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COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION

APPLICATION OF

SHENANDOAH VALLEY ELECTRIC  
COOPERATIVE

Case Number PUR-2021-00054

For a general increase in electric rates

**BOARD OF SUPERVISORS OF FREDERICK COUNTY, VIRGINIA'S  
POST-HEARING BRIEF**

COMES NOW the Board of Supervisors of Frederick County, Virginia (generally, "Frederick County"), by counsel, and submits its Post-Hearing Brief pursuant to the Hearing Examiner's Ruling of October 15, 2021 in the above-captioned proceeding, and states as follows:

Frederick County has already entered a stipulation (the "Stipulation") with the applicant, Shenandoah Valley Electric Cooperative ("SVEC"), and Commission Staff ("Staff") regarding most of the matters at issue in this proceeding. Hearing Ex. 9. One of the issues as to which Frederick County did not take a position in the Stipulation concerned SVEC's basic consumer charge (generally, the "Consumer Charge"), for Residential Schedule A-12, Church Service Schedule C-12, and General Service Schedule B-12. Hearing Ex. 9, ¶ 7.

Regarding the Consumer Charge, Frederick County respectfully submits that the Commission consider the impact of the Consumer Charge on all of the wide range of SVEC's ratepayers and consider a modification to SVEC's requested Consumer Charge. As many of the public comments at the hearing indicated, in particular, the impact of the Consumer Charge falls most heavily on the residential consumers who use the least electricity. Many of these consumers, in turn, are consumers with more limited economic means. One option for these consumers should be to enable them to control better their electricity costs through reduced consumption. By shifting more of their electric bills from a volumetric charge to a fixed charge, however, as SVEC requests in this proceeding, these consumers have less ability to control their electricity costs. Along similar

lines, even for consumers who are less sensitive to electricity costs, the higher Consumer Charge, relative to volumetric charges, has the effect of discouraging consumers from conserving in their use of electricity.

Accordingly, Frederick County respectfully requests the Commission consider a modification to SVEC's requested Consumer Charge, so to address the impacts of electricity costs on SVEC's ratepayers of limited means and so to encourage electricity conservation.

Respectfully submitted,

BOARD OF SUPERVISORS OF  
FREDERICK COUNTY, VIRGINIA  
By Counsel



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CERTIFICATE OF SERVICE

I hereby certify that, on the 12<sup>th</sup> day of November, 2021, I caused a true copy of the foregoing to be served by e-mail sent to:

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