

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION
AT RICHMOND, OCTOBER 27, 2022

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FILING OF

APPALACHIAN POWER COMPANY

CASE NO. PUR-2022-00166

For consideration of the appropriate framework for cost recovery, the allocation of costs net of benefits pursuant to Code § 56-585.5 F, and class and jurisdictional cost allocation

ORDER FOR NOTICE AND HEARING

During its 2020 Session, the Virginia General Assembly enacted Chapters 1193 (HB 1526) and 1194 (SB 851) of the 2020 Virginia Acts of Assembly. These duplicate Acts of Assembly, known as the Virginia Clean Economy Act ("VCEA"), became effective on July 1, 2020. The VCEA, *inter alia*, establishes a mandatory renewable energy portfolio standard ("RPS") for Appalachian Power Company ("APCo" or "Company") in § 56-585.5 of the Code of Virginia ("Code"). Subdivision D 4 of Code § 56-585.5 requires APCo to submit annually to the State Corporation Commission ("Commission") plans and petitions for approval of new solar and onshore wind generation capacity ("RPS Filing").¹

In Case No. PUR-2021-00206, APCo submitted its second annual RPS Filing to the Commission on December 30, 2021.² In that case, on July 15, 2022, the Commission directed APCo to file a separate proceeding to consider the appropriate framework for cost recovery, the allocation of costs net of benefits pursuant to Code § 56-585.5 F, and class and jurisdictional cost

¹ Code § 56-585.5 D 4.

² *Petition of Appalachian Power Company for approval of its 2021 RPS Plan under § 56-585.5 of the Code of Virginia and related requests*, Case No. PUR-2021-00206, Petition and Requests for Waiver of Appalachian Power Company (filed Dec. 30, 2021).

allocation for VCEA-related costs.³ Subdivision F of Code § 56-585.5 requires the Commission to annually "determine the amount of such costs, net of benefits, that should be allocated to retail customers within the utility's service territory which have elected to receive electric supply service from a supplier of electric energy other than the utility."⁴

In compliance with that directive, APCo made a Filing ("Petition") on September 30, 2022. As part of its Petition, APCo addresses the following:

- a. the appropriate proxy values for avoided capacity costs associated with VCEA resources that are not bid into the PJM Interconnection, LLC ("PJM") capacity market;
- b. the appropriate proxy values for renewable energy certificates ("RECs") to be transferred from renewable energy projects to a separate REC cost recovery mechanism;⁵
- c. alternative cost allocation methodologies for the Commission's consideration, including both jurisdictional and class cost allocation alternatives;⁶
- d. How the Company's proposal complies with Code § 56-585.5 F to allocate "costs net of benefits" to customers who have elected to receive electric supply service from a supplier other than the utility;⁷
- e. Specifies the alternative cost allocation methodology, or methodologies, APCo recommends the Commission adopt;⁸
- f. Describes how the Company proposes to allocate costs and benefits of VCEA-related resources under each of the alternatives presented;⁹

³ *Petition of Appalachian Power Company for approval of its 2021 RPS Plan under § 56-585.5 of the Code of Virginia and related requests*, Case No. PUR-2021-00206, Final Order on Petition and Associated Requests and Order Bifurcating Proceeding at 17 (July 15, 2022).

⁴ Code § 56-585.5 F.

⁵ Petition at 5; Direct Testimony of William K. Castle ("Castle Direct") at 3.

⁶ *Id.*

⁷ Petition at 5; Castle Direct at 18.

⁸ Petition at 5; Castle Direct at 20.

⁹ Petition at 5-6; Castle Direct at 23.

- g. Details whether the Company proposes to use the same or a different allocation methodology depending on whether the resource is Company-owned or a power purchase agreement. Similarly, details whether the Company proposes to treat all VCEA-related resources as a fleet, using the same cost allocation methodology for all of the resources, or differently, with differing cost allocation methodologies depending on the type of VCEA-related resource (*i.e.*, solar, onshore wind, offshore wind, or energy storage resources);¹⁰
- h. Details the Company's proposed methodology for calculating the proxy value of avoided capacity costs associated with resources not bid into the PJM capacity market;¹¹ and
- i. Provides the proposed rate design for all rate classes for each alternative cost allocation methodology included in the filing. For each alternative methodology, also include a bill analysis that provides the projected bill impacts for residential, small general service, and large power service customers' bills.¹²

