

Commonwealth of Virginia  
STATE CORPORATION COMMISSION  
DIVISION OF PUBLIC UTILITY REGULATION

MEMORANDUM

2023 AUG 30 A 10:24

STATE CORPORATION COMMISSION  
DOCUMENT CONTROL CENTER

Date: 8/30/2023

To: Document Control

From: Michelle Brown-White, Division of Public Utility Regulation

RE: Virginia Electric and Power Company - For a financing order authorizing the issuance of deferred fuel cost bonds

Attached are four (4) comments submitted to the Commission for consideration. Please enter in the case jacket for Case No. **PUR-2023-00112**.

Thank you.

David Marsden, Senate of Virginia

Barry DuVal, Virginia Chamber of Commerce

Scott Wyatt, Member, Virginia House of Delegates

Kathy Byron, Virginia House of Delegates

NOT FOR DISTRIBUTION

**Michelle Brown-White**

**From:** do-not-reply@scc.virginia.gov  
**Sent:** Tuesday, August 29, 2023 9:33 AM  
**To:** PUR\_Comments  
**Cc:** eryan@mcguirewoods.com  
**Subject:** Comment for PUR-2023-00112  
**Attachments:** Fuel Securitization Letter\_Marsden.pdf

Case Number PUR-2023-00112  
First Name Dave  
Last Name Marsden  
Organization Senate of Virginia  
Address Line 1 9322 Jackson St  
Address Line 2  
City Burke  
State VA  
Zip Code 22015  
Phone Number 703-964-6821  
Email Address

Comments  
August 28, 2023 The Honorable Jehmal T. Hudson Virginia State Corporation Commission Tyler Building 1300 E. Main Street Richmond, VA 23219 RE: Case No. PUR-2023-00112 Dear Judge Hudson: I am writing in regard to the applications by Dominion Energy Virginia to securitize certain deferred fuel costs and, relatedly, update the fuel factor component of its customers' electric bills. As the State Corporation Commission adjudicates these cases, I wish to register my support for mitigating the immediate bill impact associated with fuel costs and for stabilizing electric rates to the greatest extent possible. To that end, I hope you will consider the merits of the fuel securitization approach. This option was born out of the General Assembly's desire to bolster the rate relief potential of important utility-focused regulatory reforms enacted during the 2023 Regular Session. By approving the relevant legislation, my fellow lawmakers and I sought to provide a tool the Commission may find beneficial to utility customers—including those I represent in Fairfax County—who might otherwise face a steep short-term rate increase. The near-universal support that legislation attracted reflects a bipartisan focus on controlling electricity costs in an inflationary environment. I would urge the Commission to keep the goal of electric rate stability, as well as successful applications of securitization in other states, top of mind when reaching a decision in this proceeding. Thank you for your continued service on the Commission and your consideration of my views on this matter. Sincerely, David W. Marsden Senate of Virginia, 37th District

August 28, 2023

The Honorable Jehmal T. Hudson  
Virginia State Corporation Commission  
Tyler Building  
1300 E. Main Street  
Richmond, VA 23219

RE: Case No. PUR-2023-00112

Dear Judge Hudson:

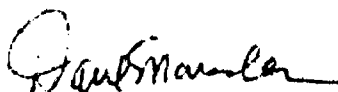
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Thank you for your continued service on the Commission and your consideration of my views on this matter.

Sincerely,



David W. Marsden  
Senate of Virginia, 37th District

**Michelle Brown-White**

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**From:** do-not-reply@scc.virginia.gov  
**Sent:** Tuesday, August 29, 2023 2:06 PM  
**To:** PUR\_Comments  
**Cc:** eryan@mcguirewoods.com  
**Subject:** Comment for PUR-2023-00112  
**Attachments:** 8.28.23 VA Chamber Fuel Securitization Letter.pdf

