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July 16, 2025

BY ELECTRONIC FILING

Mr. Bernard Logan, Clerk
STATE CORPORATION COMMISSION
DOCUMENT CONTROL CENTER
Post Office Box 2118
Richmond, Virginia 23219

RE: Application of Virginia Electric & Power Company for a 2025 biennial review of the rates, terms, and conditions for the provision of generation, distribution, and transmission services pursuant to Virginia Code § 56-585.1

Case No. PUR-2025-00058

Application of Virginia Electric and Power Company to revise its fuel factor pursuant to Virginia Code § 56-249.6

Case No. PUR-2025-00059

Dear Mr. Logan,

Please find enclosed for filing in the above-captioned cases the **Public Version** of the Direct Testimony of Devi Glick on behalf of the Sierra Club. The Club will also be filing a Confidential and Extraordinarily Sensitive Version of Ms. Glick's Testimony by hand delivery under separate cover. Please do not hesitate to contact me if you have any questions regarding this filing.

Thank you,

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COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

APPLICATION OF

VIRGINIA ELECTRIC & POWER COMPANY **Case No. PUR-2025-00058**

For a 2025 biennial review of the rates, terms, and conditions for the provision of generation, distribution, and transmission services pursuant to Virginia Code § 56-585.1.

APPLICATION OF

VIRGINIA ELECTRIC & POWER COMPANY **Case No. PUR-2025-00059**

To revise its fuel factor pursuant to Virginia Code § 56-249.6.

DIRECT TESTIMONY of

DEVI GLICK

on behalf of the

SIERRA CLUB

PUBLIC VERSION

July 16, 2025

Summary of the Direct Testimony of Devi Glick

Dominion submitted its applications for a biennial review of rates (Rate Case) and to revise its fuel factors (Fuel Docket). In the rate case application, the Company is requesting cost recovery of future fixed and variable operations and maintenance (O&M) costs as well as sustaining capital and environmental expenditures of $470.8 million for its coal fleet across the 2026 and 2027 rate years. In the fuel docket application, Dominion is requesting to revise its current fuel factor to recover past fuel costs, including $263 million in coal expenses from the historical period of March 1, 2024 – February 28, 2025.

I evaluated the economic performance of the Company's coal plants at Mt. Storm, Clover, and Virginia City Hybrid Energy Center (VCHEC). I find that all plants have incurred net revenue losses in at least two of the last five years. **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** Looking forward, I find that Mt. Storm will incur net revenue losses over the next decade, VCHEC will be marginal, and Clover will be economic. These results are driven by the high projected capacity price. Dominion is projecting high near-term utilization of the fleet, followed by a low utilization (below 10 percent) beyond 2030.

I evaluated the unit commitment practices of the fleet during the fuel factor historical period. I found that Dominion self-committed its coal fleet between **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** percent of the time each plant was available. As a result of Dominion's unit commitment practices, Clover and Mt. Storm incurred variable net losses **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** during the historical period. I found eleven specific events where Dominion imprudently utilized a must-run commitment status at a coal unit and incurred **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]**. Finally, I reviewed the Company's coal contracts and found that it made imprudent contracting decisions based on price, timing, and quantity of coal locked in.

I recommend that the Commission disallow from inclusion in rate base O&M and capex associated with Mt. Storm and VCHEC, and require pre-approval of future investments at its coal plants in excess of $1 million. I recommend the Commission disallow from inclusion in the fuel factor the avoidable losses associated with specific uneconomic events at its coal plants. I also recommend the Commission disallow from inclusion in the fuel factor excess costs associated with its most costly coal contracts. Finally, I recommend that Dominion be required to file documentation of its reasons for must-run commitment as well as its profit and loss workbook with its initial filing in future fuel factor proceedings.

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1. INTRODUCTION & PURPOSE OF TESTIMONY

Q Please state your name and occupation.

A My name is Devi Glick. I am a Senior Principal at Synapse Energy Economics, Inc. (Synapse). My business address is 485 Massachusetts Avenue, Suite 3, Cambridge, Massachusetts 02139.

Q Please describe Synapse Energy Economics.

A Synapse is a research and consulting firm specializing in energy and environmental issues, including electric generation, transmission and distribution system reliability, ratemaking and rate design, electric industry restructuring and market power, electricity market prices, stranded costs, efficiency, renewable energy, environmental quality, and nuclear power. Synapse's clients include state consumer advocates, public utilities commission staff, attorneys general, environmental organizations, federal government agencies, and utilities.

Q Please summarize your work experience and educational background.

A At Synapse, I conduct economic analysis and write testimony and publications that focus on a variety of issues related to electric utilities. These issues include power plant economics, electric system dispatch, integrated resource planning, environmental compliance technologies and strategies, and valuation of distributed energy resources. I have submitted expert testimony in over 60 different proceedings before state utility regulators in more than 20 states.

In the course of my work, I develop in-house models and perform analysis using industry-standard electricity power system models. I am proficient in the use of spreadsheet analysis tools, as well as widely used optimization and electric dispatch models. I have directly run EnCompass and PLEXOS and have reviewed inputs and outputs for several other models.

Before joining Synapse, I worked at Rocky Mountain Institute, focusing on a wide range of energy and electricity issues. I have a master's degree in public policy and a master's degree in environmental science from the University of Michigan, as well as a bachelor's degree in environmental studies from Middlebury College. I have more than 12 years of professional experience as a consultant, researcher, and analyst. A copy of my current resume is attached as Exhibit SC-1.

Q On whose behalf are you testifying in this case?

A I am testifying on behalf of Sierra Club.

Q Have you testified previously before the State Corporation Commission of Virginia (the Commission)?

A Yes, I submitted testimony in Case Nos. PUR-2024-00184, PUR-2023-00066, PUR-2023-00005, PUR-2022-00006, and PUR-2018-00195—all dockets related to Dominion resource planning or environmental compliance investments. I also submitted testimony in Case No. PUR-2022-00051, Appalachian Power Company's Integrated Resource Planning (IRP) docket.

Q What is the purpose of your testimony in this proceeding?

A In my testimony for this proceeding, I focus on two main topics. First, in the biennial review of rates (rate case), I review Dominion's request to continue to recover the costs associated with operating and maintaining its coal fleet. I review the capital expenditures (capex) and operations and maintenance (O&M) spending Dominion is requesting to include in base rates and evaluate the recent historical and projected economic performance of the units.

Second, in the application to revise its fuel factors (fuel docket), I review Dominion's commitment and dispatch practices at its coal fleet. I evaluate the Company's use of a must-run commitment status at its plants, the overall net revenue it earned at its coal plants during the reconciliation period at the plants, and the Company's fuel procurement and spending during the reconciliation period.

Q How is your testimony structured?

A Following this introduction in Section 1:

- In Section 2, I summarize my findings and recommendations for the Commission.
- In Section 3, I summarize Dominion's biennial rate case and fuel docket request, specifically those related to the Company's coal plants, and introduce the Company's coal plants.
- In Section 4, I review and evaluate the historical and projected economics, performance, and utilization of the Company's coal fleet.
- In Section 5, I review the performance of Dominion's coal fleet in the energy market during the historical period.
- In Section 6, I review and evaluate Dominion's commitment and dispatch of its coal fleet and its coal contracts.

Q What documents do you rely upon for your analysis, findings, and observations?

A My analysis relies primarily upon the workpapers, exhibits, and discovery responses of Dominion witnesses associated with this proceeding, as well as discovery from other proceedings where applicable. To a limited extent, I also rely on certain external, publicly available documents.

2. FINDINGS & RECOMMENDATIONS

Q Please summarize your findings.

A My primary findings are:

1. Dominion's coal units at Mt. Storm, Clover, and Virginia City Hybrid Energy Center (VCHEC) have performed marginally to poorly in the last five years.
    a. Mt. Storm incurred net revenue losses in three of the last five years. Clover incurred net revenue losses in the two most recent years (2023–2024). VCHEC incurred net revenue losses in every year since at least 2020 (except 2022).
    b. In 2024, Mt. Storm, Clover, and VCHEC incurred total net losses of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**, respectively.
2. High capacity-market prices driven by increasing load projections and limited near-term supply options are making legacy resources appear more economic in the near term.
    a. Based on my analysis, I find that Mt. Storm will incur net revenue losses over the next decade regardless of whether load growth materializes, based in large part on the substantial environmental upgrades required at the plant. I project VCHEC will be marginal and Clover will be economic.
3. Dominion projects a slight increase in utilization of its coal fleet over the next five years, followed by a sharp decline in utilization (below 10 percent) beyond 2030.
4. Dominion's coal fleet experienced high outage rates during the fuel factor historical reconciliation period.

5. Dominion self-committed Clover and Mt. Storm with a must-run status **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** percent of the time, respectively, that each plant was available.

6. Dominion incurred net variable losses at Mt. Storm and Clover of **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**, respectively, during the fuel factor historical period of March 1, 2024 – February 28, 2025.

7. Dominion incurred variable net losses of **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]** during eleven specific events where the Company ignored the results of its own unit-commitment analysis and uneconomically committed one or more of its coal units with a must-run status. These are losses that would have been avoidable with more prudent unit-commitment decisions.

8. Dominion failed to demonstrate prudent management of its fuel contracts, especially at **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]**

9. With increasing data center load and limited market supply options, Dominion is relying on its aging legacy fossil fuel units to fill capacity needs. These units are not economic, and the associated costs will be passed on to ratepayers absent action from the Commission.

Q Please summarize your recommendations.

A Based on my findings, I offer the following chief recommendations:

1. The Commission should disallow from inclusion in base rates the O&M, capital, and environmental expenditures for Mt. Storm and VCHEC on the basis that the plants are projected to have negative to marginal economic performance under current capacity price forecasts.

2. The Commission should require Dominion to report to the Commission and to receive pre-approval on any large capital upgrades over $1 million that will prolong the life of its coal plants.

3. The Commission should disallow from inclusion in the fuel factor the **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]** in avoidable net losses incurred during the uneconomic events at the coal plants.

4. The Commission should disallow from inclusion in the fuel factor **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]**

5. Dominion should be required to include in future fuel factor filings its documentation of the reasons for committing its coal units with a must-run status as well as its profit and loss workbook.

3. OVERVIEW OF REQUEST

Q What does the Company request in its biennial review of rates Application?

A Dominion is requesting adjustments to the upcoming 2026 and 2027 Rate Years (January 1, 2026 – December 31, 2026, and January 1, 2027 – December 31, 2027, respectively). Specifically, the Company is requesting:

- An increase in revenue requirements for of $458 million for the 2026 Rate Year and $173 million for the 2027 Rate Year.[1]
- Total capital spending across its generation fleet of $518 million in the 2027 Rate Year and $627 million in the 2027 Rate Year.[2]
- Investment in reliability and compliance projects of $267 million, including $50.0 million at Mt. Storm.[3]
- Total investments at its coal plants at Mt. Storm, Clover, and VCHEC for fixed operations and maintenance (FOM), variable operations and maintenance (VOM), and capital expenditures of over $470.8 million across the 2026 and 2027 Rate Years as shown in Table 1 below.

1 Application at 4 (PUR-2025-00058).

2 Direct Testimony of Cedric Green at 6–7 (PUR-2025-00058).

3 *Id.*; Company's Response to Sierra Club Discovery Request No. 2-8(a), Attachment Sierra Club Set 02-08(a) (BKC) (PUR-2025-00058) (enclosed as Exhibit DG-3).

Table 1. Base Rate O&M and Capital Expenditures for 2026 and 2027 Rate Years

Spending Category	2026 Rate Year ($Million)			2027 Rate Year ($Million)		
	Clover (Share)	Mt. Storm	VCHEC	Clover (Share)	Mt. Storm	VCHEC
FOM	$ 11.8	$ 69.2	$ 48.6	$ 14.0	$ 62.7	$ 49.9
VOM	$ 0.7	$ 9.4	$ 7.8	$ 0.4	$ 4.8	$ 6.4
Capex	$ 16.9	$ 56.7	$ 7.9	$ 2.2	$ 79.0	$22.4
Total	**$ 29.4**	**$135.3**	**$64.2**	**$ 16.7**	**$146.4**	**$78.8**

Source: Company's Response to Sierra Club Discovery Request No. 2-05, Attachment Sierra Club Set 02-05(i,j,m) (BKC) (PUR-2025-00058) (enclosed as Exhibit No. DG-2).

Q What does the Company request in its fuel factor docket?

A Dominion is requesting to revise its fuel factor to 3.1664 cents/kWh for the current period July 1, 2025 – June 30, 2026. This represents an increase of 1.0929 cents/kWh over the 2.0735 cents/kWh factor current in effect.[4] The Company projects energy-related fuel and capacity-related purchased power expenses of approximately $1.958 billion during the current period. When combined with the prior period under-recovery of $204.5 million, the total revenue requirement for the current period is $2.1628 billion.[5]

Q What are the Company's historical and projected fuel costs?

A Dominion projects $3.17 billion in fuel and purchased power expenses during the current period (July 1, 2025 – June 30, 2026).[6] The Company incurred $2.6 billion in

4 Application at 2–3 (PUR-2025-00059).

5 *Id.*

6 Direct Testimony of Katherine Farmer at 6 (PUR-2025-00059) (Farmer Direct).

fuel expenses during the 12-month historical period of March 1, 2024 – February 28, 2025, including $263 million in coal expenses.[7] Dominion expects its year-end under-recovery of fuel expenses through June 30, 2025, to be $204.5 million.[8]

Q Please describe Dominion's coal plants.

A Dominion has three coal plants. Mount Storm Power Station is a 3-unit plant owned 100 percent by Dominion and located near Bismarck, West Virginia. Units 1 and 2 are 570 MW each and Unit 3 is 522 MW. The units came online between 1965 and 1973.

Clover Power Station is a 2-unit plant owned 50 percent by Dominion and 50 percent by Old Dominion Electric Cooperative. The plant is located in Halifax, Virginia. Each unit is 424 MW. The units came online between 1995 and 1996.

VCHEC is a 688 MW power plant owned 100 percent by Dominion and located in St. Paul Virginia. The plant began commercial operation in 2010 and operates on biomass 10 percent of the time and coal the other 90 percent of the time.

Q What is the undepreciated balance at each plant?

A As of December 31, 2024, the undepreciated balance of Clover was around **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**, Mt. Storm was over **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**, and

7 Farmer Direct Exhibit 10.

8 Farmer Direct at 9.

VCHEC was **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]**, as shown in Confidential Table 2 below.

Confidential Table 2. Coal Plant Undepreciated Balance

[BEGIN CONFIDENTIAL]

Plant	Net Book Value ($Millions)
Clover	[redacted]
Mount Storm	[redacted]
VCHEC	[redacted]

[END CONFIDENTIAL]

Source: Company's Response to Sierra Club Discovery Request No. 2-3(c), Attachment Sierra Club Set 02-03(c) (SG) CONF (PUR-2025-00058) (enclosed as Exhibit No. DG-4).

Q Why is the undepreciated balance for the plants important?

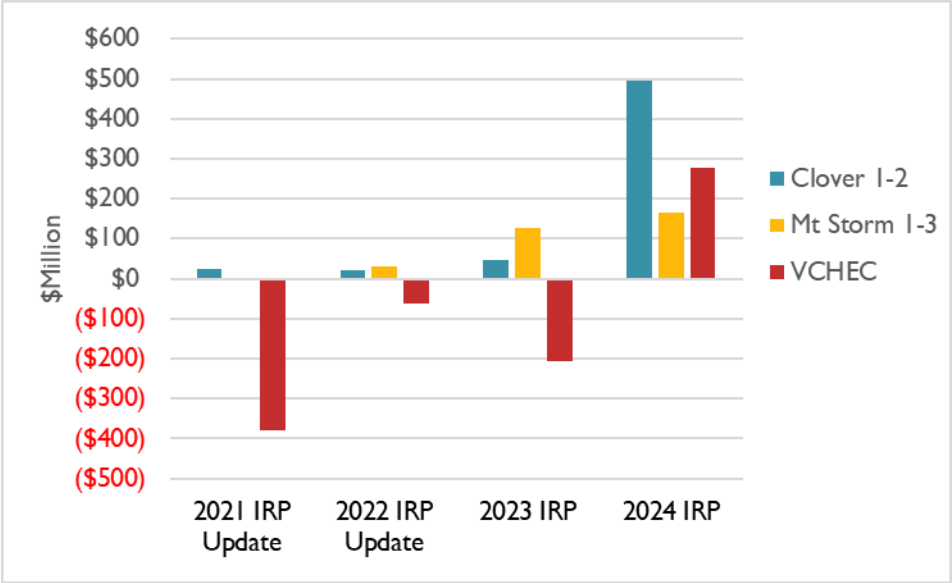
A Utilities set depreciation schedules based on the anticipated useful life of an asset. Utilities often view undepreciated plant balances as barriers to retirement before the currently planned retirement date. They may keep plants in rate base even when they are uneconomic or no longer providing value to ratepayers to ensure the undepreciated balance can be recovered. In this case, Dominion has large undepreciated balances at all three plants. The largest undepreciated balance is at VCHEC, which is the least economic of the three plants. Mt. Storm's balance is also notable given the plant is around 60 years old. A balance that large indicates substantial capital investments have been adding to the plant balance over time.

Q What is Dominion's plan for each of its coal plants?

A Dominion's current plan, according to its 2024 IRP, is to continue operating the plants until at least 2045, at which time Dominion is required to retire them according to the Virginia Clean Economy Act (VCEA).[9] This is in contrast with Dominion's plans in its IRPs from 2020 and 2021 to retire Clover in 2025. Dominion's retirement assumptions are in part driven by the results of the cash-flow analysis it must conduct on all current generating units as part of its IRPs. The results of this analysis have changed across recent IRPs as shown in Figure 1 below. Prior to 2024, Dominion's analysis found marginally positive cash flow results for Clover and Mt. Storm and negative cash flow results for VCHEC under its base plan. Then, in the 2024 IRP, the results for all coal plants changed substantially.

