SIERRA CLUB

July 14, 2026

Mr. Bernard Logan, Clerk
State Corporation Commission
Document Control Center
Post Office Box 2118
Richmond, Virginia 23219

RE: Case No. PUR-2026-00058, Application of Virginia Electric & Power Company, To revise its fuel factor pursuant to Virginia Code § 56-249.6; and

Case No. PUR-2026-00078, Application of Virginia Electric & Power Company, Petition of Virginia Electric and Power Company for a financing order authorizing the issuance of deferred fuel cost bonds pursuant to Va. Code § 56-249.6:2

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 Sierra Club will also be filing a Confidential and Extraordinarily Sensitive Version of Ms. Glick's Testimony under seal. Please do not hesitate to contact me if you have any questions regarding this filing.

Sincerely,

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COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

APPLICATION OF

VIRGINIA ELECTRIC & POWER COMPANY **Case No. PUR-2026-00058**

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

APPLICATION OF

VIRGINIA ELECTRIC & POWER COMPANY **Case No. PUR-2026-00078**

Petition of Virginia Electric and Power Company for a financing order authorizing the issuance of deferred fuel cost bonds pursuant to Va. Code § 56-249.6:2

DIRECT TESTIMONY of

DEVI GLICK

on behalf of the

SIERRA CLUB

PUBLIC VERSION

July 14, 2026

Summary of the Direct Testimony of Devi Glick

Dominion submitted its applications to revise its fuel factors (Fuel Docket) and to recover some of its fuel balance through securitization (Securitization Docket). In the Fuel Docket, 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 April 1, 2025 – March 31, 2026. In the Securitization Docket, Dominion is requesting authorization to issue a Deferred Fuel Cost Bond in the amount of $1.024 billion to cover some of the fuel under-recovery. The Company is requesting to recover the bond from ratepayers over a ten-year period.

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 avoidable variable net losses **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** during months where it incurred net revenue loses during the historical period. I found five specific events where Dominion imprudently utilized a must-run commitment status at the Mt. Storm 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. And once again relied on decrement pricing to manage a coal over-supply at Mt. Storm.

I also evaluated the Company's securitization application and find that Dominion's request to securitize part of its fuel under-recovery and recover the costs over ten years will reduce rate shock to ratepayers but also reinforces a dangerous precedent that reactive measures can address risk rather than better proactive planning.

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. I recommend that Dominion be required to file documentation of its profit and loss workbook with its initial filing in future fuel factor proceedings. I also recommend that the Commission require Dominion to be more proactive with its management of fuel costs through its resource planning processes and mechanisms such as fuel cost sharing, and not rely on reactive measures such as securitization.

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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 or formal comments in over 70 different proceedings before state utility regulators in more than 25 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 14 years of professional experience as a consultant, researcher, and analyst. A copy of my current resume is attached as Exhibit DG-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-2025-00058, PUR-2025-00059, PUR-2024-00184, PUR-2023-00066, PUR-2023-00005, PUR-2022-00006, and PUR-2018-00195. 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 application to revise its fuel factor, 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.

Second, I review the Company's request to securitize some of its unrecovered fuel balance. I assess the risks and benefits of the proposal and introduce other ways for the Company to limit ratepayer risk from reliance on gas generating resources.

Q How is your testimony structured?

A Following this introduction in Section 1:

- In Section 0, I summarize my findings and recommendations for the Commission.
- In Section 3, I summarize Dominion's Fuel Docket and Securitization Docket requests, specifically those related to the Company's coal plants, and introduce the Company's coal plants.

- In Section 4, I review the performance of Dominion's coal fleet in the energy market during the historical period and review its coal contacts.
- In Section 5, I review and evaluate Dominion's commitment and dispatch of its coal fleet.
- In Section 6, I review and evaluate the Company's securitization proposal and discuss other ways for Dominion to reduce its risk from relying on gas generation resources.

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. The full list of exhibits relied upon in my Direct Testimony is included below at Table 1.

Table 1. Exhibit List to the Direct Testimony of Devi Glick

Exhibit No.	Description of Exhibit	Status
DG-1	Resume of Devi Glick	Public
DG-2	Company's Response to Sierra Club Discovery Request No. 2-1	Public
DG-3	Company's Response to Sierra Club Discovery Request No. 2-2	Public
DG-4	Company's Response to Sierra Club Discovery Request No. 2-3	Public
DG-5	Company's Response to Sierra Club Discovery Request No. 2-8	Public
DG-6	Company's Response to Sierra Club Discovery Request No. 2-8, Attachment Sierra Club Set 02-08.3 (WAH) ES-C	ES
DG-7	Company's Response to Sierra Club Discovery Request No. 2-12	Public
DG-8	Company's Response to Sierra Club Discovery Request No. 2-12, Attachment Sierra Club Set 02-12(b) (WAH) ES-B	ES
DG-9	Company's Response to Sierra Club Discovery Request No. 2-14	CONF
DG-10	Company's Response to Appalachian Voices Discovery Request No. 1-04	Public
DG-11	Company's Response to Appalachian Voices Discovery Request No. 1-04, Attachment APV Set 01-04 (a,c,d,e) (WAH) ES B	ES
DG-12	Company's Response to Appalachian Voices Discovery Request No. 2-02, Supplemental Response (dated July 02, 2026)	Public
DG-13	Company's Response to Appalachian Voices Discovery Request No. 2-02, Attachment APV 02-02(g) (WAH) CONF (Updated May 2026)	CONF

2. FINDINGS & RECOMMENDATIONS

Q Please summarize your findings.

A My primary findings are:

- Dominion's coal fleet experienced high outage rates during the fuel factor historical reconciliation period.
- Dominion self-committed Clover, Mt. Storm and Virginia City Hybrid Energy Center (VCHEC) with a must-run status **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** percent of the time, respectively, that each plant was available.
- Dominion incurred avoidable variable net losses of **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]** during six specific events at Mt. Storm 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.
- Dominion's fuel costs were high in the historical period as a result of high market prices – driven in large part by data center load – as well as winter weather events.
- Dominion failed to demonstrate prudent management of its fuel contracts, especially at **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]**.
- Dominion's request to securitize part of its fuel under-recovery and recover the costs over ten years will reduce rate shock to ratepayers but also reinforces a dangerous precedent that reactive measures can address risk rather than better proactive planning.

Q Please summarize your recommendations.

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

1. 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.

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

3. The Commission should require Dominion to justify its use of decrements by (1) showing evidence that the utility took measures to negotiate deferring delivery of some of its coal supply; (2) showing analysis justifying its use of decrements as cost effective relative to alternatives of paying damages to defer accepting delivery of coal.

4. The Commission should require Dominion to include in future fuel factor filings its profit and loss workbook.

5. I recommend that the Commission approve securitization of the fuel cost under recovery for this year only with the following conditions:

    1. Approval of the Company's proposal for securitization of under recovered fuel costs should not be interpreted as setting a precedent that the Commission will accept the Company requests to securitize under recovery fuel balances in future years.
    2. As part of future fuel dockets, the Company will include in its application analysis on how extreme weather conditions and high commodity prices will impact its projections and under-recovery balance.
    3. As part of future IRP dockets, the Company will include fuel cost volatility analysis to understand the impact of (1) extreme weather events; (2) global events that impact commodity prices on ratepayers.
    4. As part of future IRPs, Dominion will evaluate how increased deployment of BESS and solar can help manage fuel cost.
    5. The Commission implement a fuel cost sharing as outlined in the direct testimony of Jeremy Kalin.

