

## STATE CORPORATION COMMISSION

AT RICHMOND, JULY 15, 2025

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COMMONWEALTH OF VIRGINIA, *ex rel.*

STATE CORPORATION COMMISSION

CASE NO. PUR-2024-00184

In re: Virginia Electric and Power Company's  
Integrated Resource Plan filing pursuant to  
Va. Code § 56-597 *et seq.*

FINAL ORDER

Pursuant to § 56-599 A of the Code of Virginia ("Code"), Virginia Electric and Power Company ("Dominion" or "Company") was required to file its 2024 Integrated Resource Plan ("2024 IRP") by October 15, 2024.<sup>1</sup> On August 20, 2024, the Staff of the Commission ("Staff") filed a Staff Motion to Reopen Docket and Require Certain Information to be included in the 2024 Integrated Resource Plan in Case No. PUR-2023-00066.<sup>2</sup> Thereafter, on October 11, 2024, the Commission issued an order ("October 11 Order") docketing the instant proceeding and directing Dominion to provide the following additional information by way of a supplemental filing by November 15, 2024:<sup>3</sup>

1. Additional modeling that presents, as a sensitivity for comparison purposes to the Company's modeling presented in its 2024 IRP, the following: (i) its least cost plan, and (ii) at least one [plan that complies with the Virginia Clean Economy Act ("VCEA")<sup>4</sup>], both with projected data center load growth removed;
2. Additional modeling to include updated capacity price forecasts that incorporate the impacts of the PJM Interconnection, L.L.C. ("PJM") base

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<sup>1</sup> Code § 56-599.

<sup>2</sup> *Commonwealth of Virginia, ex rel. State Corporation Commission, In re: Virginia Electric and Power Company's Integrated Resource Plan filing pursuant to Va. Code § 56-597 et seq.*, Case No. PUR-2023-00066, Doc. Con. Cen. No. 2305100119, 2023 Integrated Resource Plan (May 1, 2023).

<sup>3</sup> October 11 Order at 3-5.

<sup>4</sup> 2020 Va. Acts. chs. 1193, 1194.

residual capacity auction held in July 2024 for the entire 15-year planning period;

3. After obtaining and incorporating updated capacity price forecasts, present as sensitivities for comparison purposes, the following: (i) its least cost plan (which includes data center load); (ii) at least one VCEA-compliant plan (which includes data center load); (iii) its least cost plan without data center load; and (iv) at least one VCEA-compliant plan without data center load; and
4. For each planned transmission project, an indication of whether the need for the transmission project is primarily being driven by data center load growth.

On October 15, 2024, Dominion filed its 2024 IRP with the Commission. On November 15, 2024, the Company filed the supplemental information as directed in the October 11 Order.

On November 18, 2024, the Commission entered an Order for Notice and Hearing in this case that, among other things, directed Dominion to provide public notice of its 2024 IRP; scheduled hearings for the purpose of receiving testimony and evidence on the 2024 IRP; provided interested persons an opportunity to file comments on the 2024 IRP or to participate as respondents in this proceeding; directed Staff to investigate the 2024 IRP and file testimony and exhibits containing its findings and recommendations thereon; and appointed a Hearing Examiner to rule on all discovery matters and any *pro hac vice* motions that might arise over the course of the proceeding.

The following entities filed notices of participation in this case: Appalachian Voices; the Sierra Club and the National Resources Defense Council (“Sierra Club/NRDC”);<sup>5</sup> the Virginia Committee for Fair Utility Rates (“Committee”); Advanced Energy United (“Advanced Energy”); Clean Virginia; the Data Center Coalition (“DCC”); Walmart Inc. (“Walmart”);

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<sup>5</sup> On October 21, 2024, Sierra Club filed a Notice of Participation. On January 16, 2025, Sierra Club and NRDC filed a Notice of Participation as Joint Respondents.

Piedmont Environmental Council (“PEC”); Microsoft Corporation (“Microsoft”); Google, LLC (“Google”); the City of Alexandria, Virginia (“City”); Amazon Data Services, Inc. (“Amazon”); the Department of the Navy, on behalf of all federal executive agencies (“DON/FEA”);<sup>6</sup> and the Office of the Attorney General’s Division of Consumer Counsel (“Consumer Counsel”).

On February 28, 2025, Clean Virginia, Advanced Energy, Microsoft, Appalachian Voices, Walmart, the City, and Sierra Club/NRDC each filed testimony. On March 11, 2025, Staff filed testimony. On March 25, 2025, Dominion filed rebuttal testimony. The Commission received 312 public comments on Dominion’s 2024 IRP between January 3, 2025, and April 9, 2025.

