McGuireWoods LLP
434 Fayetteville Street
Suite 2600
PO Box 27507 (27611)
Raleigh, NC 27601
Phone: 919.755.6600
Fax: 919.755.6699
www.mcguirewoods.com

E. Brett Breitschwerdt
Direct: 919.755.6563

McGUIREWOODS

bbreitschwerdt@mcguirewoods.com

May 23, 2014

VIA ELECTRONIC FILING

Mrs. Gail L. Mount, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603-5918

Re: Docket No. E-100, Sub 137

Dear Mrs. Mount:

Enclosed for filing in the above-referenced docket on behalf of Virginia Electric and Power Company, d/b/a Dominion North Carolina Power, is the *Reply Comments of Dominion North Carolina Power*.

Thank you for your assistance in this matter. Please do not hesitate to contact me if you need any additional information.

Very truly yours,

s/ E. Brett Breitschwerdt

EBB:asm

Enclosure

STATE OF NORTH CAROLINA
UTILITIES COMMISSION

DOCKET NO. E-100, SUB 137

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of 2013 Updated Integrated Resource Plans and Related 2013 REPS Compliance Plans	)	REPLY COMMENTS OF DOMINION NORTH CAROLINA POWER

On August 31, 2013, Virginia Electric and Power Company d/b/a Dominion North Carolina Power ("DNCP" or the "Company") filed its 2013 updates to its Integrated Resource Plan ("2013 Plan" or "Plan") pursuant to North Carolina Utilities Commission ("Commission") Rule R8-60 and its 2013 Renewable Energy and Energy Efficiency Portfolio Standards Compliance Plan ("REPS Plan") pursuant to Rule R8-67 in the above-captioned docket.

In an Order issued October 11, 2013, the Commission established February 4, 2014, as the date for the Public Staff and other intervenors to file initial comments on the Integrated Resource Plans ("IRPs") and REPS Plans filed by the electric power suppliers (the "Utilities") and allowed the Utilities to file reply comments on or before February 18, 2014.[1] At the Public Staff's and then subsequently the Southern Alliance for Clean Energy and the Sierra Club's (collectively "SACE") requests, the Commission extended the dates for comments and reply comments to April 11, 2014, and then to April 25, 2014. Initial comments on the Utilities' IRPs and REPS compliance plans were timely filed by the Public Staff, the North Carolina Waste Awareness and Reduction Network ("NC WARN"), SACE, the Mid-Atlantic Renewable Energy Coalition ("MAREC"), and

[1] A separate procedural schedule was established for parties to comment on the 2013 REPS plans and 2012 REPS reports filed by certain non-public utility electric power suppliers in Docket E-100, Sub 139.

the North Carolina Sustainable Energy Association ("NCSEA"). On April 17, 2014, the Commission granted a joint request by DNCP along with Duke Energy Progress, Inc. ("DEP"), and Duke Energy Carolinas, LLC ("DEC") to extend the date for filing reply comments to May 23, 2014.

No party objected to DNCP's 2013 Plan or its REPS Plan. The Public Staff and NCSEA were the only parties to specifically address DNCP's 2013 Plan in their Comments. DNCP hereby files its reply comments to the Comments submitted by the Public Staff and certain other parties.[2]

I. COMMENTS IN RESPONSE TO PUBLIC STAFF

The Company agrees with the Public Staff's statements that:

(1) "[a]ll of the utilities use accepted econometric and end-use analytical models to forecast their peak and energy needs;"[3]

(2) "DNCP's peak load and energy sales forecasts are reasonable for planning purposes;"[4] and

(3) "the reserve margins filed by the [Utilities] are reasonable for planning purposes."[5]

The Company has reviewed the recommendations set forth in the Public Staff's Comments ("Recommendation"), and specifically the subset of Recommendations applicable to DNCP. While certain of those Recommendations require further discussion, which the Company addresses in detail below, DNCP can summarily state its