3. OVERVIEW OF REQUEST

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

A Dominion is proposing a fuel factor rate of 5.1472 cents/kWh to cover the current fuel factor period of July 1, 2026 – June 30, 2027 and the prior period under-recovery.[1] This represents an increase of 2.1792 cents/kWh over the 2.9680 cents/kWh factor current in effect.[2] This breaks down as follows:

1. The Company projects energy-related fuel and capacity-related purchased power expenses of approximately $2.691 billion during the current period which works out to a fuel factor of 3.6749 cents/kWh.[3]

2. The Company's prior period under-recovery of $1.078 billion works out to 1.4723 cents/kWh. This is comprised of an under-recovery balance of $1.012 billion for July 1, 2025 – June 30, 2026, and an under-recovery balance of $65.8 million from June 30, 2025 (2025/2026 deferral).[4]

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[1] Direct Testimony of J. Scott Gaskill at 3-4 (PUR-2026-00058) (Gaskill Direct).

[2] *Id.*

[3] *Id.* at 3.

[4] *Id.* at 3-4.

Q Is Dominion asking to recover that entire balance through current fuel factors?

A No. Dominion is proposing to implement a 3.7648 cents/kWh fuel factor to cover the current period fuel factor and a portion of the prior period under-recovery.[5] It is requesting to recover the remainder through a securitization mechanism.

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

A Dominion projects $4.35 billion in fuel and purchased power expenses during the current period (July 1, 2026 – June 30, 2027).[6] The Company incurred $2.6 billion in fuel expenses during the 12-month historical period of April 1, 2025 – March 31, 2026, including $360 million in coal expenses.[7] Dominion expects its year-end under-recovery of fuel expenses through June 30, 2026, to be $1.08 billion.[8]

Q How do the Company's fuel factor costs and fuel expenses compare to prior years?

A Dominion's fuel factor expenses for July 1, 2026 – June 30, 2027 are up by over one billion dollars from $3.17 billion in the 2025 fuel factor case to

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[5] *Id.* at 4.

[6] Direct Testimony of Katherine Farmer at 6 (PUR-2026-00058) (Farmer Direct).

[7] Farmer Direct, Schedule 10.

[8] *Id.* at 11.

$4.35 billion in the current case.[9] The Company attributes this increase to higher load and commodity prices.[10]

The Company's actual historical coal expense of $360 million for April 1, 2025 – March 30, 2026 are nearly $100 million higher than the $263 million in coal costs for the period March 1, 2024 – February 28, 2025 in the 2025 fuel factor docket.[11] This is attributed to both an increase in utilization of the Company's coal fleet, and higher coal costs than in prior years. Specifically, coal generation is up 28 percent over last year while coal expenses are up 37 percent.[12] This results in an increase in the average cost per MWh of 7 percent for the Company's coal units.[13]

The Company's year-end fuel under-recovery of fuel expenses through June 30, 2026 is also nearly five times larger than last year ($1.08 billion this year compared to $204.5 million last year).[14]

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[9] *Id.* at 6; Direct Testimony of Katherine Farmer at 6 (PUR-2025-00059) (Farmer Direct 2025).

[10] Farmer Direct at 6.

[11] Farmer Direct, Schedule 10; Farmer Direct, Schedule 10 (PUR-2025-00059).

[12] *Id.*

[13] *Id.*

[14] Farmer Direct at 11; Farmer Direct 2025 at 10.

Q Why is the Company's under-recovery balance so large?

A There are two main drivers of the under recovery. First, commodity and market prices are higher than projected, and higher than they were historically, due to increased demand from data center load. Second, weather-related events, specifically Winter Storm Fern which occurred in January 2026, accounted for over half of the fuel deferral balance ($567 million).[15]

Q What is the Company requesting through its Securitization Docket?

A Dominion is requesting a non-bypassable fuel securitization charge to cover some of the fuel under-recovery. Specifically, the Company is requesting authorization to issue a Deferred Fuel Cost Bond in the amount of $1.024 billion, which consists of $1.012 billion of Deferred Fuel Costs + Up-front Financing Costs of $11.39 million.[16] The Company is requesting to securitize the balance over a ten-year period. It calculated a net present value (NPV) benefit to customers of $64.65 million under this option and a monthly charge of $2.36 for the typical residential customer using 1,000 kWh per month.[17]

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[15] Fuel Docket Application at 3.

[16] Securitization Application at 8.

[17] Securitization Application at 10.

4. 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 April 1, 2025 – March 31, 2026, and more recent months from the current period of April 1, 2026 – June 30, 2026. My analysis in this section is based on hourly data the Company provided in discovery in PUR-2026-00058. 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 avoidable variable net losses during specific months during the historical period. I also find that both Clover and VCHEC both incurred avoidable variable net losses during recent months (April 1, 2026 – June 30, 2026).

Q Please describe Dominion's coal plants.

A Dominion has three coal plants. Mt. 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 How did Dominion's coal plants perform in the energy market in recent years?

A Based on each unit's net generation,[18] real time dispatch rate (variable cost of production)[19] and hourly energy market revenues[20] – including energy, losses and congestion – I find Dominion's coal plants earned net positive revenues for the historical period of April 1, 2025 – March 31, 2026. This is

[18] Company's Response to Sierra Club Discovery Request No. 2-1(f), Attachment Sierra Club Set 02-01(b,d,f,g,j) (WAH) CONF (Updated June 2026) (PUR-2026-00058). Dominion's response includes voluminous spreadsheet data and can be provided to the Commission and properly-authorized parties upon request.

[19] Company's Response to Sierra Club Discovery Request No. 2-1(l), Attachment Sierra Club Set 02-01(a,l) (WAH) ES-B (Updated June 2026) (PUR-2026-00058). Dominion's response includes voluminous spreadsheet data and can be provided to the Commission and properly-authorized parties upon request.

[20] Company's Response to Sierra Club Discovery Request No. 2-1(n, p, r), Attachment Sierra Club Set 02-01(n-r) (LTG) CONF (Updated June 2026) (PUR-2026-00058). Dominion's response includes voluminous spreadsheet data and can be provided to the Commission and properly-authorized parties upon request.

in contrast to last year, where both Clover and Mt. Storm incurred net revenue losses. Critically, this shift occurred due to higher market prices and revenues due to tightening capacity markets driven by data center load growth – not because the plants became less expensive to operate.

However, despite the plants' overall performance, I did find that the Company's coal plants all incurred avoidable net revenue losses, adding up to **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]**, during specific months in the historical period (ES Table 2). This means that there were months in which ratepayers would have been better off if Dominion had relied more on lower cost resources that were available and less on the coal plants. Clover incurred **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]** in avoidable net revenue losses in **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]** out of the 12 months in the historical period. Mt. Storm incurred net revenue losses of **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]** from the 12-month period. VCHEC incurred net revenue losses of **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]** out of the 12-month period.

