

**PART B**

**SUMMARY OF PREFILED TESTIMONY OF MATTHEW B. C. UNGER**

The following findings and recommendations are found in my testimony:

- With the uncertainty around the outcome of APCo's net metering proceeding in the NEM Case and noting that the Code provided only a limited time frame for parties and Staff to evaluate the Company's minimum bill proposal, Staff recommends only a temporary adoption of the Company's proposed minimum bill.
- Staff also recommends that the Company consider the adoption of Staff's proposed tariff language presented in this testimony, to address potential issues identified herein, by comparing the proposed tariff language to the Commission's Rules Governing Shared Solar Program.
- After a final order is issued in the NEM Case, Staff anticipates that the Commission would re-evaluate the minimum bill in a future proceeding, pursuant to the 2024 Virginia Acts of Assembly Chapter 716 (HB 109) and Chapter 765 (SB 255) and these unresolved items could be addressed in that future proceeding.

**PREFILED TESTIMONY  
OF  
MATTHEW B. C. UNGER**

**PETITION OF APPALACHIAN POWER COMPANY,  
FOR APPROVAL OF A MINIMUM BILL, TARIFFS, AND AGREEMENTS TO  
IMPLEMENT A SHARED SOLAR PROGRAM,  
PURSUANT TO § 56-594.4 OF THE CODE OF VIRGINIA**

**CASE NO. PUR-2025-00028**

1 **Q. PLEASE STATE YOUR NAME AND POSITION WITH THE**  
2 **COMMONWEALTH OF VIRGINIA STATE CORPORATION COMMISSION**  
3 **("COMMISSION").**

4 **A.** My name is Matthew B. C. Unger, and in the Commission's Division of Public Utility  
5 Regulation ("PUR"), I am a Senior PUR Analyst.

6 **Q. WHAT ARE YOUR PRESENT DUTIES AND RESPONSIBILITIES?**

7 **A.** My primary responsibility as a Senior PUR Analyst is to address renewable energy-related  
8 matters, including analysis and evaluation of issues that develop around matters before the  
9 Commission that are informed by the Code of Virginia ("Code"). These statutes may  
10 include, but are not limited to, Code §§ 56-585.5, 56-587, 56-594.02, 56-594.3, 56-596.2,  
11 and 56-596.2:1. Additionally, I perform analyses and evaluation of utility submissions  
12 related to the Commonwealth's mandatory Renewable Portfolio Standard ("RPS")  
13 program. I also provide testimony as a member of the Commission's Staff ("Staff") and  
14 present alternative recommendations and proposals to the Commission as necessary.

15 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

16 **A.** On April 1, 2025, Appalachian Power Company ("APCo" or "Company") filed with the  
17 Commission a petition for approval of a proposed minimum bill for its Shared Solar

1 Program pursuant to Code § 56-594.4 ("Petition"). This filing was made in response to the  
 2 Commission's Order Initiating Proceedings issued on February 10, 2025.<sup>1</sup> In my  
 3 testimony, I will discuss:

- 4       ▪ Staff's ultimate recommendation in the instant proceeding for the Commission to  
 5 temporarily adopt the Company's minimum bill proposal and revisit the complex  
 6 issues raised by Staff in this proceeding in a future directed proceeding following  
 7 the issuance of a final order in the Company's net energy metering case, Case No.  
 8 PUR-2024-00161 ("NEM Case"), as found within the 2024 Virginia Acts of  
 9 Assembly Chapter 716 and Chapter 765.
- 10       ▪ APCo's bill credit calculation.
- 11       ▪ APCo's Shared Solar Program proposed tariff language.
- 12       ▪ Potential "benefits of shared solar to the electric grid and to the Commonwealth"<sup>2</sup>  
 13 that appear to be excluded from the Company's minimum bill analysis.

14 **Q. PLEASE DISCUSS THE SCOPE OF YOUR TESTIMONY IN THIS PROCEEDING**  
 15 **AS IT RELATES TO APCO'S PETITION.**

16 **A.** My testimony will address only those specific issues identified above. Staff witness  
 17 Rafferty discusses:

- 18       • APCo's Shared Solar Program requirements under Code § 56-594.4.
- 19       • Staff's concerns with the Code mandated timing of this  
 20 proceeding and ongoing uncertainty about the Company's net  
 21 metering program relative to the NEM Case.
- 22       • How the Company derives the minimum bill within its Petition.
- 23       • The apparent ambiguity in what the "benefits of shared solar to  
 24 the electric grid and to the Commonwealth"<sup>3</sup> are, that should be

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<sup>1</sup> See *Commonwealth of Virginia, ex rel. State Corporation Commission, Ex Parte: In the matter of future minimum bill proceedings of Appalachian Power Company pursuant to Code § 56-594.4*, Case No. PUR-2025-00028, Doc. Con. Cen. No. 250210179, Order Initiating Proceedings (Feb. 10, 2025).

<sup>2</sup> Code § 56-594.

<sup>3</sup> Code § 56-594.4 D.

1 included in the calculation, and the subsequent appropriateness  
 2 of including or excluding those benefits attributed to shared  
 3 solar.

