

McGuireWoods LLP  
Gateway Plaza  
800 East Canal Street  
Richmond, VA 23219-3916  
Phone: 804.775.1000  
Fax: 804.775.1061  
www.mcgulrewoods.com

Vishwa B. Link  
Direct: 804.775.4330

McGUIREWOODS

STATE CLERK'S OFFICE  
DOCUMENT CONTROL CENTER

2022 APR 29 P 1:41

vlink@mcgulrewoods.com

220450015

**PUBLIC VERSION**

April 29, 2022

**VIA HAND DELIVERY**

Mr. Bernard Logan, Clerk  
State Corporation Commission  
c/o Document Control Center  
Tyler Building, First Floor  
1300 East Main Street  
Richmond, Virginia 23219

**RE: Application of Columbia Gas of Virginia, Inc.  
For authority to increase rates and charges and to  
revise the terms and conditions applicable to gas service  
Case No. PUR-2022-00036**

Dear Mr. Logan:

Enclosed for filing in the above-captioned proceeding are an unbound original and one (1) bound copy of the **public version** of Columbia Gas of Virginia, Inc.'s Application, including Direct Testimony and Attachments, and Filing Schedules 1-43, as applicable (Volumes I-V). These materials are filed in compliance with the Rules Governing Utility Rate Applications and Annual Informational Filings of the State Corporation Commission of Virginia (the "Commission"), 20 VAC 5-201-10 *et seq.* ("Rate Case Rules"). A confidential version is also being filed under seal under separate cover.

In accordance with the Rate Case Rules, only one copy of Schedule 29 has been filed with this Application. Two copies of Schedules 29 and 40 have been submitted directly to the Commission's Division of Utility Accounting and Finance. Two copies of Schedule 40 have been submitted to the Commission's Division of Public Utility Regulation. In addition, electronic versions of Schedules 1-5, 8-28, 36 and 40, as applicable, have been made available to the Commission's Division of Utility Accounting and Finance and Division of Public Utility Regulation through an electronic discovery site ("V-Room") established for this matter, consistent with the Company's communications with Commission Staff. The Company has also included a CD-ROM with the electronic versions of these schedules with the filing of the public version of its Application.

Mr. Bernard Logan, Clerk  
April 29, 2022  
Page 2

Should you have any questions regarding this matter, please do not hesitate to contact me.

Best regards,



Vishwa B. Link

Enclosures

- cc: Ms. Kimberly B. Pate (without enclosures)
- Dr. David N. Essah (without enclosures)
- Ms. Lauren Govoni (without enclosures)
- William H. Chambliss, Esq. (without enclosures)
- C. Meade Browder, Jr., Esq.
- T. Borden Ellis, Esq.
- Katherine C. Creef, Esq.
- Sarah R. Bennett, Esq.
- Briana M. Jackson, Esq.

**COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION**

**APPLICATION, DIRECT TESTIMONY, ATTACHMENTS  
AND SCHEDULES OF**

**COLUMBIA GAS OF VIRGINIA, INC.**

**For authority to increase rates and to  
revise the terms and conditions  
applicable to gas service**

**VOLUME I OF V**

**Case No. PUR-2022-00036**

**April 29, 2022**

202204290900

**COLUMBIA GAS OF VIRGINIA, INC.**  
For authority to increase rates and charges and to revise  
the terms and conditions applicable to gas service  
Case No. PUR-2022-00036

220450015

**TABLE OF CONTENTS**

**VOLUME I**

**Application**

**Direct Testimony of Brentley K. Archer**

**Direct Testimony of Paul V. Hunter**

Attachment PVH-1 – DIMP Plan Expenditures by Activity Code

**Direct Testimony of Vincent V. Rea**

Appendix A – DCF Analysis – Detailed Discussion

Appendix B – DCF Estimates – Determination of “Outlier” Results

Appendix C – Floatation Costs

Schedule 1 – Professional Qualifications of Vincent V. Rea

Schedule 2 – W.A.C.C. and Fair Rate of Return

Schedule 3 – Comparative Risk Assessment

Schedule 4 – Analysis of Regulatory Mechanisms

Schedule 5 – Capitalization and Capital Structure Ratios

Schedule 6 – Embedded Cost of Long-Term Debt

Schedule 7 – DCF Method - Gas LDC Group

Schedule 8 – DCF Method - Combination Utility Group

Schedule 9 – DCF Method - Non-Regulated Group

Schedule 10 – Capital Asset Pricing Model

Schedule 11 – Risk Premium Method

**VOLUME II**

**Direct Testimony of Julie C. Wozniak**

**Direct Testimony of Jennifer Harding**

**Direct Testimony of Jana M. Berberich**

**Direct Testimony of Kevin L. Johnson**

Attachment KLJ-1 – Balance Sheet Accounts

**Direct Testimony of Candice Lash**

Attachment CL-1 – Proposed Annual Revenues by Rate Schedule Based on Revenue Requirements

