

Dominion Energy Services, Inc.
Law Department
120 Tredegar Street, Richmond, VA 23219
DominionEnergy.com



October 3, 2017

**Petition of Virginia Electric and Power Company
For approval to extend an existing demand-side management program and for
approval of two updated rate adjustment clauses pursuant to
§ 56-585.1 A 5 of the Code of Virginia
Case No. PUR-2017-00129**

To: Local Government Officials

Pursuant to 20 VAC 5-201-10 J, Virginia Electric and Power Company (the "Company") is providing you a copy of its Petition in the above-referenced matter. Please take notice of its contents.

A copy of the complete Application in this matter may be obtained from the Company at no cost by written or oral request to William H. Baxter II, Senior Counsel, Law Department, Dominion Energy Services, Inc., 120 Tredegar Street, RS-2, Richmond, Virginia 23219, (804) 819-2458.

A handwritten signature in blue ink that reads "William H. Baxter II".

William H. Baxter II
Senior Counsel

Attachment

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

PETITION OF)
)
VIRGINIA ELECTRIC AND POWER COMPANY)
) Case No. PUR-2017-00129
For approval to extend an existing demand-side)
management program and for approval of two)
updated rate adjustment clauses pursuant to)
§ 56-585.1 A 5 of the Code of Virginia)

APPLICATION

Virginia Electric and Power Company (“Dominion Energy Virginia” or the “Company”), by counsel, pursuant to § 56-585.1 A 5 (“Subsection A 5”) of the Code of Virginia (“Va. Code”), Rules 10 (20 VAC 5-201-10) and 60 (20 VAC 5-201-60) of the State Corporation Commission of Virginia’s (“Commission”) Rules Governing Utility Rate Case Applications and Annual Informational Filings (20 VAC 5-201-10, *et seq.*) (“Rate Case Rules”), the Commission’s Rules Governing Utility Promotional Allowances (20 VAC 5-303-10, *et seq.*) (“Promotional Allowances Rules”), the Commission’s Rules Governing Cost/Benefit Measures Required for Demand Side Management (“DSM”) Programs (Rules 20 VAC 5-304-10, *et seq.*) (“Cost/Benefit Rules”), and the directive contained in Ordering Paragraph (4) of the Commission’s June 1, 2017 Final Order (“June 1, 2017 Final Order”) in Case No. PUE-2016-00111,¹ (“2016 DSM proceeding”), respectfully requests the Commission approve the Company’s:

- (i) Petition for approval to extend an existing Demand-Side Management program (individually, “DSM Program” or “Program” and collectively with other DSM Programs, the “DSM Portfolio” or “Portfolio”) and cost recovery related thereto; and

¹ *Petition of Virginia Electric and Power Company For approval to implement new, and to extend existing, demand-side management programs and for approval of two updated rate adjustment clauses pursuant to § 56-585.1 A 5 of the Code of Virginia, Case No. PUE-2016-00111, Final Order (June 1, 2017).*

(ii) Annual update application to continue two rate adjustment clauses (“RAC”), Riders C1A and C2A, for cost recovery associated with the Company’s Phase II Programs approved by the Commission in its April 30, 2012 Order (“April 30, 2012 Order”) in Case No. PUE-2011-00093 (“2011 DSM proceeding”),² Phase III Programs approved in Case No. PUE-2013-00072 (“2013 DSM proceeding”),³ Phase IV Programs approved in Case No. PUE-2014-00071,⁴ Phase V Program approved in Case No. PUE-2015-00089 (“2015 DSM proceeding”),⁵ and Phase VI Program approved in the 2016 DSM proceeding, as well as the Electric Vehicle Pilot Program (“EV Pilot Program”) approved in Case No. PUE-2011-00014.⁶

In support of the Company’s petition and annual update application (hereinafter collectively, the “Application”), the Company respectfully states the following:

I. BACKGROUND

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 nonjurisdictional customers in Virginia and to the public in portions of North Carolina. Dominion Energy Virginia’s electric system, consisting of facilities for generation, transmission, and distribution of electric energy, as well as associated facilities, is interconnected with the electric systems of

² *Petition of Virginia Electric and Power Company for approval to implement new demand-side management programs and for approval of two updated rate adjustment clauses pursuant to § 56-585.1 A 5 of the Code of Virginia*, Case No. PUE-2011-00093, Order (Apr. 30, 2012).