ES Table 2. Total Losses During Historical Period at Dominion's Coal Plants

[BEGIN EXTRA SENSITIVE]

Unit	**Net revenues Variable cost of production ($)**	**Count of months with losses (12-month historical period)**
Clover 1	[redacted]	1
Clover 2	[redacted]	3
Mt. Storm 1	[redacted]	3
Mt. Storm 2	[redacted]	2
VCHEC	[redacted]	2
Plant totals	[redacted]	
Clover 1&2	[redacted]	3
Mt. Storm 1&2	[redacted]	5
VCHEC	[redacted]	2
Coal plant total losses	[redacted]	**7**

[END EXTRA SENSITIVE]

Source: Calculated based on Company's response to SC 2-1(f) Attachment Sierra Club Set 02-01(b, d, f, g, j) (WAH) CONF (Updated June 2026) (PUR-2026-00058); SC 2-1(l) Attachment Sierra Club Set 02-01(a, l) (WAH) ES-B (Updated June 2026) (PUR-2026-00058); SC 2-1(n, p, r) Attachment Sierra Club Set 02-01(n-r) (LTG) CONF (Updated June 2026) (PUR-2026-00058).

Separately, I find that in more recent months (April 1, 2026 – June 30, 2026), Clover and VCHEC incurred net revenue losses adding up to **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]** **ES Table 3**. Clover incurred **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]** in avoidable net revenue losses in **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]** while VCHEC incurred net revenue losses of **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]**. Similar to losses incurred in the historical period, Dominion could have relied on lower cost resources over their coal units in these months to avoid losses.

ES Table 3. Total Losses During April 1, 2026 to June 30, 2026 at Dominion's Coal Plants

[BEGIN EXTRA SENSITIVE]

Unit	**Net revenues Variable cost of production ($)**	**Count of months with losses (12-month historical period)**
Clover 1	[redacted]	2
Clover 2	[redacted]	3
VCHEC	[redacted]	2
[redacted]	[redacted]	
Clover 1&2	[redacted]	3
VCHEC	[redacted]	2
Coal plant total losses	[redacted]	**3**

[END EXTRA SENSITIVE]

Source: Calculated based on Company's Response to Sierra Club Discovery Request No. 2-1(f) Attachment Sierra Club Set 02-01(b, d, f, g, j) (WAH) CONF (Updated June 2026) (PUR-2026-00058); SC 2-1(l) Attachment Sierra Club Set 02-01(a, l) (WAH) ES-B (Updated June 2026) (PUR-2026-00058); SC 2-1(n, p, r) Attachment Sierra Club Set 02-01(n-r) (LTG) CONF (Updated June 2026) (PUR-2026-00058). Dominion's response includes voluminous spreadsheet data and can be provided to the Commission and properly-authorized parties upon request.

Q How do the coal fuel costs that Dominion seeks to pass on to ratepayers through the fuel factor compare to the fuel costs that Dominion uses to dispatch its coal units?

A A unit's real-time dispatch rate is generally set based on a unit's marginal fuel costs.[21] 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

[21] Company's Response to Sierra Club Discovery Request No. 2-3(a).

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. Variable Operations and Maintenance (VOM) costs, and other operating costs and credits (including renewable energy credits, and production tax credits) are added to the final value.[22] The real-time dispatch rate that I used for my analysis does not include decrements or adders.[23] However, 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.[24] Dominion bases its marginal fuel costs on a daily brokersheet / fuel sheet which reflects the daily spot market for coal.[25]
- For VCHEC, the unit's dispatch rate is based on the actual weighted average fuel cost (that is, the actual price paid for coal).[26] 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.

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[22] Company's Response to Sierra Club Discovery Request No. 2-3(b).

[23] *See* Company's Response to Sierra Club Discovery Request No. 2-1(l), Attachment Sierra Club Set 02-01(a,l)(WAH) ES-B (Updated June 2026) (PUR-2026-0058).

[24] *See* Company's Response to Sierra Club Discovery Request No. 2-3(b); Company's Response to Sierra Club Discovery Request No. 2-2(c).

[25] Company's Response to Sierra Club Request No. 2-2(b).

[26] *Id.*

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.[27] Accounting costs include fixed costs which can include transportation (rail or truck), coal pile freeze maintenance, replacement coal commodity charges, and any other fixed costs.[28] Fixed production costs are not included in generator commitment offers but some fixed transportation cost are.[29]

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.

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[27] 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.

[28] Company's Response to Sierra Club Discovery Request No. 2-2(a and e).

[29] Company's Response to Sierra Club Request No. 2-2(d and e).

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 During the historical period of April 1, 2025 – March 30, 2026, the Company dispatched and bid the units based on **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** in fuel costs, which includes only variable costs.[30] In contrast, Dominion's fuel factor application includes $360 million in coal expenses and $61.4 million in biomass expenses during the historical period.[31]

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**

[30] Calculated based on Company's Response to Sierra Club Discovery Request No. 2-1(f and j), Attachment Sierra Club Set 02-01(b,d,f,g,j) (WAH) CONF (Updated June 2026) (PUR-2026-00058); Farmer Direct, Confidential Schedule 14; Company's Response to Sierra Club Discovery Request No. 2-14 Confidential. 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.

[31] Farmer Direct, Schedule 10.

SENSITIVE] [redacted] **[END EXTRA SENSITIVE]** during the historical period to increase the utilization of the coal plant and burn off excess coal.[32] 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 difference between the contract price and the spot market price.[33] This is at least the second year in a row that Dominion utilized decrements to manage its coal oversupply at Mt. Storm.

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.[34] **[BEGIN EXTRA SENSITIVE]** [redacted]

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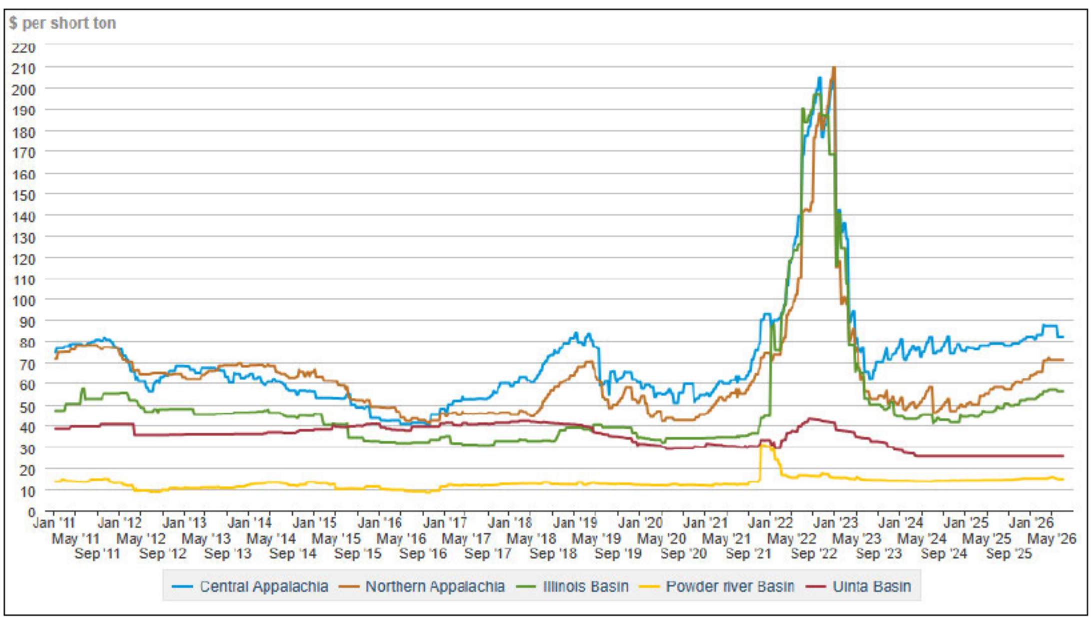
[32] Company's Response to Sierra Club Discovery Request No. 2-12(b), Attachment Sierra Club Set 02-12(b) (WAH) ES (PUR-2026-00058).