Attachment CL-2 – Comparison of Present and Proposed Rates

Attachment CL-3 – Calculation of Average Bill by Rate Class

**Direct Testimony of Kevin M. Stanley**

Attachment KMS-1 – Affiliates for Whom NCSC Provided Services During the Test Year

Attachment KMS-2 – Current Service Agreement Between NCSC and CVA

Attachment KMS-3 – Unadjusted NCSC Gross Contract Charges Billed to CVA by Service Category for the Test Year

**COLUMBIA GAS OF VIRGINIA, INC.**  
For authority to increase rates and charges and to revise  
the terms and conditions applicable to gas service  
Case No. PUR-2022-00036

220450015

**Direct Testimony of Patrick L. Baryenbruch**

Attachment PLB-1 – Market Cost Comparison for Affiliate Company Charges

**Direct Testimony of John D. Taylor**

Attachment JDT-1 – Customer/Demand ACOS Study  
Attachment JDT-2 – Demand/Commodity ACOS Study  
Attachment JDT-3 – Allocation Factors  
Attachment JDT-4 – Factor Selection  
Attachment JDT-5 – Allocation of Proposed Revenues  
Attachment JDT-6 – Excess Bank Tolerance Fee  
Attachment JDT-7 – Demand Polling Charge  
Attachment JDT-8 – Gas Transfer Service Charge  
Attachment JDT-9 – Annual GTS Customer Imbalances  
Attachment JDT-10 – Calculated BMNR for Revenue Normalization Adjustment  
Attachment JDT-11 – Allocation of Proposed TCJA Tax Credit

**Direct Testimony of Carla D. Dix**

Attachment CDD-1 – Other Service Charges per Section 19 of the GT&Cs

**VOLUME III**

- |             |  |
|-------------|--|
| Schedule 1  | Historic Profitability and Market Data (Parts A and B – NiSource) (Part C – CVA)   |
| Schedule 2  | Interest and Cash Flow Coverage Data (Part A – NiSource) (Part B – CVA)  |
| Schedule 3  | Capital Structure and Cost of Capital Statement – Per Books and Average  |
| Schedule 4  | Schedules of Long-Term Debt, Preferred and Preference Stock, Job Development Credits, and Any Other Components of Ratemaking Capital |
| Schedule 5  | Schedule of Short-Term Debt, Revolving Credit Agreements, and Similar Short-Term Financing Arrangements                              |
| Schedule 6  | Public Financial Reports   |
| Schedule 7  | Comparative Financial Statements   |
| Schedule 8  | Proposed Cost of Capital Statement   |
| Schedule 9  | Rate of Return Statement – Earnings Test – Per Books   |
| Schedule 11 | Rate of Return Statement – Earnings Test – Adjusted to a Regulatory Accounting Basis   |
| Schedule 12 | Rate Base Statement – Earnings Test – Per Books  |

**COLUMBIA GAS OF VIRGINIA, INC.**  
For authority to increase rates and charges and to revise  
the terms and conditions applicable to gas service  
Case No. PUR-2022-00036