4 **Q. DO YOU HAVE ANY FURTHER COMMENTS BEYOND THOSE DISCUSSED IN**  
 5 **STAFF WITNESS RAFFERTY'S TESTIMONY, REGARDING THE ISSUES AND**  
 6 **UNCERTAINTIES CREATED BY THE TIMING OF THE INSTANT**  
 7 **PROCEEDING AND THE ABSENCE OF A FINAL ORDER IN APCO'S NEM**  
 8 **CASE?**

9 **A.** Yes. First, Staff notes that Code § 56-594.4 F requires that the utility shall file any tariffs  
 10 to implement the Shared Solar Program by July 1, 2025.<sup>4</sup> Due to this statutory deadline,  
 11 Staff believes that most of the proposed tariff language found in Company witness Long's  
 12 Schedule 3 and discussed in this testimony, need to be addressed in this proceeding. In  
 13 enactment clause 3 of the 2024 Virginia Acts of Assembly Chapter 716 and Chapter 765,  
 14 the Virginia General Assembly explicitly linked the Company's Shared Solar Program with  
 15 the Company's NEM Case.<sup>5</sup> In the instant case, the Company uses an avoided cost  
 16 methodology that originated in the NEM Case, meaning there is a limited window of time  
 17 within which to conduct a robust discovery, evaluate the minimum bill proposal, and *fully*  
 18 develop the record in the instant case as it relates to the Company's avoided cost  
 19 methodology. As discussed in Staff witness Rafferty's testimony, Staff believes that  
 20 without a final order in the NEM Case, significant uncertainty exists regarding the  
 21 appropriateness of including or excluding perceived shared solar benefits.

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<sup>4</sup> Code § 56-594.4 F states that the utility should file "any tariffs, agreements, or forms necessary for implementation of the program by July 1, 2025."

<sup>5</sup> *Petition of Appalachian Power Company, For approval to revise its net metering program pursuant to § 56-594 of the Code of Virginia*, Case No. PUR-2024-00161, Doc. Con. Cen. No. 241030096, Order for Notice and Hearing (Oct. 7, 2024) (Establishing a procedural schedule on the APCo petition filed Aug. 30, 2024).

1 **Q. PLEASE EXPLAIN APCO'S BILL CREDIT RATE METHODOLOGY.**

2 **A.** APCo purports to use the same bill credit rate methodology as found in Virginia Electric  
 3 and Power Company's d/b/a Dominion Energy Virginia ("Dominion") Shared Solar  
 4 Program petition.<sup>6</sup> The Bill Credit Rate, found on Sheet 35-1 of Company witness  
 5 Hallie L. Long's Schedule SSP-S,<sup>7</sup> was updated by the Company to use values provided to  
 6 the Commission as part of 2024 Appalachian Power Company VA State report from the  
 7 year ended December 31, 2024 FERC Form 1, under filing ID 237383 as found on page  
 8 300-301.<sup>8</sup> The Bill Credit Rate divides the operating revenues of a specific customer class  
 9 by megawatt hours sold. Given the fact that Virginia's Shared Solar Program involves third  
 10 parties (*i.e.*, Subscriber Organizations ("SO")) that may operate in both Phase I and  
 11 Phase II utility service territories, Staff is supportive of using a similar bill credit  
 12 methodology between the two utilities, to avoid confusion.

13 **Q. DOES STAFF HAVE ANY COMMENTS ON THE TARIFF LANGUAGE**  
 14 **PROPOSED BY THE COMPANY?**

15 **A.** Yes. While Staff does not oppose the Company's use of Dominion's Shared Solar Program  
 16 Subscriber Organization Coordination Agreement as the basis of APCo's filing, Staff

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<sup>6</sup> See Petition at 4, citing (*Commonwealth of Virginia, ex rel. State Corporation Commission, Ex Parte: In the matter of establishing regulations for a shared solar program pursuant to § 56-594.3 of the Code of Virginia*, Case No. PUR-2020-00125, 2022 S.C.C. Ann. Rept. 208 (Jul. 7, 2022); *see also*, Direct Testimony of Nicole M. Coon at 3; Direct Testimony of William K. Castle at 2-3, 7.

<sup>7</sup> See Direct Testimony of Hallie L. Long ("Long Direct") at Schedule 1.

<sup>8</sup> See APCo's Response to Staff Interrogatory No. 2-10, and Staff 2-10 Supplemental Attachment 1 through Attachment 3. See Attachment MBCU-1. Due to the voluminous nature and formatting of Supplemental Attachment 1, excerpts are attached to this testimony. Staff has maintained the full the referenced document and will provide it upon request.



would recommend that references to Dominion be removed from Company witness Long's Schedule 3.

**Q. GIVEN THAT DOMINION'S SHARED SOLAR PROGRAM SUBSCRIBER ORGANIZATION COORDINATION AGREEMENT IS THE BASIS FOR APCO'S SHARED SOLAR PROGRAM SUBSCRIBER ORGANIZATION COORDINATION AGREEMENT, DOES STAFF HAVE ANY COMMENTS ON APCO'S PROPOSED TARIFF LANGUAGE AROUND LOW-INCOME CUSTOMERS AND LOW-INCOME SHARED SOLAR FACILITIES?**

**A.** Yes. Unlike Dominion's (*i.e.*, Phase II utility) Shared Solar Program, APCo has no requirement for tracking of low-income shared solar customers at the Subscriber Organization level. Staff does not view tracking low-income shared solar customers as a requirement of 20 VAC 5-340-10 *et seq.*, Rules Governing Shared Solar Program for APCo. Therefore, without a requirement for tracking of low-income shared solar customers at the Subscriber Organization level for APCo, it may be appropriate for APCo to remove the reference to "Low-income Shared Solar Facility."<sup>9</sup> In addition without a utility requirement for tracking of low-income shared solar customers, it may also be appropriate to remove the first sentence of section 3.6.3 "Prior to commercial operation of any Shared Solar Facility, each SO will provide a report on its achievement of contracting with Low-income Customers."<sup>10</sup> Should APCo choose to include tracking of low-income

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<sup>9</sup> Long Direct at Schedule 3, p. 7.