[33] Company's Response to Sierra Club Discovery Request No. 2-12(c).

[34] Company's Response to Appalachian Voices Discovery Request 2-06, Attachments APV Set 02-06 (JR) ES-B (PUR-2026-00058). 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 1. Historical Coal Price by Region (2011 – Current Data)



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

[BEGIN EXTRA SENSITIVE] [redacted]

[redacted] **[END EXTRA SENSITIVE]**.[36]

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]

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[35] *Id.*

[36] *Id.*

[redacted][38]

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

[37] *Id.*

[38] Company's Response to Appalachian Voices Discovery Request 2-06, Attachments APV Set 02-06 (JR) ES-B (PUR-2026-00058). 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.

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

A **[BEGIN EXTRA SENSITIVE]** [redacted] **[END EXTRA SENSITIVE]**. Therefore, I recommend that the Commission disallow from inclusion in the fuel factor **[BEGIN EXTRA SENSITIVE]** [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 require Dominion to justify its use of decrements by (1) showing evidence that the utility took measures to negotiate deferring delivery of some of its coal supply; (2) showing analysis justifying its use of decrements as cost effective relative to alternatives of paying damages to defer accepting delivery of coal.

5. 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 one third of 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 April 1, 2025 – March 31, 2026. I also look at Dominion's unit commitment practices in more recent months of April 1, 2026 to June 30, 2026. 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 4 of the testimony?

A In Section 4, 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.[39] 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.[40] Unlike the market

[39] 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.

[40] 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.

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.

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 of 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.

Additionally, PJM has to make whole payments that compensate the units if they lose money for the day—but ONLY if they were economically committed. Self-committing forgoes that opportunity to break even.

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.[41]

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?

A As shown in CONF Table 4 below, Dominion committed Clover with a must-run status around **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** of the time it was available on average during the

[41] Company's Response to Sierra Club Discovery Request No. 2-8.

historical period, Mt. Storm around **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** of the time on average, 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.

CONF Table 4. Dominion Commitment Decision in Non-Outage Hours During the Historical Period

[BEGIN CONFIDENTIAL]

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

[END CONFIDENTIAL]

Source: Company's Response to Sierra Club Discovery Request No. 2-1(d), Attachment Sierra Club Set 02-01(b,d,f,g,i) (WAH) CONF (Updated June 2026) (PUR-2026-00058).

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.[42] 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 How did Dominion commit its coal plants in more recent months?

A As shown in **CONF Table 5.** Dominion Commitment Decision in Non-Outage Hours Dominion committed Clover with a must-run status around **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** of the time it was available on average from April 1, 2026 – June 30, 2026. Mt. Storm Unit 2 and 3 were committed as must-run around **[BEGIN CONFIDENTIAL]** [redacted] **[END CONFIDENTIAL]** of the time on average, respectively, 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 three-month period.

[42] Company's Response to Sierra Club Discovery Request No. 2-12(b), Attachment Sierra Club Set 02-12(b) (WAH) ES-B (PUR-2026-00058).

CONF Table 5. Dominion Commitment Decision in Non-Outage Hours Between April and June 2026

[BEGIN CONFIDENTIAL]

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

[END CONFIDENTIAL]

Source: Company's Response to Sierra Club Discovery Request No. 2-1(d), Attachment Sierra Club Set 02-01(b,d,f,g,i) (WAH) CONF (Updated June 2026) (PUR-2026-00058). Dominion's response includes voluminous spreadsheet data and can be provided to the Commission and properly-authorized parties upon request.

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 it demonstrates that its internal decision-making process 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. And that it is worth the risk of losing money by opting out of the make-whole payment structure.

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 six different events at the Mt. Storm plant. I identified these by reviewing the Company's documentation of its must-run decisions,[43] Dominion's single and 5-day profit and loss projections the Company prepared at the time that it made each daily unit-commitment decision,[44] and its actual hourly cost and revenue data.[45]

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

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[43] Company's Response to Appalachian Voices Discovery Request No. 2-2(g), Attachment APV 02-02(g) (WAH) CONF (Updated May 2026) (PUR-2026-00058).

[44] Company's Response to Sierra Club Discovery Request No. 2-8, Attachment Sierra Club Set 02-08.3 (WAH) ES-C (PUR-2026-00058).

[45] Calculated based on the Company's Response to Sierra Club Discovery Request No. 2-1(f and j), Attachment Sierra Club Set 02-01(b, d, f, g, j) (WAH) CONF (Updated June 2026) (PUR-2026-00058), Sierra Club Set 2-1(n, p, r), and Attachment Sierra Club Set 02-01(n-r) (LTG) CONF (Updated June 2026) (PUR-2026-00058); Company's Response to Sierra Club Discovery Request No. 2-1(i), Attachment Sierra Club Set 02-01(i) (KEF) (Updated June 2026) (PUR-2026-00058); Company's Response to Sierra Club Discovery Request No. 2-1(l), Attachment Sierra Club Set 02-01(a,l) (WAH) ES-B (Updated June 2026) (PUR-2026-00058); Farmer Direct, Confidential Schedule 14 (PUR-2026-00058); Company's Response to Sierra Club Discovery Request No. 2-14 Confidential. These attachments include 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.

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 units' must-run commitments were for testing.[46] 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 five events at Mt. Storm 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 indicating that ratepayers would be better off if the unit shut down. I include a

[46] Company's Response to Sierra Club Discovery Request No. 2-8, Attachment Sierra Club Set 02-08.3 (WAH) ES-C (PUR-2026-00058).

summary of the events below and the resulting net revenues in ES Table 6. Summary of Coal Plant Uneconomic Must-Run Events below.

[BEGIN EXTRA SENSITIVE]

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

ES Table 6. Summary of Coal Plant Uneconomic Must-Run Events

[BEGIN EXTRA SENSITIVE]

Unit	Projected losses	Actual losses	Incremental start-up costs	Net losses
Mt. Storm Total	[redacted]			

[END EXTRA SENSITIVE]

Sources: Company's Response to APV Request 1-04, Attachment APV Set 01-04 (a,c,d,e) (WAH) ES B (PUR-2026-00058); Company's Response to Sierra Club Request 2-08, Attachment ES Sierra Club Set 02-08.3 (WAH) ES-C (PUR-2026-00058); see also sources for Confidential Table 1 for actual loses calculations.

Q What are your recommendations regarding Mt. Storm?