9 Dominion 2024 IRP at 74.

Figure 1. Cash Flow Analysis for Dominion's Coal Fleet from Recent IRPs



Source: Dominion 2021 IRP Update to 2020 IRP at 38 (Plan B); Dominion 2022 IRP Update to the 2020 IRP at 47 (Plan B); Dominion 2023 IRP at 83 (Plan B); Dominion 2024 IRP at 74 (VCEA with EPA).

The current positive findings for the coal plants are driven by the increase in demand from data centers throughout the region. High demand has resulted in supply scarcity, which has in turn driven up capacity market prices. As a result, in Dominion's 2024 IRP, the Company's cash-flow analysis showed that each plant was projected to be economic over the next 15 years. The Company also included the coal plants in its PLEXOS model and allowed the model to choose if it wanted to select a plant for retirement. Dominion found that none of its coal plants were selected for retirement prior to the end of the plan period.[10]

10 *Id.*

As I will discuss in the next section, I am concerned that these results are all driven by near-term projections of high utilization for the coal fleet and lower operational costs than are likely to materialize. I am also concerned that the Company is not considering the regulatory and fuel volatility risks and costs that continued reliance on its coal fleet is likely to impose on its ratepayers.

4. UTILIZATION & OVERALL ECONOMIC PERFORMANCE OF MT. STORM, CLOVER & VCHEC

Q Please summarize this section.

A In this section, I evaluate the economic performance and utilization of each of the Company's coal units over the past five years (since 2020). I then evaluate the projected economic performance and utilization assumptions for the coal units over the next decade (through 2035). I rely on annual data provided by Dominion in PUR-2025-00058 to conduct this analysis. I find that Mt. Storm, Clover, and VCHEC all incurred net revenue losses in recent years. My analysis projects that Clover and VCHEC will be marginal-to-economic going forward, driven by high capacity market prices, but Mt. Storm will remain uneconomic. Dominion projects utilization of all the coal plants will increase over the next five years and then fall dramatically in the 2030s.

Q Please summarize the coal fleet's recent historical and projected utilization.

A Over the past five years, all Dominion's coal plants have seen low utilization, with Mt. Storm averaging around **[BEGIN CONFIDENTIAL]** ■ **[END CONFIDENTIAL]** percent capacity factor, Clover at **[BEGIN CONFIDENTIAL]**

[redacted] **[END CONFIDENTIAL]** percent and VCHEC at **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** percent (Confidential Figure 2). Over the next five years, Dominion projects a jump in utilization at all plants, with Mt. Storm averaging around 42 percent capacity factor, Clover 22 percent, and VCHEC 43 percent utilization. From 2030 onward, Dominion projects a large drop in utilization at both Mt. Storm and VCHEC, with the plants operating at an average capacity factor of 2 percent and 8 percent, respectively, between 2030 and the end of the study period in 2035, and Clover operating at around a 15 percent capacity factor.

Confidential Figure 2. Historical & Projected Capacity Factors for Dominion's Coal Plants

[BEGIN CONFIDENTIAL]

Source: Company's Response to Sierra Club Discovery Request No. 2-4(e), Attachment Sierra Club Set 02-04(a-e, m) (LTG) CONF (PUR-2025-00058) (enclosed as Confidential Exhibit No. DG-5); Company's Response to Sierra Club Discovery Request No. 2-5(d), Attachment Sierra Club Set 02-05(a-k) (SR) (PUR-2025-00058) (enclosed as Exhibit No. DG-6).

It is concerning that Dominion is projecting such a large jump in the near term, because the Company is anticipating, on one hand, high energy revenues from the units, but there will also be high emissions and high operational costs associated with increased utilization. I find it likely that Dominion is over-projecting the plants' utilization in the near term. In the 2024 IRP, the Company over-projected 2024 capacity factors for the plants by between 41 and 57 percent (when compared to actual utilization for 2024). And in the time between when Dominion created its 2024 IRP and when it filed the rate case, the Company decreased its near-term capacity factor projections for 2025 and 2026 for all three coal plants by 22 percent at Mt. Storm, 33 percent at VCHEC, and 35 percent at Clover (as shown in Confidential Figure 2 above).[11]

Q How did the coal units perform economically over the past five years (since 2020)?

A All three coal plants incurred net revenue losses in 2020, 2023 and 2024, with VCHEC also incurring net revenue losses in 2021. All plants earned positive net revenues in 2022, driven by high gas prices that resulted from the war in Ukraine. VCHEC has been performing particularly poorly, incurring net losses in every year except 2022. Confidential Table 3 below summarizes the plant's annual net revenues. Confidential Figure 3, Confidential Figure 4, and Confidential Figure 5 show the cost and revenue breakdown for each plant.

11 Dominion 2024 IRP, Appendix 3B-4.

Confidential Table 3. Historical Net Revenues

[BEGIN CONFIDENTIAL]

Year	Net Revenue (2025 $Million)		
	Mt. Storm	Clover	VCHEC
2020	[redacted]	[redacted]	[redacted]
2021	[redacted]	[redacted]	[redacted]
2022	[redacted]	[redacted]	[redacted]
2023	[redacted]	[redacted]	[redacted]
2024	[redacted]	[redacted]	[redacted]

[END CONFIDENTIAL]

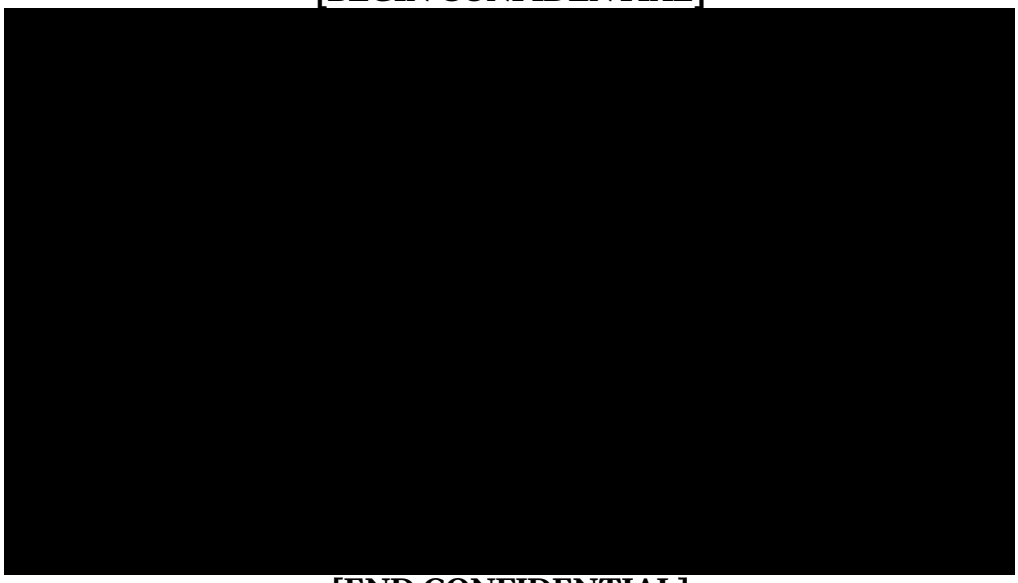
Sources: Exhibit DG-5; Company's Response to Sierra Club Discovery Request No. 2-4(l), Attachment Sierra Club Set 02-04(l) Revised (CAN) (PUR-2025-00058) (enclosed as Exhibit DG-7); Company's Response to Sierra Club Discovery Request No. 2-4(j–k) and (o), Attachment Sierra Club Set 02-04(j,k,o) (BKC) (PUR-2025-00058) (enclosed as Exhibit DG-8).

Confidential Figure 3. Mt. Storm Historical Economic Performance

Source: See Exhibit Nos. DG-5, DG-7, DG-8.

Confidential Figure 4. Clover Historical Economic Performance

[BEGIN CONFIDENTIAL]



[END CONFIDENTIAL]

Sources: See Exhibit Nos. DG-5, DG-7, DG-8.

Confidential Figure 5. VCHEC Historical Economic Performance

[BEGIN CONFIDENTIAL]

[END CONFIDENTIAL]

Sources: See Exhibit Nos. DG-5, DG-7, DG-8.

Q Explain the methodology you used to develop this historical analysis.

A I relied on data from Dominion to calculate the cost and revenues Dominion incurred at Mt. Storm, Clover, and VCHEC between 2020 and 2024. I first summed the energy, capacity, and ancillary market revenues[12] to find the total unit revenues.

I then summed the fuel costs,[13] VOM,[14] FOM,[15] and sustaining capital expenditures[16] together to get the total units costs. I netted the units' cost and value to find the units' historical net costs or revenues for each year. I relied on data provided by the Company for all costs.

Q Does this analysis reflect system costs as they are allocated to ratepayers through the Company's revenue requirement?

A No. This analysis is not intended to reflect the way costs are passed on to ratepayers over the lifespan of energy assets—but rather to provide a comparison of real-time expenses and revenues. Revenue requirements inherently require assumptions around the lifetime of assets / resources. Additionally, a substantial portion of resource costs are deferred until the future through capital and regulatory asset treatment.

12 Exhibit No. DG-5.

13 Exhibit No. DG-7.

14 Exhibit No. DG-8.

15 *Id.*

16 *Id.*

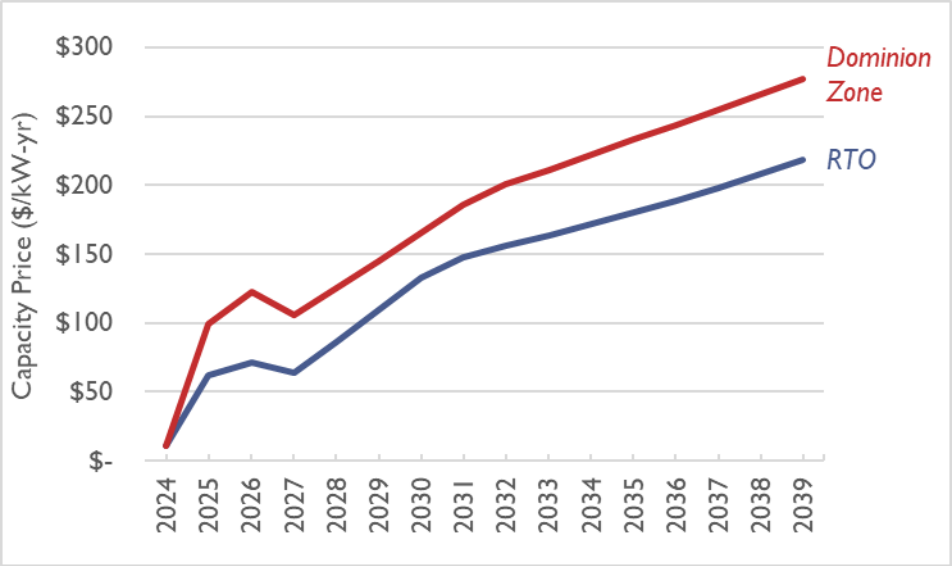
Therefore, poor near-term unit economics can be diluted or obscured by spreading out the losses over a longer period of time.

My analysis, on the other hand, is intended to provide a clear snapshot of how input revenues match output costs. It may be reasonable for expenses to exceed revenues in a single year (for example, when a large capital investment is made). But over a period of multiple years, expenses should not regularly exceed revenues. If they do, that is a strong indication that the unit is not operating economically.

Q How does Dominion project the plants will operate going forward?

A Dominion projects that the plants will have positive-to-marginal economic performance, driven mainly by the high capacity market prices and associated revenues. As shown in Figure 6 below, by 2039, Dominion expects capacity market prices will increase by 180 percent relative to 2025 prices in the DOM zone (up to $277/kW-year from $99/kW-year), and 252 percent across the RTO (up to $218/kW-year up from $62/kW-year). As discussed above, Dominion projects utilization at all the plants will decline, and the Company will rely on the coal plants primarily as capacity resources beyond 2030.

Figure 6. PJM Capacity Market Price Forecast



Source: Dominion 2024 Integrated Resource Plan Appendix 5B-1.

I find that Clover will have marginal-to-positive economic performance over the next decade. These results are driven by the PJM high capacity market price forecast. Mt. Storm will incur substantial near-term environmental capital investments to comply with required mercury regulations which results in the plant having negative economic performance over the next decade. VCHEC is also projected to have marginal-to-poor economic performance, even with the high capacity market forecast, due to its high operational costs.

Overall, I project that Clover will have a positive net present value (NPV) over the next decade of $317.97 million. I project that VCHEC will be marginally profitable with an NPV of $41.37 million, but it could easily flip to earning negative net revenues if capacity market prices fall by as little as 6 percent relative to what Dominion projected. I project that Mt. Storm will earn negative-to-marginal revenues, with an NPV over the next decade of -$18.44 million.

Table 4 below summarizes the plants' projected annual net revenues. Figure 7, Figure 8, and Figure 9 below show the projected cost and revenue breakdown for each plant.

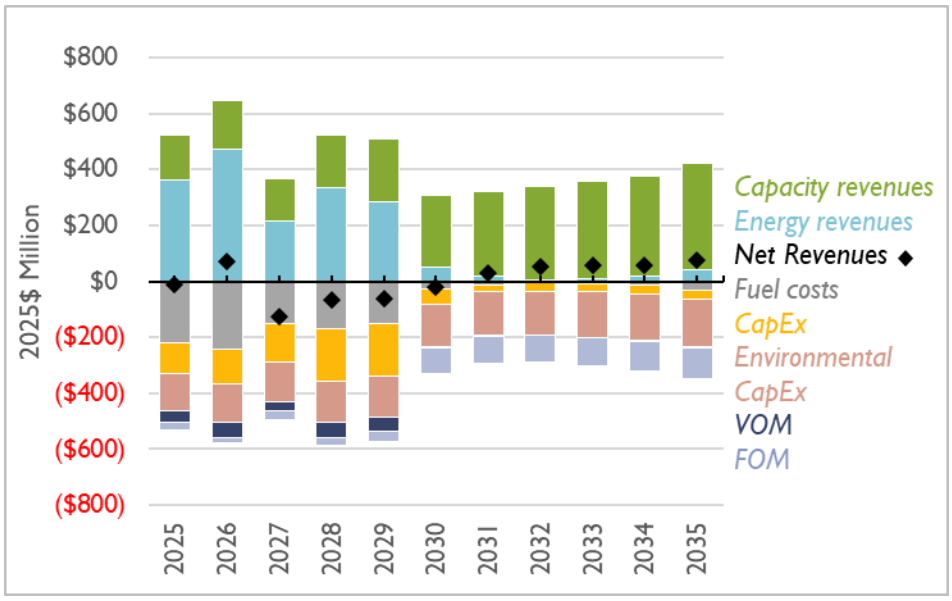
Table 4. Projected Net Revenues & Net Present Values

Year	Net Revenue (2025 $Million)		
	Mt. Storm	**Clover**	**VCHEC**
2025	($8.91)	$14.95	$12.08
2026	$71.88	$32.99	$7.72
2027	($127.33)	$11.67	($43.70)
2028	($64.24)	$27.40	($11.62)
2029	($62.14)	$30.55	($8.65)
2030	($18.39)	$60.46	$8.71
2031	$31.60	$65.20	$15.86
2032	$54.24	$69.93	$31.52
2033	$58.02	$70.71	$30.56
2034	$57.05	$71.75	$27.21
2035	$77.38	$78.32	$31.54
NPV	**($18.44)**	**$317.97**	**$41.37**

Sources: Exhibit No. DG-6; Company's Response to Consumer Counsel Discovery Request No. 1-10, Attachment AG Set 01-10 (JLM) (PUR-2025-00058) (enclosed as Exhibit No. DG-9); Company's Response to Sierra Club Discovery Request No. 5-2(a), Attachment Sierra Club Set 05-02 (JLM) (PUR-2025-00058).[17]

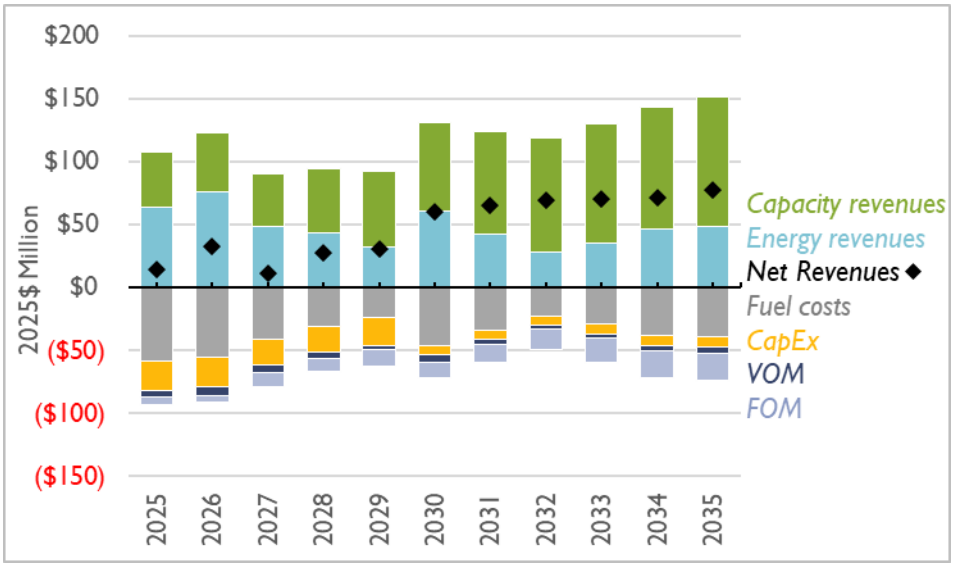
17 The Company's Response to Sierra Club Discovery Request No. 5-2(a) and the associated attachment contain voluminous spreadsheet data and can be provided to the Commission and properly-authorized parties upon request.