³ *Petition of Virginia Electric and Power Company for approval to implement new demand-side management programs and for approval of two updated rate adjustment clauses pursuant to § 56-585.1 A 5 of the Code of Virginia*, Case No. PUE-2013-00072, Final Order (Apr. 29, 2014).

⁴ *Petition of Virginia Electric and Power Company For approval to implement new demand-side management programs and for approval of two updated rate adjustment clauses pursuant to § 56-585.1 A 5 of the Code of Virginia*, Case No. PUE-2014-00071, Final Order (Apr. 24, 2015).

⁵ *Petition of Virginia Electric and Power Company For approval to implement new demand-side management programs, for approval to continue a demand-side management program, and for approval of two updated rate adjustment clauses pursuant to § 56-585.1 A 5 of the Code of Virginia*, Case No. PUE-2015-00089, Final Order (Apr. 19, 2016).

⁶ *Application of Virginia Electric and Power Company for approval to establish an electric vehicle pilot program pursuant to § 56-234 of the Code of Virginia*, Case No. PUE-2011-00014, Order Granting Approval (July 11, 2011).

neighboring utilities and is part of the interconnected network of electric systems serving the continental United States. The Company is engaged in the business of generating, transmitting, distributing, and selling electric power and energy to the public for compensation. 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. By reason of its operation in Virginia and North Carolina and its interconnections with other electric utilities, the Company engages in interstate commerce.

2. The Company's name and post office address are:

Virginia Electric and Power Company
120 Tredegar Street
Richmond, Virginia 23219

3. The names, post office addresses and telephone number of the attorneys for the Company are:

Lisa S. Booth
William H. Baxter II
Dominion Energy Services, Inc.
120 Tredegar Street, Riverside 2
Richmond, Virginia 23219
(804) 819-2288 (LSB)
(804) 819-2458 (WHB)

Vishwa B. Link
Lisa R. Crabtree
Jakarra J. Jones
McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, Virginia 23219
(804) 775-4330 (VBL)
(804) 775-1327 (LRC)
(804) 775-1132 (JJJ)

4. In its April 30, 2012 Order, the Commission approved certain Phase II Programs for a five-year period, including the Residential Bundle Program, consisting of the Residential Home Energy Check-Up Program; the Residential Duct Sealing Program;⁷ the Residential Heat Pump Tune-Up Program; and the Residential Heat Pump Upgrade Program.⁸ The Commission also approved the Non-residential Bundle Program comprised of the Non-residential Energy Audit Program and the Non-residential Duct Testing & Sealing Program.⁹ Finally, the Commission approved the Non-residential Distributed Generation (“DG”) Program as a peak-shaving DSM Program. The Commission established five-year cost caps for the Phase II Programs, which specifically included “operating costs, lost revenues, common costs, return on capital expenditures, margins on [operations & maintenance] and evaluation, measurement and verification (“EM&V”) costs.”¹⁰ In the April 30, 2012 Order, the Commission also adopted the Company’s proposal to file in future proceedings updated cost/benefit test results for the Phase II Programs.¹¹ The Commission approved cost recovery associated with the Phase II Programs and the Company’s EV Pilot Program.

5. In its April 29, 2014 Order, the Commission approved the Company’s Phase III petition to implement three new Non-residential Programs: Lighting Systems & Controls, Heating & Cooling Efficiency, and Window Film,¹² as well as an expansion of the Phase II Non-residential Energy Audit Program.¹³ Like with the Phase II Programs, the Commission established five-year cost caps for the Phase III Programs inclusive of “operating costs, lost

⁷ Approved as the Residential Duct Testing and Sealing Program.

⁸ April 30, 2012 Order at 10.

⁹ *Id.* at 12.

¹⁰ *Id.* at 9.

¹¹ *Id.* at 14.

¹² Approved as the Non-residential Solar Window Film Program.

¹³ April 29, 2014 Order at 9-11.

revenues, common costs, return on capital expenditures, margins on O&M, and EM&V costs.”¹⁴

The Commission also directed the Company to work with Commission Staff to prepare and submit, with every DSM filing going forward, an exhibit similar to what was marked “Exhibit 5” in the 2013 DSM proceeding,¹⁵ which is a summary of DSM Programs proposed by the Company in prior DSM proceedings and includes information regarding each Program’s approval status, costs requested, costs approved, costs and participation, and start and end dates, among other content.

