversion, exclusive of financing costs, and an average cost per mile of \$750,000, exclusive of financing costs, the Commission shall approve such costs.

REQUESTED RECOVERY

7. In the Company’s most recent application in Case Number PUR-2019-00046 (“Phase Four proceeding”), the Commission approved Rider U for implementation for a February 1, 2020 through January 31, 2021 rate year. On March 30, 2020, the Company filed a

Motion for Expedited Consideration to Extend Currently Approved Rider U (“Motion”). On April 1, 2020, the Commission granted the Motion and ordered that the currently-approved rates of Rider U be continued through March 31, 2021. Therefore, in this current application, the Company proposes an effective date of April 1, 2021 (for a rate year of April 1, 2021 through March 31, 2022) or, consistent with the Company’s request for billing purposes in other cases to implement rate adjustment clauses, on and after the first day of the month which is at least fifteen (15) calendar days following the date of any Commission order approving Rider U.

8. As explained by Company Witness C. Alan Givens, the Company is requesting recovery for a revenue requirement of \$44.340 million for the Previously Approved Phases and a revenue requirement of \$35.348 million for proposed Phase Five costs, for a total combined Rider U revenue requirement of \$79.687 million.

PHASE FOUR UPDATE

9. In Phase Four, the Company completed 247.5 miles of underground conversions of overhead distribution tap lines and associated facilities. This compares to the projected 246 miles the Company proposed for Phase Four underground conversions. Company Witness Leslie M. Carter discusses the underground conversion projects completed in Phase Four.

10. The Company invested a total of \$123.5 million in Phase Four projects, which is in line with the projected Phase Four capital expenditures of \$123 million. The Company estimated Phase Four would cost an average of approximately \$500,000 per mile, and the actual cost per mile for Phase Four was \$499,205. Company Witness Carter provides details for Phase Four costs and the total capital investment.

PROPOSED PHASE FIVE

11. Phase Five is designed to convert approximately 317 miles of overhead tap lines to underground facilities at a capital investment of approximately \$172 million. Phase Five actual expenditures through March 31, 2020, are \$54.5 million, and projected expenditures for the period April 1, 2020 through March 31, 2021, are approximately \$117 million. For Phase Five underground conversions, the Company estimates an average cost per mile of \$542,087, an average cost per customer of \$9,968, and an events per mile of 14.76. Company Witness Carter describes the process to develop the Phase Five budget and calculate the average cost per mile of underground conversions. As explained by Company Witness Karen M. Kinslow, the Phase Five tap lines meet the statutory requirements in Subsection A 6 for cost recovery.

12. Consistent with the Code, the Company continues to use the selection metric of “events per mile” to identify the most-outage prone tap lines that are candidates for underground conversions based upon outage history of each line over a ten year period.

13. The Company is requesting to recover costs of Phase Five through Rider U for only those projects that will be completed prior to the beginning of the proposed Rate Year or April 1, 2021. Company Witness Kinslow discusses the complete undergrounding process – including tap line selection, as well as refinements to Phase Five’s project management and customer communications and outreach.

14. The Company respectfully requests that the Commission approve recovery of these Phase Five capital investments through Rider U, subject to subsequent true-ups, and find that such expenditures are consistent with Subsection A 6.

PHASES ONE THROUGH FOUR ACCOUNTING UPDATE AND PHASE FIVE ACCOUNTING

A. Rate of Return on Common Equity

15. For purposes of this Application and consistent with the Commission's November 21, 2019 Final Order in the Company's 2019 ROE Proceeding in Case No. PUR-2019-00050, the Company is utilizing the approved ROE of 9.2% for the period subsequent to the date of that Final Order. For the time periods prior to the Final Order in Case No. PUR-2019-00050, the Company is utilizing a ROE of 9.2%, as approved by the Commission in its Final Order on November 29, 2017 in the Company's 2017 ROE Proceeding, Case No. PUR-2017-00038.