Proposed Cost Recovery Mechanisms

APCo proposes to recover the costs associated with VCEA-related facilities by quantifying the value streams of each facility, including energy, capacity and RECs. The costs would then be assigned to separate revenue requirements based on the value stream methodology.¹³ APCo proposes to recover these costs through three rate adjustment clauses ("RACs"):¹⁴

- (i) A.5 RPS-RAC: The A.5 RPS-RAC is composed of two subcomponents depending on the applicable Code section:
 - (a) A.5 RPS-RACD&E - This RAC recovers the renewable attribute costs associated with projects acquired in compliance with Code § 56-585.5 D & E.
 - (b) A.5 RPS-RACF - This RAC recovers the renewable attribute costs associated with projects acquired in compliance with Code § 56 585.5 F.

¹⁰ Petition at 6; Castle Direct at 11, 20.

¹¹ Petition at 6; Castle Direct at 16.

¹² Petition at 6; Direct Testimony of Michael M. Spaeth ("Spaeth Direct") at 6.

¹³ Petition at 7.

¹⁴ *Id.* at 7-8.

- (ii) A.5 PCAP-RAC: The A.5 PCAP-RAC recovers the capacity costs associated with projects acquired through power purchase agreements.
- (iii) A.6 RPS-RAC: The A.6 RPS-RAC is composed of two subcomponents to split the energy and capacity costs:
 - (a) A.6 RPS-RACC - recovers the capacity costs associated with Company-owned projects.
 - (b) A.6 RPS-RACE -recovers the energy costs associated with Company-owned projects.

The Company states that this structure would allow it to determine, as required by Code, the "cost net of benefits" to charge each customer type. The Company asserts that its proposed cost recovery mechanisms are designed to allow the Company to assign costs to customers consistent with the various requirements in the Code.¹⁵

NOW THE COMMISSION, upon consideration of this matter, is of the opinion and finds that APCo should provide public notice of its Petition; hearings should be scheduled for the purpose of receiving testimony from public witnesses and evidence on the Petition; interested persons should have an opportunity to file comments on the Petition and to participate as respondents in this proceeding; and Staff should be directed to investigate the Petition and file testimony and exhibits containing its findings and recommendations thereon.

We find that a Hearing Examiner should be assigned to conduct all further proceedings in this matter on behalf of the Commission, including filing a final report containing the Hearing Examiner's findings and recommendations.

The Commission takes judicial notice of the ongoing public health issues related to the spread of the coronavirus, or COVID-19, in this matter. The Commission has taken certain actions, and may take additional actions going forward, that could impact the procedures in this

¹⁵ *Id.*

proceeding.¹⁶ Consistent with these actions, in regard to the terms of the procedural framework established below, the Commission will, among other things, direct the electronic filing of testimony and pleadings, unless they contain confidential information, and require electronic service on parties to this proceeding.

Accordingly, IT IS ORDERED THAT:

(1) This matter is docketed and assigned Case No. PUR-2022-00166.

(2) All pleadings, briefs, or other documents required to be served in this matter should be submitted electronically to the extent authorized by Rule 5 VAC 5-20-150, *Copies and format*, of the Commission's Rules of Practice and Procedure ("Rules of Practice").¹⁷

Confidential and Extraordinarily Sensitive Information shall not be submitted electronically and should comply with 5 VAC 5-20-170, *Confidential information*, of the Rules of Practice. Any person seeking to hand deliver and physically file or submit any pleading or other document shall contact the Clerk's Office Document Control Center at (804) 371-9838 to arrange the delivery.¹⁸

