

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION
AT RICHMOND, FEBRUARY 16, 2018

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APPLICATION OF

VIRGINIA ELECTRIC AND POWER COMPANY

CASE NO. PUR-2018-00009

For approval to establish a Virginia community solar pilot program, pursuant to § 56-585.1:3 of the Code of Virginia

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ORDER FOR NOTICE AND COMMENT

On January 19, 2018, Virginia Electric and Power Company d/b/a Dominion Energy Virginia ("Dominion" or "Company") filed an application ("Application") with the State Corporation Commission ("Commission") pursuant to § 56-585.1:3 of the Code of Virginia ("Code")¹ and Rule 80 of the Commission's Rules of Practice and Procedure ("Rules of Practice")² for approval to establish a Virginia Community Solar Pilot Program ("Pilot Program"), including a new voluntary companion tariff, designated Rider VCS – Virginia Community Solar Pilot Program ("Rider VCS").³ Code § 56-585.1:3 requires, among other things, each investor-owned utility, including Dominion, to design a community solar pilot program, and to make subscriptions for participation in its pilot program available to retail customers on a voluntary basis within six months of receiving Commission approval. The Application states that pursuant to such a community solar pilot program, "participating retail customers may voluntarily elect to purchase the 'net electrical output' of new solar generating

¹ Code § 56-585.1:3 is the codification of Virginia Senate Bill 1393, passed during the 2017 General Assembly session and enacted on March 16, 2017, as Chapter 580 of the 2017 Virginia Acts of Assembly. See Application at 3.

² 5 VAC 5-20-10 *et seq.*

³ Application at 1.

facilities located in communities throughout the Company's Virginia service territory...under Rider VCS."⁴

Code § 56-585.1:3 provides, in part, that the Commission shall approve the recovery of the Pilot Program costs that the Commission deems to be reasonable and prudent. This Code section also requires Commission approval of the Pilot Program design, the voluntary companion rate schedule (*i.e.*, Rider VCS), and the portfolio of participating generating facilities (referred to herein as the "Community Solar Portfolio" or "Portfolio"), pursuant to specific requirements in Code § 56-585.1:3 regarding the Request for Proposal ("RFP") criteria and selection process, the minimum and maximum generating capacities of the Community Solar Portfolio, and the Pilot Program duration.

Dominion states in the Application that, using the RFP process prescribed by Code § 56-585.1:3,⁵ "the Company solicited power purchase agreements ('PPAs') to be executed with eligible solar generating facilities that provide the Company the exclusive right to 100 percent of the net electrical output that these facilities dedicate to the Pilot Program."⁶ The Company selected five winning proposals and four alternate proposals from facilities that qualify as "eligible generation facilities," as defined in Code § 56-585.1:3 A, and which total ten

⁴ *Id.* at 1-2. The Company defines "net electrical output" as including "capacity, energy, ancillary services and Environmental Attributes (including but not limited to renewable energy credits) delivered from designated new photovoltaic...solar facilities." *Id.* at 1, n. 1. The Company states further that "Environmental Attributes" include Renewable Energy Certificates, but do not include federal, state or local tax credits or other incentives. *Id.* As used in the Application, a Renewable Energy Certificate ("REC") means "the certificate or other transferable indicia created under the applicable program associated with one (1) megawatt-hour...of electric energy generated by the applicable renewable generation facility." *Id.*

⁵ See *id.* at 5-11 for a description of the Company's RFP process and Attachments A and B to the Application for a copy of the RFPs.

⁶ Application at 5.

megawatts ("MW") of new solar photovoltaic capacity, consistent with Code § 56-585.1:3.⁷

Dominion states that the selected PPA projects, which would constitute the Company's Community Solar Portfolio, are located within the Company's service territory and will be interconnected to the Company's distribution system.⁸ Dominion further states that it expects to execute final PPAs with these developers in the near future.⁹

According to the Company, "the spirit and intent of the community solar legislation" is to include, to the extent possible, small eligible generating facilities with a generating capacity of less than 0.5 MW.¹⁰ The smallest project bidder in response to the Company's RFP was 625 kilowatts ("kW").¹¹ Accordingly, on January 19, 2018, the Company issued a second RFP tailored specifically to seek small projects less than 500 kW in size.¹² The Company states that based on the responses, which are due February 22, 2018, the Company may select one or more projects that qualify as small eligible generating facilities for inclusion in its Community Solar Portfolio, which the Commission is being asked to approve.¹³

⁷ *Id.* at 9-10.