<sup>10</sup> *Id.* at Schedule 3, p.10.

shared solar customers for its own purposes, Staff does not oppose APCo implementing this process and including this proposed tariff language.

**Q. DOES STAFF HAVE ANY COMMENTS ON APCO'S PROPOSED TARIFF LANGUAGE AROUND SUBSTANTIAL COMPLETION AND THE DEPOSIT REQUIREMENTS WITHIN 20 VAC 5-340-40 E?**

**A.** Staff believes it would also be appropriate to update section 5.2.2.2 of APCo's proposed tariff to incorporate mechanical completion and the deposit language from the updates to 20 VAC 5-340-10 *et seq.* within Case No. PUR-2024-00122 as follows:<sup>11</sup>

If a Shared Solar Facility has been awarded capacity in the program queue on and after January 1, 2025, ~~Should a Shared Solar Facility project fails to not~~ reach ~~mechanical~~ Substantial eCompletion within 24 months of the date ~~the project~~ it was awarded capacity, the Company shall remove the Shared Solar Facility ~~will be removed~~ from the program queue unless the SO pays an additional deposit of \$2575 per kW ~~AC in order to maintain its place within the queue.~~ The Company will accept a ~~surety~~ bond using the Company's supplemental bond form in lieu of the cash deposit. ~~If, after paying the additional deposit, the Shared Solar Facility fails to reach Substantial Completion within an additional 9 months (total of 33 months), the Company shall remove the Shared Solar Facility from the program queue. However, if the SO notifies the Company that it is prepared to proceed with Commissioning Tests, as set forth in 20 VAC 5-314-90, or comparable project milestone, and the Company must delay proceeding with the interconnection for reasons beyond the Company's control, these time periods are tolled until the Company is able to proceed with the interconnection.~~

This would also necessitate updating section 5.3.1 of the proposed tariff to include the following language: "The SO must notify the Company within 10 days of any reduction in a project's anticipated installed AC capacity provided in the SO's Application or the SO's ability to achieve the anticipated substantial completion date."

<sup>11</sup> *Commonwealth of Virginia, ex rel. State Corporation Commission Ex Parte: In the matter of amending regulations governing shared solar programs*, Case No. PUR-2024-00122, Doc. Con. Cen. No. 250330142, Schedule SS and Table of Contents tariffs revised to reflect the inclusion of experimental Schedule GS-3 EV (Mar.. 19, 2025).



**Q. DOES STAFF HAVE ANY COMMENTS ON THE PROPOSED TARIFF LANGUAGE AROUND TERMINATION OF COORDINATION SERVICES?**

**A.** Staff believes it would be appropriate to include "Any remaining bill credits accumulated by the SO and submitted to the Company will be provided to Subscribers within two billing cycles" in section 5.7.1 of the proposed tariff. Additionally, in place of the current language in section 5.7.4 of the proposed tariff, Staff would also recommend including the following language to address the issue of potential remaining bill credits that would otherwise not be allocated should a SO abandon or terminate a Shared Solar Facility:

Should the SO abandon or terminate a Shared Solar Facility, the Company will apply any remaining Bill Credits in accordance with 20 VAC 5-340-60 F 2. Any remaining bill credits accumulated by the SO and submitted to the Company will be provided to Subscribers within two billing cycles. Where applicable, the Minimum Bill may also apply to the Subscriber's account beyond the time identified in Subsection 5.7.1.

**Q. ARE THERE POTENTIAL "BENEFITS OF SHARED SOLAR TO THE ELECTRIC GRID AND TO THE COMMONWEALTH" THAT APPEAR TO HAVE BEEN EXCLUDED FROM THE COMPANY'S METHODOLOGY?**

**A.** Yes. Staff believes that there are potential benefits that have been excluded. The majority of those have been brought up within the NEM Case, and Staff believes that the issues raised in the NEM Case should also be addressed within the Shared Solar Program after the final order in the NEM Case is issued. However, as discussed by Staff witness Rafferty, there is uncertainty around the pending NEM Case, including the Company's rebuttal testimony in that case.<sup>12</sup> Staff believes that the resolutions to the issues identified in the

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<sup>12</sup> See *Petition of Appalachian Power Company, For approval to revise its net metering program pursuant to § 56-594 of the Code of Virginia*, Case No. PUR-2024-00161, Doc. Con. Cen. No. 250440080, Rebuttal Testimony of Appalachian Power Company (Apr. 29, 2025).

1 NEM Case should be evaluated for their inclusion within APCo's Shared Solar Program.  
2 Specifically, Staff believes that the multiple benefit items excluded from the Company's  
3 analysis, such as the societal cost of carbon and the RPS load reduction potential, as offered  
4 by Staff to the Commission in the NEM Case, should also be addressed in a future Shared  
5 Solar Program docket once the NEM Case concludes. Until such time as the NEM Case  
6 concludes, Staff recommends only a temporary adoption of the Company's proposed  
7 minimum bill in the instant proceeding.