B. Revenue Requirement

16. The two key components of the revenue requirement for each phase in this filing are the Projected Cost Recovery Factor and the Actual Cost True-up Factor. There will not be an Allowance for Funds Used During Construction ("AFUDC") Cost Recovery Factor in Rider U filings. Consistent with the Company's previous Rider U applications, costs for Phase Five underground conversion projects are being closed directly to plant-in-service in the month incurred, consistent with the Company's longstanding practice for Distribution Massed Assets. Therefore, the underground distribution conversion projects will not have Construction Work in Progress balances requiring the accrual of AFUDC.

17. To calculate the Projected Cost Recovery Factor, the Company is proposing to only include actual and projected capital expenditures up until the beginning of the Rate Year in determination of the rate base and the calculation of financing costs on rate base. The projected rate base as of March 31, 2021, will be utilized separately for each phase of the current filing. Additionally, similar to costs deferred as part of the Company's previous Rider U applications,

the Company has identified certain costs incurred related to Phase Five that have been deferred and will be amortized over the Rate Year in this case.

18. As Company Witness Givens explains, the Actual Cost True-Up Factor will credit to, or recover from, customers any over- or under-collection of costs from the most recently completed calendar year, 2019. For the current Rider U filing, the Company is proposing to true-up Phases One through Three for the period of January 1, 2019 through December 31, 2019.

19. The Company utilizes an end-of-test period capital structure and cost of capital pursuant to Va. Code § 56-585.1 A 10 and consistent with the Commission's Order on Commission Staff's Motion *in Limine* dated July 14, 2009 in the Company's 2009 going-in review, Case No. PUE-2009-00019. For purposes of setting rates during the Rate Year, the Company is utilizing the actual December 31, 2019 year-end capital structure and year-end Cost of Capital. Company Witness Givens supports this calculation.

20. Similar to the Company's treatment of costs incurred for prior phases of the SUP, the Company is proposing to defer depreciation expense, property taxes, and financing costs on rate base incurred up through the beginning of the Rate Year for Phase Five, and recover them over the Rate Year ending March 31, 2022. This is consistent with how the Company is currently deferring Pre-Commercial Operation costs in other various Subsection A 6 rate adjustment clause cases.

21. For the Rate Year beginning April 1, 2021, the Company is therefore requesting recovery of a total revenue requirement of \$44.340 million for Previously Approved Phases, and a revenue requirement of \$35.348 million for proposed Phase Five, for a combined Rider U revenue requirement of \$79.687 million.

RIDER U COST ALLOCATION AND RATE DESIGN UPDATE

22. The Company interprets the language in Subsection A 6 to mean that the Company's Virginia Jurisdictional large general service rate classes, GS-3 and GS-4, are exempt from Rider U charges. That is, the Virginia Jurisdictional Rider U costs will be collected only from the Residential, GS-1, GS-2, Church, and Lighting classes. As described by Company Witness George G. Beasley, the Company is proposing a method of cost allocation between the Virginia Jurisdictional and Virginia Non-Jurisdictional customers approved by the Commission's Final Order dated October 31, 2019 in Case No. PUR-2019-00046. Under this methodology, the Company is using a Virginia Jurisdictional Rider U allocation factor of 88.7508% for Rider U's Projected Cost Recovery Factor. Based on the Commission's previously-approved methodology, the Company is using a Virginia Jurisdictional Rider U allocation factor of 88.7508% for Rider U's Actual Cost True-Up Factor. Company Witness Beasley also details the Rider U customer class allocation and pricing, and the assignment of Rider U distribution plant to the Virginia Jurisdiction.

23. Sponsored by Company Witness Beasley, the updated Rider U, identifies the rates in either cents per kilowatt-hour ("kWh") or dollars per kilowatt that will apply to each applicable Company Rate Schedule for Rider U.

24. The Company proposes, for billing purposes, that Rider U have an effective date for usage on and after the first day of the month which is at least fifteen (15) calendar days following the date of any Commission order approving Rider U. Regardless of the resulting effective date of Rider U for billing purposes, the Company proposes, for calculation of the revenue requirement, the Rate Year be April 1, 2021 to March 31, 2022.