¹⁶ See, e.g., *Commonwealth of Virginia, ex rel. State Corporation Commission, Ex Parte: Electronic Service of Commission Orders*, Case No. CLK-2020-00004, 2020 S.C.C. Ann. Rept. 76, Order Concerning Electronic Service of Commission Orders (Mar. 19, 2020), *extended by* 2020 S.C.C. Ann. Rept. 77, Order Regarding the State Corporation Commission's Revised Operating Procedures During COVID-19 Emergency (May 11, 2020); *Commonwealth of Virginia, ex rel., State Corporation Commission, Ex Parte: Revised Operating Procedures During COVID-19 Emergency*, Case No. CLK-2020-00005, 2020 S.C.C. Ann. Rept. 77, Order Regarding the State Corporation Commission's Revised Operating Procedures During COVID-19 Emergency (Mar. 19, 2020) ("Revised Operating Procedures Order"), *extended by* 2020 S.C.C. Ann. Rept. 78, Order Regarding the State Corporation Commission's Revised Operating Procedures During COVID-19 Emergency (May 11, 2020); *Commonwealth of Virginia, ex rel. State Corporation Commission, Ex Parte: Electronic service among parties during COVID-19 emergency*, Case No. CLK-2020-00007, 2020 S.C.C. Ann. Rept. 79, Order Requiring Electronic Service (Apr. 1, 2020).

¹⁷ 5 VAC 5-10-20 *et seq.*

¹⁸ As noted in the Commission's Revised Operating Procedures Order, submissions to the Commission's Clerk's Office via U.S. mail or commercial mail equivalents may be subject to delayed processing due to the COVID-19 public health issues.

(3) Pursuant to 5 VAC 5-20-140, *Filing and service*, of the Rules of Practice, the Commission directs that service on parties and Staff in this matter shall be accomplished by electronic means. Concerning Confidential or Extraordinarily Sensitive Information, parties and Staff are instructed to work together to agree upon the manner in which documents containing such information shall be served upon one another, to the extent practicable, in an electronically protected manner, even if such information is unable to be filed in the Office of the Clerk, so that no party or Staff is impeded from preparing its case.

(4) As provided by § 12.1-31 of the Code and Rule 5 VAC 5-20-120, *Procedure before hearing examiners*, of the Rules of Practice, a Hearing Examiner is appointed to conduct all further proceedings in this matter on behalf of the Commission. A copy of each filing made with the Commission's Clerk's office in this matter shall also be sent electronically to the Office of the Hearing Examiners.¹⁹

(5) The Commission hereby schedules a telephonic hearing for the receipt of testimony from public witnesses on APCo's Petition, as follows:

- (a) A hearing for the receipt of testimony from public witnesses shall be convened telephonically at 10 a.m. on May 23, 2023, with no witness present in the Commission's courtroom.²⁰
- (b) To promote fairness for all public witnesses, each witness will be allotted five minutes to provide testimony.
- (c) On or before May 15, 2023, any person desiring to offer testimony as a public witness shall provide to the Commission (a) your name, and (b) the telephone number that you wish the Commission to call during the hearing to receive your testimony. This information may be provided to the Commission in three ways: (i) by filling out a form on the Commission's website at scc.virginia.gov/pages/Webcasting; (ii) by completing and

¹⁹ Such electronic copies shall be sent to: Wendy.Starkey@scc.virginia.gov, LeaAnn.Robertson@scc.virginia.gov and Kaitlyn.McClure@scc.virginia.gov.

²⁰ The Commission will convene counsel of record in this proceeding to attend the public witness hearing virtually.

emailing the PDF version of this form to SCCInfo@scc.virginia.gov; or (iii) by calling (804) 371-9141.

- (d) Beginning at 10 a.m. on May 23, 2023, the Commission will telephone sequentially each person who has signed up to testify as provided above. This hearing will not be convened, and the parties will be notified of such, if no person signs up to testify as a public witness.
- (e) This public witness hearing will be webcast at scc.virginia.gov/pages/Webcasting.

(6) A public evidentiary hearing shall be convened at 10 a.m. on May 24, 2023, in the Commission's second floor courtroom located in the Tyler Building, 1300 East Main Street, Richmond, Virginia 23219, to receive testimony and evidence offered by the Company, any respondents, and the Staff on APCo's Petition.

(7) An electronic copy of the Petition may be obtained by submitting a written request to counsel for the Company, Noelle J. Coates, Esquire, American Electric Power Service Corporation, 1051 East Cary Street, Suite 1100, Richmond, Virginia 23219, or njcoates@aep.com. Interested persons also may download unofficial copies from the Commission's website: scc.virginia.gov/pages/Case-Information.

