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OFFICIAL COPY

Nov 09 2020

November 9, 2020

Ms. Kimberley A. Campbell, Chief Clerk  
North Carolina Utilities Commission  
Dobbs Building  
430 North Salisbury Street  
Raleigh, North Carolina 27603

*Re: Docket No. E-22, Sub 590  
Rebuttal Testimony of Ronnie T. Campbell*

Dear Ms. Campbell:

Enclosed for filing in the above-referenced proceedings on behalf of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina (the "Company"), is its Rebuttal Testimony of Ronnie T. Campbell.

Please do not hesitate to contact me if you have any questions regarding this filing. Thank you for your assistance with this matter.

Very truly yours,

/s/Mary Lynne Grigg

MLG:sjg

Enclosures

cc: John Little  
William Creech

**REBUTTAL TESTIMONY  
OF  
RONNIE T. CAMPBELL  
ON BEHALF OF  
DOMINION ENERGY NORTH CAROLINA  
BEFORE THE  
NORTH CAROLINA UTILITIES COMMISSION  
DOCKET NO. E-22, SUB 590**

1   **Q.     Please state your name, business address and position with Virginia**  
2           **Electric and Power Company.**

3   A.     My name is Ronnie T. Campbell, and my business address is 120 Tredegar  
4           Street, Richmond, Virginia 23219. I am a Supervisor of Accounting for the  
5           Dominion Energy Virginia and Contracted Assets operating segments of  
6           Dominion Energy, Inc., which includes responsibility for Virginia Electric &  
7           Power Company, which operates in North Carolina as Dominion Energy  
8           North Carolina (“Company”). My responsibilities include overseeing  
9           personnel responsible for recording the Company’s actual fuel and purchased  
10          power expenses, as well as any under-/over-recovery of such expenses  
11          through the fuel deferral mechanism, operation and maintenance accounting  
12          activities, reserve analysis and joint owner billings.

13   **Q.     Have you previously submitted testimony in this proceeding?**

14   A.     Yes, I prepared direct testimony in this cases and have also participated in  
15          responding to data requests in this proceeding.

16   **Q.     What is the purpose of your rebuttal testimony?**

17   A.     My rebuttal testimony addresses the testimony of Public Staff Witness Michael C.  
18          Maness, regarding the treatment of electricity sales in the wholesale market (“off-  
19          system” or “intersystem” sales) in the component of the fuel and fuel-related cost

1 factor (“fuel factor”).

2 **Q. Please summarize Witness Maness’s testimony.**

3 A. Witness Maness testified that Public Staff is currently in the process of reviewing  
4 the off-system sales in the Company’s fuel factor. The Public Staff is not  
5 recommending an adjustment in this fuel factor proceeding, but Witness Maness  
6 stated that it may raise this issue in future fuel factor or other rate proceedings.

7 **Q. What is the Company’s position regarding its treatment of off-system sales?**

8 A. The Company agrees with witness Maness that, since all or most of DENC’s  
9 off-system sales are made to or through PJM Interconnection, LLC (“PJM”),  
10 and thus the PJM cost and billing system is intertwined with the determination  
11 of the fuel cost of these sales, the tracking and accounting of the components  
12 of these sales is somewhat more complicated. The Company’s position is that  
13 it appropriately accounts for the components of off-system sales in the fuel  
14 factor and in its general rate cases, and the Company has received no previous  
15 indication that a change in its accounting practices is warranted. However, the  
16 Company will continue to work with the Public Staff to address its concerns  
17 and any additional inquiries. To the extent that the Public Staff or the  
18 Commission raises the issue of how the Company accounts for off-system  
19 sales in the future, this issue should be addressed in coordination with the  
20 Company’s next general rate case, since components of off-system sales are  
21 included in base rates.

22 **Q. Does this conclude your rebuttal testimony?**

23 A. Yes.

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Rebuttal Testimony of Ronnie T. Campbell, as filed in Docket No. E-22, Sub 590, was served via electronic delivery or mailed, first-class, postage prepaid, upon all parties of record.

This, the 9<sup>th</sup> day of November, 2020.

/s/Mary Lynne Grigg

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