25. The implementation of the proposed Rider U on April 1, 2021, is calculated to

incrementally increase the residential customer's monthly bill by \$0.74 compared to the current Rider U. The total Rider U bill impact is \$2.14, based on usage of 1,000 kWh per month. Company Witness Beasley provides typical monthly bill changes for customers subject to Rider U receiving service on Residential Schedule 1, General Service Schedules GS-1, GS-2, and Church Schedule 5C, at several representative levels of consumption or demand.

**PRE-FILED DIRECT TESTIMONY AND EXHIBITS
SUPPORTING FILING SCHEDULE 46 AND REQUEST FOR PARTIAL
WAIVER OF THE RATE CASE RULES FILING REQUIREMENTS**

26. In support of this Application, Dominion Energy Virginia presents herewith the pre-filed direct testimony and exhibits of the following witnesses: Karen M. Kinslow, Leslie M. Carter, C. Alan Givens, and George G. Beasley.

A. Filing Schedule 46

27. Filing Schedule 46A, Statement 1, sponsored by Company Witness Carter, provides actual and projected Rider U costs annually and by month through March 2021. Statement 2 contains the SAP backup for actual costs from May 2018 to May 2019. Filing Schedule 46A, Statement 3 provides documentation supporting these costs to the extent that such information has changed since the Company's Phase Four proceeding, including all documentation, contracts, studies, investigations, or correspondence that supports costs proposed to be recovered via the RAC. However, consistent with the Company's request for waiver below, the Company has provided the Statement 3 documents in electronic format only.

28. Filing Schedule 46B, Statement 1, sponsored by Company Witness Givens, provides the combined total revenue requirement for the Previously Approved Phases and Phase Five for the Rate Year ending March 31, 2022. Filing Schedule 46B, Statement 2 provides the annual revenue requirement over the duration of the RAC for the Previously Approved Phases

and Phase Five. Filing Schedule 46B, Statement 3 provides documentation supporting Statement 2. Lastly, Filing Schedule 46B, Statement 4 provides a detailed description of all significant accounting procedures and internal controls that the Company has instituted to identify all costs associated with the RAC.

29. Filing Schedule 46C, Statement 1 sponsored by Company Witness Beasley, provides the allocation of the revenue requirement and the rate design for the Rate Year ending March 31, 2022. In addition, Filing Schedule 46C, Statement 2, provides the annual revenue requirement by customer class over the duration of the RAC.

B. Request for Waiver of Filing Schedule 45 Requirements

30. The Company, for good cause shown and pursuant to 20 VAC 5-201-10 E, respectfully requests that the Commission waive, in part, the requirements under Rules 60 and 90 of the Rate Case Rules with respect to Filing Schedule 45 (Return on Equity Peer Group Benchmark). The Commission approved a 9.2% base ROE in Case Nos. PUR-2017-00038 and PUR-2019-00050 to be used in the Company's riders under Va. Code § 56-583.1 A 5 and Subsection A 6 to calculate the revenue requirement. To promote judicial economy and efficiency of case administration, the Company therefore respectfully requests that the Commission waive, for good cause shown, the requirements of 20 VAC 5-201-60 and 20 VAC 5-201-90 with respect to the submission of Filing Schedule 45 in this Rider U update.

C. Request for Waiver of Filing Schedule 46 Requirements

31. The Company, for good cause shown and pursuant to 20 VAC 5-201-10 E, additionally respectfully requests that the Commission waive, in part, the requirements under Rules 60 and 90 of the Rate Case Rules with respect to paper copies of certain Filing Schedule 46 materials. Specifically, the Rate Case Rules require the Company provide all documents,

contracts, studies, investigations or correspondence that support projected costs proposed to be recovered via the rate adjustment clause. Even with the limitation of only including those materials that are new since the prior Rider U filing, the supporting documentation responsive to this requirement is voluminous and, often, not easily reviewed in hard copy (paper) format. Accordingly, and after consultation with certain members of the Commission Staff, the Company seeks waiver of the requirement to file this information in hard copy. Instead, the Company proposes to provide this documentation to Commission Staff and any other future case participant in electronic format only. The Company will make these documents available via an e-room contemporaneously with this filing, with immediate access available to Commission Staff. Should the Commission deny this request, the Company asks for a reasonable allowance of time to print the requisite filing copies of this material and submit it to the Commission prior to the Company's application being deemed incomplete.