Figure 7. Mt. Storm Projected Economic Performance



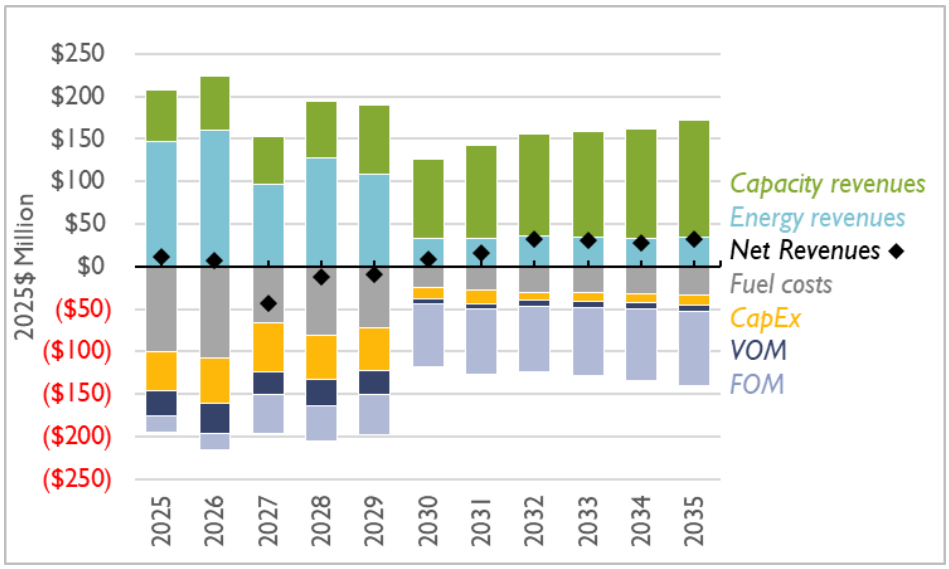
Sources: Exhibit Nos. DG-6, DG-9; Company's Response to Sierra Club Discovery Request No. 9-2(d)(i) (PUR-2025-00058) (enclosed as Exhibit No. DG-10); Company's Response to Sierra Club Discovery Request No. 5-2(a), Attachment Sierra Club Set 05-02 (JLM) (PUR-2025-00058).

Figure 8. Clover Projected Economic Performance



Sources: Exhibit Nos. DG-6, DG-9; Company's Response to Sierra Club Discovery Request No. 5-2(a), Attachment Sierra Club Set 05-02 (JLM) (PUR-2025-00058).

Figure 9. VCHEC Projected Economic Performance



Sources: Exhibit Nos. DG-6, DG-9; Company's Response to Sierra Club Discovery Request No. 5-2(a), Attachment Sierra Club Set 05-02 (JLM) (PUR-2025-00058).

Q How did you calculate the projected economic performance of Dominion's coal fleet?

A As with the historical analysis presented above, I relied on Company projections for unit revenues and costs over the next 10 years. I first summed projected energy and capacity market revenues[18] from the Company's 2024 IRP to find total projected revenues. Because Dominion didn't project revenues as part of the biennial data set prepared for this rate case,[19] I scaled down the energy market revenues from the 2024 IRP to match the level of generation from Dominion's biennial data set modeling.

18 Exhibit No. DG-9.

19 Company's Response to Sierra Club Request No. 2-5(m) (PUR-2025-00058) (enclosed as Exhibit No. DG-11).

I then summed up fuel costs[20] and VOM[21] from the biennial data set to get total variable costs. Dominion did not provide fixed costs beyond 2027 in the biennial data set, so I had to rely on its 2024 IRP PLEXOS data for FOM,[22] sustaining capital expenditures,[23] and environmental capital expenditures.[24] I summed the variable and fixed costs data sets to get total projected cost.

For environmental capital expenditures for Mt. Storm, I annualized the projected $1.5 billion MATC project cost over the remaining life of the plant (through 2045). To do this, I netted out the environmental capex from the total sustaining capex costs[25] provided by Dominion. The unit incurs all other costs on an annual basis and so it is reasonable to evaluate the net costs and revenues on an annual basis as well. I spread out this one-time environmental capital expenditure over the remaining plant life to present a more uniform view of the unit's economics.

20 Exhibit No. DG-6.

21 *Id.*

22 Company's Response to Sierra Club Discovery Request No. 5-2, Attachment Sierra Club Set 05-02 (JLM) (PUR-2025-00058).

23 Exhibit No. DG-6.

24 Exhibit No. DG-10.

25 Company's Response to Sierra Club Discovery Request No. 5-2, Attachment Sierra Club Set 05-02 (JLM) (PUR-2025-00058).

Q How will the future projections you showed above change if load levels do not materialize as projected?

A The high capacity market prices shown in Figure 6 reflect PJM's forecast for high load growth driven by data center demand during the next five to 10 years. But if load levels do not materialize as expected, capacity market prices won't rise to the levels Dominion is currently projecting. Resources that depend on high capacity market prices could instead lose money and potentially become stranded assets. PJM has also placed a temporary cap for the 2026 / 2027 auction year on capacity market prices.[26] If price caps continue into future years, the market may be capped at a level below what Dominion projects. As discussed above, this is particularly relevant to Dominion's marginal plant at VCHEC, which is likely to be uneconomic if load deviates even a little from Company projections.

Q What are your recommendations regarding Dominion's rate case requests?

A I recommend that the Commission disallow inclusion in rates of the O&M and capital costs at Mt. Storm on the basis that the plant is not projected to be economic on a forward-going basis. I recommended the same for VCHEC on the basis that the plant is only marginally economic, and that projection is highly dependent on high load projections. I also recommend that the Commission require Dominion to report on,

26 Ethan Howland, *FERC Approves PJM Capacity Auction Price Cap Floor*, UTILITY DIVE (April 22, 2025) available at http://bit.ly/4lFJbIj/.

and seek approval for, all capital expenditures over $1 million that will extend the lives of any of its coal plants.

5. MARKET PERFORMANCE OF MT. STORM, CLOVER & VCHEC DURING THE HISTORICAL FUEL FACTOR PERIOD

Q Please summarize this section.

A In this section, I review the actual net revenues and losses that resulted from Dominion's operation of its coal plants during the fuel factor historical period of March 1, 2024 – February 28, 2025. My analysis in this section is based on hourly data the Company provided in discovery in PUR-2025-00059. I also review the fuel cost and contracts that Dominion uses to dispatch its units, as well as the costs it is asking to pass on to ratepayers through fuel factors. I find that Clover and Mt. Storm both incurred variable net losses during the historical period.

Q How did Dominion's coal plants perform in the energy market in recent years?

A Based on each unit's net generation,[27] real time dispatch rate (variable cost of production)[28] and hourly energy market revenues[29] – including energy, losses and

27 Company's Response to Sierra Club Discovery Request No. 2-1(f), Attachment Sierra Club Set 02-01(b,d,f,h) (WAH) CONF (PUR-2025-00059). Dominion's response includes voluminous spreadsheet data and can be provided to the Commission and properly-authorized parties upon request.

28 Company's Response to Sierra Club Discovery Request No. 2-1(j), Attachment Sierra Club Set 02-01(a,j) (WAH) ES (PUR-2025-00059). Dominion's response includes voluminous spreadsheet data and can be provided to the Commission and properly-authorized parties upon request.

29 Company's Response to Sierra Club Discovery Request No. 2-1(l), Attachment Sierra Club Set 02-01(l-p) (LTG) CONF (PUR-2025-00059). Dominion's response includes

congestion – I find that Clover and Mt. Storm both lost money while VCHEC earned net positive revenues for the historical period of March 30, 2024 – February 28, 2025 (Confidential Table 5). Specifically, Clover incurred **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** in variable net losses, Mt. Storm incurred **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** in variable net losses at two of its plants and earned **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** in variable net revenues at the third unit. VCHEC earned **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** in variable net revenues.

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voluminous spreadsheet data and can be provided to the Commission and properly-authorized parties upon request.

Confidential Table 5. Variable Net Revenues at Coal Plants
(March 2024 – February 2025)

[BEGIN CONFIDENTIAL]

Unit	Net Revenues ($Million)
Clover 1	[redacted]
Clover 2	
Mt. Storm 1	
Mt. Storm 2	
Mt. Storm 3	
VCHEC	

[END CONFIDENTIAL]

Sources: Calculated based on Company's Response to Sierra Club Discovery Request No. 2-1(f)(j)(l)(n)(p), Attachment Sierra Club Set 02-01(b,d,f,h) (WAH) CONF, Attachment Sierra Club Set 02-01(a,j) (WAH) ES, Attachment Sierra Club Set 02-01(l-p) (LTG) CONF (PUR-2025-00059); Company's Response to Sierra Club Discovery Request No. 2-12(b), Attachment Sierra Club Set 02-12(b) (WAH) ES (PUR-2025-00059). [30]

Looking at each plant's monthly performance, I find Dominion's coal plants were operating uneconomically during most months in the historical period. At Clover, Units 1 and 2 incurred net losses in every month it was generating power except January 2025. At Mt. Storm, Unit 1 earned net revenues during only three of the 10 months it was generating power, Unit 2 during five of the nine months it was generating power, and Unit 3 during four of the nine months it was generating power.

30 The Company's Response to Sierra Club Discovery Request No. 2-12(b) includes voluminous spreadsheet data. As such, the input sources are not attached as exhibits to this testimony but can be provided to the Commission and properly-authorized parties upon request.

VCHEC similarly earned net revenues in only three of the 11 months of the year it was generating power.

Q Explain how you calculated the net revenues discussed above?

A I multiplied the hourly real-time dispatch rates ($/MWh)[31] and net generation (MWh)[32] provided by Dominion for each unit to obtain the total variable production cost for each hour. I summed hourly energy, congestion, and loss market revenues and costs[33] for each unit to find total hourly revenues. I then calculated the differences between the total hourly variable production costs and total hourly revenues. I summarized these results by taking the sum of the hourly net revenues over the historical period for each unit.

Q How do your analysis and findings here compare to your economic analysis discussed in Section 3 above?

A My findings are directionally aligned. Looking at solely the annual variable cost and revenues (that is, the fuel costs, VOM and energy and ancillary market revenues) from the economic analysis in Section 4, I find that in 2024, Mt. Storm, Clover, and VCHEC incurred variable net revenue losses of **[BEGIN CONFIDENTIAL]** [redacted]

31 Company's Response to Sierra Club Discovery Request No. 2-01(j), Attachment Sierra Club Set 02-01(a), (j) (WAH) ES (PUR-2025-00059).

32 Company's Response to Sierra Club Discovery Request No. 2-1(f), Attachment Sierra Club Set 02-01(b,d,f,h) (WAH) CONF (PUR-2025-00059).

33 Company's Response to Sierra Club Discovery Request No. 2-1(l)–(p), Attachment Sierra Club Set 02-01(l-p) (LTG) CONF (PUR-2025-00059).

[redacted] **[END CONFIDENTIAL]**, respectively. While in the fuel factor analysis, I find that for March 2024 – February 2025, Mt. Storm and Clover incurred **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** in net revenue losses while VCHEC earned **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** in variable net revenues. Confidential Table 6 below shows the comparison of the results from the economic and fuel factor analyses.

Confidential Table 6. Variable Net Revenues for Dominion's Coal Plants

[BEGIN CONFIDENTIAL]

	Rate Case	Fuel Factor Case	
	Economic Analysis	Real Dispatch Rate	Accounting Fuel Cost
Study Period	January 1, 2024 – December 31, 2024	March 1, 2024 – February 28, 2025	
Clover	[redacted]	[redacted]	[redacted]
Mt. Storm	[redacted]	[redacted]	[redacted]
VCHEC	[redacted]	[redacted]	[redacted]

[END CONFIDENTIAL]

Sources: See sources in Table 3 for rate case calculations and Confidential Table 5 for real dispatch rate calculations. Monthly accounting fuel costs are from the Response to Sierra Club Discovery Request No. 2-1(g), Attachment Sierra Club Set 02-01(g) (KEF) (PUR-2025-00059) (enclosed as Exhibit No. DG-12)

Q Explain why the results are directionally aligned but not identical.

A The economic analysis covers the calendar year of 2024, while the fuel docket historical period is March 2024 – February 2025. Additionally, the fuel factor analysis

uses the real-time dispatch rate, which, as explained below, represents the cost the Company would pay in the market today to replace the fuel.[34] In contrast, in the economic analysis, the Company is likely using accounting fuel costs, which represents the cost of fuel Dominion has on hand.[35] This accounting cost is closer to the fuel cost that Dominion is asking to pass on to ratepayers in the fuel docket. For this reason, I also include in Confidential Table 6 a calculation of net revenues using the accounting fuel costs from the fuel docket, as these costs should more closely mirror the fuel costs used in the rate case economic analysis.

Q How does the unit's real-time dispatch rate compare to the accounting fuel costs that Dominion seeks to pass on to ratepayers through the fuel factor?

A A unit's real-time dispatch rate is generally set based on a unit's marginal fuel costs. It is a hypothetical rate calculated based on the replacement cost of coal in the market today; it is not based on what the Company actually paid for coal. The dispatch rate is calculated by multiplying the unit's heat rate by the total fuel-related costs and then dividing by net MW generated in the hour. VOM costs, and other operating costs and credits (including renewable energy credits, and production tax credits) are added to

34 VCHEC is an exception, as its units are dispatched based on accounting costs.

35 Company's Response to Sierra Club Discovery Request No. 12-1(b) (PUR-2025-00058) (enclosed as Exhibit No. DG-13).

the final value.[36] The real-time dispatch rate does not include decrements or adders.[37] When units are bid into the market, decrements or adders are included at that time.

- For Mt. Storm and Clover, the fuel cost input to the real-time dispatch rate is the marginal fuel cost. This represents the replacement cost of fuel.[38] Dominion bases its marginal fuel costs on a daily brokersheet / fuel sheet which reflects the daily spot market for coal.[39]
- For VCHEC, the unit's dispatch rate is based on the actual weighted average fuel cost (that is, the actual price paid for coal).[40] Dominion did not explain why it uses the actual weighted average cost of fuel, but it is likely because there is no spot market for biomass.

In contrast, the accounting cost is based on the fuel purchases and represents the costs that the Company incurs and passes on to customers. It is calculated for all units based on the weighted average cost of the coal inventory at each plant.[41] Accounting costs include fixed costs which can include transportation (rail or truck), coal pile

36 Company's Response to Sierra Club Discovery Request No. 4-4(b) (PUR-2025-00059) (enclosed as Exhibit No. DG-14).

37 *See* Exhibit No. DG-14; Company's Response to Sierra Club Discovery Request No. 2-1(j) (PUR-2025-00059) (enclosed as Exhibit No. DG-15).

38 *See* Exhibit No. DG-14; Company's Response to Appalachian Voices Discovery Request No. 2-6(b) (PUR-2025-00059) (enclosed as Exhibit No. DG-16).

39 *See* Exhibit No. DG-15.

40 *See* Exhibit No. DG-16.

41 Dominion calculates what it calls an "expense rate" for each unit. This expense rate is based on the cost of coal in the piles used at each plant.

freeze maintenance, replacement coal commodity charges, and any other fixed costs.[42] Real-time dispatch rates do not include fixed costs.

Q Why are unit-commitment and dispatch decisions made based on marginal fuel costs rather than actual fuel costs?

A Actual fuel costs are based on purchases made in the past and include fixed costs and other costs that are essentially "sunk" costs once the coal is purchased. While all fixed and fuel costs should be factored into a long-term economic analysis, they should not necessarily impact day-to-day dispatch decisions. The decision of how and when to operate a plant should be based on the marginal cost to generate the next unit of power. The marginal cost of fuel is generally based on the replacement cost in the current spot market.

Q What are the total fuel expenses that Dominion seeks to pass on to its ratepayers in the fuel factor docket, and how do they compare with the marginal costs used to dispatch the unit?

A The Company dispatched and bid the units based on **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** in fuel costs, which includes only variable costs.[43] In contrast, Dominion's fuel factor application includes $263 million in coal

42 Company Response to Sierra Club Discovery Request No. 4-1(b) (PUR-2025-00059) (enclosed as Exhibit No. DG-17).

43 Calculated based on Company's Response to Sierra Club Discovery Request No. 2-1, Attachment Sierra Club Set 02-01(b,d,f,h) (WAH) CONF (PUR-2025-00059); Company's Response to Sierra Club Discovery Request No. 2-1(q), Attachment

expenses and $61.5 million in biomass expenses during the historical period.[44] This is on par with the **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** in total accounting fuel expenses that I calculated for the coal plants during the historical period using Dominion's monthly fuel accounting data (which includes costs for coal, oil and biomass).[45] It is also roughly on par with fuel expenses that Dominion provided in Case No. PUR-2025-00058 for the calendar year 2024.[46]

Q Is this divergence between fuel accounting and dispatch costs concerning?

A Yes and no. As discussed above, it is reasonable for a utility to exclude some fuel costs, such as transportation costs, and to pass them through as fixed. But when contracts have take-or-pay terms that lock utilities into a specific quantity of coal regardless of whether they need it, that can result in excess and inefficient costs used to manage the fuel supply. In this case, we see that within the use of fuel price decrements **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]** during the historical

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Sierra Club Set 02-01(q) (JLS) CONF (PUR-2025-00059); Company's Response to Sierra Club Discovery Request No. 3-1, Attachment Sierra Club Set 03-01 (KEF) CONF (PUR-2025-00059). These attachments are voluminous. As such, the input sources are not attached as exhibits to this testimony but can be provided to the Commission and properly-authorized parties upon request.

44 Farmer Direct Exhibit 10.

45 Exhibit No. DG-12.

46 Exhibit No. DG-7.

period to increase the utilization of the coal plant and burn off excess coal.[47] Dominion stated that when it has excess coal, it uses the lower contractual coal commodity fuel cost (the actual fuel cost under contract with the Company's supplier) to dispatch its coal plants, and the decrement is the different between the contract price and the spot market price.[48]

Q Have you reviewed Dominion's coal contracts that were in effect during the historical period?