6. In its April 24, 2015 Final Order in the 2014 DSM proceeding, the Commission approved, with certain modifications, two new DSM Programs: Residential Income and Age Qualifying Home Improvement Program and Residential Appliance Recycling Program.¹⁶

7. In its April 19, 2016 Final Order in the 2015 DSM proceeding, the Commission approved the Non-residential Small Business Improvement Program, with certain adjustments, as Phase V of the Company’s DSM Portfolio, as well as an extension of the Phase I Residential Air Conditioner (“AC”) Cycling Program for an additional five years.¹⁷

8. Finally, in its June 1, 2017 Final Order in the 2016 DSM proceeding, the Commission approved the Non-residential Prescriptive Program, with certain modifications, as Phase VI of the Company’s DSM Portfolio, as well as an extension of the Phase II Non-residential DG Program for an additional five years through May 31, 2022.¹⁸ The Commission further directed that “Dominion Energy Virginia shall continue to file its annual evaluation, measurement and verification reports.”¹⁹

¹⁴ *Id.* at 11, n.36.

¹⁵ *Id.* at 17.

¹⁶ April 24, 2015 Final Order at 7.

¹⁷ April 19, 2016 Final Order at 8-9.

¹⁸ June 1, 2017 Final Order at 12.

¹⁹ *Id.* at 16.

9. Consistent with the Commission's Order Granting Motion issued March 8, 2017, in the 2016 DSM proceeding, the Company filed its 2017 EM&V Report on May 1, 2017. The Company respectfully requests to continue this filing schedule such that the Company's 2018 EM&V Report will be filed on or before May 1, 2018.

II. REQUEST FOR PROGRAM EXTENSION

10. The Company seeks approval to extend its Phase IV Residential Income and Age Qualifying Home Improvement Program for an additional five years, through May 31, 2023, subject to future extensions as requested by the Company and granted by the Commission.

11. The Commission approved the Residential Income and Age Qualifying Home Improvement Program in its April 24, 2015 Order with a total cost cap of \$15.2 million.²⁰ Because the majority of this cost cap has been spent, the Company requests a new five-year cost cap for the Program of \$24,812,590. The calculation of this proposed five-year cost cap is presented by Company Witness Jarvis E. Bates.

III. APPROVAL OF UPDATED RIDERS C1A AND C2A

A. Status of Approved DSM Programs

12. Detailed participation and cost information through June 30, 2017, for the Company's DSM Portfolio is provided in Schedule 3 to the pre-filed direct testimony of Company Witness Michael T. Hubbard.

13. The Company began implementation of its Phase VI Program in August 2017, and is encouraged by the initial interest shown in the Program. Company Witness Hubbard provides the details of the Phase VI launch and establishment of the vendor network supporting the new Program in his pre-filed direct testimony.

²⁰ April 24, 2015 Final Order at 7.

14. As required by the April 30, 2012 Order, the Company is filing in this proceeding updated going-forward cost/benefit test results for the Phase I AC Cycling Program, as well as the Phase II, III and V Programs and the Phase IV Program for which the Company is seeking an extension. Company Witness Deanna R. Kesler provides these results in her pre-filed direct testimony.

B. Cost Recovery Request to Continue Phase IV Program and Accounting Update for Phase II, III, IV and V Programs and EV Pilot

1. Rate Year

15. The Company presents a rate year of July 1, 2018 through June 30, 2019 (“Rate Year”) for the updated Riders C1A and C2A.

2. Electric Vehicle Pilot Program

16. Consistent with the cost recovery approved in prior DSM Orders, the Company is seeking projected costs for the Rate Year and True-up of calendar year 2016 costs associated with the EV Pilot Program under Va. Code § 56-585.1 A 5 to be included in Rider C1A.²¹

3. Rate of Return on Common Equity

17. For purposes of calculating the projected revenue requirement for the Rate Year, the Company has utilized a general rate of return on common equity (“ROE”) of 10.5%, as supported by the direct and rebuttal testimony of Company Witness Robert B. Hevert in Case No. PUR-2017-00038.²² For the 2016 calendar year Monthly True-up Adjustment, the Company has utilized a general ROE of 10.0% for the period of January 1, 2016 through April 30, 2016, which is the ROE approved by the Commission in the Company’s 2013 Biennial Review (Case

²¹ See April 30, 2012 Order at 15-16. Granting this continued approval is consistent with 2011 legislation which directed in relevant part that, “[a]n electric utility that participates in such an approved [EV] pilot program shall be entitled to recover annually the costs of its participation in any such pilot program conducted by the utility on or after January 1, 2011.” 2011 Va. Acts of Assembly Ch. 408.

