part 2

COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

APPLICATION OF	)	
	)	
VIRGINIA ELECTRIC AND POWER COMPANY	)	
	)	
For approval and certification of the Coastal Virginia Offshore Wind Commercial Project and Rider Offshore Wind, pursuant to § 56-585.1:11, § 56-46.1, § 56-265.1 *et seq.*, and § 56-585.1 A 6 of the Code of Virginia	)	Case No. PUR-2021-00142

APPLICATION OF VIRGINIA ELECTRIC AND POWER COMPANY FOR APPROVAL AND CERTIFICATION OF ELECTRIC TRANSMISSION FACILITIES: VIRGINIA FACILITIES, APPROVAL OF RIDER OSW, AND REQUEST FOR LIMITED WAIVER

Pursuant to § 56-585.1:11 of the Code of Virginia ("Va. Code" or "Code"), Virginia Electric and Power Company ("Dominion Energy Virginia" or the "Company"), by counsel, hereby requests review and approval of the Coastal Virginia Offshore Wind Commercial Project ("CVOW Commercial Project," "CVOW Project," "CVOW," or the "Project"), as required, to be located in a federal lease area beginning approximately 27 statute miles (approximately 24 nautical miles) off the coast of Virginia Beach, Virginia, ("Lease Area") and its related power export facilities.

Additionally, pursuant to Va. Code § 56-46.1 and the Utility Facilities Act, Va. Code § 56-265.1 *et seq.*, the Company hereby requests approval and certification of electric interconnection and transmission facilities, comprising transmission facilities required to interconnect the CVOW Commercial Project reliably with the existing transmission system (the "Virginia Facilities").

Finally, pursuant to Va. Code § 56-585.1:11 and related provisions of § 56-585.1 A 6 (or "Subsection A 6"), in conformance with the State Corporation Commission of Virginia's (the

"Commission") July 26, 2021 Order entered in this docket ("July 26 Order"), and subject to the Rules Governing Utility Rate Applications and Annual Informational Filings of Investor-Owned Electric Utilities,[1] Dominion Energy Virginia hereby files with the Commission its application for approval of a rate adjustment clause ("RAC"), designated Rider Offshore Wind ("Rider OSW"), for the recovery of costs incurred to construct, own, and operate the offshore wind generation facilities and related interconnection and transmission facilities that compose the CVOW Commercial Project. Within Project costs, the Company has included the costs of its Foreign Currency Risk Mitigation Plan, which the Company requests the Commission deem reasonable and prudent as soon as procedurally possible (collectively, the "Application").

The Company further requests limited waiver of certain of the Rate Case Rules. Specifically, pursuant to Rule 10 E of the Rate Case Rules, 20 VAC 5-204-10 E, and for the reasons stated herein, the Company requests a limited waiver of the requirements of Rules 60 and 90 of the Rate Case Rules, 20 VAC 5-204-60 and 20 VAC 5-204-90, with respect to hard copies of certain Filing Schedule 46 materials as it relates to the provision of "economic analyses, contracts, studies, investigations, results from requests for proposals, cost benefit analyses . . . ," which are voluminous.

In support of its Application and request for limited waiver, the Company respectfully shows as follows:

I. GENERAL INFORMATION

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

[1] 20 VAC 5-204-5 *et seq.* (the "Rate Case Rules").

customers in Virginia and to the public in portions of North Carolina. The Company is engaged in the business of generating, transmitting, distributing, and selling electric power and energy to the public for compensation. Dominion Energy Virginia's electric system—consisting of facilities for the generation, transmission, and distribution of electric energy—is interconnected with the electric systems of neighboring utilities and is a part of the interconnected network of electric systems serving the continental United States. By reason of its operation in two states and its interconnections with other utilities, the Company is engaged in interstate commerce. The Company is also a public utility under the Federal Power Act, and certain of its operations are subject to the jurisdiction of the Federal Energy Regulatory Commission. The Company is an operating subsidiary of Dominion Energy, Inc. ("Dominion Energy").

2. The Company's post office address is:

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120 Tredegar Street
Richmond, Virginia 23219

3. The addresses and telephone numbers of the attorneys for the Company are:

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II. BACKGROUND

4. The CVOW Project is designed to provide clean, reliable offshore wind energy to Virginia customers, create the opportunity to displace electricity generated by fossil fuel-powered plants, and offer substantial economic and environmental benefits to the Commonwealth of Virginia. This Project represents a viable and needed opportunity for Virginia to obtain clean renewable energy and realize its economic and environmental goals. The Project is essential to meeting the benchmarks set forth in the Virginia Clean Economy Act ("VCEA")[2] and other legislation mandating the development and deployment of renewable generation resources. In 2010, the Virginia General Assembly passed legislation to create the Virginia Offshore Wind Development Authority to help facilitate offshore wind energy development in the Commonwealth. During its 2018 and 2020 legislative sessions, the General Assembly passed the Grid Transformation and Security Act ("GTSA")[3] and VCEA, respectively, which amended and added multiple provisions to the Code expressing the General Assembly's and the Commonwealth's support for offshore wind, and found certain projects advancing these objectives to be in the public interest. The VCEA expressly supports the development of 2,500 to 3,000 megawatts ("MW") of clean, reliable offshore wind energy to be in service by 2028. Specifically, Va. Code § 56-585.1 A 6 indicates in relevant part (emphasis added),

> In connection with planning to meet forecasted demand for electric generation supply and assure the adequate and sufficient reliability of service, consistent with § 56-598, *planning and development*

[2] Va. Code §§ 56-585.1:11, 56-585.5.
[3] Virginia 2018 Acts of Assembly, ch. 296.

> *activities for a new utility-owned and utility-operated generating facility or facilities utilizing energy derived from sunlight or from onshore or offshore wind are in the public interest.*
>
> Notwithstanding any provision of Chapter 296 of the Acts of Assembly of 2018, construction, purchasing, or leasing activities for a new utility-owned and utility-operated generating facility or facilities utilizing energy derived from sunlight or from onshore wind with an aggregate capacity of 16,100 megawatts, including rooftop solar installations with a capacity of not less than 50 kilowatts, and with an aggregate capacity of 100 megawatts, together with a utility-owned and utility-operated generating facility or *facilities utilizing energy derived from offshore wind with an aggregate capacity of not more than 3,000 megawatts, are in the public interest.*

Va. Code § 56-585.1:4 A (emphasis added) provides further,

> Notwithstanding any provision of Chapter 296 of the Acts of Assembly of 2018, construction, purchasing, or leasing activities for a new utility-owned and utility-operated generating facility or facilities utilizing energy derived from sunlight or from onshore wind with an aggregate capacity of 16,100 megawatts, including rooftop solar installations with a capacity of not less than 50 kilowatts, and with an aggregate capacity of 100 megawatts, together with a utility-owned and utility-operated generating facility or *facilities utilizing energy derived from offshore wind with an aggregate capacity of not more than 3,000 megawatts, are in the public interest.*

Va. Code § 56-585.1:11 B (emphasis added) states,

> In order to meet the Commonwealth's clean energy goals, prior to December 31, 2034, *the construction or purchase by a public utility of one or more offshore wind generation facilities located off the Commonwealth's Atlantic shoreline or in federal waters and interconnected directly into the Commonwealth, with an aggregate capacity of up to 5,200 megawatts, is in the public interest* and the Commission shall so find, provided that no customers of the utility shall be responsible for costs of any such facility in a proportion greater than the utility's share of the facility.