⁸ *Id.* at 10. The Company states that it intends to provide a list of the projects comprising the Community Solar Portfolio, and related details, confidentially during the proceeding. *Id.* at 10, n. 15.

⁹ *Id.* at 10.

¹⁰ *Id.*

¹¹ *Id.*

¹² *Id.*

¹³ *Id.* at 10-11.

According to the Application, the proposed pricing for the three-year subscription-based Pilot Program¹⁴ is designed "to be attractive to qualifying customers looking for voluntary options to promote, support, and purchase community solar."¹⁵ The Pilot Program would be available to all retail customers,¹⁶ net metering customers, as well as Special Contracts approved by the Commission pursuant to Code § 56-235.2,¹⁷ in two subscription options.¹⁸ Participants may subscribe by purchasing 100 kilowatt-hour ("kWh") blocks (each constituting one "VCS Block") of community solar on a monthly (or billing period) basis, for an annually-updated fixed price.¹⁹ Alternatively, participants, with the exception of "Large Non-residential Customers,"²⁰ may subscribe by purchasing community solar to match 100% of their monthly (or billing period) usage in kWh for an annually-updated fixed price per kWh.²¹

The Company proposes, to allow for broader community participation in the Pilot Program, the following maximum subscription allotments for eligible customers who subscribe

¹⁴ Code § 56-585.1:3 prescribes a three-year pilot program period, which the statute defines as "the three-year period ending three years following the date the first subscription is entered into by a customer." The Company states that it may seek Commission approval to expand or modify the Pilot Program and execute PPAs with additional eligible generating facilities if customer interest and participation result in subscriptions reaching full capacity during the three-year period. Application at 11.

¹⁵ Application at 11.

¹⁶ This includes those customers taking service on the Company's Rate Schedules 1, 1P, 1S, 1T, DP-R, 1EV, 5, 5C, 5P, 6, 6TS, 10, 25, 27, 28, 29, GS-1, DP-1, GS-2, GS-2T, DP-2, GS-3, SCR-GS-3, MBR-GS-3, GS-4, SCR-GS-4, and MBR-GS-4. *Id.* at 11-12.

¹⁷ *Id.*

¹⁸ *Id.* at 12.

¹⁹ *Id.*

²⁰ A "Large Non-residential Customer" is defined by Dominion as a commercial or industrial customer whose peak measured demand has reached or exceeded 500 kW within the current or previous 11 billing months at the Customer's service location. *Id.* at 12, n. 20.

²¹ *Id.* at 12.

by purchasing VCS blocks: (1) residential customers would be limited to five whole VCS Blocks per billing cycle, and (2) non-residential customers would be limited to ten whole VCS Blocks per billing cycle.²² If the 100% match option is not selected, participating customers must subscribe to a minimum of one whole VCS Block per billing cycle.²³ Under the Company's proposal, Customers may change their subscription level once per year, subject to availability.²⁴ The Company states that it would make every effort to ensure the subscribed amount of community solar does not exceed the projected output of the Portfolio.²⁵ If the Portfolio's net electrical output is not sufficient to meet participating customers' subscriptions on an annual basis, the Company would supplement the Portfolio with solar RECs.²⁶

As proposed, there would be no application fee to subscribe to Rider VCS.²⁷ The Company states that because Rider VCS is designed as a voluntary companion tariff to the participating customer's Principal Tariff (*i.e.* the rate schedule on which the customer takes service from the Company), the customer's billing statement would be largely unchanged, with the exception of a new line item – the "VCS Net Rate."²⁸ The proposed VCS Net Rate (in cents per kWh) would be calculated based on the participating customer's actual billed usage during each billing period, capped at the customer's subscription level.²⁹ A participating customer's

²² *Id.* at 12-13.

²³ *Id.* at 13.

²⁴ *Id.*

²⁵ *Id.*

²⁶ *Id.*

²⁷ *Id.*

²⁸ *Id.* at 16.