A Yes, I reviewed the Company's coal and transportation contracts that were in place during the fuel factor historical period.[49] **[BEGIN EXTRA SENSITIVE]** [redacted]

47 Company's Response to Sierra Club Discovery Request No. 2-12; Attachment Sierra Club Set 02-12(b) (WAH) ES (PUR-2025-00059).

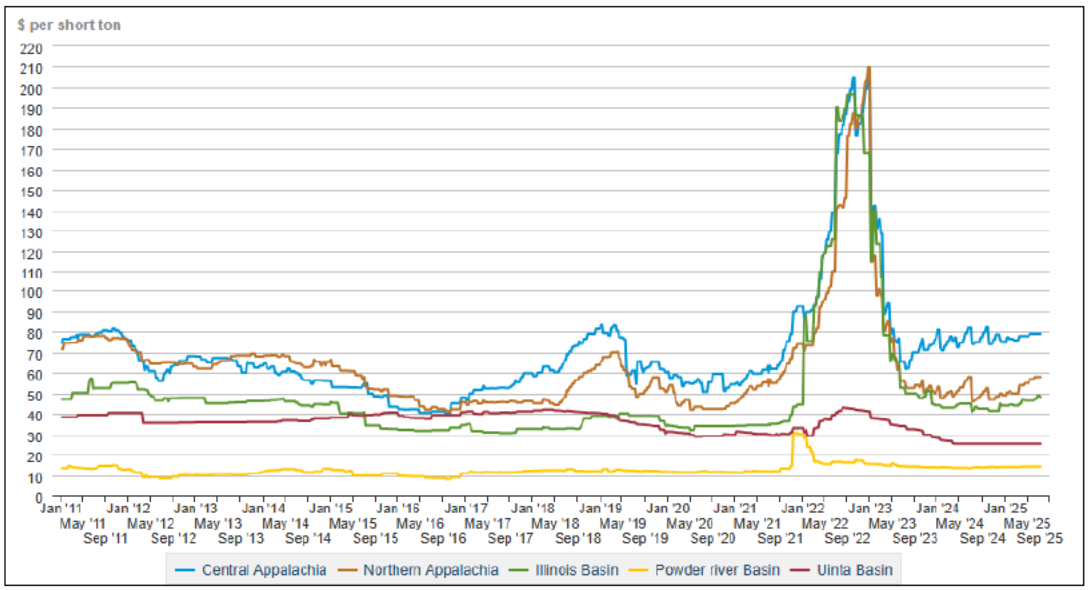
48 Company's Response to Appalachian Voices Discovery Request No. 4-6 (PUR-2025-00059) (enclosed as Exhibit No. DG-18).

49 Company's Response to Sierra Club Discovery Request No. 2-13(a), Attachments Sierra Club Set 02-13(a) (JR) ES (PUR-2025-00059). The Company's Response is voluminous. As such, the input sources are not attached as exhibits to this testimony but can be provided to the Commission and properly-authorized parties upon request.

[redacted]

[END EXTRA SENSITIVE]

Figure 10. Historical coal price by region (2011 – Current Data)



Source: Energy Information Administration Coal Market Data, available at https://www.eia.gov/coal/markets/.

[BEGIN EXTRA SENSITIVE] [redacted][50]

[END EXTRA SENSITIVE]

50 Company's Response to Sierra Club Discovery Request No. 2-13(a), Attachment Sierra Club Set 02-13(a) (JR) ES (PUR-2025-00059).

[redacted]

[END EXTRA SENSITIVE] [51]

Q Do you have any concerns about the Company's coal contracting during the historical period?

A Yes, I have concerns about the fuel supply for each plant. First, I am concerned about

[BEGIN EXTRA SENSITIVE] [redacted]

51 Company's Response to Sierra Club Discovery Request No. 2-13(a), Attachment Sierra Club Set 02-13(a) (JR) ES (PUR-2025-00059).

52 *Id.*

[redacted]

[redacted]

[redacted]

[redacted]

[redacted] **[END EXTRA SENSITIVE]**

Q What are your recommendations regarding the unit market performance and fuel procurement?

A **[BEGIN EXTRA SENSITIVE]** [redacted]

[redacted]

[redacted] **[END EXTRA SENSITIVE]** Therefore, I recommend that the Commission disallow from inclusion in the fuel factor **[BEGIN EXTRA SENSITIVE]** [redacted]

[redacted] **[END EXTRA SENSITIVE]** I also recommend that the Commission carefully monitor the cost of waste coal at VCHEC to ensure the Company is not signing unnecessarily expensive contracts. Finally, I recommend that the Commission, in the next fuel docket, issue a disallowance if the Company continues to over-procure coal for Mt. Storm.

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53 Company's Response to Sierra Club Discovery Request No. 2-13(a), Attachment Sierra Club Set 02-13(a) (JR) ES (PUR-2025-00059).

6. COMMITMENT & DISPATCH OF MT. STORM, CLOVER & VCHEC

Q Please summarize this section.

A In this section, I explain how dispatchable power plants operate within the PJM market. I define the practice of uneconomic self-commitment and discuss the impacts this practice can have on ratepayers if utilities are permitted to pass along the avoidable losses that result. I describe the tools that Dominion uses to make its unit-commitment decisions. I then review the Company's own data and find that Dominion self-commits its coal units (*i.e.*, with a must-run status) as much as half the time they are available. I evaluate the Company's daily commitment analysis and evaluate specific events that reflected imprudent unit commitment decisions. Finally, I review the Company's fuel contracts and its use of decrements to manage fuel inventory at Mt. Storm.

Q Why are you evaluating unit-commitment practices during a fuel factor docket?

A The fuel factor proceedings reconcile fuel spending and cover the reasonableness of fuel costs incurred by the Company to provide electricity to ratepayers during the historical period of March 1, 2024 – February 28, 2025. The magnitude of Dominion's incurred fuel costs is directly tied to the operation of each of its units, and thus its unit-commitment decisions.

Q How does the analysis in this section differ from the analysis presented in Section 5 of the testimony?

A In Section 5, I present analysis on how Dominion's units *actually* performed during the historical period using data available after the fact (*i.e.*, the net revenue and losses that Dominion incurred by operating its units rather than purchasing energy from the market). I show the total harm that Dominion seeks to pass on to ratepayers as a result of its decisions to uneconomically maintain and operate its solid fuel fleet.

In contrast, in this section, I evaluate the data, projections, and analysis that Dominion had at the time that it made its daily unit-commitment decisions. I identify the periods of time when the Company projected it would incur net losses by operating its units, yet still opted to operate those units, and then predictably incurred significant net losses. I then calculate the net losses incurred during just that subset of days, which Dominion seeks to pass on to ratepayers.

Q How are coal plants committed and dispatched in the PJM market?

A Generator operators within the PJM market commit their units with a status of "economic," "outage," or "must run." When a unit "self-commits" or operates as "must-run," this means the utility, in this case Dominion, is independently deciding to operate a unit up to its minimum capacity regardless of whether PJM determines that it is economic to do so.

In contrast, under economic commitment, PJM has responsibility for making commitment decisions. Utilities in PJM generally commit dispatchable generating

units with a status of "economic," thereby making the market operator responsible for the unit-commitment decisions.[54] PJM's algorithms prioritize reliability, and then compare the variable cost of operating (and starting) a unit to the variable production costs of all other units available to the market for the next day. An "economic" plant will be committed if it is the least-cost option available to the market. Once a plant is online, the market operator may economically dispatch the unit by ramping it up and down from that minimum operating level. This process generally ensures customers are served (reliably) by the lowest-cost resources.

Q In practice, are power plants actually committed in PJM in that way?

A No. For units with long startup and shutdown times, such as coal plants, utilities may elect to maintain control of unit-commitment decisions and design independent processes outside of the PJM market to determine when to commit a unit at its minimum operating level.[55] Unlike the market operator, generation owners may choose not to incorporate costs into their decision-making processes and may elect to commit units as "must-run," regardless of economics.

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54 In my testimony, I will use the term "unit commitment" to refer to the decision made by the utility or the market on whether to operate a unit at its minimum operating level and therefore make it available to the market. I will use the term "unit dispatch" to refer to the decision by the utility or the market on how to operate a unit above its minimum operating level once the unit has been committed online.

55 Minimum operating level is an output threshold often determined operationally and below which a generator is either less stable or operates inefficiently. Once the unit-commitment decision is made, the level of generation output (above the minimum) is generally left to the market. The operating level is based upon the marginal running cost assumptions the owner provides in the form of offers or bids to PJM.

The process of committing a unit outside the market is called self-commitment. A self-committed unit (*i.e.*, one designated as must-run) will operate with a power output no less than its minimum operating level—no matter how the prevailing market price compares to the unit's operating economics. The market operator may then ramp the unit up from that minimum operating level, but a must-run designation ensures the unit remains online. The unit receives market revenue (and incurs variable operational costs) but typically does not set the market price of energy. If the market price of energy falls below a unit's operational cost, that self-committed unit will continue to operate and incur losses. The utility often seeks to recover these losses from ratepayers.

Q What does the phrase "uneconomic self-commitment" mean?

A The term uneconomic self-commitment refers to a utility's practice of committing a unit into a wholesale energy market (in this case the PJM market) with a must-run status when the utility knows, or should know, that the unit's revenues from market energy and ancillary service will not be sufficient to cover the unit's variable production costs.

Q What tools does Dominion have to inform its unit-commitment decisions?

A Dominion uses a proprietary software product to determine when to commit a unit. The factors it considers include locational marginal price (LMP) forecasts, unit cost, weather forecast, PJM emergency notifications, length of expected run,

environmental permit limits and requirements, outage scheduling, fuel inventory/ availability, and testing requirements.[56]

The Company manually stores a "daily sheet" of the commitment decisions for its coal units and VCHEC. This includes a profit and loss calculation on both a day-ahead and a 5-day-ahead basis. The Company also documents the reasons for must-run commitment decisions.

Q How did Dominion commit its coal plants during the historical period?

As shown in Confidential Table 7 below, Dominion committed Clover with a must-run status around **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** of the time it was available during the historical period, Mt. Storm around **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** of the time, and VCHEC around **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** of the time. Clover, Mt. Storm, and VCHEC were committed in outage status about **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** of the time, respectively, during the historical period.

56 Company's Response to Sierra Club Discovery Request No. 2-6 (PUR-2025-00059) (enclosed as Exhibit No. DG-19).

Confidential Table 7. Dominion Commitment Decision in Non-Outage Hours

[BEGIN CONFIDENTIAL]

Unit	Must-Run	Economic
Clover 1	[redacted]	[redacted]
Clover 2	[redacted]	[redacted]
Mt. Storm 1	[redacted]	[redacted]
Mt. Storm 2	[redacted]	[redacted]
Mt. Storm 3	[redacted]	[redacted]
VCHEC 1	[redacted]	[redacted]

[END CONFIDENTIAL]

Source: Company's Response to Sierra Club Discovery Request No. 2-1(d), Attachment Sierra Club Set 02-01(b,d,f,h) (WAH) CONF (PUR-2025-00059).

Dominion's low utilization at Mt. Storm is even more concerning given that the Company artificially operated the plant more than was economic through the use of fuel price decrements. Specifically, Dominion utilized a decrement for coal inventory management at Mt. Storm **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]** percent of the time during the historical period.[57] This means that without the use of fuel price decrements—that is, based on the units' actual economics—the plant's utilization would have been even lower.

Q Are you concerned with Dominion's self-commitment of its coal units?

A Yes. It may be reasonable for Dominion to take control of its unit-commitment decisions if the Utility demonstrates that its internal decision-making process

57 Company's Response to Sierra Club Discovery Request No. 2-12, Attachment Sierra Club Set 02-12(b) (WAH) ES (PUR-2025-00059).

consistently produces greater net revenues and a more economic outcome than relying solely on the PJM market. But Dominion has not demonstrated that its internal process to make self-commitment decisions regularly produced more economic results than relying solely on the market.

Q What did you find in reviewing the Company's documentation for its must-run decisions and its daily profit and loss sheets?

A I find that Dominion utilized the must-run commitment status more than it should have and incurred avoidable net losses during at least four different events at the Mt. Storm and Clover plants. I identified these by reviewing the Company's documentation of its must-run decisions,[58] Dominion's single and 5-day profit and loss projections the Company prepared at the time that it made each daily unit-commitment decision,[59] and its actual hourly cost and revenue data.[60]

58 Company's Response to Appalachian Voices Discovery Request No. 2-3, Attachment APV Set 02-03 (WAH) CONF (PUR-2025-00059) (enclosed as Exhibit No. DG-20).

59 Company's Response to Sierra Club Discovery Request No. 3-2, Attachment Sierra Club Set 03-02.1 (WAH) ES SUPP (enclosed as Exhibit No. DG-21) and Attachment Sierra Club Set 03-02.2 (WAH) ES SUPP (PUR-2025-00059) (enclosed as Exhibit No. DG-22).

60 Calculated based on the Company's Response to Sierra Club Discovery Request No. 2-01(f)(j)(l)(n)(p), Attachments Sierra Club Set 02-01(b,d,f,h) (WAH) CONF, Sierra Club Set 02-01(a,j) (WAH) ES, Sierra Club Set 02-01(l–p) (LTG) CONF (PUR-2025-00059); Company's Response to Sierra Club Discovery Request No. 2-12(b), Attachment Sierra Club Set 02-12(b) (WAH) ES (PUR-2025-00059).

This data together tells me (1) the information the Company had at the time it made a unit-commitment decision, (2) the commitment decision it made, (3) the reason it made the decision, and (4) the net impact of that decision.

Q Is it always imprudent for Dominion to commit a unit with a must-run status?

A No. There are legitimate reasons for self-committing a unit as must-run. A unit may be self-committed to avoid a short cycle—*i.e.*, keep a unit from shutting down and starting back up very quickly (within a day). A unit can also be self-committed for testing—either for environmental reasons or after planned or forced outages. At Mt. Storm and Clover, **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** percent, respectively, of the unit's must-run commitments were for testing.[61] But even with testing, the Company should attempt to minimize losses and plan the testing for when the plant is expected to earn net revenues.

Q Did you find specific events where Dominion imprudently committed its units with a must-run status?

A Yes. I found one event at Mt. Storm, three at Clover, and seven at VCHEC where Dominion ignored the results of its own unit-commitment analysis and decided to keep a unit online. This is despite its own single and multi-day profit and loss analysis

61 Company's Response to Sierra Club Discovery Request No. 2-9(a)–(b), Attachment Sierra Club Set 02-09(a, b) (JLS) CONF (PUR-2025-00059). This attachment includes voluminous spreadsheet data. As such, the input sources are not attached as exhibits to this testimony but can be provided to the Commission and properly-authorized parties upon request.

indicating that ratepayers would be better off if the unit shut down. I include a summary of the events below and the resulting net revenues in Extraordinarily Sensitive Table 8 below. Extraordinarily Sensitive Exhibit No. DG-24 contains a more complete description of each event.

[BEGIN EXTRA SENSITIVE]

1. [redacted]

2. [redacted]

3. [redacted]

4. [redacted]

5. [redacted]

[redacted]

[redacted]

[redacted] **[END EXTRA SENSITIVE]**

Extraordinarily Sensitive Table 8. Summary of Coal Plant Uneconomic Must-Run Events

[BEGIN EXTRA SENSITIVE]

Unit	Projected losses	Actual losses	Incremental start-up cost	Net losses
Mt. Storm Total	[redacted]	[redacted]	[redacted]	[redacted]
Clover Total	[redacted]	[redacted]	[redacted]	[redacted]
VCHEC	[redacted]	[redacted]	[redacted]	[redacted]
Grand Total	[redacted]	[redacted]	[redacted]	[redacted]

[END EXTRA SENSITIVE]

Sources: Exhibit Nos. DG-21, DG-22; Company's Response to Sierra Club Discovery Request No. 2-4(a), Attachment Sierra Club Set 02-04(a, b) (WAH) ES SUPP (PUR-2025-00059) (enclosed as Exhibit No. DG-23); see also sources for Confidential Table 5 for actual losses calculations.

Q What are your recommendations regarding the fuel docket?

A I recommend that the Commission disallow from recovery in the fuel factor the **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]** in net losses incurred at Mt. Storm, Clover, and VCHEC during the events outlined below on the basis that these losses were imprudent and completely avoidable based on the information that the Company had at the time it made its commitment decisions. Further, I recommend that the Commission require Dominion, as part of its fuel factor filing, to provide the documentation for the reasons for its must-run commitment decisions at each coal plant, as well as the single-day and 5-day profit and loss projections.

Q Does this conclude your testimony?

A Yes.