### 8 **Conclusions and Recommendations**

9 **Q. PLEASE SUMMARIZE YOUR CONCLUSIONS AND RECOMMENDATIONS.**

10 **A.** With the uncertainty around the outcome of APCo's net metering proceeding in the NEM  
11 Case and noting that the Code provided only a limited time frame for parties and Staff to  
12 evaluate the Company's minimum bill proposal, Staff recommends only a temporary  
13 adoption of the Company's proposed minimum bill. After a final order is issued in the  
14 NEM Case, Staff anticipates that the Commission would re-evaluate the minimum bill in  
15 a future proceeding, pursuant to the 2024 Virginia Acts of Assembly Chapter 716 (HB 109)  
16 and Chapter 765 (SB 255) and these unresolved items could be addressed in that future  
17 proceeding.

18 Staff also recommends that the Company consider the adoption of Staff's proposed  
19 tariff language presented in this testimony, to address potential issues identified herein, by  
20 comparing the proposed tariff language to the Commission's Rules Governing Shared  
21 Solar Program.<sup>13</sup>

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<sup>13</sup> 20 VAC 5-340-10 *et seq.*

1    **Q.**     **DOES THIS CONCLUDE YOUR TESTIMONY?**

2    **A.**     Yes, it does.

# Attachment No. MBCU-1



**COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION  
APPLICATION OF  
APPALACHIAN POWER COMPANY  
SCC CASE NO. PUR-2025-00028  
Interrogatories and Requests for the Production  
of Documents by the STAFF OF THE STATE CORPORATION COMMISSION  
Staff Set 2  
To Appalachian Power Company**

Interrogatory Staff 2-10:

Please refer to the Company's proposed shared solar tariff bill credit rates in Company Witness Long's Schedule 1.

- a. Please provide an explanation as to how the Company derived each customer classes' bill credit rate.
- b. Please provide all workpapers related to the Company's calculation of the applicable bill credit rate and notate which workpapers are applicable if they were provided in response to Staff Set 1-2.

Response Staff 2-10:

- a. The Company used 2023 FERC Form 1 data for revenues by class and divided by the energy consumed by class.
- b. Residential:  $\$900,543,431 / 5,674,430 \text{ MW} = 158.702 \text{ \$/MWh} = 15.782 \text{ ¢/kWh}$   
Commercial:  $\$353,501,990 / 2,776,871 \text{ MW} = 127.302 \text{ \$/MWh} = 12.730 \text{ ¢/kWh}$   
Industrial:  $\$466,407,580 / 4,814,748 = 96.871 \text{ \$/MWh} = 9.687 \text{ ¢/kWh}$

Supplemental Response Staff 2-10 (May 5, 2025):

The Company has updated the tariff and recalculated the bill credit rates based on the updated FERC Form 1. Please see Staff 2-10 SUPPLEMENTAL Attachments 1 through 3.

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The foregoing response is made by William K. Castle, Dir Regulatory Svcs, and Hallie L. Long, Regulatory Consultant Sr, on behalf of Appalachian Power Company

# ANNUAL REPORT

OF

APPALACHIAN POWER COMPANY

(NAME OF RESPONDENT)

40 FRANKLIN ROAD, ROANOKE, VIRGINIA 24011

(ADDRESS OF RESPONDENT)

TO THE

STATE CORPORATION COMMISSION OF THE COMMONWEALTH OF VIRGINIA

FOR THE

**YEAR ENDED DECEMBER 31, 2024**


Name, title, address and telephone number (including area code), of the person to be  
Contacted concerning this report:

SHEILA BALSTER, SENIOR MANAGER OF CORPORATE ACCOUNTING

1 RIVERSIDE PLAZA, COLUMBUS, OHIO 43215      PHONE 614.716.1000

ANNUAL REPORT  
OF  
APPALACHIAN POWER COMPANY  
TO THE  
STATE CORPORATION COMMISSION OF THE COMMONWEALTH OF VIRGINIA  
FOR THE YEAR ENDED DECEMBER 31, 2024

FERC FORM NO 1:  
ANNUAL REPORT OF MAJOR ELECTRIC UTILITIES, LICENSEES, AND OTHERS

IDENTIFICATION		
01 Exact Legal Name of Respondent  <b>Appalachian Power Company</b>	02 Year of Report  <b>12/31/2024</b>	
03 Previous Name and Date of Change (if name changed during year)		
04 Address of Principal Office at End of Year (Street, City, State, Zip Code)  <b>1 Riverside Plaza, Columbus, OH 43215-2373</b>		
05 Name of Contact Person  <b>Sheila Balster</b>	06 Title of Contact Person  <b>Senior Manager - Corporate Accounting American Electric Power Service Corp.</b>	
07 Address of Contact Person (Street, City, State, Zip Code)  <b>American Electric Power Service Corporation 1 Riverside Plaza, Columbus, OH 43215-2373</b>		
08 Telephone of Contact Person, including Area Code  <b>(614) 716-1000</b>	09 This Report is (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	10 Date of Report (Mo, Da, Yr) <b>4/25/2025</b>
ATTESTATION		
<p>The undersigned officer certifies that he/she has examined the accompanying report, that to the best of his/her knowledge, information, and belief, all statements of fact contained in the accompanying report are true and the accompanying report is a correct statement of the business and affairs of the above named respondent in respect to each and every matter set forth therein during the period from and including January 1 to and including December 31 of the year of the report.</p>		
01 Name  <b>Jeffrey W. Hoersdig</b>	03 Signature  	04 Date Signed (Mo, Da, Yr) <b>4/24/2025</b>
02 Title  <b>Assistant Controller</b>		
<p>Title 18, U.S.C. 1001, makes it a crime for any person knowingly and willingly to make to any Agency or Department of the United States any false, fictitious or fraudulent statements as to any matter within its jurisdiction.</p>		