(8) On or before November 25, 2022, the Company shall cause the following notice to be published as display advertising (not classified) on one occasion in newspapers of general circulation throughout the Company's Virginia service territory:

NOTICE TO THE PUBLIC OF PETITION BY
APPALACHIAN POWER COMPANY FOR
CONSIDERATION OF THE APPROPRIATE
FRAMEWORK FOR COST RECOVERY, THE
ALLOCATION OF COSTS NET OF BENEFITS
PURSUANT TO CODE § 56-585.5 F AND CLASS
AND JURISDICTIONAL COST ALLOCATION
CASE NO. PUR-2022-00166

During its 2020 Session, the Virginia General Assembly enacted Chapters 1193 (HB 1526) and 1194 (SB 851) of the 2020 Virginia Acts of Assembly. These duplicate Acts of Assembly, known as the Virginia Clean Economy Act ("VCEA"), became effective on July 1, 2020. The VCEA, *inter alia*, establishes a mandatory renewable energy portfolio standard ("RPS") for Appalachian Power Company ("APCo" or "Company") in new § 56-585.5 of the Code of Virginia ("Code"). Subdivision D 4 of Code § 56-585.5 requires APCo to submit annually to the State Corporation Commission ("Commission") plans and petitions for approval of new solar and onshore wind generation capacity ("RPS Filing").

In Case PUR-2021-00206, APCo submitted its second annual RPS Filing to the Commission on December 30, 2021. In that case, on July 15, 2022, the Commission directed APCo to file a separate proceeding to consider the appropriate framework for cost recovery, the allocation of costs net of benefits pursuant to Code § 56-585.5 F, and class and jurisdictional cost allocation for VCEA-related costs.

In compliance with that directive, APCo made a Filing ("Petition") on September 30, 2022. As part of its Petition, APCo addresses the following:

- a. The appropriate proxy values for avoided capacity costs associated with VCEA resources that are not bid into the PJM Interconnection, LLC ("PJM") capacity market.
- b. The appropriate proxy values for RECs to be transferred from renewable energy projects to a separate REC cost recovery mechanism.

- c. Alternative cost allocation methodologies for the Commission's consideration, including both jurisdictional and class cost allocation alternatives.
- d. How the Company's proposal complies with Code § 56-585.5 F to allocate "costs net of benefits" to customers who have elected to receive electric supply service from a supplier other than the utility.
- e. Specifies the alternative cost allocation methodology, or methodologies, APCo recommends the Commission adopt.
- f. Describes how the Company proposes to allocate costs and benefits of VCEA-related resources under each of the alternatives presented.
- g. Details whether the Company proposes to use the same or a different allocation methodology depending on whether the resource is Company-owned or a power purchase agreement. Similarly, details whether the Company proposes to treat all VCEA-related resources as a fleet, using the same cost allocation methodology for all of the resources, or differently, with differing cost allocation methodologies depending on the type of VCEA-related resource (*i.e.*, solar, onshore wind, offshore wind, or energy storage resources).
- h. Details the Company's proposed methodology for calculating the proxy value of avoided capacity costs associated with resources not bid into the PJM capacity market.
- i. Provides the proposed rate design for all rate classes for each alternative cost allocation methodology included in the filing. For each alternative methodology, also include a bill analysis that provides the projected bill impacts for residential, small general service, and large power service customers' bills.

Proposed Cost Recovery Mechanisms

APCo proposes to recover the costs associated with VCEA-related facilities by quantifying the value streams of each facility, including energy, capacity and RECs. The costs would then be assigned to separate revenue requirements based on the value stream methodology. APCo proposes to recover these costs through three rate adjustment clauses ("RACs"):

- (i) A.5 RPS-RAC: The A.5 RPS-RAC is composed of two subcomponents depending on the applicable Code section:
 - (a) A.5 RPS-RACD&E - This RAC recovers the renewable attribute costs associated with projects acquired in compliance with Code § 56-585.5 D & E.
 - (b) A.5 RPS-RACF - This RAC recovers the renewable attribute costs associated with projects acquired in compliance with Code § 56-585.5 F.
- (ii) A.5 PCAP-RAC: The A.5 PCAP-RAC recovers the capacity costs associated with projects acquired through power purchase agreements.
- (iii) A.6 RPS-RAC: The A.6 RPS-RAC is composed of two subcomponents to split the energy and capacity costs:
 - (a) A.6 RPS-RACC - recovers the capacity costs associated with Company-owned projects.
 - (b) A.6 RPS-RACE -recovers the energy costs associated with Company-owned projects.