INDEX OF EXHIBITS

No.	Description	Status
DG-1	Resume of Devi Glick	Public
DG-2	Company's Response to Sierra Club Discovery Request No. 2-5, Attachment Sierra Club Set 02-05(i, j, m) (BKC)	Public
DG-3	Company's Response to Sierra Club Discovery Request No. 2-8(a), Attachment Sierra Club Set 02-08(a) (BKC)	Public
DG-4	Company's Response to Sierra Club Discovery Request No. 2-3(c), Attachment Sierra Club Set 02-03(c) (SG) CONF	CONFIDENTIAL
DG-5	Company's Response to Sierra Club Discovery Request No. 2-4(e), (m) Attachment Sierra Club Set 02-04(a–e, m) (LTG) CONF	CONFIDENTIAL
DG-6	Company's Response to Sierra Club Discovery Request No. 2-5, Attachment Sierra Club Set 02-05(a–k)	Public
DG-7	Company's Response to Sierra Club Discovery Request No. 2-4(l), Attachment Sierra Club Set 02-04(l) Revised (CAN)	Public
DG-8	Company's Response to Sierra Club Discovery Request No. 2-4(j)–(k), (o) Attachment Sierra Club Set 02-04(j, k, o) (BKC)	Public
DG-9	Company's Response to Consumer Counsel Request No. 1-10, Attachment AG Set 01-10 (JLM)	Public
DG-10	Company's Response to Sierra Club Discovery Request No. 9-2	Public
DG-11	Company's Response to Sierra Club Discovery Request No. 2-5(m)	Public
DG-12	Company's Response to Sierra Club Discovery Request No. 2-1(g), Attachment Sierra Club Set 02-01(g) (KEF)	Public
DG-13	Company's Response to Sierra Club Discovery Request No. 12-1(b)	Public
DG-14	Company's Response to Sierra Club Discovery Request No. 4-4(a)–(c)	Public
DG-15	Company's Response to Sierra Club Discovery Request No. 2-1(j), (h)	Public
DG-16	Company's Response to Appalachian Voices Discovery Request No. 2-6(b)	Public
DG-17	Company's Response to Sierra Club Discovery Request No. 4-1(b)	Public
DG-18	Company's Response to Appalachian Voices Discovery Request No. 4-6	Public
DG-19	Company's Response to Sierra Club Discovery Request No. 2-6	Public
DG-20	Company's Response to Appalachian Voices Discovery Request No. 2-3, Attachment APV Set 02-03 (WAH) CONF	CONFIDENTIAL

DG-21	**Company's Response to Sierra Club Discovery Request No. 3-2, Attachment Sierra Club Set 03-02.1 (WAH) ES SUPP**	**EXTRA SENSITIVE**
DG-22	**Company's Response to Sierra Club Discovery Request No. 3-2, Attachment Sierra Club Set 03-02.2 (WAH) ES SUPP**	**EXTRA SENSITIVE**
DG-23	**Company's Response to Sierra Club Discovery Request No. 2-4(a), Attachment Sierra Club Set 02-04(a,b) (WAH) ES**	**EXTRA SENSITIVE**
DG-24	**Detail of Uneconomic Must-Run Events**	**EXTRA SENSITIVE**

EXHIBIT DG-1

Resume of Devi Glick

Devi Glick, Senior Principal

Synapse Energy Economics I 485 Massachusetts Avenue, Suite 3 I Cambridge, MA 02139 I 617-453-7050
dglick@synapse-energy.com

PROFESSIONAL EXPERIENCE

Synapse Energy Economics Inc., Cambridge, MA. *Senior Principal*, May 2022 – Present; *Principal Associate*, June 2021 – May 2022; *Senior Associate*, April 2019 – June 2021; *Associate*, January 2018 – March 2019.

Conducts research and provides expert witness and consulting services on energy sector issues. Examples include:

- Modeling for resource planning using PLEXOS and Encompass utility planning software to evaluate the reasonableness of utility IRP modeling.
- Modeling for resource planning to explore alternative, lower-cost and lower-emission resource portfolio options.
- Providing expert testimony in rate cases on the prudence of continued investment in, and operation of, coal plants based on the economics of plant operations relative to market prices and alternative resource costs.
- Providing expert testimony and analysis on the reasonableness of utility coal plant commitment and dispatch practice in fuel and power cost adjustment dockets.
- Serving as an expert witness on avoided cost of distributed solar PV and submitting direct and surrebuttal testimony regarding the appropriate calculation of benefit categories associated with the value of solar calculations.
- Reviewing and assessing the reasonableness of methodologies and assumptions relied on in utility IRPs and other long-term planning documents for expert report, public comments, and expert testimony.
- Evaluating utility long-term resource plans and developing alternative clean energy portfolios for expert reports.
- Co-authoring public comments on the adequacy of utility coal ash disposal plans, and federal coal ash disposal rules and amendments.
- Analyzing system-level cost impacts of energy efficiency at the state and national level.

Rocky Mountain Institute, Basalt, CO. August 2012 – September 2017
Senior Associate

- Led technical analysis, modeling, training and capacity building work for utilities and governments in Sub-Saharan Africa around integrated resource planning for the central electricity grid energy. Identified over one billion dollars in savings based on improved resource-planning processes.

- Represented RMI as a content expert and presented materials on electricity pricing and rate design at conferences and events.
- Led a project to research and evaluate utility resource planning and spending processes, focusing specifically on integrated resource planning, to highlight systematic overspending on conventional resources and underinvestment and underutilization of distributed energy resources as a least-cost alternative.

Associate

- Led modeling analysis in collaboration with NextGen Climate America which identified a CO2 loophole in the Clean Power Plan of 250 million tons, or 41 percent of EPA projected abatement. Analysis was submitted as an official federal comment which led to a modification to address the loophole in the final rule.
- Led financial and economic modeling in collaboration with a major U.S. utility to quantify the impact that solar PV would have on their sales and helped identify alternative business models which would allow them to recapture a significant portion of this at-risk value.
- Supported the planning, content development, facilitation, and execution of numerous events and workshops with participants from across the electricity sector for RMI's Electricity Innovation Lab (eLab) initiative.
- Co-authored two studies reviewing valuation methodologies for solar PV and laying out new principles and recommendations around pricing and rate design for a distributed energy future in the United States. These studies have been highly cited by the industry and submitted as evidence in numerous Public Utility Commission rate cases.

The University of Michigan, Ann Arbor, MI. *Graduate Student Instructor*, September 2011 – July 2012

The Virginia Sea Grant at the Virginia Institute of Marine Science, Gloucester Point, VA. *Policy Intern*, Summer 2011

Managed a communication network analysis study of coastal resource management stakeholders on the Eastern Shore of the Delmarva Peninsula.

The Commission for Environmental Cooperation (NAFTA), Montreal, QC. *Short Term Educational Program/Intern*, Summer 2010

Researched energy and climate issues relevant to the NAFTA parties to assist the executive director in conducting a GAP analysis of emission monitoring, reporting, and verification systems in North America.

Congressman Tom Allen, Portland, ME. *Technology Systems and Outreach Coordinator*, August 2007 – December 2008

Directed Congressman Allen's technology operation, responded to constituent requests, and represented the Congressman at events throughout southern Maine.

EDUCATION

The University of Michigan, Ann Arbor, MI
Master of Public Policy, Gerald R. Ford School of Public Policy, 2012
Master of Science, School of Natural Resources and the Environment, 2012
Masters Project: *Climate Change Adaptation Planning in U.S. Cities*

Middlebury College, Middlebury, VT
Bachelor of Arts, 2007
Environmental Studies, Policy Focus; Minor in Spanish
Thesis: *Environmental Security in a Changing National Security Environment: Reconciling Divergent Policy Interests, Cold War to Present*

PUBLICATIONS

Glick, D., T. Gyalmo, D. Karabakal, L. Metz, C. Resor. 2024. *Review of Tennessee Valley Authority's Draft 2025 Integrated Resource Plan.* Synapse Energy Economics for Sierra Club.

Biewald, B., D. Glick, S. Kwok, K. Takahashi, J. Carvallo, L. Schwartz. 2024. *Best Practices in Integrated Resource Planning: A guide for planners developing the electricity resource mix of the future.* Synapse Energy Economics and Lawrence Berkeley National Laboratory for The Energy Foundation.

Kwok, S., D. Glick, R. Anderson, T. Gyalmo. 2023. *Review of Southwestern Public Service Company 2023 Integrated Resource Plan*. Synapse Energy Economics for Sierra Club.

Kwok, S., J. Smith, D. Glick. 2023. *Review of Cleco Power's 2021 IRP Report.* Synapse Energy Economics for Sierra Club.

Addleton, I., D. Glick, R. Wilson. 2021. *Georgia Power's Uneconomic Coal Practices Cost Customers Millions*. Synapse Energy Economics for Sierra Club.

Glick, D., P. Eash-Gates, J. Hall, A. Takasugi. 2021. *A Clean Energy Future for MidAmerican and Iowa.* Synapse Energy Economics for Sierra Club, Iowa Environmental Council, and the Environmental Law and Policy Center.

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Eash-Gates, P., D. Glick, S. Kwok. R. Wilson. 2020. *Orlando's Renewable Energy Future: The Path to 100 Percent Renewable Energy by 2020.* Synapse Energy Economics for the First 50 Coalition.

Eash-Gates, P., B. Fagan, D. Glick. 2020. *Alternatives to the Surry-Skiffes Creek 500 kV Transmission Line.* Synapse Energy Economics for the National Parks Conservation Association.

Biewald, B., D. Glick, J. Hall, C. Odom, C. Roberto, R. Wilson. 2020. *Investing in Failure: How Large Power Companies are Undermining their Decarbonization Targets.* Synapse Energy Economics for Climate Majority Project.

Glick, D., D. Bhandari, C. Roberto, T. Woolf. 2020. *Review of benefit-cost analysis for the EPA's proposed revisions to the 2015 Steam Electric Effluent Limitations Guidelines.* Synapse Energy Economics for Earthjustice and Environmental Integrity Project.

Glick, D., J. Frost, B. Biewald. 2020. *The Benefits of an All-Source RFP in Duke Energy Indiana's 2021 IRP Process.* Synapse Energy Economics for Energy Matters Community Coalition.

Camp, E., B. Fagan, J. Frost, N. Garner, D. Glick, A. Hopkins, A. Napoleon, K. Takahashi, D. White, M. Whited, R. Wilson. 2019. *Phase 2 Report on Muskrat Falls Project Rate Mitigation, Revision 1 – September 25, 2019.* Synapse Energy Economics for the Board of Commissioners of Public Utilities, Province of Newfoundland and Labrador.

Camp, E., A. Hopkins, D. Bhandari, N. Garner, A. Allison, N. Peluso, B. Havumaki, D. Glick. 2019. *The Future of Energy Storage in Colorado: Opportunities, Barriers, Analysis, and Policy Recommendations.* Synapse Energy Office for the Colorado Energy Office.

Glick, D., B. Fagan, J. Frost, D. White. 2019. *Big Bend Analysis: Cleaner, Lower-Cost Alternatives to TECO's Billion-Dollar Gas Project*. Synapse Energy Economics for Sierra Club.

Glick, D., F. Ackerman, J. Frost. 2019. *Assessment of Duke Energy's Coal Ash Basin Closure Options Analysis in North Carolina.* Synapse Energy Economics for the Southern Environmental Law Center.

Glick, D., N. Peluso, R. Fagan. 2019. *San Juan Replacement Study: An alternative clean energy resource portfolio to meet Public Service Company of New Mexico's energy, capacity, and flexibility needs after the retirement of the San Juan Generating Station*. Synapse Energy Economics for Sierra Club.

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Knight, P., E. Camp, D. Glick, M. Chang. 2018. *Analysis of the Avoided Costs of Compliance of the Massachusetts Global Warming Solutions Act*. Supplement to 2018 AESC Study. Synapse Energy Economics for Massachusetts Department of Energy Resources and Massachusetts Department of Environmental Protection.

Fagan, B., R. Wilson, S. Fields, D. Glick, D. White. 2018. *Nova Scotia Power Inc. Thermal Generation Utilization and Optimization: Economic Analysis of Retention of Fossil-Fueled Thermal Fleet to and Beyond 2030 – M08059*. Prepared for Board Counsel to the Nova Scotia Utility Review Board.

Ackerman, F., D. Glick, T. Vitolo. 2018. *Report on CCR proposed rule*. Prepared for Earthjustice.

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Iowa Utilities Commission (Docket RPU-2025-0001): Direct Testimony of Devi Glick in MidAmerican Energy Company Application for a Determination of Ratemaking Principles. On behalf of the Environmental Intervenors. April 11, 2025.

Louisiana Public Service Commission (Docket No. U-37425): Direct Testimony of Devi Glick in the Application of Entergy Louisiana, LLC. for approval of generation and transmission resources proposed in connection with services to a significant customer project in north Louisiana, including proposed rider, and request for timely treatment. On behalf of Sierra Club. April 11, 2025.

Michigan Public Service Commission (Case No. U-21262): Direct Testimony of Devi Glick in the matter of the Application of Indiana Michigan Power Company for approval of a Power Supply Cost Recovery Plan and Factors (2025). On behalf of Attorney General Dana Nessel, Citizens Utility Boad of Michigan, and Sierra Club. March 4, 2025.

Virginia State Corporation Commission (Case No. PUR-2024-00184): Direct Testimony of Devi Glick in re: Virginia Electric and Power Company's 2024 Integrated Resource Plan filing pursuant to Virginia Code to §56-597 *et seq.* On behalf of Sierra Club and NRDC. February 28, 2025.

Michigan Public Service Commission (Case No. U-21262): Direct Testimony of Devi Glick in the matter of the Application of Indiana Michigan Power Company for a Power Supply Cost Recovery Reconciliation proceeding for the 12-month period ended December 31, 2023. On behalf of the Michigan Attorney General, Sierra Club, and Citizens Utility Board of Michigan. October 16, 2024.

State of Vermont Public Utility Commission (Case No. 24-2945-PET): Direct testimony of Devi Glick in Petition of VT Real Estate Holdings 2 LLC ("Fair Haven Solar") for a Certificate of Public Good, pursuant to 30 V.S.A. § 248, authorizing the installation and operation of a 20 MW solar electric generation facility off Airport Road in Fair Haven, Vermont to be known as the "Fair Haven Solar Project". On behalf of VT Real Estate Holdings 2 LLC. September 17, 2024

Public Service Commission of South Carolina (Docket No. 2024-203-E): Direct Testimony of Devi Glick in Application of Kingstree East 230 for a certificate of environmental compatibility and public convenience and necessity for the construction and operation of a 249 MW AC solar and battery facility in Williamsburg County, South Carolina Pursuant to S.C.Code Ann. § 58-33-10 et. Seq., and request to proceed with initial construction work, S.C. Code Ann. § 58-33-110(7). On behalf of Kingstree East 230 LLC. August 9, 2024.

Indiana Utility Regulatory Commission (Cause No. 46038): Direct Testimony of Devi Glick in Petition of Duke Energy Indiana, LLC Pursuant to Indiana code §§ 8-1-2-42.7 and 8-1-2-61, for authority to modify its rate and changes. On behalf of Citizens Action Coalition of Indiana, Inc. July 11, 2024.

State of Vermont Public Utility Commission (Case No. 23-1447-PET): Rebuttal testimony of Devi Glick in the Petition of VT Real Estate Holdings 1 LLC for a Certificate of Public Good, pursuant to 30 V.S.A. § 248, for a 20 MW ground-mounted solar array in Shaftsbury, Vermont. On behalf of VT Real Estate Holdings 1 LLC ("Shaftsbury Solar"). Revised June 27, 2024.

State of Vermont Public Utility Commission (Case No. 23-1447-PET): Direct testimony of Devi Glick in the Petition of VT Real Estate Holdings 1 LLC ("Shaftsbury Solar") for a Certificate of Public Good, pursuant to 30 V.S.A. § 248, authorizing the installation and operation of a 20 MW solar electric generation facility off Holy Smoke Road in Shaftsbury, Vermont to be known as the "Shaftsbury Solar Project". On behalf of VT Real Estate Holdings 1 LLC ("Shaftsbury Solar"). Revised June 27, 2024.

Iowa Utilities Board (RPU-2023-002): Supplemental Testimony of Devi Glick in re: Interstate Power and Light Company, Proposed Rate Increase. On behalf of Environmental Intervenors. June 21, 2024.

Florida Public Service Commission (Docket No. 20240026-EI): Direct testimony of Devi Glick in petition for rate increase by Tampa Electric Company. On behalf of Sierra Club. June 6, 2024.

Iowa Utilities Board (RPU-2023-0002): Surrebuttal Testimony of Devi Glick in re: Interstate Power and Light Company, Proposed Rate Increase. On behalf of Environmental Intervenors. June 3, 2024.

Iowa Utilities Board (RPU-2023-0002): Direct Testimony of Devi Glick in re: Interstate Power and Light Company, Proposed Rate Increase. On behalf of Environmental Intervenors. April 16, 2024.

Michigan Public Service Commission (Case No. U-21051): Direct Testimony of Devi Glick in the Matter of the application of DTE Electric Company for reconciliation of its power supply cost recovery plan (Case No. U-21050) for the 12 months ended December 31, 2022. On behalf of Michigan Environmental Council. March 8, 2024.

Michigan Public Service Commission (Case No. U-21427): Direct Testimony of Devi Glick in the matter of the Application of Indiana Michigan Power Company for approval of a Power Supply Cost Recovery plan and factors (2024). On behalf of Sierra Club and Citizens Utility Board of Michigan. March 4, 2024.

Georgia Public Service Commission (Docket No. 55378): Direct Testimony of Devi Glick and Lucy Metz in Re: Georgia Power Company's 2023 Integrated Resource Plan Update. On behalf of Sierra Club. February 15, 2024.

Louisiana Public Service Commission (Docket No. U-36923): Direct Testimony of Devi Glick in the Application of Cleco Power LLC for: (1) Implementation of changes in rates to be effective July 1, 2024; and (2) extension of existing formula rate plan. On behalf of Sierra Club. February 5, 2024.

Public Service Commission of South Carolina (Docket No. 2023-154-E): Supplemental Testimony of Devi Glick in re: 2023 Integrated Resource Plan for the South Carolina Public Service Authority. On behalf of Sierra Club. January 29, 2024.

Public Service Commission of South Carolina (Docket No. 2023-154-E): Surrebuttal Testimony of Devi Glick in re: 2023 Integrated Resource Plan for the South Carolina Public Service Authority. On behalf of Sierra Club. November 17, 2023.

Public Utilities Commission of Ohio (Case No. 21-477-EL-RDR): Direct Testimony of Devi Glick in the Matter of the OVEC Generation Purchase Rider Audits Required by 4928.148 for Duke Energy Ohio, Inc. the Dayton Power and Light Company, and AEP Ohio. On behalf of Union of Concerned Scientists and the Citizens Utility Board. October 10, 2023.

Public Service Commission of South Carolina (Docket No. 2023-154-E): Direct Testimony of Devi Glick in re: 2023 Integrated Resource Plan for the South Carolina Public Service Authority. On behalf of Sierra Club. September 22, 2023.

Public Utilities Commission of Ohio (Case No. 20-165-EL-RDR): Direct Testimony of Devi Glick in the matter of the review of the Reconciliation Rider of the Dayton Power and Light Company. On behalf of Office of the Ohio Consumers' Counsel. September 12, 2023.