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[2] Capitalized terms, to the extent not defined in these Comments, have been defined in the 2013 Plan.
[3] *In the Matter of 2013 Updated Integrated Resource Plans and Related 2013 REPS Compliance Plans*, Docket No. E-100, Sub 137, Comments of the Public Staff, at 12 (Apr. 11, 2014) ("Public Staff Comments").
[4] Public Staff Comments, at 17.
[5] Public Staff Comments, at 33.

agreement to the following Public Staff Recommendations: (2), (4), (8), (9), (10), (12), (14), (15). The Company also notes that due to the timing of a prospective Commission Order in this proceeding and the Company's current development of its 2014 Plan, as further explained below, it is highly unlikely that DNCP will be able to incorporate the requirements of a Commission Order prior to filing its next biennial Plan due to be filed September 1, 2014.

The Company responds to the Public Staff's other comments and Recommendations, as follows:

a. Biomass Conversions

On page 27 of its Comments and through its Recommendation (7), the Public Staff noted that conversion of the Hopewell, Altavista, and Southampton Coal Stations to biomass-fueled facilities was scheduled to be implemented before the end of 2013. The Public Staff sought confirmation that these conversions were, in fact, completed during 2013. The Company completed conversion of the above-referenced facilities to biomass on the following schedule:

Plant	COD
Altavista	7/12/2013
Hopewell	10/18/2013
Southampton	11/28/2013

b. Extending Future Planning Period to 20 Years

On page 61 of its Comments and through its Recommendation (16), the Public Staff recommends that "the planning period for future IRPs that foresee substantial nuclear retirements be at least 20 years."[6] The Company currently uses a 25-year Study

[6] Public Staff Comments, at 61-62.

Period (e.g., 2014 – 2038 in the 2013 Plan) and displays text, numbers, and appendices for a 15-year Planning Period (e.g., 2014 – 2028 in the current 2013 Plan). As explained in the 2013 Plan, the Company's customers today benefit substantially from the Company's prior investments in the four nuclear units, at North Anna and Surry, and the Company is mindful of the scheduled license expirations of these units between 2032 and 2040.[7] However, DNCP notes that Commission Rule R8-60(c) and (h) direct the Company to present its IRP using a 15-year planning period. Further, the Company notes that its odd-year Virginia IRP filing is based on a 15-year Planning Period, and is filed pursuant to Va. Code § 56-592 *et seq.* and the Virginia State Corporation Commission's Integrated Resource Planning Guidelines.[8] The Company prefers to maintain consistency between the North Carolina and Virginia IRP filings (which both require 15-year planning periods) and, therefore, disagrees with presenting the IRP based on a 20-year planning period. However, upon request during discovery, the Company will provide the Public Staff with all the requisite information contained in the 25-year Study Period analysis, which should provide the Public Staff with the information sought through Recommendation (16).

c. Quantifying Fuel Diversity Value

The Public Staff's discussion at page 66 and its Recommendation (17) suggests that the Utilities "continue to develop methods of quantifying the benefits of fuel diversity" and requests the Utilities provide detailed support in future IRPs if a utility selects a fuel diversity plan over a plan that is otherwise lower in costs. Specifically, the

[7] The Company's operating licenses for Surry Unit 1 (838 MW) and Surry Unit 2 (838 MW) expire in 2032 and 2033, respectively, and North Anna Unit 1 (838 MW) and North Anna Unit 2 (835 MW) expire in 2038 and 2040, respectively.

[8] *See Order Establishing Guidelines for Developing Integrated Resource Plans*, at Attachment A Virginia State Corporation Commission Case No. PUE-2008-00099 (Dec. 23, 2008).

Public Staff requests the Utilities develop a "metric to quantify the value of diverse generation portfolios" such as the present value revenue requirement ("PVRR") method.[9]

At the outset, the Company would note that its 2013 Plan does not select its Fuel Diversity Plan over the least cost Base Plan. Instead, the Company recommends a path forward based upon the least-cost Base Plan, while concurrently continuing forward with reasonable development efforts of the additional resources identified in the Fuel Diversity Plan.[10] As with any strategic plan, the Company will update its future Plans to incorporate new information as it becomes known.