²⁹ *Id.* at 15-17.

energy usage that exceeds the amount subscribed under Rider VCS would be billed under the Principal Tariff for the customer's account.³⁰

The proposed VCS Net Rate would include the cost of the Pilot Program ("VCS Charge") and a proportional credit for the market value of power equal to the net electrical output generated, as well as the capacity provided, by the Community Solar Portfolio ("VCS Adjustment").³¹ The Company states that the proposed VCS Charge would include: (i) purchased power costs, which are based on PPA prices for solar energy, capacity, and Environmental Attributes; (ii) RFP costs; (iii) marketing charges; (iv) customer service costs; and (v) a reasonable margin based on purchased power costs.³² The VCS Adjustment would include a forecasted energy credit and a credit based on the market value of the capacity provided by the Community Solar Portfolio.³³ The Company proposes to reset the VCS Adjustment annually, with 90 days' advance notice to existing and prospective Pilot Program customers,³⁴ using forecasting methods for PJM Interconnection, L.L.C. ("PJM") energy and capacity prices consistent with those used in the Company's annual fuel filing.³⁵ Accordingly, Rider VCS customers would be able to lock in to the VCS Net Rate annually.³⁶

³⁰ *Id.* at 17, n. 29.

³¹ *Id.* at 14.

³² *Id.*

³³ *Id.* at 14-15.

³⁴ *Id.* at 15, 18.

³⁵ *Id.* at 15.

³⁶ *Id.*

The Company proposes a fixed price of 5.95¢ per kWh for the VCS Charge.³⁷ The VCS Adjustment may fluctuate annually, but the Application states that based on current energy credit forecasts, the Company believes the VCS Net Rate would be approximately 1.55¢ per kWh in the first year of the Pilot Program, if approved.³⁸

The Company states that the generating resources in the Portfolio would act as load reducers in PJM and, accordingly, all generation from those resources will lower purchased power costs recovered through the Company's fuel factor.³⁹ To ensure that Rider VCS customers receive the benefit and non-participating customers remain neutral to Rider VCS, the Company plans to make a Rider VCS energy adjustment to the Company's fuel factor.⁴⁰ For the same reason, Dominion states that it plans to make a capacity adjustment in the Company's future cost-of-service studies because the generation from the Portfolio's resources would reduce the amount of capacity that the Company must purchase in PJM.⁴¹ Dominion states that per Code § 56-585.1:3 B 7, the Company would retire the RECs and other environmental attributes associated with the resources used to serve customers on Rider VCS.⁴²

The Company would make Rider VCS subscriptions available within six months of Commission approval of the Pilot Program; however, the Company states that participating customer subscriptions would not become effective until one or more Community Solar Portfolio

³⁷ *Id.*

³⁸ *Id.*

³⁹ *Id.* at 16.

⁴⁰ *Id.*

⁴¹ *Id.*

⁴² *Id.*

sites begin to generate renewable energy.⁴³ Subscribing customers would be subject to a minimum one-year term. After the initial one-year term, Rider VCS customers may terminate service under Rider VCS with 30 days' notice to the Company.⁴⁴

Dominion asserts that its Community Solar Pilot Program, including Rider VCS, is in the public interest because the Pilot Program is consistent with the requirements of Code § 56-585.1:3,⁴⁵ which states, in part:

The participation of retail customers in a [community solar pilot program] administered by a participating utility in the Commonwealth is in the public interest. Voluntary companion rate schedules approved by the Commission pursuant to this section are necessary in order to acquire information which is in furtherance of the public interest.⁴⁶

The Company asserts, among other things, that the Pilot Program is also in the public interest because it would: (i) enhance fuel diversification across the Company's generation portfolio; (ii) provide environmental benefits; (iii) provide economic benefits; (iv) further the General Assembly's stated goals of promoting solar energy through distributed energy generation; and (v) support the objectives of the Commonwealth Energy Policy set forth at Code § 67-101, *et seq.*⁴⁷

The Company further asserts that Rider VCS and its cost recovery method are reasonable and prudent because: (i) the Rider VCS Charge would be designed to recover the Company's expected actual costs to serve each participating customer under the Pilot Program; (ii) the VCS

⁴³ *Id.* at 17.

⁴⁴ *Id.* at 18.

⁴⁵ *Id.* at 18-19.

⁴⁶ Code § 56-585.1:3 D.

⁴⁷ Application at 19-20.