VIRGINIA

Name of Respondent Appalachian Power Company	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr)	Year of Report 2024
LIST OF SCHEDULES (Electric Utility)			
Enter in column (d) the terms "none," "not applicable," or "NA," as appropriate, where no information or amounts have been reported for certain pages.		Omit pages where the responses are "none," "not applicable," or "N/A."	
Title of Schedule (a)	Reference Page No. (b)	Date Revised (c)	Remarks (d)
GENERAL CORPORATE INFORMATION AND FINANCIAL STATEMENTS			
General Information	101	Ed. 12-87	
Control Over Respondent	102	Ed. 12-87	
Corporations Controlled by Respondent	103	Ed. 12-87	
Officers	104	Ed. 12-87	
Directors	105	Ed. 12-87	
Information on Formula Rates	106(a)(b)	New 12-09	
Important Changes During the Year	108-109	Ed. 12-90	
Comparative Balance Sheet	110-113	Rev.12-93	
Statement of Income for the Year	114-117	Rev.12-93	
Statement of Retained Earnings for the Year	118-119	Ed. 12-89	
Statement of Cash Flows	120-121	Rev.12-93	
Notes to Financial Statements	122-123	Ed. 12-89	
Statement of Accum Comp Income, Comp Income, and Hedging Activities	122(a)(b)	New 12-04	
BALANCE SHEET SUPPORTING SCHEDULES (Assets and Other Debits)			
Summary of Utility Plant and Accumulated Provisions for Depreciation, Amortization, and Depletion	200-201	Ed. 12-89	
Nuclear Fuel Materials	202-203	Ed. 12-89	N/A
Electric Plant in Service	204-207	Ed. 12-91	
Electric Plant Leased to Others	213	Ed. 12-89	N/A
Electric Plant Held for Future Use	214	Ed. 12-89	
Construction Work in Progress - Electric	216	Ed. 12-87	
Accumulated Provision for Depreciation of Electric Utility Plant	219	Ed. 12-88	
Investment in Subsidiary Companies	224-225	Ed. 12-89	
Material and Supplies	227	Ed. 12-89	
Allowances	228-229	New 12-93	
Extraordinary Property Losses	230	Ed. 12-93	
Unrecovered Plant and Regulatory Study Costs	230	Ed. 12-93	N/A
Transmission Service and Generation Interconnection Study Costs	231	New 12-06	
Other Regulatory Assets	232	New 12-93	
Miscellaneous Deferred Debits	233	Ed. 12-89	
Accumulated Deferred Income Taxes (Account 190)	234	Ed. 12-88	
BALANCE SHEET SUPPORTING SCHEDULES (Liabilities and Other Credits)			
Capital Stock	250-251	Ed. 12-91	
Capital Stock Subscribed, Capital Stock Liability for Conversion, Premium on Capital Stock, and Installments	253	Ed. 12-87	
Other Paid-in Capital	254		N/A
Capital Stock Expense	256-257	Ed. 12-91	
Long-Term Debt			
Reconciliation of Reported Net Income with Taxable Income for Federal Income Taxes	261	Ed. 12-88	
Taxes Accrued, Prepaid and Charged During Year	262-263	Ed. 12-90	
Accumulated Deferred Investment Tax Credits	266-267	Ed. 12-89	
Other Deferred Credits	269	Ed. 12-88	
Accumulated Deferred Income Taxes - Accelerated Amortization Property	272-273	Ed. 12-89	
Accumulated Deferred Income Taxes - Other Property	274-275	Ed. 12-89	
Accumulated Deferred Income Taxes - Other	276-277	Ed. 12-93	
Other Regulatory Liabilities	278	New 12-93	
* Modified Schedules to meet State Commission requirements.			



VIRGINIA

Name of Respondent Appalachian Power Company	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr)	Year of Report 2024
LIST OF SCHEDULES (Electric Utility) (Continued)			
Enter in column (d) the terms "none," "not applicable," or "NA," as appropriate, where no information or amounts have been reported for certain pages.		Omit pages where the responses are "none," "not applicable," or "NA."	
Title of Schedule (a)	Reference Page No. (b)	Date Revised (c)	Remarks (d)
INCOME ACCOUNT SUPPORTING SCHEDULES			
Electric Operating Revenues	300-301	Ed. 12-90	N/A
Regional Transmission Service Revenues	302	New 12-12	
Sales of Electricity by Rate Schedules	304	Ed. 12-90	N/A
Sales for Resale	310-311	Ed. 12-91	
Electric Operation and Maintenance Expenses	320-323	Rev.12-93	N/A
Number of Electric Department Employees	323	Rev.12-93	
Purchased Power	326-327	Rev.12-90	N/A
Transmission of Electricity for Others	328-330	Rev.12-90	
Transmission of Electricity by ISO/RTOs	331	New 12-06	N/A
Transmission of Electricity by Others	332	Rev.12-90	
Miscellaneous General Expenses - Electric	335	Ed. 12-87	N/A
Depreciation and Amortization of Electric Plant	336-337	Ed. 12-88	
COMMON SECTION			
Regulatory Commission Expenses	350-351	Ed. 12-90	N/A
Research, Development and Demonstration Activities	352-353	Ed. 12-87	
Distribution of Salaries and Wages	354-355	Ed. 12-88	N/A
Common Utility Plant and Expenses	356	Ed. 12-87	
Amounts included in ISO/RTO Settlement Statements	397	New 12-06	N/A
Purchase and Sale of Ancillary Services	398	New 12-06	
Monthly Transmission System Peak Load	400	New 12-06	N/A
Monthly ISO/RTO Transmission System Peak Load	400a	New 12-06	
ELECTRIC PLANT STATISTICAL DATA			
Electric Energy Account	401	Rev.12-90	N/A
Monthly Peaks and Output	401	Rev.12-90	
Steam-Electric Generating Plant Statistics (Large Plants)	402-403	Ed. 12-89	N/A
Hydroelectric Generating Plant Statistics (Large Plants)	406-407	Ed. 12-89	
Pumped Storage Generating Plant Statistics (Large Plants)	408-409	Ed. 12-88	N/A
Generating Plant Statistics (Small Plants)	410-411	Ed. 12-87	
Transmission Line Statistics	422-423	Ed. 12-87	N/A
Transmission Lines Added During Year	424-425	Ed. 12-86	
Substations	426-427	Ed. 12-86	N/A
Transactions with Associated (Affiliated) Companies	429	New 12-09	
Footnote Data	450	Ed. 12-87	N/A
Stockholders' Reports Check appropriate box:			
<input checked="" type="checkbox"/> Four copies will be submitted.  <input type="checkbox"/> No annual report to stockholders is prepared.			