Finally, Va. Code § 56-585.1:11 C 1 (emphasis added) states, in part:

> Pursuant to subsection B, *construction by a Phase II Utility of one or more new utility-owned and utility-operated generating facilities*

> *utilizing energy derived from offshore wind and located off the Commonwealth's Atlantic shoreline, with an aggregate rated capacity of not less than 2,500 megawatts and not more than 3,000 megawatts, along with electrical transmission or distribution facilities associated therewith for interconnection is in the public interest.*

5. The CVOW Project also supports and furthers other related important policy goals of the Commonwealth. The Commonwealth Clean Energy Policy provided at Va. Code § 45.2-1706.1 seeks to reach net-zero emissions in all sectors, including electric power, by 2045, promote environmental justice, and prioritize economic competitiveness and workforce development. To achieve these objectives, it is the "policy of the Commonwealth" to, among other things, "[d]evelop energy resources necessary to produce 30 percent of Virginia's electricity from renewable energy sources by 2030 and 100 percent of Virginia's electricity from carbon-free sources by 2040."[4] Va. Code § 45.1706.1 C 4 further declares it is "the policy of the Commonwealth" to "[i]ncrease wind energy development and grow the Commonwealth's role as a wind industry hub for offshore wind generation projects in state and federal waters off the United States coast."

6. The Company's development of the CVOW Commercial Project has benefitted from the invaluable experience gained from the 12 MW Coastal Virginia Offshore Wind demonstration project ("Pilot Project"), which was approved by the Commission in Case No. PUR-2018-00121. With this experience, the Company is well positioned to be a leader in the offshore wind industry, which is set to see the installation of more than 1,500 turbines from North Carolina to Massachusetts throughout 17 federally leased areas off the coasts of eight U.S. states.

[4] Va. Code § 45.2-1706.1 A 1.

7. The CVOW Project encompasses offshore wind generation facilities consisting of 176 14.7 MW Wind Turbine Generators ("WTGs") located in the Lease Area[5] as well as related Offshore Export Facilities, which will transport the generated electricity onshore to the Cable Landing Location at the State Military Reservation ("SMR") in the City of Virginia Beach, Virginia, then to the Harpers Switching Station at Naval Air Station Oceana, which will become the point of interconnection ("POI") to the PJM system after construction, and finally terminating at the Company's existing Fentress Substation. As discussed below, the Virginia Facilities, which are a subset of the larger CVOW Project, include certain offshore and onshore interconnection and transmission facilities. With a combined nominal capacity of 2,587 MW (AC), the CVOW Commercial Project is expected to provide approximately 9,500 gigawatt-hours of carbon-free energy per year.

8. The proposed Virginia Facilities are necessary to interconnect the CVOW Commercial Project reliably with the existing transmission system. The Virginia Facilities include (1) 3.0 miles of the offshore submarine export circuits designed to bring electric energy output from the WTGs onshore, (2) underground onshore export circuits to carry the electricity to the proposed Harpers Switching Station located on Naval Air Station Oceana property in Virginia, (3) the new Harpers Switching Station, (4) three new overhead 230 kV transmission circuits between the new Harpers Switching Station and the Company's existing Fentress Substation, (5) a partial rebuild of Line #271, (6) a rebuild of Line #2240, and (7) an expansion of Fentress Substation.

[5] In a separate proceeding, during the fourth quarter of 2021, the Company will submit an Application for Approval of Affiliate Agreement Under Chapter 4 of Title 56 of the Code of Virginia, seeking authority under the Affiliates Act to enter into an agreement with its affiliate, Blue Ocean Energy Marine, LLC, for the use of its WTIV to install the WTGs.

9. In the July 26 Order, the Commission established this proceeding to receive and consider the Company's Application and directed the Company to include specific additional information and analyses with its Application, as well as an index identifying the specific location(s) within the Application corresponding to the questions and issues for which the Commission required responses. The Company has complied with the July 26 Order and the Company's responses to the inquiries presented therein are included, using the Commission's nomenclature, in Section VII of the Generation Appendix.

10. To best facilitate the Commission's review of this Application, it is presented in three primary components: (1) Generation Appendix and related testimony, which address statutory requirements unique to offshore wind projects and the responses to the Commission's July 26 Order; (2) the Transmission Appendix, DEQ Supplement, Environmental Routing Study, and related testimony; and (3) the RAC, which includes the revenue requirement, cost allocation, and rates testimony. An index providing additional detail regarding the information included in each component is included as Schedule 1 to the testimony of Company Witness Mark D. Mitchell. In short, these three components address the following issues:

a. Statutory Requirements for Offshore Wind: The Company is including with this filing a Generation Appendix that describes the Company's compliance with Code § 56-585.1:11, and related provisions of Code § 56-585.1 A 6. It also addresses the questions presented in the Commission's July 26 Order. The Generation Appendix is presented in prompt and response format, and is sponsored by designated witnesses. Some of these witnesses expand upon statutory compliance issues in greater detail in their testimony.

b. Transmission Appendix: This document presents information responsive to the "Guidelines for Transmission Line Applications Filed Under Title 56 of the Code of Virginia" in support of the Company's application for approval and certification of the Virginia Facilities under Code § 56-46.1 and § 56-265.1, *et seq*. The Transmission Appendix is presented in prompt and response format, and is sponsored by designated witnesses. The Transmission Appendix is supported by the DEQ Supplement and Environmental Routing Study.

c. RAC Testimony: The Company presents witness testimony in support of the requested revenue requirement, jurisdictional and class cost allocation, and rate design. This testimony is presented in the Company's typical format for Subsection A 6 RAC applications.