Adjustment would be market-based and reset annually to maintain consistency with then-current market conditions; (iii) non-participating customers would not be required to pay for, or subsidize, the costs to serve participating customers with community solar; and (iv) Rider VCS would be voluntary.⁴⁸

NOW THE COMMISSION, upon consideration of this matter, is of the opinion and finds that this matter should be docketed; Dominion should provide public notice of its Application; interested persons should have an opportunity to file comments on the Application, file a notice of participation as a respondent, and/or request that a hearing be convened; the Commission's Staff ("Staff") should be directed to investigate the Application and present its findings and recommendations in a report; and a Hearing Examiner should be assigned to rule on any discovery matters that arise during the course of this proceeding.

Accordingly, IT IS ORDERED THAT:

(1) This matter is docketed and assigned Case No. PUR-2018-00009.

(2) As provided by § 12.1-31 of the Code and Rule 5 VAC 5-20-120, *Procedure before Hearing Examiners*, of the Commission's Rules of Practice, a Hearing Examiner is appointed to rule on any discovery matters that arise during the course of this proceeding.

(3) The Company shall make copies of its Application, as well as a copy of this Order for Notice and Comment, available for public inspection during regular business hours at each of the Company's business offices in the Commonwealth of Virginia. Copies also may be obtained by submitting a written request to counsel for the Company, Lisa S. Booth, Esquire, Dominion Energy Services, Inc., 120 Tredegar Street, RS-2, Richmond, Virginia 23219. If acceptable to the requesting party, the Company may provide the documents by electronic means. Copies of

⁴⁸ *Id.* at 20.

the public version of all documents also shall be available for interested persons to review in the Commission's Document Control Center located on the first floor of the Tyler Building, 1300 East Main Street, Richmond, Virginia 23219, between the hours of 8:15 a.m. and 5 p.m., Monday through Friday, excluding holidays. Interested persons also may download unofficial copies from the Commission's website: <http://www.scc.virginia.gov/case>.

(4) On or before March 26, 2018, the Company shall cause a copy of the following notice to be published as display advertising (not classified) on one occasion in newspapers of general circulation throughout the Company's service territory within the Commonwealth of Virginia:

NOTICE TO THE PUBLIC OF AN APPLICATION
 BY VIRGINIA ELECTRIC AND POWER COMPANY
 FOR APPROVAL TO ESTABLISH A VIRGINIA
 COMMUNITY SOLAR PILOT PROGRAM
 PURSUANT TO § 56-585.1:3 OF THE CODE OF VIRGINIA
CASE NO. PUR-2018-00009

On January 19, 2018, Virginia Electric and Power Company d/b/a Dominion Energy Virginia ("Dominion" or "Company") filed an application ("Application") with the State Corporation Commission ("Commission") pursuant to § 56-585.1:3 of the Code of Virginia ("Code") and Rule 80 of the Commission's Rules of Practice and Procedure ("Rules of Practice") for approval to establish a Virginia Community Solar Pilot Program ("Pilot Program"), including a new voluntary companion tariff, designated Rider VCS – Virginia Community Solar Pilot Program ("Rider VCS"). Code § 56-585.1:3 requires, among other things, each investor-owned utility, including Dominion, to design a community solar pilot program, and to make subscriptions for participation in its pilot program available to retail customers on a voluntary basis within six months of receiving Commission approval. The Application states that pursuant to such a community solar pilot program, "participating retail customers may voluntarily elect to purchase the 'net electrical output' of new solar generating facilities located in communities throughout the Company's Virginia service territory...under Rider VCS."

Code § 56-585.1:3 provides, in part, that the Commission shall approve the recovery of the Pilot Program costs that the Commission deems to be reasonable and prudent. This Code section also requires Commission approval of the Pilot Program design, the voluntary companion rate schedule (*i.e.*, Rider VCS), and the portfolio of participating generating facilities (referred to herein as the "Community Solar Portfolio" or "Portfolio"), pursuant to specific requirements in Code § 56-585.1:3 regarding the Request for Proposal ("RFP") criteria and selection process, the minimum and maximum generating capacities of the Community Solar Portfolio, and the Pilot Program duration.