Case Number PUR-2023-00112  
 First Name Barry  
 Last Name DuVal  
 Organization Virginia Chamber of Commerce  
 Address Line 1 919 East Main Street  
 Address Line 2 Suite 900  
 City Richmond  
 State VA  
 Zip Code 23219  
 Phone Number 804-644-1607  
 Email Address k.martin@vachamber.com

Comments  
 Mr. Bernard Logan, Clerk Virginia State Corporation Commission 1300 East Main Street Richmond, VA 23219 Re: Case No. PUR-2023-00112 Dear Mr. Logan: As the State Corporation Commission (Commission) draws closer to its decision on Dominion Energy's application related to securitization of deferred fuel costs, the Virginia Chamber of Commerce wants to express its support to protecting all ratepayers—business and residential customers alike—from a spike in electric rates associated with fuel costs. The 2023 General Assembly addressed its goal of providing rate relief and stability to electric customers by enacting legislation which, among other things, directly enabled Dominion Energy's securitization proposal. Securitization can be a customer-beneficial approach to the extent it avoids significant fuel rate adjustment which could result from business-as-usual cost recovery in favor of minimizing present-day bill impacts and diffusing the impact over time. We acknowledge that securitization is a new tool for the Commission, one which demands careful consideration. However, it is important to recognize that it is a tool which other states have successfully deployed when circumstances warrant, and one that the Virginia legislature specifically envisioned as a mitigant of near-term electric rate increases. Recent economic conditions have proven difficult to navigate, both for the business community and Virginia households. In reaching a ruling in this proceeding, the Virginia Chamber respectfully requests that the Commission supports rate stability for all Dominion Energy customers. Thank you for the consideration of my comments. Sincerely, Barry E. DuVal President and CEO

# VIRGINIA CHAMBER

THE VOICE of BUSINESS

August 28, 2023

Mr. Bernard Logan, Clerk  
Virginia State Corporation Commission  
1300 East Main Street  
Richmond, VA 23219

Re: Case No. PUR-2023-00112

Dear Mr. Logan:

As the State Corporation Commission (Commission) draws closer to its decision on Dominion Energy's application related to securitization of deferred fuel costs, the Virginia Chamber of Commerce wants to express its support to protecting all ratepayers—business and residential customers alike—from a spike in electric rates associated with fuel costs.

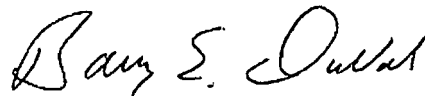
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We acknowledge that securitization is a new tool for the Commission, one which demands careful consideration. However, it is important to recognize that it is a tool which other states have successfully deployed when circumstances warrant, and one that the Virginia legislature specifically envisioned as a mitigant of near-term electric rate increases.

Recent economic conditions have proven difficult to navigate, both for the business community and Virginia households. In reaching a ruling in this proceeding, the Virginia Chamber respectfully requests that the Commission supports rate stability for all Dominion Energy customers.

Thank you for the consideration of my comments.

Sincerely,



Barry E. DuVal  
President and CEO

**Michelle Brown-White**

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**From:** do-not-reply@scc.virginia.gov  
**Sent:** Wednesday, August 30, 2023 9:55 AM  
**To:** PUR\_Comments  
**Cc:** eryan@mcguirewoods.com  
**Subject:** Comment for PUR-2023-00112  
**Attachments:** Del Wyatt Fuel Securitization Letter.pdf

Case Number PUR-2023-00112  
First Name Scott  
Last Name Wyatt  
Organization Member, Virginia House of Delegates  
Address Line 1 PO Box 365  
Address Line 2  
City Mechanicsville  
State VA  
Zip Code 23111  
Phone Number 8046981097  
Email Address delswyatt@house.virginia.gov  
Comments Please see attached letter.