226450015

- Schedule 14 Rate Base Statement – Earnings Test – Adjusted to a Regulatory Accounting Basis
- Schedule 15 Schedule of Regulatory Assets
- Schedule 16 Detail of Regulatory Accounting Adjustments – Earnings Test
- Schedule 17 Lead/Lag Cash Working Capital Calculation – Earnings Test
- Schedule 18 Balance Sheet Analysis – Earnings Test
- Schedule 19 Rate of Return Statement – Per Books
- Schedule 21 Rate of Return Statement – Reflecting Ratemaking Adjustments
- Schedule 22 Rate Base Statement – Per Books
- Schedule 24 Rate Base Statement – Reflecting Ratemaking Adjustments
- Schedule 25 Detail of Ratemaking Adjustments
- Schedule 26 Revenue Requirement Reconciliation
- Schedule 27 Lead/Lag Cash Working Capital Calculation – Adjusted
- Schedule 28 Balance Sheet Analysis – Adjusted
- Schedule 29 Earnings Test and Ratemaking Adjustments (workpapers located in Volume V)
- Schedule 30 Revenue and Expense Variance Analysis
- Schedule 31 Advertising Expense
- Schedule 34 Miscellaneous Expenses
- Schedule 35 Affiliate Services
- Schedule 36 Income Taxes
- VOLUME IV**
- Schedule 37 Organization
- Schedule 38 Changes in Accounting Procedures
- Schedule 39 Out-of-Period Book Entries
- Schedule 40a Jurisdictional Study – Earnings Test

**COLUMBIA GAS OF VIRGINIA, INC.**  
For authority to increase rates and charges and to revise  
the terms and conditions applicable to gas service  
Case No. PUR-2022-00036

220450015

- Schedule 40b Jurisdictional Study – Rate Case
- Schedule 40c Class Cost of Service Study
- Schedule 41 Proposed Rates and Tariffs
- Schedule 42 Present and Proposed Revenues
- Schedule 43 Sample Billing
- BTU Report BTU Values by Market Area for 2021

**VOLUME V**

- Schedule 29 Workpapers for Earnings Test and Ratemaking Adjustments (confidential information within Adjustments 7 and 12 redacted)

**CONFIDENTIAL APPENDIX**

- Schedule 29 Confidential Pages of Workpapers for Earnings Test and Ratemaking Adjustments—Adjustment 7, Sheet 7 and Adjustment 12, Sheet 4 (contains confidential information)





COMMONWEALTH OF VIRGINIA  
 STATE CORPORATION COMMISSION

APPLICATION OF	)	
	)	
COLUMBIA GAS OF VIRGINIA, INC.	)	CASE NO. PUR-2022-00036
	)	
For authority to increase rates and	)	
charges and to revise the terms and	)	
conditions applicable to gas service	)	

**APPLICATION OF  
 COLUMBIA GAS OF VIRGINIA, INC.**

Pursuant to Chapter 10 of Title 56 of the Code of Virginia (“Va. Code”), Va. Code § 56-232 *et seq.* and the Rules Governing Utility Rate Applications and Annual Informational Filings, 20 VAC 5-201-10 *et seq.* (“Rate Case Rules”), Columbia Gas of Virginia, Inc. (“CVA” or “Company”), hereby requests authority from the State Corporation Commission of Virginia (“Commission”) to increase its rates and charges, effective for the first billing unit of October 2022, and to revise the terms and conditions applicable to gas service (the “Application”). The proposed rates and charges are designed to increase the non-gas base revenues of CVA by approximately \$58.2 million per year. This revenue increase includes approximately \$17.7 million of revenues associated with investments under the Company’s Steps to Advance Virginia’s Energy (“SAVE”) Plan pursuant to Va. Code § 56-603 *et seq.* (the “SAVE Act”). As permitted under the SAVE Act, CVA is proposing to include recovery of the costs associated with approximately \$154.4 million of net rate base SAVE investments as of September 30, 2022, in base rates.

In support of its Application, CVA respectfully states the following:

**GENERAL INFORMATION**

1. The name, address, and telephone number of CVA and its counsel are as follows:

T. Borden Ellis, Assistant General Counsel  
 Katherine C. Creef, Senior Counsel  
 Columbia Gas of Virginia, Inc.

1809 Coyote Drive  
 Chester, Virginia 23836  
 (804) 768-6475 (TBE)  
 (804) 546-9303 (KCC)  
 tbellis@nisource.com  
 kcreef@nisource.com

Vishwa B. Link  
 Sarah R. Bennett  
 Briana M. Jackson  
 McGuireWoods LLP  
 Gateway Plaza  
 800 East Canal Street  
 Richmond, Virginia 23219-3916  
 (804) 775-4330 (VBL)  
 (804) 775-4730 (SRB)  
 (804) 775-1323 (BMJ)  
 vlink@mcguirewoods.com  
 sbennett@mcguirewoods.com  
 bmjackson@mcguirewoods.com

2. CVA is a public service corporation organized and existing under the laws of the Commonwealth of Virginia. It is also a local distribution company providing natural gas distribution service to approximately 285,000 residential, commercial, and industrial customers in 98 cities, towns, and counties throughout its Northern, Piedmont, Central, and Tidewater operating regions. The gas distribution services and operations of CVA are regulated by the Commission.