Dominion states in the Application that, using the RFP process prescribed by Code § 56-585.1:3, "the Company solicited power purchase agreements ('PPAs') to be executed with eligible solar generating facilities that provide the Company the exclusive right to 100 percent of the net electrical output that these facilities dedicate to the Pilot Program." The Company selected five winning proposals and four alternate proposals from facilities that qualify as "eligible generation facilities," as defined in Code § 56-585.1:3 A, and which total ten megawatts of new solar photovoltaic capacity, consistent with Code § 56-585.1:3. Dominion states that the selected PPA projects, which would constitute the Company's Community Solar Portfolio, are located within the Company's service territory and will be interconnected to the Company's distribution system. Dominion further states that it expects to execute final PPAs with these developers in the near future.

On January 19, 2018, the Company issued a second RFP tailored specifically to seek small projects less than 500 kilowatts in size. The Company states that based on the responses, which are due February 22, 2018, the Company may select one or more projects that qualify as small eligible generating facilities for inclusion in its Community Solar Portfolio, which the Commission is being asked to approve.

According to the Application, the proposed pricing for the three-year subscription-based Pilot Program is designed "to be attractive to qualifying customers looking for voluntary options to promote, support, and purchase community solar." The Pilot Program would be available to all retail customers, net metering customers, as well as Special Contracts approved by the Commission pursuant to Code § 56-235.2, in two subscription options. Participants may subscribe by purchasing 100 kilowatt-hour ("kWh") blocks (each constituting one "VCS Block") of

filing a notice of participation. If not filed electronically, an original and fifteen (15) copies of the notice of participation shall be submitted to the Clerk of the Commission at the address above. A copy of the notice of participation as a respondent also must be sent to counsel for the Company at the address set forth above. Pursuant to Rule 5 VAC 5-20-80 B, *Participation as a respondent*, of the Commission's Rules of Practice, any notice of participation shall set forth: (i) a precise statement of the interest of the respondent; (ii) a statement of the specific action sought to the extent then known; and (iii) the factual and legal basis for the action. All filings shall refer to Case No. PUR-2018-00009. For additional information about participation as a respondent, any person or entity should obtain a copy of the Commission's Order for Notice and Comment.

On or before April 30, 2018, any interested person may file a written request for a hearing. If not filed electronically, an original and fifteen (15) copies of the hearing request shall be submitted to the Clerk of the Commission at the address above, and the interested person simultaneously shall serve a copy of the hearing request on counsel to the Company at the address set forth above. All requests for a hearing shall refer to Case No. PUR-2018-00009.

All documents filed with the Office of the Clerk of the Commission in this docket may use both sides of the paper. In all other respects, all filings shall comply fully with the requirements of 5 VAC 5-20-150, *Copies and format*, of the Commission's Rules of Practice.

The Commission's Rules of Practice may be viewed at <http://www.scc.virginia.gov/case>. A printed copy of the Commission's Rules of Practice and an official copy of the Commission's Order for Notice and Comment in this proceeding may be obtained from the Clerk of the Commission at the address above.

VIRGINIA ELECTRIC AND POWER COMPANY

(5) On or before March 26, 2018, Dominion shall serve a copy of its Application and this Order for Notice and Comment on the following officials, to the extent the position exists, in each county, city, and town in which the Company provides service in the Commonwealth of Virginia: the chairman of the board of supervisors of each county; the mayor or manager (or

equivalent official) of every city and town; and the county, city, or town attorney. Service shall be made by personal delivery or by first class mail, postage prepaid, to the customary place of business or residence of the person served.⁴⁹

(6) On or before April 12, 2018, the Company shall file with Joel H. Peck, Clerk, State Corporation Commission, c/o Document Control Center, P.O. Box 2118, Richmond, Virginia 23218-2118, proof of the notice and service required by Ordering Paragraphs (4) and (5), including the name, title, and address of each official served.

(7) On or before April 30, 2018, any interested person may file written comments on the Application with the Clerk of the Commission at the address shown in Ordering Paragraph (6). Any interested person desiring to submit comments electronically may do so on or before April 30, 2018, by following the instructions found on the Commission's website: <http://www.scc.virginia.gov/case>. Compact discs or any other form of electronic storage medium may not be filed with the comments. All comments shall refer to Case No. PUR-2018-00009.