In response to the Public Staff's specific Recommendation to establish metrics to quantify the benefits of fuel diversity, DNCP agrees that more purposefully assessing the benefits of fuel diversity in future planning processes is a reasonable goal. Fuel diversity considerations represent increasingly important risk trade-offs between generally higher long-term operating cost risks under the Base Plan versus higher near-term project development cost risks under the Fuel Diversity Plan. The importance of quantifying this risk trade-off also increases as the percentage of gas-fired generation selected as the least-cost option in the Company's Base Plan trends higher. The Company agrees to further analyze this risk-trade off and to develop potential metrics to quantify the benefits of fuel diversity prior to filing its 2015 IRP update filing. The Company is also willing to work with the Public Staff in the coming months to develop appropriate analytical metrics that allow for quantification of the benefits of fuel diversity.

The Company does, however, disagree with the Public Staff's further Recommendation that PVRR should be used to represent the value of fuel diversity in the

[9] Public Staff Comments, at 65.
[10] 2013 Plan, at 5.

Company's future Plans. While the Public Staff's comments suggest that it has "no clear preferred method" to quantify fuel diversity at this time, this methodological ambivalence quickly transitions into a Recommendation that the Utilities graph PVRR for their resource portfolios by various scenarios similar to the Tennessee Valley Authority's ("TVA") approach in its March 2011 IRP.[11,12] The Company has reviewed the TVA approach to graphing PVRR, and would submit that this approach provides little additional value in assessing the risk of a given portfolio. Cost risk is assessed based on how a given portfolio performs relative to a base case under a series of scenarios and sensitivity cases. This is precisely what is reflected in the 2013 Plan. What is important is the difference between the base case PVRR cost and the PVRR of the scenario or sensitivity case in question. The absolute value PVRR in and of itself offers little relative insight.

The Company also disagrees with the Public Staff's related Recommendation that the Utilities should estimate the annual rate impacts of their various plans over the life of the planned resource additions. While an estimate of annual rate impacts of resource additions on a levelized per kWh basis may provide some understanding of ratepayer impacts, the Company believes this value would be limited in comparison to the way bill impacts are provided in base rate, fuel, DSM and other ratemaking proceedings. In addition, the Company is concerned that such an additional requirement may be a source of confusion for customers since the Company is not asking for actual cost recovery in the IRP proceeding.

[11] Public Staff Comments, at 66.
[12] *See* March 2011 TVA IRP, accessible at http://www.tva.gov/environment/reports/irp/archive/index.htm

In sum, while the Company disagrees with the Public Staff's specific Recommendation to follow TVA's approach to presenting PVRR in analyzing its future Plans, the Company does agree in principle that quantifying the benefits of fuel diversity in its future Plans is of increasing importance and commits to provide appropriate metrics to show this analysis in its 2015 IRP update filing.

d. Anticipating Environmental Regulatory Constraints Impacting Planning

On page 69 of its comments and through its Recommendation (19), the Public Staff recommends that the 2014 and future IRPs "include an economic analysis of the costs of compliance with pending environmental regulations, both individually and in combinations, and an environmental compliance scenario that includes reasonable assumptions regarding the costs of compliance."[13] The Company would like to clarify that its 2013 Plan (and prior Plans) do, in fact, consider both "effective *and anticipated* U.S. Environmental Protection Agency ("EPA") regulations concerning air, water, and solid waste constituents." (emphasis added)[14] The Company's planning process not only evaluates the risks associated with effective and anticipated EPA regulations, but also analyzes the cost of compliance with anticipated environmental regulations in developing all of its planning scenarios. Section 3.1.3 of the Company's 2013 Plan recognizes the effective and anticipated EPA regulations that DNCP considered in developing its Plan (as set forth in DNCP's Figure 3.1.3.1 cited to on page 68 of the Public Staff's comments). The Company's 2013 Plan then noted that the Company's 2012 Plan comprehensively reviewed and analyzed the costs to retrofit units with new environmental control equipment, repower units to natural gas, convert units to burn

[13] Public Staff Comments, at 69.
[14] 2013 Plan, at 3, 31.

biomass as a fuel source, or retire the units from service.[15] DNCP's 2013 Plan remains largely unchanged compared to its 2012 Plan regarding the costs of retrofitting, repowering, and retiring units affected by EPA regulations. However, the Company's 2013 Plan does update expected installation of environmental controls on Yorktown 3 and Possum Point 5, which have been delayed and will both be implemented in 2018.