### **BACKGROUND, SUMMARY, AND BASIS FOR FILING**

3. CVA was last authorized to increase its rates and charges effective February 2019 in Case No. PUR-2018-00131 (the "2018 Rate Case").<sup>1</sup> The increase authorized in that proceeding provided for the recovery of costs associated with the Company's capital program and provided for cost increases associated with a number of initiatives to strengthen the safety of CVA's operations, including the recovery of costs associated with the Company's written distribution

---

<sup>1</sup> *Application of Columbia Gas of Virginia, Inc. For authority to increase rates and charges and to revise the terms and conditions applicable to gas service*, Case No. PUR-2018-00131, Final Order (June 12, 2019) (hereinafter referred to as the "2018 Final Order"). The final rates and charges approved in the 2018 Final Order substituted the rates and charges that took effect on an interim basis in February 2019, subject to refund.

integrity management plan (“DIMP Plan”). These important initiatives are ongoing and have a continuing impact on CVA’s revenue requirement in this case.

4. As demonstrated in testimony of Company Witness Julie C. Wozniak, the earnings test analysis of the Company’s jurisdictional operations during the 12 months ending December 31, 2021 (“test year”), after limited accounting adjustments, shows a return on equity (“ROE”) of 7.598%, which is below the authorized earnings test ROE of 9.70%.

5. In addition to these under-earnings, the increase in base rates proposed by CVA in this Application is driven primarily by the Company’s ongoing capital investments to accommodate pipeline and facility safety and modernization and to accommodate sustained demand for natural gas.

6. As Company Witnesses Brentley K. Archer and Paul V. Hunter discuss in their pre-filed direct testimony, CVA’s commitment to the safety of its customers, employees, contractors, and communities is a foundational component of its business operation. To fulfill its commitment to safety, CVA must invest in a variety of programs and initiatives related to addressing and minimizing possible safety concerns. Since the 2018 Rate Case, the Company has continued to enhance pipeline safety and reliability through its DIMP Plan by identifying, prioritizing, and reducing gas distribution pipeline integrity risks. The significant DIMP Plan initiatives that are currently underway and are expected to continue in the 12 months ending September 30, 2023 (“rate year”) include damage prevention communications; legacy cross bore investigation and remediation; high pressure pipeline maximum allowable operating pressure review; and meter inspection for abnormal operating condition remediation. Company Witness Hunter explains these initiatives, as well as the Company’s related request to increase the annual amount of eligible safety activity costs necessary for the DIMP Plan to \$8.5 million. Apart from DIMP initiatives, Company Witness Hunter describes other activities focused on further enhancing the safety of CVA’s infrastructure, including initiatives related to line locating, advanced mobile leak detection, and emergency response.

7. The Company has also made and will continue to make capital investments to support growth in its service territory. For the past 10 years, CVA has experienced steady and sustained growth, with a year-over-year growth rate of approximately 1.6%. This growth rate is the highest among the NiSource operating companies and compares favorably to peer gas utility growth rates. As CVA continues to experience growth in its residential, commercial, and industrial sectors, investment in its facilities will enable CVA to meet the demand in its territory for safe and reliable natural gas service.

8. From 2021 through 2023, CVA expects to make over approximately \$390 million in capital investments for the benefit of customers. A fair rate of return that appropriately recognizes the financial and business risks of the Company is essential to CVA's ongoing ability to access and attract the capital needed for ongoing improvements to the system on reasonable terms for the long-term benefit of our customers.

9. The Company proposes an ROE of 10.75%, which falls at the midpoint of the cost of equity range for CVA of 10.25% and 11.25% and incorporates a 0.40% (or 40 basis point) composite risk adjustment to recognize CVA's higher level of financial risk as compared to other proxy group companies. Company Witness Vincent V. Rea supports this proposal as reasonable to ensure a fair rate of return for CVA, driven by recent capital market trends, including the prevailing higher U.S. inflation rate and upward trends in long-term interest rates. Mr. Rea also addresses the NiSource capital structure and cost of debt and equity in detail.