The Commission convened a public hearing on April 14, 2025. Immediately following the public hearing, the Commission convened an evidentiary hearing in the Commission’s courtroom to hear testimony and accept evidence on the Company’s 2024 IRP. Counsel for Dominion, Appalachian Voices, Sierra Club/NRDC, Advanced Energy, Clean Virginia, DCC, Walmart, PEC, Microsoft, the City, Consumer Counsel, and Staff were in attendance, and one public witness provided testimony.<sup>7</sup> The evidentiary hearing concluded after closing arguments on April 18, 2025. On May 19, 2025, the participants filed issues matrices and post-hearing briefs, as directed by the Commission at the close of the evidentiary hearing.<sup>8</sup>

NOW THE COMMISSION, upon consideration of this matter, is of the opinion and finds as follows.

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<sup>6</sup> On April 2, 2025, DON/FEA filed a Motion to Withdraw as a Respondent and Request for Expedited Consideration, which also requested that its filed pleadings in this case be treated as public comments. On April 11, 2025, the Commission issued an Order granting the motion.

<sup>7</sup> Tr. 8-14. The Commission granted requests from the Committee, Amazon, and Google to be excused from attending the hearing.

<sup>8</sup> Tr. 1463-1464. On May 21, 2025, Google filed a Letter in Lieu of Post-Hearing Brief.



*2024 IRP*

An IRP, as defined by Code § 56-597, is “a document developed by an electric utility that provides a forecast of its load obligations and a plan to meet those obligations by supply side and demand side resources over the ensuing 15 years to promote reasonable prices, reliable service, energy independence, and environmental responsibility.” Pursuant to Code § 56-599 A, Dominion files its IRP in each year immediately preceding the year the utility is subject to a biennial review of rates for generation and distribution services filing. Pursuant to Code § 56-599 E, the Commission determines whether an IRP is reasonable and in the public interest.

The Commission finds that the 2024 IRP is legally sufficient under both Code § 56-597 *et seq.* and the Commission’s Integrated Resource Planning Guidelines.<sup>9</sup> The Commission emphasizes, though, that such acceptance “does not ‘express approval in this Final Order of the magnitude or specifics of Dominion’s future spending plans, the costs of which will significantly impact millions of residential and business customers in the monthly bills they must pay for power.’”<sup>10</sup>

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<sup>9</sup> See *Commonwealth of Virginia, ex rel. State Corporation Commission, Concerning Electric Utility Integrated Resource Planning Pursuant to [§] 56-597 et seq. [of the] Code of Virginia*, Case No. PUE-2008-00099, 2008 S.C.C. Ann. Rept. 606, Order Establishing Guidelines for Developing Integrated Resource Plans (Dec. 23, 2008).

<sup>10</sup> *Commonwealth of Virginia, ex rel. State Corporation Commission, In re: Virginia Electric and Power Company’s 2022 Update to its Integrated Resource Plan pursuant to Va. Code § 56-597 et seq.*, Case No. PUR-2022-00147, 2022 S.C.C. Ann. Rept. 612, Final Order (Oct. 31, 2022) (quoting *Commonwealth of Virginia, ex rel. State Corporation Commission, In re: Virginia Electric and Power Company’s Integrated Resource Plan filing pursuant to Va. Code § 56-597 et seq.*, Case No. PUR-2019-00141, 2019 S.C.C. Ann. Rept. 507, Final Order (Sept. 20, 2019)).

### *Planning Period*

The Commission finds that the Company's use of a 15-year planning period is permissible in this case given the statutory language defining an IRP<sup>11</sup> and the absence of any other directive from the Commission. However, for Dominion's next IRP filing, to better inform how the electric utility intends to meet its obligation to provide electric generation service for use by its retail customers over the planning period, the Company shall use a study period commensurate with the 20-year PJM forecast window,<sup>12</sup> which is consistent with our final order in Dominion's 2024 RPS proceeding.<sup>13</sup> There is a significant overlap in the information underling IRP planning and RPS planning, and it is sensible to use consistent planning periods. Accordingly, the Commission directs Dominion to provide a least-cost plan and to identify and provide its preferred plan over a 20-year study period in its next IRP filing.

### *Modeling*

The Commission finds that Dominion's future IRP filings shall provide (in addition to previously required modeling directives) at least one model run where carbon-emitting generation is retired in accordance with the default targets of the VCEA.<sup>14</sup>

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<sup>11</sup> See Code § 56-597 (“‘Integrated Resource Plan’ or ‘IRP’ means a document developed by an electric utility that provides a forecast of its load obligations and a plan to meet those obligations by supply side and demand side resources over the ensuing 15 years to promote reasonable prices, reliable service, energy independence, and environmental responsibility.”)

<sup>12</sup> See Ex. 50 (2025 PJM Long-Term Load Forecast Report).