III. STATUTORY REQUIREMENTS FOR OFFSHORE WIND PROJECTS

11. The Code sets forth various requirements for offshore wind projects undertaken off the Commonwealth's shores. Code § 56-585.1:11 in particular addresses the development of offshore wind capacity in Virginia. Section 56-585.1:11 C 1 provides in relevant part:

> In acting upon any request for cost recovery by a Phase II Utility for costs associated with such a facility, the Commission shall determine the reasonableness and prudence of any such costs, provided that such costs shall be presumed to be reasonably and prudently incurred if the Commission determines that (i) the utility has complied with the competitive solicitation and procurement requirements pursuant to subsection E; (ii) the project's projected total levelized cost of energy, including any tax credit, on a cost per megawatt hour basis, inclusive of the costs of transmission and distribution facilities associated with the facility's interconnection, does not exceed 1.4 times the comparable cost, on an unweighted average basis, of a conventional simple cycle combustion turbine generating facility as estimated by the U.S. Energy Information Administration in its Annual Energy Outlook 2019; and (iii) the utility has commenced construction of such facilities for U.S. income taxation purposes prior to January 1, 2024, or has a plan for

> such facility or facilities to be in service prior to January 1, 2028. The Commission shall disallow costs, or any portion thereof, only if they are otherwise unreasonably and imprudently incurred. In its review, the Commission shall give due consideration to (a) the Commonwealth's renewable portfolio standards and carbon reduction requirements, (b) the promotion of new renewable generation resources, and (c) the economic development benefits of the project for the Commonwealth, including capital investments and job creation.

12. As discussed, the Company is including with this Application a Generation Appendix as a vehicle to explain in detail how the Company has complied with the legal requirements set forth in § 56-585.1:11 and related provisions of § 56-585.1 A 6 that are not readily addressed by established filing formats for other types of cases, or that otherwise warrant further discussion. The Company also addresses each requirement of the Commission's July 26 Order requiring additional information and analyses about the CVOW Commercial Project in Section VII of the Generation Appendix.

13. The VCEA instructs that an appropriate cost comparison for offshore wind is the Project's total levelized cost of energy ("LCOE") in reference to the comparable cost of a conventional simple cycle combustion turbine generating facility. Specifically, it states that the LCOE should not exceed 1.4 times that cost as estimated by the U.S. Energy Information Administration in its Annual Energy Outlook 2019, or $125 per megawatt-hour ("MWh") in 2018 dollars. As supported by Company Witnesses Joshua Bennett and Glenn Kelly, the CVOW Commercial Project's LCOE of $87 per MWh in 2027 dollars ($73 per MWh in 2018 dollars) is well within this cost governor established by the Commonwealth. Should the federal production tax credit be expanded through future legislation, the Project's LCOE would drop to $80 per MWh in 2027 dollars.

14. In addition to the information provided in the Generation Appendix, the generation portion of the Project is supported by the pre-filed direct testimony of Company Witnesses Joshua Bennett and Glenn Kelly. In addition to their substantive testimony, Company Witnesses Bennett and Kelly sponsor portions of the Generation Appendix, along with Company Witnesses Grant Hollett, Scott Lawton, and John Larson.

IV. REQUEST FOR APPROVAL AND CERTIFICATION OF THE VIRGINIA FACILITIES

15. In order to interconnect the proposed CVOW Commercial Project reliably as requested by the Company's Generation Construction Group ("Dominion Generation" or the "Customer"), and to maintain the structural integrity and reliability of the transmission system in compliance with mandatory North American Electric Reliability Corporation ("NERC") Reliability Standards, Dominion Energy Virginia requests approval and certification of the following Virginia Facilities in the Cities of Virginia Beach and Chesapeake, Virginia:

- Offshore Export Circuits: Install nine 230 kV submarine export circuits, which begin approximately 3.0 miles offshore at the Virginia jurisdictional line demarcating state-owned submerged lands and extend to an onshore Cable Landing Location on SMR in the City of Virginia Beach, Virginia;[6]

- Onshore Export Circuits: At the onshore Cable Landing Location on SMR, the Offshore Export Circuits will transition to nine underground 230 kV Onshore Export Circuits, which will extend underground approximately 4.4 miles to the proposed Harpers Switching Station located on Naval Air Station Oceana ("NAS Oceana") property in Virginia;

- Harpers Switching Station: Construct a 230 kV Gas Insulated Station ("GIS"), 12 line-position, breaker-and-a-half bus configuration switching station on a site located along Harpers Road at NAS Oceana, which will transition the nine Onshore Export Circuits to three Overhead Transmission Circuits. The proposed arrangement will include twenty-five 230 kV 4000A circuit breakers, nine 230 kV 180 MVAR fixed reactor banks, two

[6] For purposes of the Transmission Appendix, the Offshore Export Circuits commence 3.0 miles offshore. See Section I.A of the Generation Appendix filed with the Application for a detailed description of the Offshore Export Circuits, which are referred to therein as the Offshore Export Cables. Use of "Offshore Export Circuits" in the Transmission Appendix refers to the grouping of three Offshore Export Cables (totaling nine) coming in from an offshore substation for transfer of electricity from 3.0 miles offshore to the Cable Landing Location at SMR.

230 kV 150 MVAR variable reactor banks, three 250 MVAR static synchronous compensators ("STATCOMs"), and associated facilities;

- Overhead Transmission Circuits: Install three new overhead 230 kV transmission circuits, each with a rating of approximately 1,500 MVA, along the same corridor extending approximately 14.2 miles between the Harpers Switching Station and the Company's existing Fentress Substation and utilizing a combination of new, existing and expanded right-of-way in the Cities of Virginia Beach and Chesapeake, Virginia;

- Line #271 Partial Rebuild: Wreck and rebuild approximately 6.1 miles of the Company's existing approximately 7.1-mile 230 kV overhead Landstown-Pocaty Line #271, which also supports idle 115 kV Line #I-74. With a few exceptions discussed in the Transmission Appendix, the Company will wreck the existing double circuit lattice structures for Lines #271/#I-74 and replace them with (i) new double circuit monopole structures to carry Line #271 and one Overhead Transmission Circuit, and (ii) either new single circuit or double circuit monopole structures to carry the two remaining Overhead Transmission Circuits. The Line #271 Partial Rebuild will rebuild COR-TEN® towers that have been identified for replacement and remove idle Line #I-74.[7] The Company determined based on sound engineering judgment that it is prudent to wreck these COR-TEN® structures in order to accommodate the Overhead Transmission Circuits on co-located structures within the existing right-of-way and during the same outage, and expedite the rebuild of these structures as part of the Virginia Facilities;[8]