Name of Respondent: Appalachian Power Company	This report is: (1) <input checked="" type="checkbox"/> An Original	Date of Report: 04/08/2025	Year/Period of Report End of: 2024/ Q4
	(2) <input type="checkbox"/> A Resubmission		

**Electric Operating Revenues**

- The following instructions generally apply to the annual version of these pages. Do not report quarterly data in columns (c), (e), (f), and (g). Unbilled revenues and MWH related to unbilled revenues need not be reported separately as required in the annual version of these pages.
- Report below operating revenues for each prescribed account, and manufactured gas revenues in total.
- Report number of customers, columns (f) and (g), on the basis of meters, in addition to the number of flat rate accounts; except that where separate meter readings are added for billing purposes, one customer should be counted for each group of meters added. The average number of customers means the average of twelve figures at the close of each month.
- If increases or decreases from previous period (columns (c),(e), and (g)), are not derived from previously reported figures, explain any inconsistencies in a footnote.
- Disclose amounts of \$250,000 or greater in a footnote for accounts 451, 456, and 457.2.
- Commercial and industrial Sales, Account 442, may be classified according to the basis of classification (Small or Commercial, and Large or Industrial) regularly used by the respondent if such basis of classification is not generally greater than 1000 Kw of demand. (See Account 442 of the Uniform System of Accounts. Explain basis of classification in a footnote.)
- See page 108, Important Changes During Period, for important new territory added and important rate increase or decreases.
- For Lines 2,4,5,and 6, see Page 304 for amounts relating to unbilled revenue by accounts.
- Include unmetered sales. Provide details of such Sales in a footnote.

Line No.	Title of Account (a)	Operating Revenues Year to Date Quarterly/Annual (b)	Operating Revenues Previous year (no Quarterly) (c)	MEGAWATT HOURS SOLD Year to Date Quarterly/Annual (d)	MEGAWATT HOURS SOLD Amount Previous year (no Quarterly) (e)	AVG.NO. CUSTOMERS PER MONTH Current Year (no Quarterly) (f)	AVG.NO. CUSTOMERS PER MONTH Previous Year (no Quarterly) (g)
1	Sales of Electricity						
2	(440) Residential Sales	1,772,263,894	1,614,401,806	10,483,202	10,125,697	814,229	812,538
3	(442) Commercial and Industrial Sales						
4	Small (or Comm.) (See Instr. 4)	764,522,118	700,214,915	5,947,791	5,728,265	140,970	140,754
5	Large (or Ind.) (See Instr. 4)	814,035,520	779,924,490	8,666,010	8,709,584	4,124	4,135
6	(444) Public Street and Highway Lighting	10,381,369	10,240,920	62,931	63,249	1,679	1,684
7	(445) Other Sales to Public Authorities	102,623,109	96,137,358	766,007	740,883	6,406	6,406
8	(446) Sales to Railroads and Railways						
9	(448) Interdepartmental Sales						
10	TOTAL Sales to Ultimate Consumers	3,463,826,010	3,200,919,489	25,925,940	25,367,677	967,408	965,517
11	(447) Sales for Resale	338,249,220	323,532,150	4,708,653	5,107,607	9	8
12	TOTAL Sales of Electricity	3,802,075,229	3,524,451,639	30,634,594	30,475,284	967,417	965,525
13	(Less) (449.1) Provision for Rate Refunds	20,908,639	39,081,549				
14	TOTAL Revenues Before Prov. for Refunds	3,781,166,590	3,485,370,090	30,634,594	30,475,284	967,417	965,525
15	Other Operating Revenues						
16	(450) Forfeited Discounts	5,283,460	4,854,042				
17	(451) Miscellaneous Service Revenues	3,478,714	3,656,875				
18	(453) Sales of Water and Water Power						
19	(454) Rent from Electric Property	28,077,521	21,395,434				
20	(455) Interdepartmental Rents						
21	(456) Other Electric Revenues	49,130,495	44,081,720				
22	(456.1) Revenues from Transmission of Electricity of Others	194,327,357	193,381,502				
23	(457.1) Regional Control Service Revenues						
24	(457.2) Miscellaneous Revenues						
25	Other Miscellaneous Operating Revenues						
26	TOTAL Other Operating Revenues	280,297,547	267,369,573				
27	TOTAL Electric Operating Revenues	4,061,464,138	3,752,739,663				

Line12, column (b) includes \$ 22,109,647 of unbilled revenues.