As the foregoing shows, the potential economic impacts of both effective and anticipated EPA regulations on the Company's current generating units and future planning scenarios are fully considered in the Company's planning process. The Company will continue to take this approach and will continue to provide the economic analysis through discovery supporting its planning scenarios to the Public Staff in the future. This includes the reasonably anticipated and quantifiable cost of ensuring its current generating unit options as well as planned resource options can comply with anticipated environmental regulations. The Company does, however, note that the focus of its planning process is on "resource planning" – meaning evaluating prudent and least-cost supply-side and demand-side resources available to reliably serve its customers – and is not designed to solely develop cost estimates of compliance with prospective individual environmental regulations.

Based on the foregoing, the Company will continue its comprehensive approach to evaluate the cost of current and anticipated EPA regulatory compliance in its future resource planning process and urges denial of Public Staff Recommendation (19) as unnecessary.

[15] 2012 Plan, at Section 3.1.3

e. Inclusion of Decommissioning Costs

The Public Staff's discussion at page 69 and its Recommendation (20) suggest that the Utilities "include the decommissioning costs associated with each resource type, including coal, nuclear, natural gas, and renewable resources in one or more of the scenarios evaluated." The Company generally agrees that inclusion of material decommissioning costs in the development of its future resource plans is reasonable where such decommissioning costs are currently quantifiable and not de minimis. In its ongoing development of its 2014 Plan, the Company plans to recognize decommissioning costs associated with potential new nuclear, offshore wind, and onshore wind resources included in that Plan, as those resource options present quantifiable and non-de minimis decommissioning costs. Other future resource options including coal, natural gas, and solar/non-wind renewables are projected to be "decommissioned-in-place," and are not currently expected to cause material decommissioning costs in substantial excess of potential salvage value of the unit at the time of unit shut down. The Company will continue to evaluate all future resource options to assess whether material decommissioning costs should be recognized in future Plans.

f. Stakeholder Participation and Streamlining IRP Update Process

The Public Staff concludes its comments by making three general suggestions in Recommendations (21) – (23) about how the IRP process could be improved.[16] First, the Public Staff suggests that the Commission solicit comments from the parties regarding changes to the IRP process to make it more "robust and meaningful."[17] Second, the Public Staff advocates allowing stakeholder input prior to development of the IRPs by the

[16] Public Staff Comments, at 70-72.
[17] Public Staff Comments, at 71.

Utilities. Finally, the Public Staff suggests the Commission may wish to consider issuing expedited rulings on key inputs and assumptions to be included in the next IRP filing to be made by September 1, 2014.

In response to the Public Staff's first suggestion, the Company notes that the current IRP process was established through revisions to Rule R8-60 approved on July 11, 2007 and reflected a consensus between the Public Staff, the Utilities, and numerous other stakeholders regarding the structure of the revised IRP rule and process.[18] The Company would welcome the opportunity to comment on the IRP process with any eye towards streamlining the IRP update in North Carolina (the odd-year filing) to make it less burdensome on the Company. The Company notes that its resource planning process is an ongoing process designed to meet its biennial resource planning responsibilities in both Virginia and North Carolina. Because, by statute,[19] the Company's IRP filing in Virginia is due on September 1 of each odd year, a streamlined update proceeding in North Carolina while the Company is supporting a fully-litigated proceeding in Virginia would help maximize and conserve the Company's planning resources.