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 during the events outlined above 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 single-day and 5-day profit and loss projections.

6. REDUCING COSTS & RISKS TO RATEPAYESR FROM RELIANCE ON GAS GENERATING RESOURCES

Q How can the Company reduce the risk and price volatility posted to ratepayers from reliance on gas generating resources?

A Dominion has a variety of tools it can use to manage risks facing customers from relying on gas ranging from reactive actions such as the securitization measures proposed in the current Securitization Docket, to proactive policies such as fuel cost sharing and active management of risk through integrated resource planning.

Q What is the Company requesting with regards to securitization?

A As summarized above, Dominion is requesting permission to place some if its fuel cost under-recovery in a non-bypassable fuel securitization charge. Specifically, the Company is requesting authorization to issue a Deferred Fuel Cost Bond in the amount of $1.024 billion, which consists of $1.012 billion of Deferred Fuel Costs + Up-front Financing Costs of $11.39 million.[47]

Q What is securitization?

A Securitization is a legislatively provided for mechanism that allows the Company to create a separate special purpose entity (SPE) that issues securitized bonds to finance a portion of the fuel deferral balance. With securitization, the debt is taken off the utility's books and transferred to the SPE. The fuel costs will be removed from base-rate and will instead be passed through to customers using a separate non-bypassable securitization charge.

[47] Securitization Application at 8.

Q What is the impact on ratepayers of the proposal?

A Dominion considered three options (7-year, 10-year and 15-year securitization) and is ultimately requesting to securitize the balance over a ten-year period. The Company calculated an NPV benefit to customers of $64.65 million under the ten-year option and a monthly charge of $2.36 for the typical residential customer using 1,000 kWh per month.[48] The ten-year option has a higher NPV but lower monthly impact than the seven-year option and a lower NPV but higher monthly impact than the 15-year option that the Company calculated.

Q What are the benefits of securitization?

A The main benefit of securitization in this context is to reduce near-term rate shock by spreading out the under-recovery over multiple years.

Q What are the concerns associated with securitization?

A First, as the Company acknowledges, securitization causes intergenerational equity concerns.[49] Because recovery of the costs is delayed and separated from cost causation, securitization does not follow best practices of cost recovery. People in five or ten years who were not receiving service today will be paying for high fuel costs that they never benefited from.

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[48] *Id.* at 10.

[49] *Id.* at 11.

Second, securitization provides a safety net to the Company to placate customers who would otherwise be facing rate shock. With securitization, the utility has less of an incentive to better manage fuel costs. If customers were regularly dealing with rate shock from high under-recovery, they would be more likely to demand action from the Commission to limit high fuel costs.

Third, the nominal value – that is the total money paid out over time – is higher than if the fuel costs were just passed through in the current year. This is because securitization involves a bond rate. And while that rate is lower than a traditional utility rate of return, it's higher than the zero percent normally imposed on a pass-through fuel cost.

Fourth, with Dominion's proposal here, some of its large customers have the option to opt-out or securitization and pay for the fuel costs all upfront while residential customers do not have the option to opt-out.

Q You mentioned other options to manage fuel cost risks. Explain fuel cost sharing.

A Fuel cost sharing is a practice whereby the Company shares the risk of fuel price volatility and uncertainty with ratepayers. In the event of an under-recovery, the under recovered balance is shared between the ratepayers and the Company (for example, 90/10). Sierra Club Witness Jeremy Kalin covers fuel cost sharing in greater detail.

Q How can Dominion reduce ratepayer risk through the IRP and other planning exercises?

A The best way for Dominion to reduce fuel price volatility and risk to ratepayers is through proactive planning that takes into account the values of resource diversity. By reducing the share of its generation from gas resources and relying more on zero marginal cost renewables like solar and wind, Dominion will reduce its exposure to gas market and price volatility.

Q What do you recommend with regard to the Company's proposal for securitization?

A I recommend that the Commission approve securitization of the fuel cost under recovery for this year only with the following conditions:

1. Approval of the Company's proposal for securitization of under recovered fuel costs should not be interpreted as setting a precedent that the Commission will accept the Company requests to securitize under recovery fuel balances in future years.
2. As part of future fuel dockets, the Company will include in its application analysis on how extreme weather conditions and high commodity prices will impact its projections and under-recovery balance.
3. As part of future IRP dockets, the Company will include fuel cost volatility analysis to understand the impact of (1) extreme weather events; (2) global events that impact commodity prices on ratepayers.

4. As part of future IRP, Dominion will evaluate how increased deployment of BESS and solar can help manage fuel cost.

I also recommend that the Commission implement a fuel cost sharing as outlined in the direct testimony of Jeremy Kalin.

Q Does this conclude your testimony?

A Yes.

EXHIBIT DG-1

Resume of Devi Glick

Devi Glick, Senior Principal

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PROFESSIONAL EXPERIENCE

Synapse Energy Economics Inc., Cambridge, MA. *Senior Principal*, May 2022–Present; *Principal Associate*, Jun 2021–May 2022; *Senior Associate*, Apr 2019–Jun 2021; *Associate*, Jan 2018–Mar 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. Aug 2012–Sept 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*, Sept 2011–Jul 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*, Aug 2007–Dec 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*

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TESTIMONY

North Carolina Utilities Commission (Docket No. E-100, Sub 207): Direct Testimony of Devi Glick in the matter of 2025 Biennial Consolidated Carbon Plan and Integrated Resource Plans of Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC, Pursuant to N.C.G.S. §§ 62-2(a)(3a), 62-110.1, 62-110.9, and Commission Rule R8-60A. On behalf of North Carolina Sustainable Energy Association. March 30, 2026.

New Mexico Public Regulation Commission (Case No. 25-00066-UT): Direct Testimony of Devi Glick in the matter of Southwestern Public Service Company's application requesting: (1) issuance of certificates of public convenience and necessity to construct and operate wind, solar, battery, and thermal generation projects and associated facilities; (2) issuance of certificates of public convenience and necessity, location approval, and right-of-way width approval, for transmission lines; (3) authorization of related ratemaking principles including accrual of an allowance for funds used during construction; (4) variances on abandonment of Tolk Generating Station and Class II affiliate transactions; (5) other associate relief. On behalf of New Mexico Department of Justice. December 23, 2025.

Kentucky Public Service Commission (Case No. 2025-00175): Direct Testimony of Devi Glick in the Application Of Kentucky Power Company For Approval Of (1) A Certificate Of Public Convenience And Necessity To Make The Capital Investments Necessary To Continue Taking Capacity And Energy From The Mitchell Generating Station After December 31, 2028, (2) An Amended Environmental Compliance Plan, (3) Revised Environmental Surcharge Tariff Sheets, And (4) All Other Required Approvals And Relief. On behalf of Sierra Club. November 6, 2025.

Public Utilities Commission of Ohio (Case No. 24-153-EL-RDR): Direct Testimony of Devi Glick in the Matter of the Legacy Generation Resource Rider Audits Required by R.C. 4928.148 for Duke Energy Ohio Inc., the Dayton Power and Light Company dba AES Ohio, and Ohio Power Company dba AEP Ohio. On behalf of Office of the Ohio Consumers' Counsel. November 4, 2025.