Virginia State Corporation Commission (Case No. PUR-2023-00066): Direct Testimony of Devi Glick in re: Virginia Electric and Power Company's 2023 Integrated Resource Plan filing pursuant to Virginia Code to §56-597 *et seq.* On behalf of Sierra Club. August 8, 2023.

Public Utility Commission of Texas (PUC Docket No. 54634): Direct Testimony of Devi Glick in the application of Southwestern Public Service Company for authority to change rates. On behalf of Sierra Club. August 4, 2023

Arizona Corporation Commission (Docket No. E-1345A-22-0144): Surrebuttal Testimony of Devi Glick in the matter of the application of Arizona Public Service Company for a hearing to determine the fair value of the utility property of the company for ratemaking purposes, to fix a just and reasonable rate of return thereon, and to approve rate schedules designed to develop such return. On Behalf of Sierra Club. July 26, 2023.

Arizona Corporation Commission (Docket No. E-01345A-22-0144): Direct Testimony of Devi Glick in the matter of the application of Arizona Public Service Company for a hearing to determine the fair value of the utility property of the company for ratemaking purposes, to fix a just and reasonable rate of return thereon, and to approve rate schedules designed to develop such return. On Behalf of Sierra Club. June 5, 2023.

Virginia State Corporation Commission (Case No. PUR-2023-00005): Direct Testimony of Devi Glick in the Petition of Virginia Electric & Power Company for revision of rate adjustment clause, Rider E, for the recovery of costs incurred to comply with state and federal environmental regulations pursuant to §56-585.1 A 5 e of the Code of Virginia. On behalf of Sierra Club. May 23, 2023.

New Mexico Public Regulation Commission (Case No, 22-00286-UT): Direct Testimony of Devi Glick in the matter of Southwestern Public Service Company's application for: (1) Revisions of its retail rates under advance no. 312; (2) Authority to abandon the Plant X Unit 1, Plant X Unit 2, and Cunningham Unit 1 Generating Stations and amend the abandonment date of the Tolk Generating Station; and (3) other associated relief. On behalf of Sierra Club. April 21, 2023.

Michigan Public Service Commission (Case No. U-20805): Direct Testimony of Devi Glick in the matter of the Application of Indiana Michigan Power Company for a Power Supply Cost Recovery Reconciliation proceeding for the 12-month period ended December 31, 2021. On behalf of Michigan Attorney General. April 17, 2023.

Michigan Public Service Commission (Case No. U-21261): Direct Testimony of Devi Glick in the matter of the application of Indiana Michigan Power Company for approval to implement a Power Supply Cost Recovery Plan for the twelve months ending December 31, 2023. On Behalf of Sierra Club. March 23, 2023.

New Mexico Public Regulation Commission (Case No. 19-00099-UT / 19-00348-UT): Direct Testimony of Devi Glick in the matter of El Paso Electric Company's Application for Approval of Long-Term Purchased Power Agreements with Hecate Energy Santa Teresa, LLC, Buena Vista Energy, LLC, and Canutillo Energy Center LLC. On Behalf of New Mexico Office of the Attorney General, January 23, 2023.

Arizona Corporation Commission (Docket No. E-01933A-22-0107): Direct Testimony of Devi Glick in the matter of the application of Tucson Electric Power Company for the establishment of just and reasonable rates and charges designed to realize a reasonable rate of return on the fair value of the properties of Tucson Electric Power Company devoted to its operations throughout the state of Arizona for related approvals. On Behalf of Sierra Club. January 11, 2023.

New Mexico Public Regulation Commission (Case No. 22-00093-UT): Direct Testimony of Devi Glick in the amended application for approval of El Paso Electric Company's 2022 renewable energy act plan pursuant to the renewable energy act and 17.9.572 NMAC, and sixth revised rate no. 38-RPS cost rider. On Behalf of New Mexico Office of the Attorney General, January 9, 2023.

Iowa Utilities Board (Docket No. RPU-2022-0001): Supplemental Direct and Rebuttal Testimony of Devi Glick in MidAmerican Energy Company Application for a Determination of Ratemaking Principles. On behalf of Environmental Intervenors. November 21, 2022.

Public Utility Commission of Texas (PUC Docket No. 53719): Direct Testimony of Devi Glick in the application of Entergy Texas, Inc. for authority to change rates. On behalf of Sierra Club. October 26, 2022.

Virginia State Corporation Commission (Case No. PUR-2022-00051): Direct Testimony of Devi Glick in re: Appalachian Power Company's Integrated Resource Plan filing pursuant to Virginia Code §56-597 *et seq*. On behalf of Sierra Club. September 2, 2022.

Public Service Commission of the State of Missouri (Case No. ER-2022-0129, Case No. ER-2022-0130): Surrebuttal Testimony of Devi Glick in the matter of Every Missouri Metro and Evergy Missouri West request for authority to implement a general rate increase for electric service. On behalf of Sierra Club. August 16, 2022.

Iowa Utilities Board (Docket No. RPU-2022-0001): Direct Testimony of Devi Glick in MidAmerican Energy Company Application for a Determination of Ratemaking Principles. On behalf of Environmental Intervenors. July 29, 2022.

Public Service Commission of the State of Missouri (Case No. ER-2022-0129, Case No. ER-2022-0130): Direct Testimony of Devi Glick in the matter of Every Missouri Metro and Evergy Missouri West request for authority to implement a general rate increase for electric service. On behalf of Sierra Club. June 8, 2022.

Virginia State Corporation Commission (Case No. PUR-2022-00006): Direct Testimony of Devi Glick in the petition of Virginia Electric & Power Company for revision of rate adjustment clause: Rider E, for the recovery of costs incurred to comply with state and federal environmental regulations pursuant to §56-585.1 A 5 e of the Code of Virginia. On behalf of Sierra Club. May 24, 2022.

Oklahoma Corporation Commission (Case No. PUD 202100164): Direct Testimony of Devi Glick in the matter of the application of Oklahoma gas and electric company for an order of the Commission authorizing application to modify its rates, charges, and tariffs for retail electric service in Oklahoma. On behalf of Sierra Club. April 27, 2022.

Public Utility Commission of Texas (PUC Docket No. 52485): Direct Testimony of Devi Glick in the application of Southwestern Public Service Company to amend its certifications of public convenience and necessity to convert Harrington Generation Station from coal to natural gas. On behalf of Sierra Club. March 25, 2022.

Public Utility Commission of Texas (PUC Docket No. 52487): Direct Testimony of Devi Glick in the application of Entergy Texas Inc. to amend its certificate of convenience and necessity to construct Orange County Advanced Power Station. On behalf of Sierra Club. March 18, 2022.

Michigan Public Service Commission (Case No. U-21052): Direct Testimony of Devi Glick in the matter of the application of Indiana Michigan Power Company for approval of a Power Supply Cost Recovery Plan and Factors (2022). On Behalf of Sierra Club. March 9, 2022.

Arkansas Public Service Commission (Docket No. 21-070-U): Surrebuttal Testimony of Devi Glick in the Matter of the Application of Southwestern Electric Power Company for approval of a general change in rate and tariffs. On behalf of Sierra Club. February 17, 2022.

New Mexico Public Regulation Commission (Case No. 21-00200-UT): Direct Testimony of Devi Glick in the Matter of the Southwestern Public Service Company's application to amend its certifications of public convenience and necessity to convert Harrington Generation Station from coal to natural gas. On behalf of Sierra Club. January 14, 2022.

Public Utilities Commission of Ohio (Case No. 18-1004-EL-RDR): Direct Testimony of Devi Glick in the Matter of the Review of the Power Purchase Agreement Rider of Ohio Power Company for 2018 and 2019. On behalf of the Office of the Ohio Consumer's Counsel. December 29, 2021.

Arkansas Public Service Commission (Docket No. 21-070-U): Direct Testimony of Devi Glick in the Matter of the Application of Southwestern Electric Power Company for Approval of a General Change in Rates and Tariffs. On behalf of Sierra Club. December 7, 2021.

Michigan Public Service Commission (Case No. U-20528): Direct Testimony of Devi Glick in the matter of the Application of DTE Electric Company for reconciliation of its power supply cost recovery plan (Case No. U-20527) for the 12-month period ending December 31, 2020. On behalf of Michigan Environmental Council. November 23, 2021.

Public Utilities Commission of Ohio (Case No. 20-167-EL-RDR): Direct Testimony of Devi Glick in the Matter of the Review of the Reconciliation Rider of Duke Energy Ohio, Inc. On behalf of The Office of the Ohio Consumer's Counsel. October 26, 2021.

Public Utilities Commission of Nevada (Docket No. 21-06001): Phase III Direct Testimony of Devi Glick in the joint application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of their 2022-2041 Triennial Intergrade Resource Plan and 2022-2024 Energy Supply Plan. On behalf of Sierra Club and Natural Resource Defense Council. October 6, 2021.

Public Service Commission of South Carolina (Docket No, 2021-3-E): Direct Testimony of Devi Glick in the matter of the annual review of base rates for fuel costs for Duke Energy Carolinas, LLC (for potential increase or decrease in fuel adjustment and gas adjustment). On behalf of the South Carolina Coastal Conservation League and the Southern Alliance for Clean Energy. September 10, 2021.

North Carolina Utilities Commission (Docket No. E-2, Sub 1272): Direct Testimony of Devi Glick in the matter of the application of Duke Energy Progress, LLC pursuant to N.C.G.S § 62-133.2 and commission

R8-5 relating to fuel and fuel-related change adjustments for electric utilities. On behalf of Sierra Club. August 31, 2021.

Michigan Public Service Commission (Docket No. U-20530): Direct Testimony of Devi Glick in the application of Indiana Michigan Power Company for a Power Supply Cost Recovery Reconciliation proceeding for the 12-month period ending December 31, 2020. On behalf of the Michigan Attorney General. August 24, 2021.

Public Utilities Commission of Nevada (Docket No. 21-06001): Phase I Direct Testimony of Devi Glick in the joint application of Nevada Power Company d/b/a NV Energy and Sierra Pacific Power Company d/b/a NV Energy for approval of their 2022-2041 Triennial Intergrade Resource Plan and 2022-2024 Energy Supply Plan. On behalf of Sierra Club and Natural Resource Defense Council. August 16, 2021.

North Carolina Utilities Commission (Docket No. E-7, Sub 1250): Direct Testimony of Devi Glick in the Mater of Application Duke Energy Carolinas, LLC Pursuant to §N.C.G.S 62-133.2 and Commission Rule R8-5 Relating to Fuel and Fuel-Related Charge Adjustments for Electric Utilities. On behalf of Sierra Club. May 17, 2021.

Public Utility Commission of Texas (PUC Docket No. 51415): Direct Testimony of Devi Glick in the application of Southwestern Electric Power Company for authority to change rates. On behalf of Sierra Club. March 31, 2021.

Michigan Public Service Commission (Docket No. U-20804): Direct Testimony of Devi Glick in the application of Indiana Michigan Power Company for approval of a Power Supply Cost Recovery Plan and factors (2021). On behalf of Sierra Club. March 12, 2021.

Public Utility Commission of Texas (PUC Docket No. 50997): Direct Testimony of Devi Glick in the application of Southwestern Electric Power Company for authority to reconcile fuel costs for the period May 1, 2017- December 31, 2019. On behalf of Sierra Club. January 7, 2021.

Michigan Public Service Commission (Docket No. U-20224): Direct Testimony of Devi Glick in the application of Indiana Michigan Power Company for Reconciliation of its Power Supply Cost Recovery Plan. On behalf of the Sierra Club. October 23, 2020.

Public Service Commission of Wisconsin (Docket No. 3270-UR-123): Surrebuttal Testimony of Devi Glick in the application of Madison Gas and Electric Company for authority to change electric and natural gas rates. On behalf of Sierra Club. September 29, 2020.

Public Service Commission of Wisconsin (Docket No. 6680-UR-122): Surrebuttal Testimony of Devi Glick in the application of Wisconsin Power and Light Company for approval to extend electric and natural gas rates into 2021 and for approval of its 2021 fuel cost plan. On behalf of Sierra Club. September 21, 2020.

Public Service Commission of Wisconsin (Docket No. 3270-UR-123): Direct Testimony and Exhibits of Devi Glick in the application of Madison Gas and Electric Company for authority to change electric and natural gas rates. On behalf of Sierra Club. September 18, 2020.

Public Service Commission of Wisconsin (Docket No. 6680-UR-122): Direct Testimony and Exhibits of Devi Glick in the application of Wisconsin Power and Light Company for approval to extend electric and natural gas rates into 2021 and for approval of its 2021 fuel cost plan. On behalf of Sierra Club. September 8, 2020.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC125): Direct Testimony and Exhibits of Devi Glick in the application of Duke Energy Indiana, LLC for approval of a change in its fuel cost adjustment for electric service. On behalf of Sierra Club. September 4, 2020.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC123 S1): Direct Testimony and Exhibits of Devi Glick in the Subdocket for review of Duke Energy Indian, LLC's Generation Unit Commitment Decisions. On behalf of Sierra Club. July 31, 2020.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC124): Direct Testimony and Exhibits of Devi Glick in the application of Duke Energy Indiana, LLC for approval of a change in its fuel cost adjustment for electric service. On behalf of Sierra Club. June 4, 2020.

Arizona Corporation Commission (Docket No. E-01933A-19-0028): Reply to Late-filed ACC Staff Testimony of Devi Glick in the application of Tucson Electric Power Company for the establishment of just and reasonable rates. On behalf of Sierra Club. May 8, 2020.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC123): Direct Testimony and Exhibits of Devi Glick in the application of Duke Energy Indiana, LLC for approval of a change in its fuel cost adjustment for electric service. On behalf of Sierra Club. March 6, 2020.

Public Utility Commission of Texas (PUC Docket No. 49831): Direct Testimony of Devi Glick in the application of Southwestern Public Service Company for authority to change rates. On behalf of Sierra Club. February 10, 2020.

New Mexico Public Regulation Commission (Case No. 19-00170-UT): Testimony of Devi Glick in Support of Uncontested Comprehensive Stipulation. On behalf of Sierra Club. January 21, 2020.

Nova Scotia Utility and Review Board (Matter M09420): Expert Evidence of Fagan, B, D. Glick reviewing Nova Scotia Power's Application for Extra Large Industrial Active Demand Control Tariff for Port Hawkesbury Paper. Prepared for Nova Scotia Utility and Review Board Counsel. December 3, 2019.

New Mexico Public Regulation Commission (Case No. 19-00170-UT): Direct Testimony of Devi Glick regarding Southwestern Public Service Company's application for revision of its retail rates and authorization and approval to shorten the service life and abandon its Tolk generation station units. On behalf of Sierra Club. November 22, 2019.

North Carolina Utilities Commission (Docket No. E-100, Sub 158): Responsive testimony of Devi Glick regarding battery storage and PURPA avoided cost rates. On behalf of Southern Alliance for Clean Energy. July 3, 2019.

State Corporation Commission of Virginia (Case No. PUR-2018-00195): Direct testimony of Devi Glick regarding the economic performance of four of Virginia Electric and Power Company's coal-fired units and the Company's petition to recover costs incurred to company with state and federal environmental regulations. On behalf of Sierra Club. April 23, 2019.

Connecticut Siting Council (Docket No. 470B): Joint testimony of Robert Fagan and Devi Glick regarding NTE Connecticut's application for a Certificate of Environmental Compatibility and Public Need for the Killingly generating facility. On behalf of Not Another Power Plant and Sierra Club. April 11, 2019.

Public Service Commission of South Carolina (Docket No. 2019-2-E): Surrebuttal testimony of Devi Glick in the Annual review of based rates for fuel costs for South Carolina Electric & Gas Company. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. March 29, 2019.

Public Service Commission of South Carolina (Docket No. 2019-2-E): Direct testimony of Devi Glick in the Annual review of based rates for fuel costs for South Carolina Electric & Gas Company. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. March 19, 2019.

Public Service Commission of South Carolina (Docket No. 2018-3-E): Surrebuttal testimony of Devi Glick regarding annual review of base rates of fuel costs for Duke Energy Carolinas. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. August 31, 2018.

Public Service Commission of South Carolina (Docket No. 2018-3-E): Direct testimony of Devi Glick regarding the annual review of base rates of fuel costs for Duke Energy Carolinas. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. August 17, 2018.

Public Service Commission of South Carolina (Docket No. 2018-1-E): Surrebuttal testimony of Devi Glick regarding Duke Energy Progress' net energy metering methodology for valuing distributed energy resources system within South Carolina. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. June 4, 2018.

Public Service Commission of South Carolina (Docket No. 2018-1-E): Direct testimony of Devi Glick regarding Duke Energy Progress' net energy metering methodology for valuing distributed energy resources system within South Carolina. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. May 22, 2018.

Public Service Commission of South Carolina (Docket No. 2018-2-E): Surrebuttal testimony of Devi Glick on avoided cost calculations and the costs and benefits of solar net energy metering for South Carolina Electric and Gas Company. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. April 4, 2018.

Public Service Commission of South Carolina (Docket No. 2018-2-E): Direct testimony of Devi Glick on avoided cost calculations and the costs and benefits of solar net energy metering for South Carolina Electric and Gas Company. On behalf of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy. March 23, 2018.

Resume updated May 2025

EXHIBIT DG-2

Company's Response to Sierra Club Discovery Request No. 2-5,
Attachment Sierra Club Set 02-05(i,j,m) (BKC)

Dominion Energy Virginia - Power Generation

2025 VA Biennial - Sierra Club Set 2-5 (i-j)

2026-2027 Base Rate Fixed O&M Expenditures* - Coal Plants - $ in millions

Project Description	2026	2027
Clover (at Ownership)	$ 11.8	$ 14.0
Mt. Storm	69.2	62.7
VCHEC**	48.6	49.9
Total	$ 129.5	$ 126.6

*Excluding Limestone (Fuel Expense) and Payroll Taxes (Other Taxes).