²² *Application of Virginia Electric and Power Company For determination of the fair rate of return on common equity to be used as the general rate of return applicable to its rate adjustment clauses pursuant to § 56-585.1:1 C of the Code of Virginia*, Case No. PUR-2017-00038 (filed Mar. 31, 2017).

No. PUE-2013-00020). For the period of May 1, 2016 through December 31, 2016, the Company has utilized a general ROE of 9.6% as approved by the Commission in its April 19, 2015 Final Order in the Company's 2015 DSM proceeding.

4. Assignment and Allocation of Costs

18. The costs for the DSM Programs may be viewed primarily in two categories: direct (Program costs) and indirect (Common costs). The estimated Program costs include costs primarily based on signed vendor contracts for the approved Programs and estimated costs based on updated vendor pricing information for the proposed Phase IV Program extension. Costs that are part of the implementation of Programs that are not specifically associated with any individual DSM Program are Common costs and include certain customer communication costs, Energy Conservation department labor costs, dues and association costs, customer service, and external vendor costs. The Company proposes to determine cost responsibility in the same manner as the Commission approved in the 2016 DSM proceeding. The approach for determining jurisdictional responsibility is first to assign Program costs to the jurisdiction based upon participation in the Programs, and second to allocate Common costs to the jurisdiction based on the jurisdiction's Program costs, both capital and expenses, compared to total Program costs for the system. Customer class responsibility is determined by allocating costs to the customer classes on the basis of an average and excess production demand factor. The pre-filed direct testimony of Company Witness Melba L. Lyons presents the manner in which Program costs and Common costs will be assigned or allocated to the Virginia Jurisdiction using appropriate factors.

5. Revenue Requirement Request

19. The cost components of Riders C1A and C2A are comprised of operating expenses projected to be incurred during the Rate Year and a Monthly True-Up Adjustment comparing actual costs for the 2016 calendar year to the actual revenues collected during the same period. The Company does not seek recovery of lost revenues at this time through this proceeding. The Company is not waiving any right to seek such lost revenues in future proceedings, subject to Commission approval; however, consistent with prior representations by the Company, the Company will not seek recovery of any lost revenues for periods that have already been trued-up for Riders C1A and C2A.²³ Detailed costs were used to calculate the requested revenue requirement for Riders C1A and C2A for the proposed Rate Year. The calculation of the revenue requirement is discussed in the pre-filed direct testimony of Company Witness C. Alan Givens.

20. The projected Rate Year operating expenses from July 1, 2018 through June 30, 2019, are included for recovery on a current basis during the Rate Year. A margin is authorized to be recovered effective for qualifying expenditures on and after July 1, 2009. For purposes of the Rate Year, pursuant to Va. Code § 56-585.1 a 5 c, the margin “shall be equal to the general rate of return on common equity determined as described in subdivision A 2 of [§ 56-585.1].” As noted in Paragraph (17), the Company used a 10.5% ROE for purposes of the projected Rate Year revenue requirement.

21. The revenue requirement also includes a True-up of 2016 calendar year costs associated with Phase II, III, IV, and V DSM Programs and EV Pilot Program through a Monthly True-Up Adjustment. The actual 2016 calendar year expenditures are used to calculate a 2016

²³ For example, in this proceeding, the Company is seeking to True-up calendar year 2016. Accordingly, the Company will not seek recovery of any lost revenues for the 2016 True-up period or any prior period that has already been reviewed by this Commission.

actual revenue requirement (including 2015 costs and applicable margin), and then compared to the actual 2016 revenues to produce the Monthly True-Up Adjustment. For purposes of the margin authorized to be recovered for qualifying expenditures during the 2016 calendar year, the Company utilized a 10.0% ROE for the period of January 1, 2016 through April 30, 2016, and a 9.6 % ROE for the period of May 1, 2016 through December 31, 2016, as discussed in Paragraph 16.

22. Company Witness Givens' pre-filed direct testimony details the projected Subsection A 5 costs, differentiated between capital and expense, and Rider C2A costs qualifying for the margin as provided for under Subsection A 5. In addition, Company Witness Givens depicts the revenue requirement separately for Rider C1A and Rider C2A.

23. The Company requests recovery of the Rate Year Projected Revenue Requirement for Rider C1A in the amount of \$881,582. This amount combined with the Monthly True-Up Adjustment of (\$434,845) provides the Rider C1A Total Revenue Requirement of \$446,738. For Rider C2A, the Rate Year Projected Revenue Requirement of \$26,308,122 is combined with the Monthly True-Up Adjustment of \$4,311,481 for a Rider C2A Total Revenue Requirement of \$30,619,603. Thus, the total revenue requirement requested for recovery in this proceeding for Riders C1A and C2A is \$31,066,341.