(8) On or before April 30, 2018, any person or entity wishing to participate as a respondent in this proceeding may do so by filing a notice of participation. If not filed electronically, an original and fifteen (15) copies of the notice of participation shall be submitted to the Clerk of the Commission at the address set forth in Ordering Paragraph (6). The respondent simultaneously shall serve a copy of the notice of participation on counsel to the Company at the address in Ordering Paragraph (3). Pursuant to Rule 5 VAC 5-20-80 B,

⁴⁹ Service also may be made electronically if a locality has submitted a written request to the Company for electronic service, pursuant to the Commission's April 19, 2016 Order in Case No. PUE-2016-00039. *See Petition of Virginia Electric and Power Company, For a continuing waiver of 20 VAC-5-201-10 J of the Rules Governing Utility Rate Applications and Annual Informational Filings to permit electronic service to local officials upon request*, Case No. PUE-2016-00039, Doc. Con. Cen. No. 160420194, Order (Apr. 19, 2016).

Participation as a respondent, of the Commission's Rules of Practice, any notice of participation shall set forth: (i) a precise statement of the interest of the respondent; (ii) a statement of the specific action sought to the extent then known; and (iii) the factual and legal basis for the action. Any organization, corporation, or government body participating as a respondent must be represented by counsel as required by 5 VAC 5-20-30, *Counsel*, of the Rules of Practice. All filings shall refer to Case No. PUR-2018-00009.

(9) Within five (5) business days of receipt of a notice of participation as a respondent, the Company shall serve upon each respondent a copy of this Order for Notice and Comment, a copy of the Application, and all materials filed by the Company with the Commission, unless these materials already have been provided to the respondent.

(10) On or before April 30, 2018, any interested person may file a written request for a hearing. If not filed electronically, an original and fifteen (15) copies of the hearing request shall be submitted to the Clerk of the Commission at the address set forth in Ordering Paragraph (6), and the interested person simultaneously shall serve a copy of the hearing request on counsel to the Company at the address in Ordering Paragraph (3). All requests for a hearing shall refer to Case No. PUR-2018-00009.

(11) The Staff shall investigate the Application. On or before June 5, 2018, the Staff shall file with the Clerk of the Commission an original and fifteen (15) copies of its report and exhibits regarding its investigation of the Application.

(12) On or before June 19, 2018, the Company may file with the Clerk of the Commission any comments on the Staff's report, comments from interested persons, and requests for hearing that were filed with the Commission. If not filed electronically, an original and fifteen (15) copies of such comments shall be filed with the Clerk of the Commission.

(13) All documents filed with the Office of the Clerk of the Commission in this docket may use both sides of the paper. In all other respects, all filings shall comply fully with the requirements of 5 VAC 5-20-150, *Copies and format*, of the Commission's Rules of Practice.

(14) The Commission's Rule of Practice 5 VAC 5-20-260, *Interrogatories to parties or requests for production of documents and things*, shall be modified for this proceeding as follows: responses and objections to written interrogatories and requests for production of documents shall be served within five (5) calendar days after receipt of the same. In addition to the service requirements of 5 VAC 5-20-260, on the day that copies are filed with the Clerk of the Commission, a copy of the interrogatory or request for production shall be served electronically, or by facsimile, on the party to whom the interrogatory or request for production is directed or the assigned Staff attorney if the interrogatory or request for production is directed to the Staff.⁵⁰ Except as modified above, discovery shall be in accordance with Part IV of the Commission's Rules of Practice, 5 VAC 5-20-240 *et seq.*

(15) This matter is continued generally.

AN ATTESTED COPY hereof shall be sent by the Clerk of the Commission to:

Joseph K. Reid III, Esquire, Jakarra J. Jones, Esquire, and Anne Hampton Andrews, Esquire, McGuireWoods LLP, Gateway Plaza, 800 East Canal Street, Richmond, Virginia 23219; Lisa S. Booth, Esquire, William H. Baxter II, Esquire, and David J. DePippo, Esquire, Dominion Energy Services, Inc., 120 Tredegar Street, RS-2, Richmond, Virginia 23219, Richmond, Virginia 23219; and C. Meade Browder, Jr., Senior Assistant Attorney General, Division of Consumer Counsel, Office of the Attorney General, 202 N. 9th Street, 8th Floor, Richmond, Virginia

⁵⁰ The assigned Staff attorney is identified on the Commission's website, <http://www.scc.virginia.gov/case>, by clicking "Docket Search," and clicking "Search Cases," and entering the case number, PUR-2018-00009, in the appropriate box.

23219. A copy also shall be delivered to the Commission's Office of General Counsel and Divisions of Public Utility Regulation and Utility Accounting and Finance.

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