COMMONWEALTH OF VIRGINIA  
HOUSE OF DELEGATES  
RICHMOND

SCOTT A. WYATT  
POST OFFICE BOX 365  
MECHANICSVILLE, VIRGINIA 23111  
  
NINETY-SEVENTH DISTRICT

COMMITTEE ASSIGNMENTS:  
TRANSPORTATION  
APPROPRIATIONS  
COUNTIES, CITIES AND TOWNS

230840186

August 28, 2023

The Honorable Jehmal T. Hudson, Chairman  
State Corporation Commission  
1300 E. Main Street—Tyler Building  
Richmond, Virginia 23219

RE: Case No. PUR-2023-00112

Dear Judge Hudson:

Due to the effects of inflation on fuel costs, I encourage the SCC to allow Dominion Energy to finance certain deferred fuel costs through fuel cost bonds (Fuel Securitization). I believe allowing Dominion to defer fuel costs would lessen the negative impacts on ratepayers across the Commonwealth.

One of the most compelling aspects of the electric rate reform law which became effective in July, in addition to broad-based regulatory reforms, was the substantial and immediate rate relief it entailed for Dominion Energy customers. An option to securitize deferred fuel costs was included as a possible alternative to the usual cost recovery framework which, given fuel price increases in the recent past, could significantly raise monthly bills. It was designed to help protect electric customers from a near-term price spike.

As the Commission proceeds with its review of Dominion Energy's fuel securitization proposal, I trust you will give due consideration to the opportunity to implement this new tool. I am sensitive to the fact that securitization would be a novel approach for Virginia but am also reassured by its successful use elsewhere.

In closing, I hope the Commission will bear in mind the financial strain Virginia households have been experiencing and prioritize electric rate stability when rendering a decision in this case. Thank you for the opportunity to offer my perspective.

Sincerely,

Scott A. Wyatt

**Michelle Brown-White**

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**From:** do-not-reply@scc.virginia.gov  
**Sent:** Wednesday, August 30, 2023 9:55 AM  
**To:** PUR\_Comments  
**Cc:** eryan@mcguirewoods.com  
**Subject:** Comment for PUR-2023-00112  
**Attachments:** SCC ltr securitization.pdf

Case Number PUR-2023-00112  
First Name Kathy  
Last Name Byron  
Organization  
Address Line 1 PO Box 900  
Address Line 2  
City Forest  
State VA  
Zip Code 24551  
Phone Number 4342583939  
Email Address delkbyron@house.virginia.gov  
Comments letter of support for securitization





COMMONWEALTH OF VIRGINIA  
HOUSE OF DELEGATES  
RICHMOND

KATHY J. BYRON  
POST OFFICE BOX 900  
FOREST, VIRGINIA 24551  
TWENTY-SECOND DISTRICT

August 28, 2023

COMMITTEE ASSIGNMENTS:  
COMMERCE AND ENERGY (CHAIR)  
FINANCE  
COMMUNICATIONS, TECHNOLOGY  
AND INNOVATION  
RULES

230840186

Mr. Bernard Logan, Clerk  
Virginia State Corporation Commission  
1300 East Main Street  
Richmond, VA 23219

Re: Case No. PUR-2023-00112

Dear Mr. Logan:

As the Commission weighs options for addressing the deferred fuel costs Dominion Energy Virginia accrued during a period of elevated commodity prices, I would encourage a thorough consideration of the approach that promises to minimize near-term rate impacts to electric customers.

Rate relief was a major driver behind the regulatory reform law that passed through the House Committee on Commerce and Energy, which I chair, during this year's General Assembly session. Adding statutory language to enable a securitization option for fuel costs was among the more significant amendments to that legislation as it moved through the legislative process. Compared to the typical approach, securitization is admittedly complex, but it is a powerful tool for lessening the immediate rate impact of fuel cost recovery.

Relatively few of my constituents are served by Dominion Energy Virginia. I am, however, mindful that inflation extends across jurisdictional boundaries. Household finances in the commonwealth have been strained by the rising cost of essential goods and services. With this in mind, I am keenly interested in an outcome that promotes rate stability for electric customers, wherever they reside. Judicious use of a securitization option, as observed in other states, would support that objective.

Thank you for your consideration.

Sincerely,

Kathy J. Byron  
Chairman  
House Committee on Commerce and Energy