6. Rate Design

24. The revised Riders C1A and C2A, which are sponsored by Company Witness Debra A. Stephens, identify the rates, 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. If approved as proposed, the revised Riders C1A and C2A will be applicable for billing purposes with a rate effective date for usage on or after the first day of the month which is

at least fifteen (15) days following the date of any Commission order approving Riders C1A and C2A.

25. The implementation of the proposed Riders C1A and C2A will increase the residential customer's monthly bill, based on 1,000 kWh usage per month, by \$0.01. Company Witness Stephens' testimony provides typical bill changes for customers served under Residential Schedule 1, General Service Schedules GS-1, GS-2, GS-3, and GS-4, and Church Schedule 5C, showing the impact that the updated Riders C1A and C2A will have on customer bills, at representative levels of consumption.

V. SUPPORTING TESTIMONY, FILING SCHEDULE 46 AND REQUEST FOR WAIVER OF FILING SCHEDULE 45

26. The Company's Application is supported by the attached prepared direct testimonies of Company Witnesses Brett A. Crable, Michael T. Hubbard, Deanna R. Kesler, Jarvis E. Bates, C. Alan Givens, Melba L. Lyons, and Debra A. Stephens.

27. Section 20 VAC 5-201-60 of the Rate Case Rules provides that an application filed pursuant to Subsection A 5 "shall include Schedules 45 and 46 as identified and described in 20 VAC 5-201-90, and which shall be submitted with the utility's direct testimony."

A. Request for Waiver of Filing Schedule 45 Requirements

28. The Company, for good cause shown and pursuant to 20 VAC 5-201-10 E, respectfully requests that the Commission waive, in part, the requirements under Rules 60 and 90 of the Rate Case Rules with respect to Filing Schedule 45 (Return on Equity Peer Group Benchmark). Specifically, the Company has requested in this Application that the general ROE of 10.5% as proposed in the Company's 2017 Application for determination for ROE in Case No. PUR-2017-00038 be used to calculate the revenue requirement. The Company filed testimony and other evidence in support of its requested ROE, including Filing Schedule 45

materials and analysis, in pending Case No. PUR-2017-00038. Pursuant to Va. Code § 56-585.1:1 C 3, the ROE determined in that proceeding will apply to all Subsection A 5 and A 6 RACs effective as of the date of the Commission's final order therein, which is anticipated to be issued no later than November 31, 2017, and prior to the start of the Rate Year proposed for this proceeding. To promote judicial economy and efficiency of case administration, the Company requests a waiver of Filing Schedule 45's filing requirements in this proceeding. For these reasons, and pending consideration of its procedural request, the Company respectfully requests that the Commission waive, for good cause shown, the requirements of 20 VAC 5-201-60 and 20 VAC 5-201-90 with respect to the submission of Filing Schedule 45 with this Application.

B. Filing Schedule 46

29. The Company is filing with this Application Filing Schedule 46 as follows:

A. Filing Schedule 46A, consisting of Statements 1-2, is sponsored by Company Witnesses Hubbard and Kesler. Filing Schedule 46A, Extraordinarily Sensitive Statement 1 contains the vendor contracts and change orders executed since the Company's last DSM filing; Statement 2 contains the new purchase order and change order for DNV GL, the Company's EM&V vendor.

B. Filing Schedule 46B, consisting of Statements 1-9, is sponsored by Company Witness Bates. Extraordinarily Sensitive Statement 1 provides Phase II, III, IV, V and VI System Program, EV Pilot and Common costs for the Rate Year; Statement 2 provides Phase II, III, IV, V, and VI Program penetrations; Extraordinarily Sensitive Statement 3 provides System Phase II, III, IV, V and VI Program cost details for the Rate Year; Extraordinarily Sensitive Statement 4 provides System proposed Phase II, III, IV, V and VI Program cost details for calendar years 2018 and 2019; Extraordinarily Sensitive Statement 5 provides DSM System

Common cost details for the Rate Year; Extraordinarily Sensitive Statement 6 provides DSM System Common cost details for calendar years 2018 and 2019; Extraordinarily Sensitive Statement 7 provides five years of incremental cost projections associated with the Phase IV Residential Income and Age Qualifying Home Improvement Program extension; Extraordinarily Sensitive Statement 8 provides calendar year 2016 Phase II, III, IV and Phase V Program Costs, Common and EV Pilot actual costs; and Statement 9 supports the assignment of Common costs among DSM Programs.