10. As demonstrated by the pre-filed direct testimony and schedules of Company Witness Wozniak, CVA will experience an annual revenue deficiency of approximately \$58.2 million through the rate year. This revenue deficiency reflects CVA's costs and revenues for the test year, the increase in the Company's rate base, a fair rate of return on common equity, and certain adjustments for costs that "reasonably can be predicted to occur during the rate year" as permitted by Va. Code § 56-235.2. Approximately \$17.7 million of the revenue requirement is

attributable to the recovery of costs associated with the December 31, 2022 SAVE investments in base rates rather than through the SAVE Rider, as noted above.

11. The revenue level requested by the Company would produce revenues not in excess of the aggregate total costs incurred by CVA in serving customers within the jurisdiction of the Commission, subject to normalization for non-recurring costs, adjustments for known future increases in costs and adjustments for increases reasonably predicted to occur within the rate year, and a fair return on the Company's rate base used to serve those customers, as such costs, normalizations, adjustments and return are calculated, allowed, and prescribed in the Rate Case Rules for general rate cases.

12. The Company's proposed rates will result in an increase to the typical monthly bill for a residential customer based on average usage of approximately 12.37%, inclusive of SAVE recovery, as detailed in the direct testimony of Company Witness Candice Lash. For small general service ("SGS") customers, the typical monthly bill based on average usage will increase by approximately 13.14% for SGS1 customers, 7.92% for SGS2 customers, and 5.83% for SGS3 customers. These increases do not incorporate the effect of the three-month bill credit the Company has proposed to return certain remaining tax savings resulting from the Tax Cuts and Jobs Act of 2017 (the "TCJA") to customers, which is described below.

13. The Company also proposes modifications to its currently effective Rate Schedules, General Terms and Conditions, and Form of Service Agreements (collectively, the "Tariff"), as described by Company Witness Carla D. Dix in her pre-filed direct testimony. The proposed substantive modifications to the Tariff include:

- a. **Three-Month Bill Credit to Return Certain Tax Savings to Customers.** The TCJA reduced the federal corporate income tax rate from 35% to 21% effective January 1, 2018, and was a key driver of the 2018 Rate Case. Through the stipulation in the 2018 Rate Case, CVA agreed to pass back unprotected net excess accumulated deferred income taxes ("Unprotected EDIT") to customers over a five-year period.

The final three months of that five-year period coincides with the first three months of the rate year in this proceeding. The jurisdictional amortization remaining in the stub period is \$848,099 as supported by Company Witness Jennifer Harding. Including this remaining amortization in the rate year cost of service would result in an ongoing reduction in base rates. Accordingly, the Company is proposing to remove the Unprotected EDIT amortization from the rate year cost of service and pass it back to customers as a bill credit over the remaining three months of the five-year amortization period (*i.e.*, October, November, and December 2022). Company Witness John D. Taylor describes the rate design for returning the Unprotected EDIT to customers. To ensure the timely return of the Unprotected EDIT to customers, the Company respectfully requests that the Commission authorize the three-month bill credit when it enters its procedural order in this proceeding.

- b. **New Rate Schedule GPS – Green Path Service.** In recognition of the interest of some customers in reducing their carbon footprints, as well as the public policy of the Commonwealth to reduce greenhouse gas emissions, CVA proposes a new voluntary companion tariff—Rate Schedule GPS—that will enable residential and small general service customers to opt in to reduce the greenhouse gas emissions associated with the natural gas they receive from the Company by either 50% or 100% using environmental attributes. The type of environmental attributes the Company will use are renewable natural gas certificates and carbon offsets. The proposed rate for Rate Schedule GPS is \$3.00 per dekatherm, which is based on the actual costs to the Company for the environmental attributes required to offset the greenhouse gas emissions of participating customers at their desired level. Rate Schedule GPS would cost the average residential customer using 5.4 dekatherms monthly approximately \$16.20 per month for the 100% option or \$8.10 per month for the 50% option. Rate Schedule GPS should be found in the public interest

because it is responsive to customer requests and provides a voluntary, opt-in program that allows interested customers to participate in an affordable option for reducing their carbon footprint while holding non-participating customers substantially harmless.