The Company states that this structure would allow it to determine, as required by Code, the "cost net of benefits" to charge each customer type. The Company asserts that its proposed cost recovery mechanisms are designed to

allow the Company to assign costs to customers consistent with the various requirements in the Code of Virginia.

Interested persons are encouraged to review APCo's Petition and supporting documents in full for details about these and other proposals.

The Commission has taken judicial notice of the ongoing public health issues related to the spread of the coronavirus, or COVID-19. In accordance therewith, all pleadings, briefs, or other documents required to be served in this matter shall be submitted electronically to the extent authorized by 5 VAC 5 20-150, *Copies and format*, of the Commission's Rules of Practice and Procedure ("Rules of Practice"). Confidential and Extraordinarily Sensitive Information shall not be submitted electronically and should comply with 5 VAC 5-20-170, *Confidential information*, of the Rules of Practice. Any person seeking to hand deliver and physically file or submit any pleading or other document shall contact the Clerk's Office Document Control Center at (804) 371-9838 to arrange the delivery.

Pursuant to 5 VAC 5-20-140, *Filing and service*, of the Rules of Practice, the Commission has directed that service on parties and the Commission's Staff in this matter shall be accomplished by electronic means. Please refer to the Commission's Order for Notice and Hearing or subsequent Hearing Examiner's Ruling for further instructions concerning Confidential or Extraordinarily Sensitive Information.

The Commission entered an Order for Notice and Hearing in this proceeding that, among other things, scheduled public hearings on APCo's Petition. On May 23, 2023, at 10 a.m., the Hearing Examiner assigned to this matter will hold a telephonic hearing, with no witness present in the Commission's courtroom, for the purpose of receiving the testimony of public witnesses. On or before May 15, 2023, any person desiring to offer testimony as a public witness shall provide to the Commission (a) your name, and (b) the telephone number that you wish the Commission to call during the hearing to receive your testimony. This information may be provided to the Commission in three ways: (i) by filling out a form on the Commission's website at scc.virginia.gov/pages/Webcasting; (ii) by completing and emailing the PDF version of this form to SCCInfo@scc.virginia.gov; or (iii) by calling (804) 371-9141.

This public witness hearing will be webcast at scc.virginia.gov/pages/Webcasting.

On May 24, 2023, at 10 a.m., in the Commission's second floor courtroom located in the Tyler Building, 1300 East Main Street, Richmond, Virginia 23219, the Hearing Examiner appointed to this matter will convene a hearing to receive testimony and evidence related to the Company's Petition from the Company, any respondents, and the Commission's Staff.

An electronic copy of the APCo's Petition may be obtained by submitting a written request to counsel for the Company, Noelle J. Coates, Esquire, American Electric Power Service Corporation, 1051 East Cary Street, Suite 1100, Richmond, Virginia 23219, or njcoates@aep.com. Interested persons also may download unofficial copies from the Commission's website: scc.virginia.gov/pages/Case-Information.

On or before January 27, 2023, any interested person or entity wishing to participate as a respondent in this proceeding may do so by filing a notice of participation at scc.virginia.gov/clk/efiling. Those unable, as a practical matter, to file a notice of participation electronically may file such notice by U.S. mail to the Clerk of the State Corporation Commission, c/o Document Control Center, P.O. Box 2118, Richmond, Virginia 23218-2118. Such notice of participation shall include the email addresses of such parties or their counsel, if available. The respondent simultaneously shall serve a copy of the notice of participation on counsel to the Company. Pursuant to 5 VAC 5-20-80 B, *Participation as a respondent*, of the 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-2022-00166. For additional information about participation as a respondent, any person or entity should obtain a copy of the Commission's Order for Notice and Hearing.

On or before May 22, 2023, any interested person or entity may submit comments on the Petition by following the instructions found on the Commission's website: scc.virginia.gov/casecomments/Submit-Public-Comments. Those unable, as a practical matter, to submit comments electronically

may file such comments with the Clerk of the Commission at the address listed above. All such comments shall refer to Case No. PUR-2022-00166.