D. Additional Filing Schedule 46 Requirements

32. Consistent with the Commission's ruling in the Order for Notice and Hearing issued in the Phase Three proceeding, Case No. PUR-2018-00042, the Company is not filing documents in response to certain provisions of the Rate Case Rules addressing generation-related RAC filing requirements in Schedule 46 because they are not applicable to the distribution facilities addressed in clause (iv) of Subsection A 6.¹ The Commission has previously indicated that no waiver request is necessary.

REQUEST FOR CONFIDENTIAL TREATMENT

33. The Company's Application contains, at points so designated therein, confidential and/or redacted information, and the non-public version of this filing is being made under seal.

¹ *Application of Virginia Electric and Power Company For revision of rate adjustment clause: Rider U, new underground distribution facilities, for the rate year commencing February 1, 2019, Case No. PUR-2018-00042, Order for Notice and Hearing at 6. (Apr. 2, 2018)*

Because portions of the Company's Application contain such confidential and/or redacted information, in compliance with Rule 10 I and Rule 170, 20 VAC 5-201-10 F and 5 VAC 5-20-170, this filing is accompanied by a separate Motion for Entry of a Protective Order, including a form of Proposed Protective Order, filed by the Company under separate cover but contemporaneously with this Application.

COMPLIANCE WITH RULE 10 OF THE RATE CASE RULES

34. The Company's Application for revision of Rider U complies with the requirements contained in Rule 10 of the Rate Case Rules. In accordance with Rule 10 A, the Company filed with the Commission on January 31, 2020, the Company's notice of intent to file this Application under Va. Code § 56-585.1 A 6. Copies of the Public Version of this Application, to the extent required by Rule 10 J, along with the additional information required by Rule 10 J, have been served upon the persons addressed in that Rule. A complete copy of the Public Version of this Application has been served upon the Office of the Attorney General's Division of Consumer Counsel, in accordance with Rule 10 J. Also included with and following this Application, pursuant to Rule 10, is a table of contents of this filing, including exhibits and schedules.

35. Beyond the initial Application, Rule 20 VAC 5-201-10 J requires the Company to serve copies of certain information related to Dominion Energy Virginia's rate proceedings upon local officials via first class mail or personal delivery. The Company has obtained a continuing waiver of Rule 10 J of the Rate Case Rules from the Commission to permit electronic delivery of rate application information to the localities in lieu of first class mail delivery upon request from the locality.² Accordingly, the Company requests that any procedural order issued in this

² *Petition of Virginia Electric and Power Company for continuing waiver of 20 VAC 5-201-10 J of the Rules Governing Utility Rate Applications and Annual Informational Filings to permit electronic service to local officials*

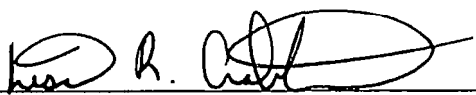
proceeding allow for electronic service of materials going forward on localities that request such service in writing.

CONCLUSION

WHEREFORE, the Company respectfully requests that the Commission: (1) approve the proposed revenue requirement, cost allocation, rate design, and accounting treatment for costs associated with the Previously Approved Phases and Phase Five of the SUP over the rate year of April 1, 2021 through March 31, 2022; (2) approve the Company's proposed Rider U, effective for usage on and after the latter of April 1, 2021 or the first day of the month which is at least fifteen (15) days following the date of any Commission order approving Rider U; (3) grant the Company's requested waiver as to the Filing Schedule 45 and Filing Schedule 46, Statement 3 Requirements; and (4) grant such other relief as deemed appropriate and necessary.

Respectfully submitted,

VIRGINIA ELECTRIC AND POWER COMPANY

By:  _____
Counsel

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Counsel for Virginia Electric and Power Company

June 1, 2020