

Commonwealth of Virginia  
STATE CORPORATION COMMISSION  
DIVISION OF PUBLIC UTILITY REGULATION

MEMORANDUM

Date: 8/30/2022

To: Document Control

From: Michelle Brown-White, Division of Public Utility Regulation

RE: Virginia Electric and Power Company - For approval and certification of the Coastal Virginia Offshore Wind Commercial Project and Rider Offshore Wind

Attached is a comment submitted to the Commission for consideration.  
Please enter in the case jacket for Case No. **PUR-2021-00142**.

Thank you.

William C. Wooldridge

NOT FOR DISTRIBUTION

2022 AUG 31 P 12:45

800 - COMMONWEALTH  
DOCUMENT CONTROL CENTER

220850133

**William C. Wooldridge**  
801 Southampton Avenue #2221  
Norfolk, Virginia 23510-1030  
757 739-0532 [wwooldridge@icloud.com](mailto:wwooldridge@icloud.com)  
August 27, 20221

To: Commonwealth of Virginia State Corporation Commission  
1300 East Main Street, Richmond, VA 23219

Re: Case No. PUR 2021-00142

On August 24, the Commission, by order granting reconsideration in this docket, continued the case in response to Dominion’s Petition for Limited Reconsideration.

This comment concerns the requirement (“performance guarantee”) in the Final Order that Dominion bear the cost and risk of some potential energy production shortfalls in the proposed offshore power generation project. Commenter is a retiree with a small investment in Dominion stock.

The performance guarantee is not reasonable and should not be imposed.

The offshore generation project has multiple public benefits. In addition to providing clean renewable energy and so slowing pollution and global warming, and to reducing the chances of power shortages, it could make Virginia a center for the manufacture, deployment, and maintenance of a whole new generation of offshore wind-driven power generation systems.

The public benefits are not at issue, as the General Assembly has already determined that offshore wind generation is in the public interest.

Nevertheless, the project’s scope and novelty entail inescapable financial risks. Dominion’s customers are the direct beneficiaries of the new power source and should bear the associated risks. Dominion’s stockholders have no direct upside from the experiment. An attempt to transfer the cost of environmental improvements to Dominion’s stockholders will discourage new investment in Dominion when it needs access to capital for clean energy investments. A utility is traditionally a vehicle for relatively low- return but non-speculative, stable investments. It is commendable that Virginia and the SCC are willing for Dominion to undertake this uncertain initiative, but offshore turbines are a technology to benefit Dominion’s customers and for those customers to pay for, as they have always paid for generating infrastructure.

Respectfully submitted,  
*William C. Wooldridge*  
William C. Wooldridge