- Line #2240 Rebuild: Wreck and rebuild the entire approximately 1.9 miles of the Company's existing 230 kV overhead Fentress-Pocaty Line #2240, which also supports idle 115 kV Line #I-74, where all three Overhead Transmission Circuits will be co-located on structures within a 40-foot expanded right-of-way (from the existing 120-foot-wide right-of-way to an expanded 160-foot right-of-way). The Line #2240 Partial Rebuild will rebuild COR-TEN® towers that have been identified for replacement and remove idle Line #I-74. The Company determined based on sound engineering judgment that it is prudent to wreck these COR-TEN® structures in order to accommodate the Overhead Transmission Circuits on co-located structures within the existing right-of-way and during the same outage, and expedite the rebuild of these structures as part of the Virginia Facilities;[9] and

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[7] The Company considers the removal of idle Line #I-74, as described in this filing for both the Line #271 Partial Rebuild and Line #2240 Rebuild, to qualify as "ordinary extensions or improvements in the usual course of business" pursuant to Va. Code § 56-265.2 A 1 and, therefore, does not require approval pursuant to Va. Code § 56-46.1 B or a certificate of public convenience and necessity ("CPCN") from the Commission. Should the Commission determine that a CPCN is required for the work associated with the removal of idle Line #I-74 as described herein, the Company requests that the Commission grant such CPCN as part of its final order in this proceeding.

[8] To the extent the Commission approves a route for the Overhead Transmission Circuits that includes the partial rebuild of Line #271, the Company would ask that the Commission's final order also include amended CPCN approval for that work, to the extent necessary.

[9] To the extent the Commission approves a route for the Overhead Transmission Circuits that includes the rebuild of Line #2240, the Company would ask that the Commission's final order also include amended CPCN approval for that work, to the extent necessary.

- Fentress Substation Expansion: Expand the Company's existing 500-230 kV Fentress Substation in Chesapeake, Virginia. The proposed arrangement will expand the existing 500 kV yard into a GIS six-position ring bus, install three new 230 kV line terminals, uprate the existing 230 kV Line #2240 terminal to 4000A, which includes replacement of four disconnect switches, and install a new control house to accommodate communications and protective relays. The proposed arrangement, which also includes installation of circuit breakers, transformers and related equipment, expands the Fentress Substation entirely within Company-owned property. Based on conceptual design, in order to expand the Fentress Substation to the north and accommodate the routing of existing Line #2128 into the station, two structures (Structures #2128/1 and #2128/2) will be removed and replaced with four new structures (Structures #2128/1, #2128/1A, #2128/1B, and #2128/2), all entirely within existing right-of-way or on Company-owned property.[10] Additionally, the Company proposes to remove three 500 kV structures (Structures #588/254, #588/255, and #588/256) and replace with two new 500 kV structures (Structures #588/254 and #588/255). Proposed Structure #588/255 is a backbone structure and will be located inside Fentress Substation, while proposed Structure #588/254 will be in existing right of way to the west of Fentress Substation.[11]

16. The proposed Virginia Facilities represent the minimal amount of transmission facilities required to interconnect the CVOW Commercial Project reliably with the existing transmission system consistent with Dominion Transmission's Facility Interconnection Requirements, which are a required NERC Reliability Standard, and Dominion Transmission's reliability criteria. These requirements are in addition to those determined as part of the PJM generation queue process as described in PJM Manual 14A: New Services Request Process.

[10] The Company considers the removal of two structures supporting existing 230 kV Line #2128 (Structures #2128/1 and #2128/2) and replacement with four new structures (Structures #2128/1, #2128/1A, #2128/1B, and #2128/2), all entirely within existing right-of-way or on Company-owned property for the purposes of expanding the Fentress Substation to the north and accommodating the routing of Line #2128 into the station as described in this filing, to qualify as "ordinary extensions or improvements in the usual course of business" pursuant to Va. Code § 56-265.2 A 1 and, therefore, does not require approval pursuant to Va. Code § 56-46.1 B or a CPCN from the Commission. Should the Commission determine that a CPCN is required for the work associated with this limited work as described herein, the Company requests that the Commission grant such CPCN as part of its final order in this proceeding.

[11] The Company considers the removal of three structures supporting existing 500 kV Line #588 (Structures #588/254, #588/255, and #588/256) and replacement with two new 500 kV structures (Structures #588/254 and #588/255) within Company-owned property or existing right-of-way for the purposes of expanding the Fentress Substation to the north, as described in this filing, to qualify as "ordinary extensions or improvements in the usual course of business" pursuant to Va. Code § 56-265.2 A 1 and, therefore, does not require approval pursuant to Va. Code § 56-46.1 B or a CPCN from the Commission. Should the Commission determine that a CPCN is required for the work associated with this limited work as described herein, the Company requests that the Commission grant such CPCN as part of its final order in this proceeding.

17. The route of the Offshore Export Circuits, which begins approximately 3.0 miles offshore at the Virginia jurisdictional line demarcating state-owned submerged lands and extends to the proposed onshore Cable Landing Location, is subject to evaluation and approval by state and federal agencies, which includes, among others, the Bureau of Ocean Energy Management ("BOEM"), the Commonwealth of Virginia, the U.S. Army Corps of Engineers ("Corps"), the Virginia Marine Resources Commission ("VMRC"), and the City of Virginia Beach. Pursuant to consultation with these stakeholders, the Company has developed one proposed route for the Offshore Export Circuits.

18. From the Cable Landing Location to the Harpers Switching Station, the approximately 4.4-mile underground route of the Onshore Export Circuits utilizes new right-of-way that has been agreed upon by SMR, the U.S. Navy ("Navy" or "USN"), and the City of Virginia Beach, whose properties are impacted by the route. Pursuant to discussions with these stakeholders regarding use of their properties, the Company has developed one proposed underground route for the Onshore Export Circuits from the Cable Landing Location to the Harpers Switching Station. This portion of the route is also subject to review by other state and federal agencies, including BOEM, the Corps, and the City of Virginia Beach.

19. From the proposed Harpers Switching Station to the Company's existing Fentress Substation, the approximately 14.2-mile route of the three new 230 kV Overhead Transmission Circuits utilizes a combination of new, existing, and expanded right-of-way. Following extensive study and outreach, the Company identified four routes for the segment of the new transmission lines from Harpers Switching Station to Fentress Substation, which includes three overhead routes and variations and one hybrid route (underground and overhead). The Company additionally identified an entirely underground route, which was rejected from consideration.

This portion of the route is also subject to review by other state, local, and federal agencies, including BOEM, the Corps, and the Cities of Chesapeake and Virginia Beach.