- c. **Modification to the Existing Line Extension Policy.** The current line extension policy provides a cost allowance for 150 feet of service line and/or main line when determining and evaluating project costs for individual residential applicants. The Company is proposing to modify the Tariff to provide a similar cost allowance of 150 feet of service line for residential developers.

#### **DIRECT TESTIMONY SUPPORTING OBJECTIVES SOUGHT**

14. Evidence in support of this Application is included in the pre-filed direct testimony and attachments included in Volumes I through II for the following individuals, as well as in the schedules required by the Rate Case Rules (“Schedules”) included in Volumes III through V, which are filed with this Application:

- **Brentley K. Archer**, President and Chief Operating Officer, Columbia Gas of Virginia, Inc., provides an overview of the Company’s business operations to provide context for the key factors driving this base rate proceeding—CVA’s commitment to providing safe, dependable service to its customers. He also provides a summary of the key aspects of the Application.
- **Paul V. Hunter**, Vice President of Operations, describes CVA’s ongoing commitment to safe, reliable, and efficient operations as exemplified through DIMP and other pipeline safety initiatives, as well as initiatives related to line locating, advanced mobile leak detection, and emergency response. Mr. Hunter also provides an overview of the Company’s recent capital additions and planned capital expenditures through the rate year.
- **Vincent V. Rea**, Managing Director of Regulatory Finance Associates, LLC, presents evidence supporting the capital structure, ROE, and the overall rate of return that CVA seeks in this proceeding.
- **Julie C. Wozniak**, Manager of Regulatory Studies for NiSource Corporate Services Company (“NCSC”), presents the results of the earnings test analysis for the test year ended December 31, 2021, and supports the majority of accounting adjustments, including reasonably predictable costs that will occur in the rate year ending September 30, 2023.

- **Jennifer Harding**, Director of Income Tax Operations for NCSC, supports the calculation of CVA's jurisdictional federal and state income tax expense for the test year and rate year, and describes how the Company calculated the proposed bill credit to customers related to the return of certain tax savings resulting from the TCJA.
- **Jana M. Berberich**, Lead Regulatory Analyst for NCSC, provides support for the test year and rate year rate base.
- **Kevin L. Johnson**, Lead Regulatory Studies Analyst for NCSC, presents the lead lag study, including a balance sheet analysis.
- **Candice Lash**, Lead Regulatory Analyst for NCSC, sponsors the development of revenues and customer bill comparisons.
- **Kevin M. Stanley**, Director of Accounting for NCSC, addresses affiliate charges to and from CVA; the role of NCSC; and the NCSC charges billed to CVA for the test year. Mr. Stanley also explains the information contained in Schedule 35, which is CVA's Annual Report of Affiliate Transactions ("ARAT") for 2021.
- **Patrick L. Baryenbruch**, President of Baryenbruch & Company, LLC, sponsors his study of the reasonableness of affiliate charges for services provided to CVA.
- **John D. Taylor**, Managing Partner of Atrium Economics, sponsors the allocated cost of service studies, jurisdictional studies, and rate design relied upon in developing the rates in this filing. Mr. Taylor also sponsors analyses developed in support of transportation-related charges.
- **Carla D. Dix**, Manager of Regulatory Affairs for CVA, discusses the Company's proposal to return certain tax savings resulting from the TCJA to customers through a three-month bill credit beginning in October 2022. Ms. Dix also sponsors the proposed changes to the Company's Rate Schedules, General Terms and Conditions, and Form of Service Agreements, including the proposed new voluntary companion tariff that will enable residential and small general service customers to reduce the greenhouse gas emissions associated with the natural gas they receive from the Company by either 50% or 100%.

The Company has included a one-page summary with each piece of direct testimony that includes a list of the Schedules and Adjustments sponsored by that witness.

#### **COMPLIANCE WITH RATE CASE RULES AND REQUEST FOR PARTIAL WAIVER**

15. In accordance with Rate Case Rule 10 A, the Company filed with the Commission its notice of intent to file this Application on February 28, 2022.



16. The Company has included all information required by Rate Case Rule 10 B in its Application, including a table of contents, direct testimony, and properly labeled exhibits and schedules.

17. In support of this Application and as required by Rate Case Rule 20, the Company is filing Schedules 1 through 9, 11, 12, 14 through 19, 21, 22, 24 to 31, 34, and 36 through 43, subject to the partial waiver described below and consistent with the Commission's rules regarding number of copies as described in Rule 150 of the Commission's Rules of Practice and Procedure, 5 VAC 5-20-150, and Rate Case Rule 10 I.