C. Filing Schedule 46C, Statements 1-3, is sponsored by Company Witness Givens. Extraordinarily Sensitive Statement 1 provides an annual revenue requirement for the Rate Year ending June 30, 2019; Statement 2 provides the annual revenue requirement over 15 years by year and projected lost revenues over the same period (regardless of whether those costs are included in base rates or in a rider); and Statement 3 provides a detailed description of all significant accounting procedures and internal controls that the Company has instituted to identify all costs associated Riders C1A and C2A.

D. Filing Schedule 46D, Statements 1-4, is sponsored by Company Witness Lyons. Statement 1 provides the assignment and allocation of Program and Common costs to the Virginia Jurisdiction; Extraordinarily Sensitive Statement 2 provides the allocation factors of the costs of the DSM Programs to the customer classes; Statement 3 provides the allocation of the revenue requirement for the Rate Year ending June 30, 2019; and Statement 4 provides the annual revenue requirement by class over the duration of Riders C1A and C2A.

E. Filing Schedule 46E, Statement 1, sponsored by Company Witness Stephens, provides the rate design for Riders C1A and C2A for the Rate Year ending June 30, 2019.

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

30. The Company's Application contains, at points so designated, Confidential and Extraordinarily Sensitive information, which is being filed under seal and subject to the Company's Motion for Protective Ruling and Additional Protective Treatment filed coincident hereto. Because portions of the Company's Application contain such Confidential and 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 5-201-10 F and 5 VAC 5-20-170, this filing is accompanied by a separate Motion for Protective Ruling and Additional Protective Treatment, including a form Proposed Protective Ruling, filed contemporaneously with this Application.

VII. COMPLIANCE WITH RULE 10 OF THE RATE CASE RULES

31. The Company's Application complies with the requirements contained in Rule 10 of the Rate Case Rules. In accordance with Rule 10 A, 20 VAC 5-201-10 A, the Company filed with the Commission on August 4, 2017, the Company's notice of intent to file this Application under Va. Code § 56-585.1 A 5. Copies of this Application, to the extent required by Rule 10 J of the Rate Case Rules, along with the additional information required by Rule 10 J, are simultaneously with this filing being served upon persons addressed in that Rule. A complete copy of the Public Version of this Application, along with testimony and supporting schedules, has been served upon the Division of Consumer Counsel of the Office of the Attorney General, in conformity with Rule 10 J.

WHEREFORE, Dominion Energy Virginia respectfully requests that the Commission:

(1) Approve the requested extension of the Company's Residential Income and Age Qualifying Home Improvement Program for a period of five years through May 31, 2023;

(2) Approve its proposed revenue requirement, cost allocation, rate design, and accounting treatment for service rendered on and after July 1, 2018;

(3) Approve the Company's updated Riders C1A and C2A to be effective for billing purposes on or after the latter of July 1, 2018, or first day of the month which is at least fifteen (15) days following the date of any Commission order approving Riders C1A and C2A;

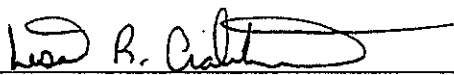
(4) Approve the Company's request to file its annual EM&V report on May 1, 2018;

and

(5) Provide any other relief as deemed appropriate and necessary.

Respectfully submitted,

VIRGINIA ELECTRIC AND POWER COMPANY

By: 
Counsel

Lisa S. Booth
William H. Baxter II
Dominion Resources Services, Inc.
120 Tredegar Street, RS-2
Richmond, Virginia 23219
(804) 819-2288 (LSB telephone)
(804) 819-2458 (WHB telephone)
(804) 819-2183 (facsimile)
Lisa.S.Booth@dominionenergy.com
William.H.Baxter@dominionenergy.com

Vishwa B. Link
Lisa R. Crabtree
Jakarra J. Jones
McGuireWoods LLP
Gateway Plaza
800 East Canal Street
Richmond, Virginia 23219
(804) 775-4330 (VBL telephone)
(804) 775-1327 (LRC telephone)
(804) 775-1132 (JJJ telephone)
(804) 698-2019 (facsimile)
vlink@mcguirewoods.com
lcrabtree@mcguirewoods.com
jjones@mcguirewoods.com

Counsel for Virginia Electric and Power Company

October 3, 2017