STATE CORPORATION COMMISSION RECEIVED JUL 07 2022

Case No. <u>PUR-2022-00064</u> Sponsor: <u>("DOMINION")</u>

Exhibit No. 2

Witness: NONE

Bailiff: JABARI T. ROBINSON

COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION

APPLICATION OF)	
VIRGINIA ELECTRIC AND POWER COMPANY)	Case No. PUR-2022-00064
To revise its fuel factor pursuant to Va. Code § 56-249.6)	

APPLICATION

Pursuant to § 56-249.6 of the Code of Virginia ("Va. Code"), Virginia Electric and Power Company ("Dominion Energy Virginia" or the "Company"), by counsel, files this application to revise its fuel factor effective July 1, 2022 (the "Application"). In support of its Application, the Company respectfully states the following:

- 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 to the public in portions of North Carolina. The Company's electric system, consisting of facilities and associated facilities for the generation, transmission, and distribution of electric energy, is interconnected with the electric systems of neighboring utilities and is part of the interconnected network of electric systems serving the continental United States. Because of its operations in Virginia and North Carolina and its interconnections with other electric utilities, the Company engages in interstate commerce. The post office address of the Company is P.O. Box 26666, Richmond, Virginia 23261.
- 2. The facts supporting this Application are set forth in the accompanying testimony and exhibits of Gregory A. Workman, J. Scott Gaskill, Whitney W. Johnson, Katherine E.

Farmer, Dale E. Hinson, Tom A. Brookmire, Wesley A. Hudson, Ronnie T. Campbell, and Timothy P. Stuller.

- 3. The testimony and exhibits demonstrate that a revision to the Company's existing fuel factor rate is necessary to provide the Company with the appropriate level of fuel cost recovery pursuant to Va. Code § 56-249.6 over the period beginning July 1, 2022 through June 30, 2023.
- 4. The Company's total fuel factor, reflected in Fuel Charge Rider A, consists of both a current period and a prior period factor. As Company Witness Timothy P. Stuller discusses, for the July 1, 2022 through June 30, 2023 fuel year, the Company projects Virginia jurisdictional fuel expenses, including purchased power expenses, of approximately \$2.278 billion, translating into a current period fuel factor rate of 3.0784 cents per kilowatt-hour ("¢/kWh"). The Company's projected June 30, 2022 fuel deferral balance is approximately \$1.020 billion, translating into a prior period factor rate of 1.3784 ¢/kWh. Together, these components translate into a total proposed fuel factor rate of 4.4568 ¢/kWh for the period July 1, 2022 through June 30, 2023.
- 5. As explained by Company Witness Gregory A. Workman and others, the total projected fuel deferral balance attributable to the July 2021 June 2022 is substantial, largely due to the increase in commodity prices over the past year. While significant, the underrecovery over the prior period was mitigated in part by the Company's comprehensive approach to fuel procurement and hedging, including the availability of a diverse generation portfolio, access to reliable fuel supply, and an effective commodity price hedging program. Comparing the July 2021 March 2022 period with the similar period of July 2020 March 2021, natural gas and coal fuel commodities experienced price increases of approximately 100% and 92%,

respectively, while the fuel component of the in-system generation output experienced only a 37% increase in \$/MWh, as supported by Company Witness Dale E. Hinson.

- 6. While the Company is entitled to recovery of these prudently incurred fuel expenses on a prompt basis under Va. Code § 56-249.6, the Company recognizes the impact of such an increase in fuel rates on our customers. In order to mitigate the impact of an increase in the fuel factor rate on customers, the Company is voluntarily offering two alternative proposals to the full recovery rate, should the Commission find it to be in the public interest and so approve. Under the alternative proposals presented by Company Witness J. Scott Gaskill, the Company would waive its right to prompt recovery of the full deferral balance over the current period in favor of recovery of this balance equally over either two fuel periods ("Two Year Mitigation") or three fuel periods ("Three Year Mitigation"), at the Commission's discretion.
- 7. The Two Year Mitigation proposal would, if adopted, amortize the \$1.020 billion projected June 30, 2022 fuel deferral balance for recovery equally over the fuel periods July 1, 2022 June 30, 2023 and July 1, 2023 June 30, 2024 (a total of 24 months). This would result in a prior period factor for the current fuel year of 0.6892 ¢/kWh and a total fuel factor rate of 3.7676 ¢/kWh for the current period—reducing the impact on the overall residential customer's monthly bill from 19.8% to 14.1%, compared to the full recovery rate during the current period.
- 8. The Three Year Mitigation proposal would, if adopted, amortize the \$1.020 billion projected June 30, 2022 fuel deferral balance for recovery equally over the fuel periods July 1, 2022 June 30, 2023, July 1, 2023 June 30, 2024, and July 1, 2024 June 30, 2025 (a total of 36 months). This would result in a prior period factor for the current fuel year of 0.4595 ¢/kWh and a total fuel factor rate of 3.5379 ¢/kWh for the current period—reducing the impact on the overall bill for the typical residential customer from 19.8% to 12.2%, compared to the full recovery rate during the current period. This represents a further 0.2297 ¢/kWh rate reduction,

