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January 10, 2022

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*Petition of Virginia Electric and Power Company for revision of a rate adjustment clause,
designated Rider RGGI, under § 56-585.1 A 5 e of the Code of Virginia*
Case No. PUR-2021-00281

Dear Mr. Logan:

Enclosed for electronic filing in the above-captioned proceeding, please find *Virginia Electric and Power Company's Motion to Withdraw Application*.

Please do not hesitate to contact me if you have any questions in regard to this filing.

Highest regards,

/s/ Elaine S. Ryan

Elaine S. Ryan

enc.

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COMMONWEALTH OF VIRGINIA
 STATE CORPORATION COMMISSION

PETITION OF)
)
 VIRGINIA ELECTRIC AND POWER COMPANY)
) Case No. PUR-2021-00281
 For revision of rate adjustment clause: Rider RGGI,)
 pursuant to § 56-585.1 A 5 e of the Code of Virginia)

**VIRGINIA ELECTRIC AND POWER COMPANY’S
 MOTION TO WITHDRAW APPLICATION**

On December 6, 2021, Virginia Electric and Power Company (“Dominion Energy Virginia” or the “Company”) filed with the State Corporation Commission of Virginia (the “Commission”) its annual update filing with respect to its rate adjustment clause (“RAC” or “Rider”), designated Rider RGGI, approved to recover costs related to the purchase of allowances through the Regional Greenhouse Gas Initiative (“RGGI”) market-based trading program for carbon dioxide (“CO₂”) emissions, a program in which the Company is required to participate pursuant to § 56-585.1 A 5 e (“Subsection A 5 e”) of the Code of Virginia (“Va. Code”). Pursuant to Rule 110 of the Commission’s Rules of Practice and Procedure,¹ 5 VAC 5-20-110, Dominion Energy Virginia moves to withdraw its update Application without prejudice (“Motion”). In support of its Motion, the Company states as follows:

1. On August 4, 2021, in Case No. PUR-2020-00169 (“2020 Rider RGGI Proceeding”), the Commission issued its Order Approving Rate Adjustment Clause (“Rider RGGI Order”), approving Rider RGGI to be effective for usage on and after September 1, 2021.²

¹ 5 VAC 5-20-10 *et seq.* (the “Procedural Rules”).

² *Petition of Virginia Electric and Power Company For approval of a rate adjustment clause, designated Rider RGGI, under § 56-585.1 A 5 e of the Code of Virginia*, Case No PUR-2020-00169, Order Approving Rate Adjustment Clause at 11 (Aug. 4, 2021).

Subsequently, the Commission suspended the Rider RGGI Order on August 25, 2021 pending consideration of a Petition for Reconsideration or Clarification. On November 17, 2021, by its Order on Reconsideration, the Commission lifted the suspension of the Rider RGGI Order without modification of its initial order. On January 1, 2022, the initial Rider RGGI was implemented, which increased the monthly bill of a residential customer using 1,000 kilowatt-hours per month by approximately \$2.39.

2. As set forth in the Company's annual update Application, if approved, the revised Rider RGGI rate would become effective for the rate year commencing September 1, 2022 and would increase the monthly bill of a residential customer using 1,000 kilowatt-hours per month by \$1.98. Including the increase associated with the annual update, the total Rider RGGI impact on the typical bill of a residential customer would be \$4.37.

3. On December 8, 2021, Governor-elect Glenn Youngkin announced that he intends to withdraw Virginia from RGGI.

4. Due to the uncertainty surrounding the timeline for the Commonwealth's participation in RGGI, as well as the compliance requirements and associated costs for the September 1, 2022 through August 31, 2023 rate year, Dominion Energy Virginia seeks leave to withdraw its Rider RGGI update Application without prejudice. The Company intends to file a new update application to recover its actual and projected RGGI compliance costs informed by these developments at the appropriate time.

5. Good cause exists for the Commission to grant this Motion and allow the Company to withdraw the Application. By granting the Motion, the existing Rider RGGI rate will remain in place to recover past compliance costs already incurred, subject to future true-up, and the Company will be able to better estimate its future compliance costs once the timeline for

the Commonwealth's RGGI participation is more certain. In turn, customers will benefit to the extent they will not bear the burden of increased near-term compliance costs that may not materialize. In the meantime, the Company will continue to meet its compliance obligations under RGGI until the withdrawal is effective.

6. Counsel for the Company has notified Commission Staff of its intention to file this Motion and has been authorized to represent that Staff takes no position on the requested relief.

WHEREFORE, for the reasons set forth in this Motion, the Company respectfully requests that the Commission (i) grant leave for the Company to withdraw the Application without prejudice and deem such Application withdrawn; and (ii) grant such other relief as the Commission deems necessary and appropriate.

Respectfully submitted,

By: /s/ Elaine S. Ryan
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