Regarding stakeholder participation in the development of the Company's IRP, the Company does not believe a "North Carolina-wide" stakeholder process is necessary or would benefit each of the Utilities mandated to separately develop their own resource plan to serve its customers' future electricity needs. Development of DNCP's IRP is obviously a distinct process from DEC's or DEP's planning process. That said, the Company does not oppose allowing up front input into its own resource planning process and, in fact, has had a stakeholder review process ("SRP") in place in Virginia for several

[18] *Order Revising Integrated Resource Planning Rules*, Docket No. E-100, Sub 111 (July 11, 2007).
[19] Va. Code § 56-599.

years. The Public Staff, Southern Environmental Law Center, Sierra Club and others routinely participate in the SRP and this forum could be made to be open to other interested parties from North Carolina as well.

Finally, regarding the Public Staff's Recommendation that the Commission consider expedited rulings mandating the Utilities include "key inputs and assumptions" in their 2014 Plans, the Company has already began its 2014 Plan development process and is concerned that any ruling that is entered now by the Commission will not be able to be implemented in time for the 2014 Plan filing. Therefore, the Company recommends the more prudent course is for the Commission to give due consideration to all the recommendations and comments received and issue a comprehensive ruling in due course that the Utilities can incorporate into their 2015 Plan filings.

II. COMMENTS IN RESPONSE TO OTHER PARTIES

a. NCSEA: Relationship to Avoided Cost Proceeding

NCSEA's request for a "Commission endorsement" of "consistency across proceedings," is not necessary or appropriate. While the Company generally agrees that reasonable consistency is a laudable purpose and, in most instances, is appropriate, a formal statement such as NCSEA requests would ignore the distinct purposes of biennial avoided cost proceedings as opposed to IRP proceedings. Moreover, such a statement would unnecessarily restrict the Utilities in developing their IRPs and avoided cost rates such that they could not account for those instances when consistency is either not possible or not reasonable under the circumstances. Finally, given that NCSEA and any other party may challenge IRP data inputs and avoided cost rates in their respective proceedings, it is unnecessary for the Commission to take this step.

As NCSEA notes, the Commission has already rejected arguments similar to those made by NCSEA here.[20] In its May 30, 2013 Order[21] in DEP's 2012 general rate case, the Commission recognized that its responsibilities under the Public Utility Regulatory Policies Act of 1978 ("PURPA") to set the Utilities' avoided costs are functionally distinct from its ratemaking functions under Chapter 62. DNCP submits that the Commission's statutory resource planning process is also functionally distinct from the PURPA avoided cost rate-setting process. This is because the precision required to ensure the Utilities are meeting PURPA's goals of promoting the development of small power producers is fundamentally different than the Commission's oversight of long-term resource planning. Under PURPA, the Commission is prohibited from directing the Utilities to pay qualifying facilities ("QF") more than avoided cost.[22] Recognizing the great importance and highly technical nature of this determination, the NCUC has initiated the 2014 avoided cost proceeding in Docket No. E-100, Sub 140, to consider whether refinements to the methodologies and calculations underlying the Utilities' avoided costs are needed.[23] In contrast to the mandated precision required to develop the Utilities *current* avoided costs and promote efficient QF development, the Commission's long-term resource planning process is an evolving and dynamic process focused on the "probable future" generating needs of the State. N.C.G.S. 62-110.1(c).[24] Given the

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[20] NCSEA Comments, at 18.

[21] *Order Granting General Rate Increase*, Docket No. E-2, Sub 1023 (May 23, 2013).

[22] 18 C.F.R. § 292.101(b)(6) (defining avoided cost); 18 C.F.R. § 292.304(a) (establishing rates for purchase by Utilities under PURPA at or below avoided cost).

[23] *Order Establishing Biennial Hearing and Scheduling Hearing*, Docket No. E-100, Sub 140 (Feb. 25, 2014).