Line12, column (d) includes 100,985 MWH relating to unbilled revenues

## APPALACHIAN POWER COMPANY

THE FOLLOWING PAGES (PINK PAPER) CONTAIN DATA THAT RELATES  
ONLY TO THE STATE OF VIRGINIA

2024

<u>Title</u>	<u>Page No.</u>
Summary of Utility Plant and Accumulated Provisions for Depreciation, Amortization, and Depletion	200-201
Electric Plant in Service	204-207
Accumulated Provision for Depreciation of Electric Utility Plant	219
Material and Supplies	227
Taxes Charged During Year	258
Electric Operating Revenues	300-301
Sales of Electricity by Rate Schedules	304
Electric Operation and Maintenance Expenses	320-323
Number of Electric Department Employees	323
Statement of Basis Used for Allocations	Va. 1
Statement of Hydro Licensed Project Expenditures by Plant Project	Va. 2
Sales and Purchases of Property as Required in Case 13162	Va. 3
Electric Operating Revenues - Virginia Jurisdictional	300-301

VIRGINIA

Name of Respondent Appalachian Power Company		This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission		Date of Report (Mo, Da, Yr) Dec. 31, 2024	
ELECTRIC OPERATING REVENUES (Account 400)					
1. Report below operating revenues for each pre-scribed account, and manufactured gas revenues in total. 2. Report number of customers, columns (f) and (g) on the basis of meters, in addition to the number of flat rate accounts; except that where separate meter readings are added for billing purposes, one customer should be counted for each			group of meters added. The average number of customers means the average of twelve figures at the close of each month. 3. If increases or decreases from previous year (columns (c), (e), and (g)), are not derived from previously reported figures, explain any inconsistencies in a footnote.		
Line No.	Title of Account (a)	OPERATING REVENUES			
		Amount for Year (b)	Amount for Previous Year (c)		
1	Sales of Electricity				
2	(440) Residential Sales	1,000,095,946	900,543,431		
3	(442) Commercial and Industrial Sales				
4	Small (or Comm.) (See Instr.4)	387,403,519	353,501,990		
5	Large (or Ind.) (See Instr.4)	475,585,182	466,407,580		
6	(444) Public Street and Highway Lighting	6,558,322	6,572,177		
7	(445) Other Sales to Public Authorities	102,604,157	96,124,371		
8	(446) Sales to Railroads and Railways				
9	(448) Interdepartmental Sales				
10	TOTAL Sales to Ultimate Consumers	1,972,247,126	1,823,149,550		
11	(447) Sales for Resale	116,510,572	98,041,289		
12	TOTAL Sales of Electricity	2,088,757,698 *	1,921,190,839		
13	(Less) (449.1) Provision for Rate Refunds	9,193,978	17,934,682		
14	TOTAL Revenues Net of Prov. for Refunds	2,079,563,719	1,903,256,156		
15	Other Operating Revenues				
16	(450) Forfeited Discounts	3,108,500	2,821,494		
17	(451) Miscellaneous Service Revenues	2,215,001	2,581,819		
18	(453) Sales of Water and Water Power				
19	(454) Rent from Electric Property	14,786,549	13,555,847		
20	(455) Interdepartmental Rents				
21	(456) Other Electric Revenues	125,642,582	121,779,584		
22					
23					
24					
25					
26	TOTAL Other Operating Revenues	145,752,632	140,738,744		
27	TOTAL Electric Operating Revenues	2,225,316,352	2,043,994,900		



VIRGINIA

Name of Respondent Appalachian Power Company	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr) Dec. 31, 2024	Year of Report Dec. 31, 2024
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ELECTRIC OPERATING REVENUES (Account 400) (Continued)

4. Commercial and Industrial Sales, Account 442, may be classified according to the basis of classification (Small or Commercial, and Large or Industrial) regularly used by the respondent if such basis of classification is not generally greater than 1000 Kw of demand. (See Account 442 of the Uniform System of Accounts. Explain basis of classification in a footnote.)

5. See page 108, Important Changes During Year, for important new territory added and important rate increases or decreases.

6. For lines 2, 4, 5, and 6, see page 304 for amounts relating to unbilled revenue by accounts.

7. Include unmetered sales. Provide details of such sales in a footnote.

MEGAWATT HOURS SOLD		AVERAGE NUMBER CUSTOMERS PER MONTH		Line No.
Amount for Year (d)	Amount for Previous Year (e)	Number for Year (f)	Number for Previous Year (g)	
5,850,905	5,674,430	465,283	462,259	1
2,873,118	2,776,871	74,684	74,472	2
4,782,830	4,814,748	1,944	1,945	3
34,862	34,615	973	973	4
765,782	740,736	6,385	6,385	5
				6
				7
				8
				9
14,307,497	14,041,399	549,270	546,033	10
1,052,727,367	1,020,844,101	5	5	11
1,067,034,864 **	1,034,885,500	549,275	546,038	12
0	0		0	13
1,067,034,864	1,034,885,500	549,275	546,038	14

\* Includes - \$13,152,120 unbilled revenues.

\*\* Includes - 52,462 MWH relating to unbilled revenues.