Michigan Public Service Commission (Case No. U-21428): Direct Testimony and Exhibits of Devi Glick in the application of Indiana Michigan Power Company for a power supply cost recovery reconciliation proceeding for the 12-month period ended December 31, 2024. On behalf of Attorney General Dana Nessel, Citizens Utility Board of Michigan, and Sierra Club. October 17, 2025.

Indiana Utility Regulatory Commission (Cause No. 38707-FAC 145): 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 and for approval of a change in its fuel cost adjustment for high pressure steam service, in accordance with Indiana Code §8-1-2-42, Indiana Code §8-1-2-42.3, and various orders of the Indiana Utility Regulatory Commission. On behalf of Sierra Club. September 3, 2025.

Virginia State Corporation Commission (Case No. PUR-2025-00037). Direct Testimony of Devi Glick in Virginia Electric and Power Company application for approval of a CPCN to construct/operate the proposed Chesterfield Energy Reliability Center Electric, generation/transmission facilities and approval of designated rider CERC. July 25, 2025.

Virginia State Corporation Commission (Case No. PUR-2025-00058 and Case No. PUR-2025-00059): Direct Testimony of Devi Glick in Virginia Electric and Power Company's 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; and Virginia Electric and Power Company's application to revise its fuel factor pursuant to Virginia Code § 56-249.6. On behalf of Sierra Club. July 16, 2025.

Iowa Utilities Commission (Docket RPU-2025-0001): Cross Rebuttal Testimony of Devi Glick in MidAmerican Energy Company Application for a Determination of Ratemaking Principles. On behalf of the Environmental Intervenors. June 19, 2025.

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 September 2025

EXHIBIT DG-2

Company's Response to Sierra Club Discovery Request No. 2-1

Virginia Electric and Power Company
Case No. PUR-2026-00058
Sierra Club
Second Set

The following response to Question No. 1(a) through (h), (j), (l), and (m) of the Second Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on June 19, 2026, was prepared by or under the supervision of:

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

The following response to Question No. 1(i), (k), and (s) of the Second Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on June 19, 2026, was prepared by or under the supervision of:

Katherine E. Farmer
Energy Market Strategic Advisor
Dominion Energy Services, Inc.

The following response to Question No. 1(n) through (r) of the Second Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on June 19, 2026, was prepared by or under the supervision of:

Luke Granstrand
Manager – Market Analytics
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 April 1, 2025 – March 31, 2026. Please also provide any data available for the months in 2026 not covered by the historical period, supplementing this response as necessary as data becomes available. If not available at an hourly scale, 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. Net generation committed in the Day-ahead market (MWh).

h. Net generation dispatched in the Real-time market (MWh).

i. Accounting fuel costs ($/MWh).

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

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

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

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

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

o. Ancillary market revenues ($).

p. Congestion revenues ($).

q. Any other revenues received ($)

r. Marginal loss ($).

s. Heat rate (Btu/kWh).

Response:

The following response relates to the twelve-month historical period of April 1, 2025 – March 31, 2026. The Company is gathering the requested information for the months in 2026 not covered by the historical period and will supplement this response as necessary as data becomes available.

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,l) (WAH) ES-B.

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

c. Yes, PJM accepted each offer during the requested period.

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

e. See the Company's response to subpart (d). Generator commitment status is a Day-Ahead function.

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

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

h. See the Company's response to subpart (f).

i. See Attachment Sierra Club Set 02-01(i) (KEF).

j. 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,g,j) (WAH) CONF.

k. See the Company's response to subpart (i).

l. The Company assumes that the marginal variable costs 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 provided is the dispatch rate without any adders or decrements. See Attachment Sierra Club Set 02-01(a,l) (WAH) ES-B.

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

n. See Attachment Sierra Club Set 02-01(n-r) (LTG) CONF.

o. See Attachment Sierra Club Set 02-01(n-r) (LTG) CONF.

p. See Attachment Sierra Club Set 02-01(n-r) (LTG) CONF.

q. See Attachment Sierra Club Set 02-01(n-r) (LTG) CONF.

r. See Attachment Sierra Club Set 02-01(n-r) (LTG) CONF.

s. See Company Witness Farmer's Schedule 14.

Certain attachments provided in this response contain confidential and/or extraordinarily sensitive (ES-B) information as indicated, and are being provided pursuant the protections set forth in 5 VAC 5-20-170, the Hearing Examiner's Protective Ruling, Including Additional

Protective Treatment for Extraordinarily Sensitive Market Information, Contracts & Prices Information, and Wholesale Market Information dated May 29, 2026, any additional 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-3

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

Virginia Electric and Power Company
Case No. PUR-2026-00058
Sierra Club
Second Set

The following response to Question No. 2(a) of the Second Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on June 19, 2026, was prepared by or under the supervision of:

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

The following response to Question No. 2(b) through (g) of the Second Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on June 19, 2026, was prepared by or under the supervision of:

Michael S. Oberleitner
Fuel Commodity Specialist
Dominion Energy Virginia

Question No. 2

Regarding the Company's fuel costs:

a. For all accounting fuel costs provided in response to Request 2.1(i):

   i. Please explain what costs are included in the accounting fuel cost and how it is calculated.

   ii. Are fixed fuel costs such as transportation costs and replacement coal commodity costs included in the accounting fuel costs?

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

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

b. For all marginal fuel costs provided in response to Request 2.1(j):

   i. Please explain what costs are included in the marginal fuel price and how it is calculated.

c. Explain what accounts for the difference between the marginal price and accounting fuel cost?

d. Explain which fixed costs are included in unit commitment costs.

e. Indicate whether all fuel costs are recovered through fuel factors rates or if any of the costs are recovered outside of fuel factors.

f. Indicate whether any fixed fuel costs – including transportation – are recovered through base rates.

g. For VCHEC, explain how fuel costs are calculated and if there is a difference relative to the fuel costs of Dominion's other coal plants.

Response:

a.

i. The data provided in Attachment Sierra Club Set 02-01(i) (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.

ii. Yes, the fixed costs that 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.

iii. See the Company's response to subpart (ii).

iv. Not applicable.

b. The marginal variable costs of production ($/MWh), including fuel, variable O&M, and any other variable operating costs, reflect the Company's assumed values. 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.

c. The daily brokersheet pricing (marginal fuel price) is based on the market pricing consistent with the Company's PJM fuel cost policy 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.

d. Fixed production costs are not included in generator commitment offers.

e. The Company's coal unit generation offers to PJM are consistent with its PJM Fuel Cost Policy. As such, fueling costs (supporting PJM generation offers) that most closely resemble "fixed costs" would be (1) transportation (rail / truck) costs, which are typically updated monthly, and (2) replacement coal commodity costs, which can change daily.

f. Eligible fuel costs under the Virginia State Corporation Commission's Definitional Framework of Fuel Expenses for Virginia Electric and Power Company (the "Definitional Framework") are recovered through fuel factor rates.

g. Certain fixed costs that are not deemed eligible fuel costs under the Company's Definitional Framework may be recovered in base rates.

h. Related to VCHEC, the marginal fuel price is the actual weighted average cost (in $/mmBTU).