Any documents filed in paper form with the Office of the Clerk of the Commission in this docket may use both sides of the paper. In all other respects, except as modified by the Commission's Order for Notice and Hearing, all filings shall comply fully with the requirements of 5 VAC 5-20-150, *Copies and format*, of the Rules of Practice.

The Petition, the Commission's Rules of Practice, the Commission's Order for Notice and Hearing, and other documents filed in the case may be viewed at: scc.virginia.gov/pages/Case-Information.

APPALACHIAN POWER COMPANY

(9) On or before November 25, 2022, the Company shall serve a copy of this Order for Notice and Hearing on the following local officials, to the extent the position exists, in each county, city, and town in the Company's service territory: 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 electronically where possible; if electronic service is not possible, service shall be made by either personal delivery or first class mail to the customary place of business or residence of the person served.

(10) On or before December 30, 2022, the Company shall file proof of the notice and service required by Ordering Paragraphs (8) and (9) above, including the name, title, address, and electronic mail address (if applicable) of each official served, with the Clerk of the State Corporation Commission by filing electronically at scc.virginia.gov/clk/efiling/.

(11) On or before May 22, 2023, any interested person may file comments on the Petition by following the instructions found on the Commission's website: scc.virginia.gov/casecomments/Submit-Public-Comments. Those unable, as a practical matter,

to submit comments electronically may file such comments by U.S. mail to the Clerk of the State Corporation Commission, c/o Document Control Center, P.O. Box 2118, Richmond, Virginia 23218-2118. All comments shall refer to Case No. PUR-2022-00166.

(12) On or before January 27, 2023, any interested person or entity wishing to participate as a respondent in this proceeding may do so by filing a notice of participation with the Clerk of the Commission at scc.virginia.gov/clk/efiling. Those unable, as a practical matter, to submit a notice of participation electronically may submit such notice by U.S. mail to the Clerk of the Commission at the address listed in Ordering Paragraph (11). Such notice of participation shall include the email addresses of such parties or their counsel, if available. The respondent simultaneously shall serve a copy of the notice of participation on counsel to the Company. Pursuant to Rule 5 VAC 5-20-80 B, *Participation as a respondent*, of the 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-2022-00166.

(13) Within three (3) business days of receipt of a notice of participation as a respondent, the Company shall serve a copy of the Petition on the respondent, unless it has already been provided.

(14) On or before March 24, 2023, each respondent may file with the Clerk of the Commission, at scc.virginia.gov/clk/efiling, any testimony and exhibits by which the respondent expects to establish its case. Any respondent unable, as a practical matter, to submit testimony

and exhibits electronically may submit such by U.S. mail to the Clerk of the Commission at the address in Ordering Paragraph (11). Each witness's testimony shall include a summary not to exceed one page. All testimony and exhibits shall be served on the Staff, the Company and all other respondents simultaneous with its filing. In all filings, the respondent shall comply with the Commission's Rules of Practice, including 5 VAC 5-20-140, *Filing and service*, and 5 VAC 5-20-240, *Prepared testimony and exhibits*. All filings shall refer to Case No. PUR-2022-00166.

(15) On or before April 7, 2023, the Staff shall investigate the Petition and file with the Clerk of the Commission its testimony and exhibits concerning the Petition, and each Staff witness's testimony shall include a summary not to exceed one page. A copy thereof shall be served on counsel to the Company and all respondents.

(16) On or before April 28, 2023, the Company shall file with the Clerk of the Commission any rebuttal testimony and exhibits that it expects to offer, and each rebuttal witness's testimony shall include a summary not to exceed one page. The Company shall serve a copy of its rebuttal testimony and exhibits on the Staff and all respondents.

(17) Any documents filed in paper form 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.

(18) The Commission's Rule of Practice 5 VAC 5-20-260, *Interrogatories 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 seven (7) calendar days after receipt of the same. In addition to the service requirements of 5 VAC 5-20-260 of the Rules of Practice, 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 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.²¹ 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.*

(19) This matter is continued.

A COPY hereof shall be sent electronically by the Clerk of the Commission to all persons on the official Service List in this matter. The Service List is available from the Clerk of the Commission.

²¹ The assigned Staff attorney is identified on the Commission's website: scc.virginia.gov/Case-Information, by clicking "Docket Search," and clicking "Search by Case Information," and entering the case number, PUR-2021-00166, in the appropriate box.