VIRGINIA

Name of Respondent Appalachian Power Company			This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Date of Report (Mo, Da, Yr)	Year of Report Dec. 31, 2024																												
Page Number (a)	Item Number (b)	Column Number (c)	Comments (d)																														
301	7	-	ELECTRIC OPERATING REVENUES (Account 400) (Continued)																														
			Unmetered Sales included in Electric Operating Revenues																														
			<table><thead><tr><th><u>Account</u></th><th><u>Amount</u></th><th><u>MWh Sales (Est)</u></th><th><u>Customers</u></th></tr></thead><tbody><tr><td></td><td>\$</td><td></td><td></td></tr><tr><td>440</td><td>6,540,415</td><td>28,249</td><td>40,669</td></tr><tr><td>442 C</td><td>6,251,506</td><td>32,372</td><td>12,249</td></tr><tr><td>442 I</td><td>602,714</td><td>3,515</td><td>506</td></tr><tr><td>444</td><td>13,591</td><td>71</td><td>20</td></tr><tr><td>445</td><td>499,993</td><td>2,729</td><td>746</td></tr></tbody></table>			<u>Account</u>	<u>Amount</u>	<u>MWh Sales (Est)</u>	<u>Customers</u>		\$			440	6,540,415	28,249	40,669	442 C	6,251,506	32,372	12,249	442 I	602,714	3,515	506	444	13,591	71	20	445	499,993	2,729	746
			<u>Account</u>	<u>Amount</u>	<u>MWh Sales (Est)</u>	<u>Customers</u>																											
				\$																													
			440	6,540,415	28,249	40,669																											
			442 C	6,251,506	32,372	12,249																											
			442 I	602,714	3,515	506																											
			444	13,591	71	20																											
			445	499,993	2,729	746																											
Each customer is coded Commercial or Industrial in accordance with the Standard Industrial Classification Manual.																																	

## APPALACHIAN POWER COMPANY

## Sheet 35-1

## VA. S.C.C. TARIFF NO. 28

SCHEDULE SSP-S  
(Shared Solar Program – Subscriber)

## AVAILABILITY OF SERVICE

Available on a voluntary basis as a rate schedule to a customer (1) that receives Standard Service from the Company and (2) owns one or more Subscription(s) of a Shared Solar Facility that is interconnected with the Company.

The terms “Subscriber,” “Subscription,” “Subscriber Organization,” and “Shared Solar Facility” are defined in accordance with the Rules Governing Shared Solar Program. These terms can be found at the following location:  
<https://law.lis.virginia.gov/vacode/title56/chapter23/section56-594.4/>

## METERING

A Shared Solar Facility must have a utility-provided meter capable of measuring output of the facility on a 30-minute interval basis.

## BILLING AND PAYMENT

Subscribers that receive Standard Service from the Company and enter into a Subscription with a Subscriber Organization to participate in the Shared Solar Program will be billed as follows:

1. The Company shall continue to bill the Customer in accordance with the applicable Standard Tariff Schedule. In addition, the Company shall apply the monthly credits and charges under this Schedule to the Customer’s Account.
2. A monthly Bill Credit will be applied to each Subscriber account. The Subscribed kWh for each Subscriber in a given month will be multiplied by the below Applicable Bill Credit Rate for the month of generation. Credits to Subscriber bills will occur within two billing cycles following the cycle in which energy was generated by the Shared Solar Facility.

**Bill Credit Rate**

a.	Residential Customer	All Subscribed kWh x	<del>17.093</del> <del>15.782</del> ¢ per kWh
b.	Commercial Customer	All Subscribed kWh x	<del>12.730</del> <del>13.484</del> ¢ per kWh
c.	Industrial Customer	All Subscribed kWh x	<del>9.944</del> <del>687</del> ¢ per kWh

3. The Subscriber Organization shall separately bill the Subscribing Customer with any applicable fee associated with the Shared Solar subscription.

## MINIMUM CHARGE

1. A Subscription must be sized such that the estimated monthly Bill Credits do not exceed the Subscriber’s average annual bill over the past twelve (12) months for the Customer account to which the Subscription is attributed
2. A monthly Minimum Bill Charge related to the Subscription is applied to each Subscriber account based upon that month’s Subscribed kWh or usage, whichever is less. The Minimum Bill Charge is the sum of the below:
  - a. The Customer’s Standard Schedule basic customer charge; plus
  - b. The Program Administrative Charge @ \$1.00 per month; plus

Issued: December 11, 2024

Effective: July1, 2025

Pursuant to Final Order

Dated: November 20, 2024

Case PUR-2024-00122

**APPALACHIAN POWER COMPANY**

**Sheet 35-2**

**VA. S.C.C. TARIFF NO. 28**

**SCHEDULE SSP-S**

**(continued)**

- c. The Subscribed kilowatt hours of generation are multiplied by each of the following charges pursuant to the Standard Tariff:
- i. Base Distribution Charges; plus
  - ii. Distribution Rider Charges; plus
  - iii. Transmission Rider Charges; plus
  - iv. Non-Bypassable Generation Charges.
  - v. Benefit Credits
    1. Shifted Transmission Credit
    2. Ancillary Services Credit
    3. Renewable Energy Certificate Credit

**SPECIAL TERMS AND CONDITIONS**

This Schedule is subject to the Company's Terms and Conditions of Standard Service

**Issued: April 1, 2025**  
**Pursuant to Order on Reconsideration**  
**Dated: February 10, 2025**  
**Case PUR-2024-00122**

**Effective: July 1, 2025**



Bill Credit Calculation

Customer Class	Operating Revenues as of December 31, 2024	Megawatt Hours Sold	
		as of December 31, 2024	¢/kWh
Residential Sales	1,000,095,946.00	5,850,905.00	17.093
Commercial and Industrial Sales	387,403,519.00	2,873,118.00	13.484
Small (or Commercial)	475,585,182.00	4,782,830.00	9.944