EXHIBIT DG-4

Company's Response to Sierra Club Discovery Request No. 2-3

Virginia Electric and Power Company
Case No. PUR-2026-00058
Sierra Club
Second Set

The following response to Question No. 3 of the Second Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on June 19, 2026, was prepared by or under the supervision of:

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

Question No. 3

For the variable production cost provided in Request 2.1(l):

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 Request 2.1(j) included in the Variable Production cost?

d. Provide the offer prices for all generation levels.

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 "l." of Attachment Sierra Club Set 02-01(a,l) (WAH) ES-B. This rate is the cost of generation ($/MWh) for that applicable station at the 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. See Attachment Sierra Club Set 02-03 (WAH) ES-B.

e. See the Company's response to Sierra Club 02-08(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. See the Company's response to Sierra Club 02-08(a) for an explanation of how it makes its unit commitment decisions. Additionally, see the Company's response to Sierra Club Set 02-08(c).

Attachment Sierra Club Set 02-03 (WAH) ES-B contains extraordinarily sensitive (ES-B) information as indicated and is being provided pursuant the protections set forth in 5 VAC 5-20-170, the Hearing Examiner's Protective Ruling, Including Additional Protective Treatment for Extraordinarily Sensitive Market Information, Contracts & Prices Information, and Wholesale Market Information dated May 29, 2026, any additional 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-5

Company's Response to Sierra Club Discovery Request No. 2-8

OMITTED FROM PUBLIC VERSION

EXTRA SENSITIVE EXHIBIT DG-6

Company's Response to Sierra Club Discovery Request No. 2-8, Attachment Sierra Club Set 02-08.3 (WAH) ES-C

Virginia Electric and Power Company
Case No. PUR-2026-00058
Sierra Club
Second Set

The following response to Question No. 8 of the Second Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on June 19, 2026, was prepared by or under the supervision of:

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

Question No. 8

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

a. Please explain how the Company decides to operate its coal units as Must Run vs Economic.

b. 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.

c. 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.

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

e. Explain how the daily unit commitment analysis was created.

Response:

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).

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. Related to unit dispatch, PJM generally makes this decision.

d. Related to both coal units and to VCHEC, the Company manually stores a "daily sheet" of the commitment decision for both its coal units and VCHEC, which include a profit and loss ("P&L") calculation on both a day-head and 5-day ahead basis. Because this calculation is performed with proprietary software, there are not any underlying formulas or workbooks associated with the number shown. See Attachment Sierra Club Set 02-08.1 (WAH) ES-C, Attachment Sierra Club Set 02-08.2 (WAH) ES-C, and Attachment Sierra Club Set 02-08.3 (WAH) ES-C for these daily sheets.

   Additionally, for its coal units, the Company documents the reason for must-run commitment decisions, consistent with Term 5 of the Stipulation approved by the Commission in the Company's 2022 Fuel Factor, Case No. PUR-2022-00064. The daily sheets contain descriptions of the must run reason that are manually entered. The Company is providing the raw daily sheets. The "Daily Sheet" provides the following information:

   • **Operating Date**
   • **Boiler Configuration:** VCHEC can generate in either a 1-boiler or 2-boiler configuration, and this number shows the number of boilers that are being offered into the market;
   • **Unit Status**: how the Company offered each unit in the PJM Day-Ahead Market. For ease of reference:
      o Unavailable (UNA): Unit is offline due to a planned, maintenance, or forced outage;
      o Economic (ECO): Unit is available to PJM for economic dispatch;
      o Must-Run (MUS): The unit is self-scheduled to generate regardless of market economics;
   • **Reason:** a brief explanation for the unit's status;
   • **Operating Day P&L:** the operating date's projected total margin;
   • **5-day P&L:** the projected total margin for the upcoming five-day period.

   For VCHEC, the Company also keeps an hourly record of the unit's projected margin, again with no underlying calculations for the numbers shown.

   See also the Company's response to APV Set 02-02(g).

e. The Company's daily unit commitment analysis and strategy has been ongoing since the Company joined PJM in 2005.

Attachment Sierra Club Set 02-08.1 (WAH) ES-C, Attachment Sierra Club Set 02-08.2 (WAH) ES-C, and Attachment Sierra Club Set 02-08.3 (WAH) ES-C are entirely extraordinarily sensitive (ES-C), and are being provided pursuant the protections set forth in 5 VAC 5-20-170, the Hearing Examiner's Protective Ruling, Including Additional Protective Treatment for Extraordinarily Sensitive Market Information, Contracts & Prices Information, and Wholesale Market Information dated May 29, 2026, any additional 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-7

Company's Response to Sierra Club Discovery Request No. 2-12

Virginia Electric and Power Company
Case No. PUR-2026-00058
Sierra Club
Second Set

The following response to Question No. 12 of the Second Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on June 19, 2026, was prepared by or under the supervision of:

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

Question No. 12

During the historical period or current period, did the Company ever modify the commitment or dispatch bids for any of its coal units with a decrement or adder to manage its coal inventory?

a. If yes, provide a narrative explanation of all instances of modified bids.

b. Provide the adder or decrement used and provide the units of the data provided.

c. Provide all associated workpapers showing how the decrements were calculated.

d. Provide the time period during which an adder or decrement was used.

e. Provide all cost / benefit analysis that the Company produced to demonstrate that using the bid modifier was the most economic way to manage its coal supply.

f. Explain how decrements or adders are incorporated into the Company's daily unit commitment decisions.

g. Does the Company evaluate the cost of using decrements to the alternative of purchasing increased storage capacity, paying contract penalties?

    i. If yes, provide all such analysis.

    ii. If no, explain why not?

Response:

a. Yes. The Company has, on occasion, included a decrement or adder in its commitments and dispatch offers. Under normal coal inventory levels, the Company offers its coal units using the replacement coal commodity fuel cost. In cases of high coal inventory levels, the Company may elect to offer a unit at a lower contractual coal commodity fuel cost with contractual commitment penalties or with a decrement. In cases where the market experiences low coal inventory levels, the Company may place an adder on units. During the historical period and current period, the Company only used decrements at Mt. Storm Power Station to manage high coal inventory levels. During the historical period and current period, the Company did not use adders for low coal inventory levels.

b. See Attachment Sierra Club Set 02-12(b) (WAH) ES-B.

c. For the historical period, the Company only used decrements at Mount Storm Power Station to reduce the units' offer to reflect the lower contractual coal commodity fuel cost due to high inventory levels. This decrement included no penalties from contractual commitment obligations.

   The Company's coal unit offers are typically based and calculated 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. Since these calculations are performed in the proprietary software, there are no workpapers to provide.

d. See the Company's response to subpart (b).

e. No cost/benefit analysis was performed. See the Company's response to subpart (c).

f. See the Company's response to subpart (c).

g. No cost/benefit analysis was performed. See the Company's response to subpart (c).

Attachment Sierra Club Set 02-12(b) (WAH) ES-B is entirely extraordinarily sensitive (ES-B) as indicated, and are being provided pursuant the protections set forth in 5 VAC 5-20-170, the Hearing Examiner's Protective Ruling, Including Additional Protective Treatment for Extraordinarily Sensitive Market Information, Contracts & Prices Information, and Wholesale Market Information dated May 29, 2026, any additional 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.