20. Accordingly, the Company is proposing the following routes for notice: one proposed route for the Offshore Export Circuits; one proposed underground route for the Onshore Export Circuits; and one proposed and two alternative overhead routes and variations, and one hybrid route (underground and overhead) for the Overhead Transmission Circuits.[12] Discussion of the proposed and alternative routes, as well as other routes that the Company studied but ultimately rejected, is provided in Section II of the Transmission Appendix and in the Environmental Routing Study included with the Application.

21. A more detailed description of the proposed Virginia Facilities is provided in Sections I and II of the Transmission Appendix attached to this Application.

22. The desired in-service target date for the Virginia Facilities is July 31, 2025.[13] The Company estimates that it will take approximately 39 months for detailed engineering, materials procurement, permitting, and construction after a final order from the Commission. Accordingly, to support this estimated construction timeline and construction plan, the Company respectfully requests a final order by August 5, 2022.[14] Should the Commission issue a final order by August 5, 2022, the Company estimates that construction of the Virginia Facilities

[12] Subject to final engineering, coordination with landowners, and working through the BOEM process, there may be slight variations to the route or engineering design. The Company does not believe any such slight variations would require updated notice.

[13] Dominion Generation has indicated that it expects rolling commissioning of the CVOW Commercial Project wind turbine generators to commence in August 2025 and continue through year end 2026. See Attachment IV.B of the Generation Appendix.

[14] As part of this Application, the Company is seeking a CPCN for the Virginia Facilities as described herein, as well as approval of Rider OSW, pursuant to Subsection A 6 for recovery of costs associated with the CVOW Commercial Project, as described in the Generation Appendix. While there is no statutory deadline for Commission approval of the Virginia Facilities, Va. Code § 56-585.1 A 7 requires a final order be entered by the Commission on a Subsection A 6 RAC no more than nine months after the application filing date. The Company respectfully requests the CPCN be issued by the deadline for the Subsection A 6 RAC in order to support the Project construction schedule.

should begin by August 1, 2023, and be completed by July 31, 2025. This construction timeline will enable the Company to meet the targeted in-service date for the Virginia Facilities. This schedule is contingent upon obtaining the necessary permits. Dates may need to be adjusted based on permitting delays or design modifications to comply with additional agency requirements identified during the permitting application process.[15]

23. The estimated conceptual cost of the onshore Virginia Facilities[16] is approximately $1,148.5 million, which includes approximately $774.3 million for transmission-related work and approximately $374.2 million for substation-related work (2021 dollars).

24. Based on consultations with the Virginia Department of Environmental Quality ("DEQ"), the Company has developed a supplement ("DEQ Supplement") containing information designed to facilitate review and analysis of the proposed facilities by the DEQ and other relevant agencies. The DEQ Supplement is attached to this Application.

25. Based on the Company's experience, the advice of consultants, and a review of published studies by experts in the field, the Company believes that no adverse health effects will result from the operation of the Virginia Facilities. Section IV of the Transmission Appendix provides further details on Dominion Energy Virginia's consideration of the health aspects of electric and magnetic fields.

[15] Of note, and as discussed above, the Project and onshore routes are subject to review by federal agencies. As discussed in greater detail in Section III.L of the Transmission Appendix, this process is being led by BOEM, already has begun, and currently is expected to conclude in summer of 2023. Changes to the conclusion of the BOEM-led process, or expected issuance of federal approvals thereafter, could impact the anticipated construction start date for the Virginia Facilities.

[16] Excludes approximately 3.0 miles of offshore cable located in Virginia's jurisdictional boundary but includes the direct pipe construction from approximately 1,800 feet offshore to the SMR cable landing location.

26. Section V of the Transmission Appendix provides a proposed route description for public notice purposes and a list of federal, state, and local agencies and officials that the Company has or will notify about the Application.

27. In addition to the information provided in the Transmission Appendix, the DEQ Supplement, and the Environmental Routing Study, the request for approval and certification of the Virginia Facilities is supported by the pre-filed direct testimony of Company Witnesses Kevin Curtis, Peter Nedwick, Sherrill Crenshaw, Shane Moulton, Thomas Dorsey, Lane Carr, Rachel Studebaker, Robert Richardson and Jon Berkin filed with this Application and summarized below.

VI. RIDER OSW

28. Code § 56-585.1 A 6 provides that a utility can petition the Commission for approval of a RAC to recover the costs of one or more generation facilities:

> To ensure the generation and delivery of a reliable and adequate supply of electricity, to meet the utility's projected native load obligations and to promote economic development, a utility may at any time, after the expiration or termination of capped rates, petition the Commission for approval of a rate adjustment clause for recovery on a timely and current basis from customers of the costs of . . . (ii) one or more . . . generation facilities . . . .

29. Subsection 56-585.1:11 of the Code of Virginia ("Offshore Wind Statute" or the "Statute") addresses the development of offshore wind capacity in the Commonwealth and the Company's substantive responses to its requirements are included at relevant portions of the Generation Appendix. This Statute indicates that certain offshore wind projects—including the CVOW Commercial Project—are in the public interest as noted above.

30. In addition to determining that certain offshore wind facilities are in the public interest, the Statute also (i) contemplates cost recovery via a rate adjustment clause to be filed

pursuant to Code § 56-585.1 A 6, with costs presumed to be reasonably and prudently incurred if certain competitive solicitation, levelized cost of energy, and construction timeline benchmarks are met; (ii) requires any utility constructing an offshore wind facility to submit an economic development and workforce utilization plan; (iii) requires any utility constructing an offshore wind facility to submit an environmental and fisheries mitigation plan; and (iv) requires offshore wind projects to comply with certain competitive procurement requirements, involve at least one experienced developer, and demonstrate economic development benefits within the Commonwealth. The Statute provides that the Commission may only disallow costs if they "are otherwise unreasonably and imprudently incurred." Pursuant to the Statute, with a few exceptions, any Project costs are non-bypassable.

31. In this Application the Company seeks Commission approval of its proposed RAC, designated Rider OSW, pursuant to Code § 56-585.1 A 6, as contemplated by Code § 56-585.1:11 C, to recover on a timely and current basis the costs incurred to construct, own, and operate the offshore generating facilities as well as associated electrical transmission and distribution facilities required to interconnect the Project.

32. The total cost of the CVOW Commercial Project is expected to be approximately $9.8 billion, including $1,148.5 million for the onshore Virginia Facilities.

33. The Company has engaged in a rigorous process to competitively bid and negotiate the major contracts to support the Project. In doing so, a key goal is to ensure as much price certainty as is commercially and practically reasonable, and to mitigate against risks of pricing increases or volatility. The CVOW Commercial Project is unique due to the magnitude of the need to source major equipment and labor resources from international vendors. To the extent the agreements with those counterparties require payment in foreign currencies, there are

inherent pricing risks surrounding potential fluctuations in the valuation of those currencies relative to the U.S. dollar ("USD").