or approximately \$2.30 per month bill savings for a residential customer, over the Two Year Mitigation.

- 9. The Company believes that its voluntary fuel factor mitigation proposals recognize the interests of customers in avoiding abrupt rate increases, as referenced in Va. Code § 56-249.6, and are consistent with the public interest. While either mitigation proposal is preferable to the full recovery rate, the Three Year Mitigation offers the smallest near-term fuel rate increase, promotes rate stability across the next several years, and offers the Commission flexibility next year if circumstances around commodity markets have improved. For these reasons, the Company requests that the Commission approve the Three Year Mitigation proposal and set a fuel rate of 3.5379 ¢/kWh.
- 10. Further, to the extent that the Commission directs implementation of an interim fuel rate for usage on and after July 1, 2022, the Company requests that the proposed fuel factor rate of 3.5379 ¢/kWh based on the Three Year Mitigation proposal be implemented as the interim rate.
- 11. Concurrent with this filing, the Company has also filed a petition to suspend its rate adjustment clause designated Rider RGGI effective July 1, 2022, which, if approved by the Commission, would lower the typical residential bill by \$2.39 per month at the same time the fuel factor increase would take place. Additionally, the Company has filed its annual update to Rider T1, which, if approved would result in a reduction in the typical residential customer bill of approximately \$3.69 per month. Taken as a whole—the Three Year Mitigation, suspension of Rider RGGI, and the Rider T1 reduction—the increase to a typical residential customer bill is approximately \$9.00 per month. While the Company does not take any such rate increase lightly, it is mindful of the impact to its customers and is taking meaningful steps to limit the impact felt from the current commodity market pressures.

- 12. In connection with this Application, the Company is also seeking approval of an accounting change as it relates to the funding of the fuel factor for customers taking service under the approved market-based rate ("MBR") schedules, Rate Schedule MBR, Rate Schedule MBR-GS-3, Rate Schedule MBR-GS-4, and the SCR Rate Schedule (collectively, the "MBR Customers"), to more timely align the timing of the fuel expense incurred by the Company and the revenues received through the market-based charges from these customers as presented by Company Witness Gaskill. This change holds both MBR and non-MBR customers harmless and is intended to resolve the timing mismatch between revenue and fuel expense that exists for customers taking service on these voluntary rate schedules.
- 13. Specifically, the Company is proposing a going-forward accounting change with respect to MBR revenues such that it will fund the Company's *actual* average system fuel costs on a month-by-month basis instead of the approved fuel rate. By making this accounting change, there will be better alignment between MBR revenue, and the fuel costs incurred to serve these customers. In other words, MBR-customer revenues would fund their share of actual fuel costs on a real-time basis instead of contributing to an over- or under-recovery of fuel costs. MBR revenue would be removed from the fuel deferral process. The Company proposes that this change take effect on July 1, 2022.
- 14. Fuel Charge Rider A specifies how MBR revenues are treated with respect to the fuel deferral. Therefore, Company Witness Timothy P. Stuller presents the revised Fuel Charge Rider A tariff sheet to incorporate this change.

WHEREFORE, Virginia Electric and Power Company respectfully files the proposed fuel factor of 3.5379 ¢/kWh, as set out herein, effective for usage on and after July 1, 2022, and requests that the Commission approve the revised Fuel Charge Rider A tariff incorporating the proposed accounting change for MBR customers effective July 1, 2022.

Respectfully submitted,

VIRGINIA ELECTRIC AND POWER COMPANY

By: Counsel

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May 5, 2022