18. Pursuant to Rule 10 E of the Commission's Rate Case Rules, and for good cause shown, the Company respectfully requests that the Commission waive in part the requirements of Rate Case Rules 20 and 90 with respect to Schedule 6, which requires an applicant to provide copies of the most recent public financial reports. In 2020, the Commission revised Schedule 6 as it relates to electric utilities to permit "a link to where such copies can be found on the internet" instead of hard copies of these voluminous reports.<sup>2</sup> Consistent with this Commission-approved revision to Schedule 6, and due to the voluminous nature of its public financial reports, CVA respectfully requests that the Commission waive the requirement to submit hard copies of its public financial reports, and instead permit CVA to provide a link to where those reports can be found on the internet.

19. CVA will serve a true copy of this Application in compliance with Rate Case Rule 10 J, together with a statement that a true copy of the complete Application may be obtained at no cost by making a request therefore orally or in writing to a specified Company official or location, by placing the same in the United States first class mail, addressed to customary places of business or residences of each of the following:

---

<sup>2</sup> 20 VAC 5-204-90; see *Commonwealth of Virginia, ex rel. State Corporation Commission, Ex Parte: In the matter of adopting new rules of the State Corporation Commission governing utility rate application by investor-owned electric utilities*, Case No. PUR-2020-00022, Order Adopting Regulations (Nov. 23, 2020).

- (a) The County Attorney and the Chairman of the Board of Supervisors of each county (or equivalent officials in the counties having alternate forms of government) in this Commonwealth affected by the proposed increase; and
- (b) The Mayor or Manager and the Attorney of every city or town (or equivalent officials in the counties having alternate forms of government) in this Commonwealth affected by the proposed increase.

20. CVA also will serve a true copy of the complete Application upon the Office of the Attorney General of Virginia's Division of Consumer Counsel as required by Rate Case Rule 10 J.

### **REQUEST FOR CONFIDENTIAL TREATMENT**

21. The Company's Application contains confidential information within Schedule 29, Adjustments 7 and 12; and the non-public version of this filing is being made under seal. Because portions of the Company's Application contain such confidential information, in compliance with Rule 10 F of the Rate Case Rules, 20 VAC 5-201-10 F, and Rule 170 of the Commission's Rules of Practice and Procedure, 5 VAC 5-20-170, this filing is accompanied by a separate Motion for Entry of Protective Ruling, including a form of Proposed Protective Ruling, filed by the Company under separate cover but contemporaneously with this Application.

### **CONCLUSION**

**WHEREFORE**, CVA respectfully requests that the Commission: (1) find this Application is deemed filed pursuant to 20 VAC 5-201-10 D; (2) grant the Company's request for a partial waiver of the Rate Case Rules with respect to the Schedule 6 filing requirements; (3) authorize the implementation of the rate and tariff modifications proposed herein, on an interim basis subject to refund, effective for the first billing unit of October 2022; (4) authorize the three-month bill credit to return certain tax savings resulting from the TCJA to customers beginning in October 2022; (5) approve the increased revenue requirement of \$58.2 million; and (6) grant the Company such further relief as the Commission deems necessary and appropriate.

Respectfully submitted,

COLUMBIA GAS OF VIRGINIA, INC.



By: \_\_\_\_\_  
Counsel

T. Borden Ellis, Assistant General Counsel  
Katherine C. Creef, Senior Counsel  
Columbia Gas of Virginia, Inc.  
1809 Coyote Drive  
Chester, Virginia 23836  
(804) 768-6475 (TBE)  
(804) 546-9303 (KCC)  
tbellis@nisource.com  
kcreef@nisource.com

Vishwa B. Link  
Sarah R. Bennett  
Briana M. Jackson  
McGuireWoods LLP  
Gateway Plaza  
800 East Canal Street  
Richmond, Virginia 23219-3916  
(804) 775-4330 (VBL)  
(804) 775-4730 (SRB)  
(804) 775-1323 (BMJ)  
vlink@mcguirewoods.com  
sbennett@mcguirewoods.com  
bmjackson@mcguirewoods.com

*Counsel for Columbia Gas of Virginia, Inc.*

April 29, 2022