**2023 includes Rider O&M costs as station shifted from Rider to Base in 2023

2026-2027 Base Rate Variable O&M Expenditures* - Coal Plants - $ in millions

Project Description	2026	2027
Clover (at Ownership)	$ 0.7	$ 0.4
Mt. Storm	9.4	4.8
VCHEC**	7.8	6.4
Total	$ 17.8	$ 11.7

*Excluding Limestone (Fuel Expense).

**2023 includes Rider O&M costs as station shifted from Rider to Base in 2023

Dominion Energy Virginia - Power Generation

2025 VA Biennial - Sierra Club Set 2-5 (n)

2026-2027 Base Rate Capital Expenditures - Coal Plants - $ in millions

Project Description	2026	2027
Clover (at Ownership)	$ 16.9	$ 2.2
Mt. Storm	56.7	79.0
VCHEC**	7.9	22.4
Total	$ 81.5	$ 103.6

**2023 includes Rider O&M costs as station shifted from Rider to Base in 2023

EXHIBIT DG-3

Company's Response to Sierra Club Discovery Request No. 2-8(a), Attachment Sierra Club Set 02-08(a) (BKC)

Dominion Energy Virginia - Power Generation

2025 VA Biennial - Sierra Club Set 2-8 (a)

$ in thousands

Station & Project	2024	2026	2027	2026-2024	2027-2024	Total
Reliabilitiy & Compliance Capital						
Power Generation Base Capital	$173,483	$304,644	$309,349	$131,161	$135,866	$267,027
Mt Storm Capital	$44,371	$56,741	$78,978	$12,370	$34,606	$46,976
Mt Storm percentage	26%	19%	26%	9%	25%	18%

EXHIBIT DG-6

Company's Response to Sierra Club Discovery Request No. 2-5, Attachment Sierra Club Set 02-05(a–k)

Sierra Club Set 2 Q5 (SR)

(a) **Rating (MW)**	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Clover 1	220	220	220	220	220	220	220	220	220	220	220
Clover 2	219	219	219	219	219	219	219	219	219	219	219
Mount Storm 1	542	542	542	542	542	542	542	542	542	542	542
Mount Storm 2	552	552	552	552	552	552	552	552	552	552	552
Mount Storm 3	520	520	520	520	520	520	520	520	520	520	520
Virginia City	610	610	610	610	610	610	610	610	610	610	610

(c) **Generation (GWh)**	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Clover 1	550	683	468	348	262	421	272	160	202	273	259
Clover 2	376	392	372	390	293	464	304	199	240	293	293
Mount Storm 1	2,485	2,454	1,554	1,910	1,603	184	22	4	11	20	73
Mount Storm 2	1,904	2,432	1,604	2,215	1,869	155	52	18	27	45	145
Mount Storm 3	1,540	2,491	1,174	2,452	2,060	274	131	53	81	145	238
Virginia City	2,387	2,622	1,894	2,445	2,091	439	439	440	439	439	439

(d) **Capacity Factor (%)**	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Clover 1	29	35	24	18	14	22	14	8	10	14	13
Clover 2	20	20	19	20	15	24	16	10	13	15	15
Mount Storm 1	52	52	33	40	34	4	0	0	0	0	2
Mount Storm 2	39	50	33	46	39	3	1	0	1	1	3
Mount Storm 3	34	55	26	54	45	6	3	1	2	3	5
Virginia City	45	49	35	46	39	8	8	8	8	8	8

(e) **EAF(%)**	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Clover 1	73	78	70	84	84	84	84	82	82	82	82
Clover 2	80	60	82	87	87	87	87	84	84	84	84
Mount Storm 1	74	65	65	79	79	79	79	79	79	79	79
Mount Storm 2	62	66	61	88	80	80	88	80	80	80	80
Mount Storm 3	54	79	63	90	82	82	90	83	83	83	83
Virginia City	84	84	83	97	97	97	97	88	88	88	88

(f) **Average Heat Rate (BTU/kWh)**	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Clover 1	10,746	10,475	10,562	9,779	9,779	9,779	9,779	9,779	9,779	9,779	9,779
Clover 2	10,983	10,349	10,666	9,596	9,596	9,596	9,596	9,596	9,596	9,596	9,596
Mount Storm 1	10,387	10,277	10,496	10,176	10,176	10,176	10,176	10,176	10,176	10,176	10,176
Mount Storm 2	10,412	10,276	10,386	9,799	9,799	9,799	9,799	9,799	9,799	9,799	9,799
Mount Storm 3	10,700	10,614	10,775	9,654	9,654	9,654	9,654	9,654	9,654	9,654	9,654
Virginia City	10,705	10,489	10,568	10,023	10,023	10,023	10,023	10,023	10,023	10,023	10,023

(g) **Forced Outage Rate (%)**	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
Clover 1	4	4	4	4	4	4	4	4	4	4	4
Clover 2	2	2	2	2	2	2	2	2	2	2	2
Mount Storm 1	6	6	6	6	6	6	6	6	6	6	6
Mount Storm 2	5	5	5	5	5	5	5	5	5	5	5
Mount Storm 3	3	3	3	2	2	2	2	2	2	2	2

	Virginia City	2	2	2	3	3	3	3	3	3	3	3

(j)	**VO&M Cost ($000)**	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
	Clover 1	3,310	4,192	2,934	2,130	1,637	2,682	1,773	1,062	1,369	1,884	1,829
	Clover 2	2,374	2,529	2,446	2,515	1,930	3,118	2,084	1,389	1,712	2,132	2,175
	Mount Storm 1	14,833	14,944	9,652	14,201	12,165	1,423	171	36	88	164	626
	Mount Storm 2	13,610	17,737	11,932	17,142	14,762	1,252	427	149	228	397	1,293
	Mount Storm 3	11,901	19,641	9,438	18,659	15,993	2,167	1,059	436	685	1,245	2,089
	Virginia City	30,911	34,635	25,520	29,387	25,641	5,490	5,602	5,732	5,832	5,951	6,072

(k)	**Unit Fuel Cost ($000)**	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
	Clover 1	34,440	34,149	21,798	13,639	10,452	19,871	14,066	8,803	11,248	15,197	14,789
	Clover 2	24,078	19,548	17,481	15,009	11,481	21,506	15,358	10,763	13,216	16,027	16,352
	Mount Storm 1	90,761	77,583	50,988	14,201	12,165	1,423	171	36	88	164	626
	Mount Storm 2	70,595	76,962	51,821	69,153	59,463	8,363	3,077	1,109	1,688	2,895	9,352
	Mount Storm 3	57,081	81,386	39,466	75,423	64,553	14,207	7,360	3,178	4,822	8,645	14,800
	Virginia City	100,443	104,908	63,142	76,073	66,306	22,804	24,895	26,209	26,110	26,338	27,205

EXHIBIT DG-7

Company's Response to Sierra Club Discovery Request No. 2-4(l), Attachment Sierra Club Set 02-04(l) Revised (CAN)

Sum of Amount in local cur.	Column Labels						
Row Labels	2020	2021	2022	2023	2024	2025	Grand Total
Chesterfield	**68,216,656**	**31,187,361**	**44,570,856**	**16,913,235**	**187,307**	**3,845,228**	**164,920,642**
Coal	63,596,653	27,693,010	37,250,041	15,447,047			143,986,750
Ign Oil	4,620,003	3,494,351	7,320,814	1,466,188	187,307	3,845,228	20,933,892
Clover	**21,284,957**	**13,317,666**	**13,445,306**	**17,643,401**	**32,367,028**	**15,588,293**	**113,646,651**
Coal	36,426,381	27,477,948	25,548,123	30,923,487	62,801,840	30,497,905	213,675,684
Coal (ODEC)	(15,741,324)	(14,542,094)	(12,464,976)	(13,308,945)	(31,400,920)	(15,249,582)	(102,707,840)
Ign Oil	1,204,890	763,624	724,318	698,956	2,001,104	432,568	5,825,459
Ign Oil (ODEC)	(604,990)	(381,812)	(362,159)	(670,098)	(1,034,996)	(92,598)	(3,146,652)
Mt Storm	**148,032,947**	**148,616,969**	**136,114,975**	**143,191,452**	**171,341,723**	**52,448,339**	**799,746,404**
Coal	144,176,906	144,251,257	130,349,354	137,085,839	165,770,312	50,941,854	772,575,522
Ign Oil	3,856,041	4,365,712	5,765,620	6,105,613	5,571,411	1,506,485	27,170,882
VCHEC	**28,976,476**	**25,267,228**	**41,341,303**	**33,444,399**	**45,681,388**	**21,022,234**	**195,733,029**
Coal	21,559,100	20,514,207	34,311,001	27,690,161	38,413,572	18,991,885	161,479,926
Ign Oil	910,473	1,057,594	2,385,668	1,851,487	2,520,103	738,370	9,463,695
Wood	6,506,903	3,695,428	4,644,634	3,902,751	4,747,713	1,291,979	24,789,409
Grand Total	**266,511,036**	**218,389,224**	**235,472,440**	**211,192,487**	**249,577,445**	**92,904,094**	**1,274,046,727**

EXHIBIT DG-8

Company's Response to Sierra Club Discovery Request No. 2-4(j)–(k), (o)
Attachment Sierra Club Set 02-04(j, k, o) (BKC)

Dominion Energy Virginia - Power Generation

2025 VA Biennial - Sierra Club Set 2-4 (j-k)

2020-2025 Base Rate Fixed O&M Expenditures* - Coal Plants - $ in millions

Project Description	2020	2021	2022	2023	2024	2025
Clover (at Ownership)	$ 11.0	$ 8.4	$ 8.5	$ 9.6	$ 16.9	$ 11.0
Mt. Storm	44.3	49.4	48.0	57.5	61.3	53.6
VCHEC**	40.9	40.0	45.1	44.6	39.8	42.0
Total	$ 96.1	$ 97.8	$ 101.6	$ 111.8	$ 118.1	$ 106.5

*Excluding Limestone (Fuel Expense) and Payroll Taxes (Other Taxes). Also excludes Chesterfield Units 5/6 as those units were retired in May 2023.

**2023 includes Rider O&M costs as station shifted from Rider to Base in 2023

2020-2025 Base Rate Variable O&M Expenditures* - Coal Plants - $ in millions

Project Description	2020	2021	2022	2023	2024	2025
Clover (at Ownership)	$ 0.3	$ 0.2	$ 0.2	$ 0.3	$ 0.4	$ 0.6
Mt. Storm	4.0	6.9	8.4	4.9	7.3	9.9
VCHEC**	2.5	3.4	6.3	3.4	4.2	8.7
Total	$ 6.8	$ 10.5	$ 14.9	$ 8.6	$ 12.0	$ 19.2

*Excluding Limestone (Fuel Expense). Also excludes Chesterfield Units 5/6 as those units were retired in May 2023.

**2023 includes Rider O&M costs as station shifted from Rider to Base in 2023

Dominion Energy Virginia - Power Generation

2025 VA Biennial - Sierra Club Set 2-4 (o)

2020-2025 Base Rate Capital Expenditures* - Coal Plants - $ in millions

Project Description	2020	2021	2022	2023	2024	2025
Clover (at Ownership)	$2.0	$2.4	($0.0)	$3.4	$7.9	$10.2
Mt. Storm	11.8	13.6	17.8	25.1	44.4	32.7
VCHEC**	9.7	11.0	14.3	7.8	5.5	4.2
Total	$ 23.5	$ 27.1	$ 32.1	$ 36.4	$ 57.8	$ 47.0

*Excluding Chesterfield Units 5/6 as those units were retired in May 2023.

**2023 includes Rider Capital costs as station shifted from Rider to Base in 2023

EXHIBIT DG-9

Company's Response to Consumer Counsel Request No. 1-10, Attachment AG Set 01-10 (JLM)

Attachment AG Set 01-10 (JLM)
includes voluminous spreadsheet data.

As such, the input sources are not attached as exhibits to this testimony but can be provided to the Commission and properly authorized parties upon request.

EXHIBIT DG-10

Company's Response to Sierra Club Discovery Request No. 9-2

Virginia Electric and Power Company
Case No. PUR-2025-00058
Sierra Club
Ninth Set

The following response to Question No. 2 of the Ninth Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on June 25, 2025, was prepared by or under the supervision of:

Jarad L. Morton
Manager, Integrated Strategic Planning
Dominion Energy Services, Inc.

Question No. 2

Refer to Dominion Response's to Sierra Club Request No. 5-2, Attachment Sierra Club Set 05-02 (JLM).

a. Explain why VOM is subtracted from FOM to get total FOM in Attachment 05-02.

b. Explain why different methodologies are used for calculating FOM in the Retirement Analysis relative to the IRP.

c. Explain why the CAPX provided in column E of Attachment 05-02 for 2026 and 2027 is so much larger than the base rate capex in Dominion's Response to Sierra Club Request No. 2-5(n), Attachment Sierra Club 02-05(i,j,n) (BKC).

d. Indicate whether the CAPX provided in column E of Attachment 05-02 for the years 2025-2027 includes environmental capex for compliance with Mercury regulations.

   i. If yes, indicate how much of the total CAPX is attributed to environmental compliance by year.
   ii. Does Dominion still plan to incur those costs in the years 2025-2027 or has the Company updated its compliance schedule?
   iii. Provide an updated schedule for capex spending that reflects current compliance plans.
   iv. Has Dominion received approval to install controls necessary to comply? If no, when does the Company plan to see approval?

Response:

a. VOM is subtracted from FOM so the retirement analysis fixed cost matches the station's budget.

b. The retirement analysis FOM is meant to align with station budgets, and the IRP methodology applies the 80/20 methodology to allow more O&M flexibility resulting from dispatch.

c. Please refer to the Company's response to Sierra Club Set 05-02(d).

d. Yes. This attachment shows the modeling assumptions associated with compliance with MATS regulations:

   i. $1.5B compliance cost is allocated to the three Mt. Storm coal units and spread across 2025-2027.

   ii-iv. The Company continues to evaluate its environmental obligations associated with federal requirements and compliance options.

EXHIBIT DG-11

Company's Response to Sierra Club Discovery Request No. 2-5(m)

Virginia Electric and Power Company
Case No. PUR-2025-00058
Sierra Club
Second Set

The following response to Question No. 5 of the Second Set of Interrogatories and Requests for Production of Documents propounded by Virginia State Corporation Commission Staff received on May 19, 2025, was prepared by or under the supervision of:

Sydney Robinson (subparts a-k)
Energy Market Strategic Advisor
Dominion Energy Services, Inc.

B. Kyle Cosby (subparts i, j, & n)
Manager – Financial & Business Services
Dominion Energy Services, Inc.

Brian M. Keefer (for subparts l and m)
Manager Power Contracts and Origination
Virginia Electric and Power Company

As it pertains to legal matters, the following response to Question No. 5 of the Second Set of Interrogatories and Requests for Production of Documents propounded by Virginia State Corporation Commission Staff received on May 19, 2025, was prepared by or under the supervision of:

Timothy D. Patterson
McGuireWoods LLP

Question No. 5

For each of the Company's coal plants, please provide the following projected data for the years 2025-2035:

a) Installed capacity
b) Unforced capacity
c) Generation (MWh)
d) Capacity factor
e) Equivalent Availability Factor (EAF)
f) Heat rate (average)
g) Forced or random outage rate
h) Effective forced outage rate (EFORd)
i) Fixed O&M costs
j) Non-fuel variable costs

k) Fuel costs (by fuel type)
l) Any energy or capacity market revenue from the energy market, ancillary services market and capacity market.
m) Any energy or capacity market revenue from bilateral deal or market sales.
n) All forecast capital expenditures (including environmental projects) by year,
o) If these categories do not comprise all costs associated with these units, please explain and quantify the other costs of the units by year.

Response:

The Company objects to this request as overly broad, unduly burdensome, and potentially voluminous. Notwithstanding and subject to this objection, the Company provides the following response:

For subparts a-k, please see Attachment Sierra Club 02-05(a-k) (SR) for the information that is used in the requested forecast.

For subparts, i, j, and n, please see Attachment Sierra Club 02-05(i,j,n) (BKC) for data through 2026 and 2027.

In response to subpart l, the Company does not project the requested information.

In response to subpart m, the Company does not project the requested information.

In response to subpart o, to the best of the Company's knowledge the categories of expenses in subparts a through n represent the costs associated with the Company's coal plants.

EXHIBIT DG-12

Company's Response to Sierra Club Discovery Request No. 2-1(g), Attachment Sierra Club Set 02-01(g) (KEF)

Sierra Club Set 2 Q 1 (g)

	2024										2025				
$/MWh	**MAR**	**APR**	**MAY**	**JUNE**	**JULY**	**AUGUST**	**SEPT**	**OCT**	**NOV**	**DEC**	**JAN**	**FEB**	**MAR**	**APR**	
Clover 1	79.29	74.52	-	71.93	72.71	72.26	99.17	65.89	-	69.88	65.47	-	75.32	-	
Clover 2	79.29	74.52	100.29	71.93	72.71	72.26	-	-	376.54	69.88	65.47	68.75	75.32	-	
Mt. Storm 1	-	53.60	40.55	41.37	41.76	42.41	37.65	-	46.25	41.67	39.64	40.79	39.48	41.51	
Mt. Storm 2	-	53.60	40.55	41.37	41.76	42.41	37.65	-	-	41.67	39.64	40.79	39.48	41.51	
Mt. Storm 3	38.18	-	40.55	41.37	41.76	42.41	37.65	-	46.25	41.67	39.64	-	-	-	
VCHEC- Coal	-	40.28	42.63	41.69	42.07	46.81	42.35	40.48	71.17	40.23	45.84	45.24	48.48	-	
VCHEC- Wood	-	42.46	80.77	44.15	50.56	44.25	45.20	50.35	48.25	43.75	43.41	51.45	26.74	-	

Note- Accounting costs are available on a monthly basis

EXHIBIT DG-13

Company's Response to Sierra Club Discovery Request No. 12-1(b)

Virginia Electric and Power Company
Case No. PUR-2025-00058
Sierra Club
Twelfth Set

The following response to Question No. 1 of the Twelfth Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on July 7, 2025, was prepared by or under the supervision of:

Richard A. DeJarnette
Accounting Manager
Dominion Energy Services, Inc.