[24] *State ex. rel. Utilities Comm. v. N.C. Electric Membership Corp.*, 105 N.C. App. 136, 143-144 (N.C. Ct. App. 1992) (explaining

> "General Statutes section 62-110.1(c) makes it clear that the only purpose of a least-cost planning proceeding is to assist the Utilities Commission in 'develop[ing], publiciz[ing], and keep[ing] current an analysis of the long-range needs for expansion of facilities for

substantially different purposes of these two proceedings, while similar inputs may be used, where appropriate, to develop the Utilities' avoided cost rates as are used in resource planning proceedings, justifiably reasonable differences may exist between the data used in the IRP proceeding and in the avoided cost proceedings.

For example, an after-the-fact discovery of error or a demonstrated change in circumstances from those contemplated during the preparation of an IRP may result in the inputs and assumptions used for the IRP to be inappropriate for use in a Utility's determination of avoided cost rates. NCSEA's proposal would result in Utilities being unable to account for such changes and could result in inaccurate and potentially unlawfully excessive avoided cost rates.

In addition to being inappropriate, no preemptory Commission endorsement of consistency is needed. If NCSEA or any other party concludes that data inputs used in either an IRP proceeding or an avoided cost proceeding are unreasonable, it would assuredly have a full and fair opportunity within the context of that specific proceeding to challenge the reasonableness of the IRP or avoided cost data for ultimate resolution by the Commission.

b. NCSEA: Policy Landscape Assumptions

On page 20 of its Comments, NCSEA recommends that the Utilities "be required to concisely list in one place in its filed plan all of the key policy assumptions which

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the generation of electricity in North Carolina.' Nowhere is it suggested in section 62-110.1(c) that the purpose of the proceeding is to issue directives which fundamentally alter a given utility's operations. Rather, we believe that the least-cost planning proceeding should bear a much closer resemblance to a legislative hearing, wherein a legislative committee gathers facts and opinions so that informed decisions may be made at a later time.")

underlie its "base case or recommended plan."[25] The Company respectfully responds that the policy and other assumptions underlying its 2013 Plan are already appropriately set forth in the Introduction and Chapter 1 Executive Summary and then articulated in greater detail throughout the remainder of its 2013 Plan. The Company's development of its 2013 Plan is fully consistent with the Commission's prior direction and the requirements of Rule R8-60(b). Unless a more precise explanation would assist the Commission in satisfying its statutory obligation to report to the Governor and the General Assembly, DNCP submits that nothing further or different should be required in presenting its future Plans.

c. NCSEA: Customer Data Access

NCSEA notes on page 26 of its Comments that the Commission could encourage data access for the benefit of DNCP's customers by requiring the Company to make its data access form available electronically.[26] The Company is working to make this form available electronically in the near future.

d. NCSEA: Request for Historical REPS Plan Review Certification

NCSEA recommends that each of the Utilities be obligated to submit a letter verifying that they have reviewed their 2009 REPS Plan and then to include in future REPS compliance plans a certification that the historical review has been conducted.[27] While the Company is not necessarily opposed to this requirement in its future plans, DNCP's cover letter submitting its 2013 Plan (in which the Company's 2013 REPS Plan was filed as NC Addendum I) stated:

[25] NCSEA Comments, at 20.
[26] NCSEA Comments, at 26.
[27] NCSEA Comments, at 28.

> In accordance with Ordering Paragraph (3) of the Commission's June 3, 2013 Order Granting in Part and Denying in Part Motion for Disclosure, the Company has reviewed its 2009 REPS Compliance Plan filed in Docket No. E-100, Sub 124, and, as no information contained in that filing was designated confidential qualifying as "trade secret" under N.C.G.S. § 66-52(3), there is no information to disclose as no longer requiring such designation.