34. While the Company has attempted to mitigate these risks in its contracting strategy and negotiations, to further minimize these risks, the Company has a foreign currency hedging plan that it intends to execute, subject to the Commission finding this plan to be reasonable and prudent. Specifically, the Company intends to enter into financial hedges of foreign currency exposure via forward swaps executed shortly after Commission approval of its Foreign Currency Risk Mitigation Plan, unless market conditions dictate otherwise. This plan is addressed further in the Direct Testimony of Company Witnesses Mitchell and Lauren Adkins.

35. The Company has used a return on equity ("ROE") of 9.20% for purposes of calculating the Rider OSW revenue requirement. This 9.20% ROE was approved by the Commission in its Final Order on November 21, 2019, in the Company's 2019 ROE proceeding.[17] The Company acknowledges that the Commission will set a new ROE in the Company's triennial review proceeding, Case No. PUR-2021-00058, and that the Commission-approved ROE will be applicable for use in the Projected Cost Recovery Factor component of the revenue requirement ultimately approved as part of this proceeding.

36. The proposed rate year for this proceeding is September 1, 2022 through August 31, 2023 ("Rate Year"). The key components of the revenue requirement are the Projected Cost Recovery Factor, the Allowance for Funds Used During Construction ("AFUDC") Cost Recovery Factor, and the Actual Cost True-Up Factor.

[17] *Application of Virginia Electric and Power Company For the determination of the fair rate of return on common equity pursuant to § 56-585.1:1 C of the Code of Virginia*, Case No. PUR-2019-00050, Final Order (Nov. 21, 2019) ("2019 ROE Proceeding").

37. In calculating the Projected Cost Recovery Factor, which includes financing costs for rate base during the Rate Year, the end-of-test-period capital structure and cost of capital is the Company's December 31, 2020 year-end capital structure and year-end cost of capital ("Cost of Capital"). The capital expenditures and accumulated deferred income tax ("ADIT") components of rate base reflect the Virginia Jurisdiction projected balances as of August 31, 2022, the month immediately preceding the beginning of the Rate Year in this case. The revenue requirement to be recovered from Virginia Jurisdictional customers through the Projected Cost Recovery Factor will consist of projected construction capital expenditures, the projected financing costs on invested capital for the Rate Year, plus income taxes on the equity component of the return. The Projected Cost Recovery Factor revenue requirement totals $47.510 million for Virginia Jurisdictional customers in this case.

38. The AFUDC Cost Recovery Factor represents the amortization of the unrecovered AFUDC from the beginning of the Rate Year through the end of the construction period for each site, as applicable, projected to be accrued on the Company's books for the OSW Projects. The Company's AFUDC Cost Recovery Factor revenue requirement is approximately $31.192 million.

39. The Actual Cost True-Up Factor will either credit to, or recover from, customers any over-/under- recovery of costs from the most recently completed calendar year. Actual revenues during the test year are compared to actual costs incurred during the test year. Any difference in these amounts becomes the Actual Cost True-Up Factor credited to, or recovered from, customers through the total revenue requirement requested for recovery during the Rate Year. Since this filing represents the initial request for cost recovery for the Project, no true-up is included in this initial proceeding.

40. The total revenue requirement requested for recovery in this initial Rider OSW for the Rate Year beginning September 1, 2022 is $78.702 million.

41. Rider OSW identifies the rate in cents per kilowatt-hour ("kWh") that will apply to each Company rate schedule or special contract approved by the Commission pursuant to Va. Code § 56-235.2. Under Va. Code § 56-585.1:11 C 3, the costs of the CVOW Project have been allocated to all customers of the utility in the Commonwealth as a non-bypassable charge, regardless of the generation supplier of any such customer, except as provided by statute. If approved as proposed, Rider OSW would be effective for usage on and after September 1, 2022.

42. The implementation of the proposed Rider OSW on September 1, 2022, will increase the residential customer's monthly bill, based on 1,000 kWh per month, by $1.45. Typical monthly bill increases for customers receiving service on Residential Schedule 1, General Service Schedules GS-1, GS-2, GS-3, and GS-4, and Church Schedule 5C are provided to present proposed Rider OSW at several representative levels of consumption or demand.

43. The request for approval of Rider OSW is supported by the pre-filed direct testimony of Company Witnesses Bennett, Christopher Lee, J. Scott Gaskill, and Timothy Stuller filed with this Application and summarized below.

VII. FILING SCHEDULES

44. Rule 60 of the Rate Case Rules, 20 VAC 5-204-5 *et seq.*, provides that a rate adjustment clause application "shall include Schedule 46" and, that, additionally, those "applications requiring an overall cost of capital shall include Schedules 3, 4, 5, and 8." The Company is filing with this Application, Filing Schedules 3, 4, 5, and 8, sponsored by Company Witness Lee. Additionally, the Company is filing with this Application the information required by Schedule 46, as follows:

A. Filing Schedule 46.b.1.i, Statements 1 through 3, are sponsored by Company Witness Bennett. These Statements provide a schedule of all projected and actual costs by type of cost and year, and by month to the extent available associated with Rider OSW.

B. Filing Schedule 46.b.1.ii, Statement 1, is sponsored by Company Witness Bennett and addresses the transaction-level details of the Project's actual costs.

C. Filing Schedule 46.b.1.iii, Statement 1, is sponsored by Company Witnesses Bennett, Kelly, Hollett, Larson, Nedwick, Crenshaw, Moulton, Dorsey, Carr, and Berkin. This Statement addresses the justification for the proposed costs.

D. Filing Schedule 46.b.1.iv, consisting of Statements 1 through 5, is sponsored by multiple Company witnesses. Company Witness Kelly sponsors Filing Schedule 46.b.1.iv, Statement 1, which addresses the economic studies for the Project. Company Witness Hollett sponsors Filing Schedule 46.b.1.iv Statements 2 and 3, which address the key documents supporting the Project costs related to the generation unit. Company Witnesses Nedwick and Moulton sponsor Filing Schedule 46.b.1.iv, Statements 4 and 5, respectively, which address the key documents supporting the Project costs related to transmission.

E. Filing Schedule 46.b.1.v, Statement 1, is sponsored by Company Witness Mitchell and provides key materials used by senior management in approving or recommending the proposed costs, as determined by the Company, for the Project.