OMITTED FROM PUBLIC VERSION

EXTRA SENSITIVE EXHIBIT DG-8

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

REDACTED EXHIBIT DG-9

Company's Response to Sierra Club Discovery Request No. 2-14

Virginia Electric and Power Company
Case No. PUR-2026-00058
Sierra Club
Second Set

The following response to Question No. 14 of the Second Set of Interrogatories and Requests for Production of Documents propounded by Sierra Club received on June 19, 2026, was prepared by or under the supervision of:

Jorge L. Serrano
Manager – Power Generations Operations Support
Virginia Electric and Power Company

Question No. 14

Provide the heat content (MMbtu/ton) of the coal burned at each unit during the historical period up through the present.

Response:

This response contains confidential information as indicated and is being provided pursuant the protections set forth in 5 VAC 5-20-170, the Hearing Examiner's Protective Ruling, Including Additional Protective Treatment for Extraordinarily Sensitive Market Information, Contracts & Prices Information, and Wholesale Market Information dated May 29, 2026, any additional 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

[BEGIN CONFIDENTIAL INFORMATION]

[redacted]

[END CONFIDENTIAL INFORMATION]

EXHIBIT DG-10

Company's Response to Appalachian Voices Discovery Request No. 1-04

Virginia Electric and Power Company
Case No. PUR-2026-00058
Appalachian Voices
First Set

The following response to Question No. 4 of the First Set of Interrogatories and Requests for Production of Documents propounded by Appalachian Voices received on May 12, 2026, was prepared by or under the supervision of:

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

Question No. 4

For each coal and biomass unit, please provide the following dispatch parameters as reflected in offers provided to PJM, starting with January 1, 2025, and running to the most recent data available. If any parameter changed during that period, please indicate when it changed and how.

a) Ramp rate in MW/minute;

b) The definitions of cold, warm, and hot starts;

c) Startup costs for cold, warm, and hot starts;

d) Startup time for cold, warm, and hot starts;

e) The $/MWh offer for different dispatch levels, or a comparable heat rate curve; and

f) Any costs associated with cycling the unit to different dispatch levels.

Response:

a) See Attachment APV Set 01-04(a,c,d,e) (WAH) ES.

b) Please see PJM Manual 15, Section 4.4 for the requested definitions, available at https://www.pjm.com/-/media/DotCom/documents/manuals/m15.pdf.

c) See Attachment APV Set 01-04(a,c,d,e) (WAH) ES.

d) In general, the Company adheres to the Unit Specific Minimum Operating Parameters for Generation Capacity Resources, which are available at: https://www.pjm.com/-/media/DotCom/committees-groups/committees/elc/postings/20150612-june-2015-capacity-performance-parameter-limitations-informational-posting.ashx. See Attachment

APV Set 01-04 (a,c,d,e) (WAH) ES.

e) See Attachment APV Set 01-04 (a,c,d,e) (WAH) ES.

f) The Company does not calculate cycling costs. PJM does not include or consider cycling costs as part of the energy offer.

Attachment APV Set 01-04(a,c,d,e) (WAH) ES contains extraordinarily sensitive information as indicated and is being provided pursuant to the protections set forth in 5 VAC 5-20-170, the Company's pending Motion for Entry of a Protective Ruling for Additional Protective Treatment dated May 26, 2026, any subsequent protective order or protective 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.

OMITTED FROM PUBLIC VERSION

EXTRA SENSITIVE EXHIBIT DG-11

Company's Response to Appalachian Voices Discovery Request No. 1-04,

Attachment APV Set 1-04 (a,c,d,e) (WAH) ES B

EXHIBIT DG-12

Company's Response to Appalachian Voices Discovery Request No. 2-02,

Supplemental Response (dated July 02, 2026)

Virginia Electric and Power Company
Case No. PUR-2026-00058
Appalachian Voices
Second Set

The following **supplemental** response (dated July 2, 2026) to Question No. 2(g) of the Second Set of Interrogatories and Requests for Production of Documents propounded by Appalachian Voices received on May 21, 2026, was prepared by or under the supervision of:

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

Question No. 2

For each hour in the July 1, 2025 through June 30, 2026 "current period," please provide each of the following for each coal and biomass unit owned or operated by Dominion. Recognizing that the current period is ongoing, please provide data that is available to date and supplement it as soon as practical on a monthly basis once data has been compiled for May 2026, and again once data has been compiled for June 2026.

a) Day-Ahead market clearing price at the unit's PJM market node

b) Net generation (MWh) from the unit

c) Total fuel and non-fuel variable O&M cost ($/MWh) used in determining the marginal cost of generation from the unit as reflected in day-ahead market offers provided to PJM

d) Fuel cost ($/MWh) used to calculate subpart (c)

e) Non-fuel variable O&M costs ($/MWh) used to calculate subpart (c)

f) Whether the unit was on outage, available for economic dispatch, or designated as must-run regardless of economics

g) If the unit was designated as must-run, please indicate the reason for the designation

Response:

a) See Attachment APV Set 02-02(a) (WAH).

b) See Attachment APV Set 02-02(b,d,f) (WAH) CONF.

c) The Company assumes that the total fuel and non-fuel variable O&M cost ($/MWh) used in determining the marginal cost of generation from the unit as reflected in day-ahead market offers provided to PJM to be the real-time dispatch rate ($/MWh). See Attachment APV Set 02-02(c,e) (WAH) ES-B.

d) The fuel cost used to calculated subpart (c) is the daily brokersheet/fuel price ($/Ton, $/mmBTU). The brokersheet/fuel price is updated daily, not hourly. See Attachment APV Set 02-02(b,d,f) (WAH) CONF.

e) Non-fuel variable O&M costs ($/MWh) are updated annually per PJM Manual 15, Section 2.6 (https://www.pjm.com/-/media/DotCom/documents/manuals/m15.pdf). See Attachment APV Set 02-02(c,e) (WAH) ES-B.

f) See Attachment APV Set 02-02(b,d,f) (WAH) CONF.

g) For the coal units, please see Attachment APV 02-02 (WAH) CONF (Updated April 2026) for an update to the Must-Run occurrences and reasons provided by the Company at filing, now through April 30, 2026. At filing, the "Coal Must-Run Reasons (WAH)_CONF – FINAL" file was posted to iManage Share on May 1, 2026 in PUR-2026-00058 – 2026 VA Fuel Factor – Application – Confidential → Application → Schedules.

Supplemental Response (dated July 02, 2026):

(g) Please see Attachment APV 02-02(g) (WAH) CONF (Updated May 2026) for an update to the Must-Run occurrences and reasons through May 2026.

Attachment APV 02-02(g) (WAH) CONF (Updated May 2026) is entirely confidential and is being provided pursuant the protections set forth in 5 VAC 5-20-170, the Hearing Examiner's Protective Ruling, Including Additional Protective Treatment for Extraordinarily Sensitive Market Information, Contracts & Prices Information, and Wholesale Market Information dated May 29, 2026, any additional 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.

OMITTED FROM PUBLIC VERSION

CONFIDENTIAL EXHIBIT DG-13

Company's Response to Appalachian Voices
Discovery Request No. 2-02,

Attachment APV 02-02(g) (WAH) (CONF) (Updated May 2026)