DNCP has satisfied the Commission's prior direction from the above-referenced Order, and will continue to do so. Therefore, this recommendation for a specific certification is unnecessary.

e. MAREC: Proposed Competitive Renewables Solicitation

MAREC advocates on pages 9-10 of its Comments that the Commission should obligate the Utilities to engage in a competitive solicitation for new renewables to satisfy their REPS obligations. DNCP disagrees. First, DNCP does not require in-state RECs to meet its REPS obligation.[28] Second, the Commission's resource planning process pursuant to N.C.G.S. § 62-110.1(c) is not designed to "alter a given utility's operations" but, instead, should resemble "a legislative hearing, wherein a legislative committee gathers facts and opinions so that informed decisions may be made at a later time."[29] Thus, MAREC's recommendation to mandate a competitive solicitation for renewables should be rejected as unnecessary and outside the scope of this proceeding.

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[28] For planning purposes, the Company notes that the Company has unique flexibility to use out-of-state RECs for 100% REPS compliance. *Order on Dominion's Motion for Further Clarification*, Docket No. E-100, Sub 113 (Sept. 22, 2009) (holding that the meaning of N.C.G.S. § 62-133.8(b)(2)(e) is to allow DNCP to achieve up to 100% REPS general obligation and set-aside compliance using out-of-state RECs).

[29] *State ex. rel. Utilities Comm. v. N.C. Electric Membership Corp.*, 105 N.C. App. 136, 143-144 (N.C. Ct. App. 1992).

f. NC WARN: Request for Evidentiary Hearing

Finally, regarding NC WARN's request for an evidentiary hearing, DNCP initially notes that NC WARN does not focus any of its comments on DNCP's 2013 Plan. NC WARN's request for an evidentiary hearing focused solely on whether the IRPs submitted by DEC and DEP are in the best interest of North Carolina ratepayers.[30] While DNCP recognizes the Commission's discretion under Commission Rule R8-60(j) to hold an evidentiary hearing on the Utilities' IRPs, DNCP does not view NC WARN's generic request for an evidentiary hearing as presenting compelling issues or reasoning to hold such a hearing, and, to the extent the Commission determines otherwise, DNCP believes that the hearing itself – similar to NC WARN's comments – should be limited to DEC's and DEP's plans.

Conclusion

Wherefore, Dominion North Carolina Power respectfully requests that the Commission accept the recommendations set forth in these reply comments, deny the NC WARN request for an evidentiary hearing, and approve its 2013 Integrated Resource Plan Update and REPS Plan as filed on August 30, 2013.

[30] NC WARN Comments, at 1; SACE Comments, at 75.

Respectfully submitted,

DOMINION NORTH CAROLINA POWER

By: s/ E. Brett Breitschwerdt

Counsel for Virginia Electric and Power Company
d/b/a Dominion North Carolina Power

Lisa S. Booth
Horace P. Payne, Jr.
Dominion Resources Services, Inc.
Legal Department
120 Tredegar Street, RS-2
Richmond, Virginia 23219
(804) 819-2288 (LSB phone)
(804) 819-2682 (HPP phone)
(804) 819-2183 (HPP fax)
lisa.s.booth@dom.com
horace.p.payne@dom.com

Vishwa B. Link
McGuireWoods LLP
One James Center
901 East Cary Street
Richmond, Virginia 23219
(804) 775-4330 (VBL phone)
(804) 698-2151 (VBL fax)
vlink@mcguirewoods.com

E. Brett Breitschwerdt
McGuireWoods LLP
434 Fayetteville Street, Suite 2600
Raleigh, North Carolina 27601
(919) 755-6563 (EBB Phone)
(919) 755-6579 (EBB Fax)
bbreitschwerdt@mcguirewoods.com

May 23, 2014

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Reply Comments of Dominion North Carolina Power* as filed in Docket No. E-100, Sub 137, was served electronically or via U.S. mail, first-class, postage prepaid, upon all parties of record.

This, the 23rd day of May, 2014.

s/ E. Brett Breitschwerdt
E. Brett Breitschwerdt
McGuireWoods LLP
434 Fayetteville Street, Suite 2600
PO Box 27507 (27611)
Raleigh, NC 27601
(919) 755-6563 Direct
bbreitschwerdt@mcguirewoods.com

Attorney for Virginia Electric and Power, d/b/a Dominion North Carolina Power