Question No. 1

Refer to Dominion's Response to Sierra Club Request No. 2-4(l), Attachment Sierra Club Set 02-04(l) Revised (CAN).xlsx.

a. Explain how the fuel costs were calculated and what they represent.

b. Indicate whether the fuel costs are the same as the accounting fuel costs provided in Dominion's Response to Sierra Club Request No. 2.1(g), Attachment Sierra Club Set 02-01(g) (KEF) in PUR-2025-00059.

i. If not, explain why they are different.

Response:

a. Fuel costs are calculated based on total eligible costs of fuel used in the generation of electricity under the Virginia State Corporation Commission's Definitional Framework of Fuel Expenses for Virginia Electric and Power Company (the "Definitional Framework").

b. Yes, the fuel costs are the same.

EXHIBIT DG-14

Company's Response to Sierra Club Discovery Request No. 4-4(a)–(c)

Virginia Electric and Power Company
Case No. PUR-2025-00059
Sierra Club
Fourth Set

The following response to Question No. 4 of the Fourth Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on June 20, 2025, was prepared by or under the supervision of:

Wesley A. Hudson
Manager – Electric Market Operations
Virginia Electric and Power Company

Question No. 4

Refer to Dominion's Response to Sierra Club Request No. 2-01, Attachment Sierra Club Set 02-01(a,j) (WAH) ES.

a. Explain what the Variable production cost represents.

b. Explain how Variable Production cost is calculated and what is included in it.

c. Is marginal fuel cost as provided in 02-01(h) included in the variable production cost?

d. Provide the offer prices for all generation levels, not just the economic Max.

e. Explain how the offer price is created based on variable production cost, fuel cost, and other factors.

f. Indicate whether the offer price represents the bid price.

g. Does Dominion ever bid a unit into the market at a price below its variable production cost?

Response:

a. The marginal variable cost of production ($/MWh) is the Real-Time Dispatch Rate ($/MWh) in tab "j." of Attachment Sierra Club Set 02-01(a,j) (WAH) ES. This rate is the cost of generation ($/MWh) for that applicable station at that net generation (MWh) value.

b. The marginal variable production cost is calculated by multiplying the unit's heat rate by the total fuel related costs by the performance factor. The resulting value is then divided by the net MW generated in the hour. Variable Operating and Maintenance costs

($/MWh), Renewable Energy Credits ($/MWh), and Production Tax Credits ($/MWh) are then added to the final value.

Total fuel related costs include the unit's fuel costs, emission costs, and any variable operating and maintenance costs in $/mmBTU.

c. Yes.

d. *Response forthcoming, as communicated by counsel.*

e. See the Company's response to Sierra Club 02-06(a) for an explanation of how it makes its unit commitment decisions. The Company creates offer prices based on prevailing PJM business rules. See PJM Manual 15, Sections 2 through 7 and 9 through 12. (https://www.pjm.com/-/media/DotCom/documents/manuals/m15.pdf)

f. Yes.

g. Yes, see the Company's response to Sierra Club 02-06(a) for an explanation of how it makes its unit commitment decisions. Additionally, see the Company's response to subpart (e).

EXHIBIT DG-15

Company's Response to Sierra Club Discovery Request No. 2-1(j), (h)

Virginia Electric and Power Company
Case No. PUR-2025-00059
Sierra Club
Second Set

The following **supplemental** response (dated July 1, 2025) to Question No. 1(a), (b), (d), (f), (h), (j), and (k) of the Second Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on May 19, 2025, was prepared by or under the supervision of:

Wesley A. Hudson
Manager – Electric Market Operations
Virginia Electric and Power Company

Question No. 1

For each of Dominion's coal units, provide the following hourly information for the twelve-month historical period of March 1, 2024 – February 28, 2025. Please also provide any data available for the months in the current period not covered by the historical period (March 1, 2024 – June 30, 2025). Please supplement this response as necessary as data becomes available. If this information is not available at an hourly scale, please explain why not and provide at the most temporally granular scale available.

a. Price ($/MWh) of offers submitted into the PJM energy market.

b. Quantity (MW) of offers submitted into the PJM energy market.

c. For each offer, whether that offer was accepted by PJM.

d. Day-ahead generator commitment offer, including "economic," "must run," "unavailable" or other recorded purpose.

e. Real-time generator commitment status, including "economic," "must-run", "unavailable", or other recorded purpose.

f. Net generation (MWh).

g. Accounting fuel costs ($/MWh).

h. Marginal (variable) fuel costs ($/MWh).

i. Accounting variable costs of production ($/MWh), including fuel, variable O&M, and any other variable operating costs.

j. Marginal variable costs of production ($/MWh), including fuel, variable O&M, and any other variable operating costs.

k. Locational marginal price received ($/MWh).

l. Energy market revenues, including all types of energy market payments such as energy uplift credits and lost opportunity cost credits ($).

m. Ancillary market revenues ($).

n. Congestion revenues ($).

o. Any other revenues received ($)

p. Marginal loss ($).

q. Heat rate (Btu/kWh).

Response:

The Company provides the following response assuming the request intended to refer to a historical period of March 1, 2024 – February 28, 2025 and to a prior period of July 1, 2024 – June 30, 2025.

a. The Company assumes that the price ($/MWh) of offers submitted into the PJM energy market to be the lowest price ($/MWh) offered at economic max. See Attachment Sierra Club Set 02-01(a, j) (WAH) ES.

b. See Attachment Sierra Club Set 02-01(b, d, f, h) (WAH) CONF.

d. See Attachment Sierra Club Set 02-01(b, d, f, h) (WAH) CONF.

f. See Attachment Sierra Club Set 02-01(b, d, f, h) (WAH) CONF.

h. The Company assumes that the marginal (variable) fuel costs ($/MWh) being requested is the daily brokersheet/fuel price ($/Ton/$/mmBTU). The brokersheet/fuel price is updated daily, not hourly. See Attachment Sierra Club Set 02-01(b, d, f, h) (WAH) CONF.

j. The Company assumes that the marginal variable cost of production ($/MWh), including fuel, variable O&M, and any other variable operating costs to be the real-time dispatch rate ($/MWh). The real-time dispatch rate is the dispatch rate without any adders or decrements. See Attachment Sierra Club Set 02-01(a,j) (WAH) ES.

k. Attachment Sierra Club Set 02-01(k) (WAH).

Certain attachments provided in this response contain confidential and/or extraordinarily sensitive information as indicated, and are being provided pursuant to the protections set forth in 5 VAC 5-20-170, the Hearing Examiner's Protective Ruling Including Additional Protective Treatment for Extraordinarily Sensitive Customer Names Information for Combined Cases, dated May 14, 2025, any subsequent protective order or ruling that may be issued for confidential or extraordinarily sensitive information in this proceeding, and the Agreements to Adhere executed pursuant to any such orders or rulings.

Supplemental Response to 02-01(a), (b), (d), (f), (h), (j), and (k) (dated July 1, 2025):

a. See Attachment Sierra Club Set 02-01(a,j) (WAH) ES SUPP.

b. See Attachment Sierra Club Set 02-01(b,d,f,h) (WAH) CONF SUPP.

d. See Attachment Sierra Club Set 02-01(b,d,f,h) (WAH) CONF SUPP.

f. See Attachment Sierra Club Set 02-01(b,d,f,h) (WAH) CONF SUPP.

h. See Attachment Sierra Club Set 02-01(b,d,f,h) (WAH) CONF SUPP.

j. See Attachment Sierra Club Set 02-01(a,j) (WAH) ES SUPP.

k. See Attachment Sierra Club Set 02-01(k) (WAH) SUPP.

The attachments provided in this supplemental response contain confidential or extraordinarily sensitive information as indicated, and are being provided pursuant to the protections set forth in 5 VAC 5-20-170, the Hearing Examiner's Protective Ruling Including Additional Protective Treatment for Extraordinarily Sensitive Customer Names Information for Combined Cases, dated May 14, 2025, the Hearing Examiner's Protective Ruling Providing Additional Protective Treatment for Extraordinarily Sensitive MBR Revenue, Contracts & Prices, & Market Information for Combined Cases issued on June 2, 2025, the Company's Motion to Amend June 2, 2025 Protective Ruling, filed June 27, 2025, any subsequent protective order or ruling that may be issued for confidential or extraordinarily sensitive information in this proceeding, and the Agreements to Adhere executed pursuant to any such orders or rulings.

EXHIBIT DG-16

Company's Response to Appalachian Voices Discovery Request No. 2-6(b)

Virginia Electric and Power Company
Case No. PUR-2025-00059
Sierra Club
Second Set

The following **supplemental** response (dated June 26, 2025) to Question No. 6 of the Second Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on May 19, 2025, was prepared by or under the supervision of:

Wesley A. Hudson
Manager – Electric Market Operations
Virginia Electric and Power Company

Question No. 6

Regarding the Company's unit commitment decision process for the coal units during the historical period and current period:

a. Please describe the Company's process for determining whether to commit with a must-run status the Company's coal electric generation units and operate them up to at least their minimum operating levels.

b. Provide a narrative of how Dominion makes its unit commitment (that is, decisions to turn the plant on and off) and unit dispatch (that is, the decision to ramp the plant up or down) decisions. If there are any differences by unit, please explain.

c. Indicate whether the Company conducts daily unit commitment analysis to determine how to commit and dispatch the plant. If yes, provide the daily analysis for the historic period and the current period. This includes all workbooks or print outs if the analysis is conducted in a program outside of excel.

d. Provide any workpapers or documentation demonstrating the analysis the Company uses to make its daily unit commitment decisions for its coal plants.

Response:

To the extent this request seeks information related to generator commitments, the Company assumes this question is referring to a portion of the prior period, as the entire current period has not yet occurred.

a. There are many factors that the Company considers in the unit commitment decision-making process, including:

- Locational Marginal Price ("LMP") Forecast;
- Unit cost;

- Weather forecast;
- PJM emergency notifications;
- Length of expected run;
- Environmental permit limits and requirements;
- Outage scheduling;
- Fuel inventory/availability;
- Testing requirements.

b. See the Company's response to subpart (a). Related to unit dispatch, PJM generally makes this decision.

c. Daily analysis is performed in a proprietary software product for each unit. The Company's Energy Supply Department, in consultation with the Fuels and Power Generation Departments, considers the outputs from the proprietary software along with the factors identified in subpart (a) and must-run considerations to determine daily unit commitment decisions. Accordingly, there are no workbooks to provide.

d. See the Company's responses to subparts (a) and (c).

Supplemental Response to 02-06(c)-(d) (dated June 26, 2025):

Please see the Company's supplemental response to Sierra Club Set 03-02 dated June 26, 2025.

EXHIBIT DG-17

Company's Response to Sierra Club Discovery Request No. 4-1(b)

Virginia Electric and Power Company
Case No. PUR-2025-00059
Sierra Club
Fourth Set

The following response to Question No. 1(a) and (b) of the Fourth Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on June 20, 2025, was prepared by or under the supervision of:

Katherine E. Farmer
Energy Market Strategic Advisor
Virginia Electric and Power Company

The following response to Question No. 1(c) through (e) of the Fourth Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on June 20, 2025, was prepared by or under the supervision of:

Wesley A. Hudson
Manager – Electric Market Operations
Virginia Electric and Power Company

Question No. 1

Refer to Dominion's Response to Sierra Club Request No. 02-01(g) and 02- 01(h).

a. Please explain what costs are included in the accounting fuel cost provided in Attachment Sierra Club Set 02-01(g) (KEF) and how it is calculated.

b. Are fixed fuel costs, such as transportation costs and replacement coal commodity costs (as referenced in Dominion's Response to Sierra Club Request No. 02-05(d)), included in the accounting fuel costs provided in response to Sierra Club Request No. 02-01(g)?

    i. If yes, please provide a breakdown of the fixed fuel costs included in the accounting fuel costs.

    ii. If no, please provide the incremental fixed costs associated with the accounting fuel costs provided.

c. Please explain what costs are included in the marginal fuel price (daily brokersheet/fuel price) provided in Attachment Sierra Club Set 02-01(b, d, f, h) (WAH) CONF and how it is calculated.

d. Are marginal fuel prices (daily brokersheet/fuel price) the same as replacement coal commodity fuel costs referenced in Dominion's response to Sierra Club Request No. 02-12(a)?

i. If no, explain the difference and provide the hourly replacement coal commodity fuel prices used for the Company's market offers.

e. What fuel cost is used for the purpose of making unit commitment decisions?

f. What accounts for the difference between the marginal fuel price (daily brokersheet/fuel price) and accounting fuel cost?

Response:

a. The data provided in Attachment Sierra Club Set 02-01(g) (KEF) was calculated by using the booked fuel expense for each station divided by the generation of that station. The booked fuel expense or "accounting cost" includes the cost of the fuel, in this case coal, and the cost of the transportation to move the fuel.

b. The fixed costs which are included in the total coal inventory are transportation and coal pile freeze maintenance. The transportation costs are related to railroad and trucking contracts. The accounting costs are calculated based on the weighted average cost of the coal inventory, which incorporates all costs associated with the coal according to the Virginia State Corporation Commission's Definitional Framework of Fuel Expenses for Virginia Electric and Power Company.

c. Related to Clover and Mt. Storm, the marginal fuel price is the broker sheet number only (in $/Ton). Related to VCHEC, the marginal fuel price is the actual weighted average cost (in $/mmBTU).

d. Yes. See the Company's response to APV Set 02-06.

e. See the Company's responses to APV Set 02-06, Sierra Club Set 02-12(a) and APV Set 02-07.

f. The daily brokersheet pricing is based on the market pricing and PJM protocols for the next day while the accounting fuel cost is based on the actual price paid for each aspect of the fuel expense (*i.e.*, price of coal burned and transportation). In addition, there are prior month's true ups included in each month's data.

EXHIBIT DG-18

Company's Response to Appalachian Voices Discovery Request No. 4-6

Virginia Electric and Power Company
Case No. PUR-2025-00059
Appalachian Voices
Fourth Set

The following response to Question No. 6 of the Fourth Set of Interrogatories and Requests for Production of Documents propounded by Appalachian Voices received on June 26, 2025, was prepared by or under the supervision of:

Joe Racelis
Manager-Fuel Operations
Dominion Energy Virginia

Question No. 6

Please reference the Company's response to APV Set 02-07, which states in part:

> The Company's coal unit offers are typically based on the replacement coal commodity fuel cost. In cases of high coal inventory levels, the lower contractual coal commodity fuel cost in $/Ton is used to calculate the coal unit offer. The resulting difference in a coal unit's offer ($/MWh) between the replacement coal commodity fuel cost and the lower contractual coal commodity fuel cost is the decrement that is applied to the coal unit's offer to PJM calculated by the proprietary software.

Please explain what the "lower contractual coal commodity fuel cost" is, how it is calculated (particularly for units with fuel supplied under multiple contracts), and how it differs from the replacement coal commodity fuel cost.

Response:

The lower contractual commodity fuel cost is the actual fuel cost under contract with the Company's supplier. In contrast, replacement cost is the spot market price of the commodity for the next incremental purchase.

EXHIBIT DG-19

Company's Response to Sierra Club Discovery Request No. 2-6

Virginia Electric and Power Company
Case No. PUR-2025-00059
Sierra Club
Second Set

The following **supplemental** response (dated June 26, 2025) to Question No. 6 of the Second Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on May 19, 2025, was prepared by or under the supervision of:

Wesley A. Hudson
Manager – Electric Market Operations
Virginia Electric and Power Company

Question No. 6

Regarding the Company's unit commitment decision process for the coal units during the historical period and current period:

a. Please describe the Company's process for determining whether to commit with a must-run status the Company's coal electric generation units and operate them up to at least their minimum operating levels.

b. Provide a narrative of how Dominion makes its unit commitment (that is, decisions to turn the plant on and off) and unit dispatch (that is, the decision to ramp the plant up or down) decisions. If there are any differences by unit, please explain.

c. Indicate whether the Company conducts daily unit commitment analysis to determine how to commit and dispatch the plant. If yes, provide the daily analysis for the historic period and the current period. This includes all workbooks or print outs if the analysis is conducted in a program outside of excel.

d. Provide any workpapers or documentation demonstrating the analysis the Company uses to make its daily unit commitment decisions for its coal plants.

Response:

To the extent this request seeks information related to generator commitments, the Company assumes this question is referring to a portion of the prior period, as the entire current period has not yet occurred.

a. There are many factors that the Company considers in the unit commitment decision-making process, including:

- Locational Marginal Price ("LMP") Forecast;
- Unit cost;

- Weather forecast;
- PJM emergency notifications;
- Length of expected run;
- Environmental permit limits and requirements;
- Outage scheduling;
- Fuel inventory/availability;
- Testing requirements.

b. See the Company's response to subpart (a). Related to unit dispatch, PJM generally makes this decision.

c. Daily analysis is performed in a proprietary software product for each unit. The Company's Energy Supply Department, in consultation with the Fuels and Power Generation Departments, considers the outputs from the proprietary software along with the factors identified in subpart (a) and must-run considerations to determine daily unit commitment decisions. Accordingly, there are no workbooks to provide.

d. See the Company's responses to subparts (a) and (c).

Supplemental Response to 02-06(c)-(d) (dated June 26, 2025):

Please see the Company's supplemental response to Sierra Club Set 03-02 dated June 26, 2025.

CERTIFICATE OF SERVICE

I certify that on July 16, 2025, I sent the foregoing by electronic mail to:

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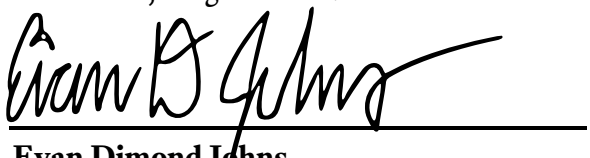

Evan Dimond Johns