F. Filing Schedule 46.b.1.vi, consisting of Statements 1 through 4, is sponsored by multiple Company witnesses. Company Witness Lee sponsors Filing Schedule 46.b.1.vi, Statements 1 through 3, which provide the annual revenue requirement for the Rate Year and duration of the proposed RAC, as well as the supporting calculations. Company Witness Stuller sponsors Filing Schedule 46.b.1.vi, Statement 4, which provides the annual revenue requirement by class for the duration of the proposed RAC.

G. Filing Schedule 46.b.1.vii, consisting of Statement 1, is co-sponsored by Company Witnesses Gaskill and Stuller, and addresses the methodology for allocating the revenue requirement among rate classes and the design of class rates.

H. Filing Schedule 46.b.2.i, Statement 1, is sponsored by Company Witnesses Bennett, Kelly, Hollett, Larson, and Moulton, and addresses the need and justification for the proposed generating unit.

I. Filing Schedule 46.b.2.ii, consisting of Statements 1 and 2, is sponsored by Company Witness Hollett. These Statements address the feasibility and engineering studies supporting the plant type and site selected for the proposed generating unit.

J. Filing Schedule 46.b.2.iii, Statement 1, sponsored by Company Witness Hollett, addresses the fuel supply studies for the proposed generating unit.

K. Filing Schedule 46.b.2.iv, Statement 1, sponsored by Company Witnesses Bennett, Kelly, Hollett, Nedwick, and Moulton, addresses the planning assumptions for the proposed generating unit.

L. Filing Schedule 46.b.2.v, Statement 1, sponsored by Company Witness Kelly, addresses the economic studies for the proposed generating unit.

M. Filing Schedule 46.b.2.vi, Statement 1, sponsored by Company Witnesses Bennett, Nedwick, Carr, and Berkin, addresses the projected and actual costs of the proposed generating unit.

VIII. PRE-FILED DIRECT TESTIMONY

45. The Company's Application is supported by the pre-filed direct testimony of the following witnesses:

A. Company Witness Mark Mitchell, Senior Vice President – Project Construction, provides an overview of the CVOW Project, describes the need for the Company's Foreign Currency Risk Mitigation Plan and the request for approval as soon as procedurally possible, and introduces the other Company witnesses. Mr. Mitchell also sponsors a portion of Filing Schedule 46.

B. Company Witness Joshua Bennett, Vice President—Offshore Wind, describes the components of the CVOW Commercial Project, which includes all of the Project's offshore elements up to the POI at the Harpers Switching Station. He outlines the legal requirements applicable to the CVOW Commercial Project as set forth in § 56-585.1:11 and related provisions of Code § 56-585.1 A 6 of the Code of Virginia and presents the Company's Generation Appendix. He also addresses certain issues of particular import to the Project, including many components of the levelized cost of energy analysis and the major capital contracts executed in support of the Project. Additionally, he presents the Company's request for approval of a cost recovery rider, consistent with Code § 56-585.1:11 C and pursuant to Code § 56-585.1 A 6, and sponsors various portions of the Generation Appendix and Filing Schedule 46.

C. Company Witness Glenn Kelly, Director—Strategic Planning, presents the levelized cost of energy calculation for the Project as well as other economic analyses supporting the Project costs, including relevant sensitivities. Mr. Kelly sponsors portions of the Generation Appendix and Filing Schedule 46.

D. Company Witness Grant Hollett, Director—Offshore Wind, sponsors portions of the Generation Appendix that provide the Project overview, address information obtained from the CVOW Pilot Project and experience from industry partnerships, and provide the Project timeline. Mr. Hollett also sponsors portions of Filing Schedule 46.

E. Company Witness Lauren V. Adkins, Director, Corporate Finance, addresses foreign currency exposure risks and a plan to mitigate those risks through selected financial instruments.

F. Company Witness Scott Lawton, Environmental Technical Advisor, addresses environmental concerns and environmental justice issues, provides a report on information obtained from the CVOW Pilot Project, and sponsors related portions of the Generation Appendix.

G. Company Witness John Larson, Director—Public Policy and Economic Development, sponsors the Economic Development Plan and sponsors related portions of the Generation Appendix.

H. Company Witness J. Kevin Curtis, Vice President—Transmission, Power Delivery, provides an overview of the CVOW Commercial Project and the PJM Interconnection Queue process, the components of the Virginia Facilities, the development of routes and related outreach and stakeholder engagement.

I. Company Witness Peter Nedwick, Principal Engineer—Electric Transmission Planning, sponsors those portions of the Transmission Appendices describing the Company's electric transmission system and the need for, and benefits of, the proposed Virginia Facilities. Additionally, Mr. Nedwick sponsors a portion of the Generation Appendix as it pertains to electric transmission planning. Mr. Nedwick also sponsors portions of Filing Schedule 46.

J. Company Witness Sherrill Crenshaw, Consulting Engineer—Electric Transmission Engineering, sponsors those portions of the Transmission Appendix providing an overview of the design characteristics of the overhead transmission facilities for the proposed Virginia Facilities, and discusses electric and magnetic field ("EMF") levels as pertaining to those overhead facilities. Mr. Crenshaw also sponsors portions of Filing Schedule 46.

K. Company Witness Shane Moulton, Engineer III—Electric Underground Transmission Engineering, sponsors those portions of the Transmission Appendix providing an overview of the design characteristics of the underground transmission facilities for the proposed Virginia Facilities, and discusses EMF levels as pertaining to those underground facilities. Additionally, Mr. Moulton sponsors an attachment to the Generation Appendix providing an overview of the competitive bid process as it relates to certain underground facilities. Mr. Moulton also sponsors portions of Filing Schedule 46.

L. Company Witness Thomas Dorsey, Contractor—Substation Engineering, sponsors those portions of the Transmission Appendix describing the substation work to be performed for the proposed Virginia Facilities. Mr. Dorsey also sponsors portions of Filing Schedule 46.

M. Company Witness Lane Carr, Senior Siting and Permitting Specialist, sponsors those portions of the Transmission Appendix providing an overview of the route for the proposed

Virginia Facilities and related permitting. Ms. Carr additionally co-sponsors the DEQ Supplement. Ms. Carr also sponsors portions of Filing Schedule 46.

N. Company Witness Rachel Studebaker, Environmental Specialist III, sponsors those portions of the Transmission Appendix providing an overview of environmental permitting. Mrs. Studebaker additionally co-sponsors the DEQ Supplement.

O. Company Witness Robert Richardson, Communications Consultant—Electric Transmission Communications, sponsors those portions of the Transmission Appendix providing an overview of outreach and engagement with the public and interested stakeholders.

