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September 7, 2021

### **VIA Electronic Filing**

Ms. Antonia Dunston, Interim Chief Clerk North Carolina Utilities Commission Dobbs Building 430 North Salisbury Street Raleigh, North Carolina 27603-5918

**Re:** Docket No. E-100, Sub 167

**Sub 158 Additional Issues Status Update** 

Dear Ms. Dunston:

Enclosed for filing on behalf of Virginia Electric and Power Company, d/b/a Dominion Energy North Carolina ("DENC" or the "Company"), and pursuant to the *Order Granting Continuance and Establishing Reporting Requirements* issued by the North Carolina Utilities Commission ("Commission") in Docket No. E-100, Sub 167 on October 30, 2020 ("Continuance Order"), is DENC's Status Update on its continued work on the applicable additional issues set forth in the Commission's April 15, 2020 *Order Establishing Standard Rates and Contract Terms for Qualifying Facilities* ("Sub 158 Order") in Docket No. E-100, Sub 158 ("Sub 158 Additional Issues").

# **Performance Adjustment Factor Development Metrics**

As reported in its July 22, 2021 status update, DENC has reached consensus with the Public Staff on this issue and will utilize the weighted equivalent unplanned outage factor ("WEUOF") metric for purposes of determining the PAF in the upcoming biennial avoided cost proceeding. The Company and Public Staff also agree that DENC will use five years of historic fleet performance data to determine the PAF. Finally, the Company and the Public Staff agree that DENC will have the flexibility to determine its own months to be used in the overall PAF calculation, and will provide support for use of those months in the next biennial avoided cost filing.

### **Transmission & Distribution Impacts**

As reported in its July 22, 2021 status update, DENC and the Public Staff have achieved consensus that it is appropriate for the Company to continue to explore the

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potential for transmission and distribution cost increments and decrements in future filings, but that an absolute increment or decrement cannot be determined at this time.

#### CT Costs

The Company continues to work on follow-up items from its July 1, 2021 meeting with the Public staff on this issue and plans to reach out to the Public Staff later this month with DENC's proposal with respect to CT costs. The Company will provide further updates on this issue in its next Status Update.

### FERC Order No. 872

In its *Order Establishing Biennial Proceeding, Requiring Data, and Scheduling Public Hearing* issued in this docket on August 13, 2020, the Commission noted "that the FERC issued Order No. 872 on July 16, 2020, in its Docket Nos. RM19-15-000 and AD16-16-000 potentially driving additional changes to PURPA implementation and the determination of avoided cost rates in North Carolina." The Company has reached out to the Public Staff with DENC's initial planned proposals consistent with Order No. 872, and continues to refine and develop those proposals in advance of the November 1 filing. DENC plans to communicate more details regarding these proposals to the Public Staff later this month and will provide further updates on this issue in its next Status Update.

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

Very truly yours,	
/s/Andrea R. Kells	

ARK/sjg

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing <u>Sub 158 Additional Issues Status</u>

<u>Update</u>, filed in Docket No. E-100, Sub 167, were served electronically or via U.S. mail, first-class postage prepaid, upon all parties of record.

This the 7<sup>th</sup> day of September, 2021.

/s/Andrea R. Kells

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