P. Company Witness Jon Berkin, Partner—Environmental Resource Management, sponsors the Environmental Routing Study provided in support of the Company's Application. Dr. Berkin additionally co-sponsors portions of the Transmission Appendix and DEQ Supplement, as well as the environmental justice analysis provided as an attachment to the Generation Appendix. Dr. Berkin also sponsors portions of Filing Schedule 46.

Q. Company Witness Christopher Lee, Manager—Regulation, Regulatory Accounting, addresses the development of the revenue requirement associated with Rider OSW for the Rate Year of September 1, 2022, through August 31, 2023. Mr. Lee also sponsors Filing Schedule 3, 4, 5, and 8, as well as portions of Filing Schedule 46.

R. Company Witness J. Scott Gaskill, Director—Power Generation Regulated Operations, sponsors the development of the jurisdictional and customer class cost allocation factors for Rider OSW. Mr. Gaskill also sponsors portions of Filing Schedule 46.

S. Company Witness Timothy Stuller, Regulatory Specialist, sponsors Rider OSW based on the revenue requirement presented by Company Witness Lee, to be effective for usage

on and after September 1, 2022, and discusses the impact that the proposed Rider OSW rates will have on customer bills. Mr. Stuller also sponsors portions of Filing Schedule 46.

IX. COMPLIANCE WITH THE RATE CASE RULES

46. Rule 60 of the Rate Case Rules provides that an application filed pursuant to Subsection A 6 "shall include Schedule 46 as identified and described in 20 VAC 5-204-90, which shall be submitted with the utility's direct testimony." The Company is filing with this Application, Filing Schedule 46, portions of which are sponsored by various Company witnesses, as noted above.

47. Rule 60 of the Rate Case Rules also provides that rate adjustment clause "applications requiring an overall cost of capital shall include Schedules 3, 4, 5, and 8." These filing schedules are sponsored by Company Witness Lee.

48. The Company's Application for approval of Rider OSW complies with the requirements contained in Rule 10 of the Rate Case Rules. In accordance with Rule 10 A, Dominion Energy Virginia filed with the Commission on August 3, 2021, the Company's notice of intent to file this Application under Va. Code § 56-585.1 A 6. Copies of this Application, to the extent required by Rule 10 J, along with the additional information required by Rule 10 J, have been served upon the persons addressed in that Rule. A complete copy of this Application has been served upon the Office of the Attorney General's Division of Consumer Counsel in conformity with Rule 10 J. Also included with and following this Application, pursuant to Rule 10, is a table of contents of this filing, including exhibits and schedules.

49. Beyond the initial Application, Rule 20 VAC 5-204-10 J requires the Company to serve copies of certain information related to Dominion Energy Virginia's rate proceedings upon local officials electronically to the extent official email addresses are available, or via first class

mail or personal delivery if electronic delivery is not possible. The Company will comply with this requirement in conjunction with the Commission's forthcoming procedural order.

X. LIMITED REQUEST FOR WAIVER OF FILING SCHEDULE 46 REQUIREMENTS

50. The Company, for good cause shown and pursuant to 20 VAC 5-204-10 E, additionally respectfully requests that the Commission waive, in part, the requirements under Rules 60 and 90 of the Rate Case Rules with respect to paper copies of certain Filing Schedule 46 materials. Specifically, the Rate Case Rules require the Company to provide key documents, including economic analyses, contracts, studies, investigations, results from requests for proposals, and cost benefit analyses that support projected costs proposed to be recovered via the rate adjustment clause. The supporting documentation responsive to this requirement is voluminous and not easily reviewed in hard copy (paper) format. Accordingly, the Company seeks waiver of the requirement to file 12 hard copies of this information. Instead, the Company proposes to provide this documentation to Commission Staff and any other future case participants in electronic format, and provide the Commission with one hard copy and three electronic copies on compact discs ("CDs"). The Company will make the electronic documents available via an e-room contemporaneously with this filing, with immediate access available to Commission Staff. This request is consistent with the Commission's recent orders granting similar limited waivers.[18] Should the Commission deny this request, the Company asks for a reasonable allowance of time to print the requisite filing copies of this material and submit it to the Commission prior to the Company's application being deemed incomplete.

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[18] *Application of Virginia Electric and Power Company, For revision of rate adjustment clause: Rider BW, Brunswick County Power Station, for the Rate Years commencing September 1, 2022, and September 1, 2023*, Case No. PUR-2021-00239, Order for Notice and Hearing at 6 (Oct. 25, 2021); *see also Petition of Virginia Electric and Power Company, For approval of its annual RPS Development Plan under § 56-585.5 D 4 of the Code of Virginia and related requests*, Order Granting Limited Reconsideration at 2 (Aug. 26, 2021).

XI. REQUEST FOR CONFIDENTIAL TREATMENT AND ADDITIONAL PROTECTIVE TREATMENT OF EXTRAORDINARILY SENSITIVE INFORMATION

51. The Company's Application contains extraordinarily sensitive information, as designated therein. Because portions of the Company's Application contain such extraordinarily sensitive information, in compliance with Rule 10 F of the Rate Case Rules and Rule 170 of the Commission's Rules of Practice and Procedure, 20 VAC 5-204-10 F and 5 VAC 5-20-170, this filing is accompanied by a separate Motion for Entry of a Protective Order and Additional Protective Treatment, including a Proposed Protective Order, filed contemporaneously with this Application.

WHEREFORE, Dominion Energy Virginia respectfully requests that the Commission (1) find that the Company has complied with the requirements for an offshore wind project set forth in Va. Code § 56-585.1:11 C 1 for purposes of the presumption that the costs are reasonably and prudently incurred; (2) determine that the Company's Foreign Currency Risk Mitigation Plan is reasonable and prudent, as soon as procedurally possible; (3) direct that notice of the request for approval and certification of the Virginia Facilities be given as required by Va. Code § 56-46.1; (4) approve, pursuant to Va. Code § 56-46.1, the construction of the Virginia Facilities; (5) grant a certificate of public convenience and necessity for the Virginia Facilities under the Utility Facilities Act, Va. Code § 56-265.1 *et seq.*; (6) direct that notice for the proposed Rider OSW under Va. Code § 56-585.1 A 6 be given; (7) approve the proposed Rider OSW under Va. Code § 56-585.1 A 6 subject to future Rider OSW proceedings and true-ups, effective for usage on and after September 1, 2022; (8) approve the proposed revenue requirement, cost allocation, rate design, and accounting treatment for the CVOW Project for the Rate Year September 1, 2022, through August 31, 2023; (9) grant the Company's requested

waiver as to portions of Filing Schedule 46; and (10) grant such other and further relief as it deems just and proper.

Respectfully submitted,

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