<sup>13</sup> See *Petition of Virginia Electric and Power Company, For approval of its 2024 RPS Development Plan under § 56-585.5 D 4 of the Code of Virginia and related requests*, Case No. PUR-2024-00147, Doc. Con. Cen. No. 250420083, Final Order at 2-3 (Apr. 15, 2025) (“The Commission finds that Dominion's future RPS modeling shall include . . . a plan where all carbon-emitting generation is retired by 2045 ([in accordance with] Code § 56-585.5 B) . . .”).

<sup>14</sup> *Id.* While we include no directive for future IRP filings related to the capacity price forecast at this time, we note our concern regarding the accuracy of the Company's ever-increasing capacity price forecast.

In the current case, Dominion demonstrated that its annual build limits around battery storage were reasonable given the facts presented.<sup>15</sup> For the next IRP, we direct Dominion to continue to monitor the feasibility of increasing its annual build limits for battery storage, and to allow PLEXOS<sup>16</sup> to select long-duration energy storage facilities in the next IRP as the technology reaches commercial viability.

Given the uncertain state of Virginia's participation in the Regional Greenhouse Gas Initiative ("RGGI"),<sup>17</sup> Dominion shall also include a "RGGI Sensitivity" as part of its modeling in the Company's next IRP.<sup>18</sup> We agree that including a RGGI scenario in the next IRP will provide useful information to the Commission, parties, and Staff.<sup>19</sup>

In modeling Dominion's next IRP, Dominion and Staff shall work together to develop a locational model in PLEXOS using no more than four (4) Virginia-specific regional nodes.

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<sup>15</sup> At the hearing, the Company maintained its commitment to pursue long duration energy storage but detailed a general lack of commercial readiness for battery storage systems having a duration discharge greater than 10 hours. Tr. 1384-90. In addition, the record demonstrated that the 350 MW annual build limit used in the current IRP is more than 1,000 percent more than *all* battery storage added to the PJM-wide footprint in calendar year 2024. Ex. 73 (Martin Rebuttal) at 2.

<sup>16</sup> See Ex. 51 (Katsarelis Direct) at 2 ("Dominion utilizes PLEXOS software, specifically the long term ('LT') model, for the creation of LT optimization models to develop resource plans that include the levels and types of resources required to meet the Company's future capacity and energy needs, optimized on a least-cost basis, given the various assumptions and parameters that the Company instructs the model to retain.").

<sup>17</sup> See *id.* at 5-6 (referencing the ongoing legal challenges to the attempted repeal of the RGGI regulation).

<sup>18</sup> See Clean Virginia's Post-Hearing Brief at Appendix A, pp. 3-4; Sierra Club and NRDC's Post-Hearing Brief at 39; Advanced Energy's Post-Hearing Brief at 9; Appalachian Voices' Post-Hearing Brief at Appendix B, p. 5.

<sup>19</sup> Staff's Post-Hearing Brief at 17.



Further, in addition to the Stakeholder Input Case,<sup>20</sup> Dominion shall accommodate up to three (3) Staff-directed models and sensitivities in PLEXOS and file those with its next IRP.<sup>21</sup>

The Commission grants Clean Virginia's request to view Dominion's final modeling, to the extent it is available during the Stakeholder process, before the Company files its next IRP. Further, we direct Dominion to distribute the Company's modeling data to Staff and Consumer Counsel when it files the Company's next IRP, and to other participating parties upon receipt of each notice of participation.

### *Demand Side Management*

The Commission recognizes that Dominion has limited control over the uptake and usage of the Company's Demand Side Management programs.<sup>22</sup> However, capping energy efficiency targets at the level that the Company proposed in Case No. PUR-2023-00227, which the Hearing Examiner in that case characterized as the "low-end of feasible targets pursuant to Code § 56-596.2 B 3,"<sup>23</sup> could dampen the impact of demand side management on the load forecast and also any associated price effects. The Commission did not approve the "low-end of feasible" energy savings targets proposed by Dominion (2.10%, 2.41%, and 2.73%) and used for IRP

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<sup>20</sup> During the stakeholder review process required under Code § 56-599 D, Dominion complied with a request from the stakeholders that the Company include as part of its IRP modeling a case that contemplated VCEA compliance, including no new natural gas-fired generation and retirements of carbon-emitting generation units by 2045 ("the Stakeholder Input Case"). Ex. 2 (2024 IRP) at Appendix 1, pp. 10-12.

<sup>21</sup> See October 11 Order.

<sup>22</sup> See Ex. 72 (Hubbard Rebuttal) at 5 ("[I]t is important to note that many of the residential and commercial DSM programs are voluntary in nature. While the Company continues to leverage marketing and program incentives to encourage participation, it is ultimately up to customers' preferences on whether to participate.").

<sup>23</sup> *Commonwealth of Virginia, ex rel. State Corporation Commission, Ex Parte: In the matter of establishing energy efficiency savings targets pursuant to Code §§ 56-596.2 B 3 and 56-596.2:2*, Case No. PUR-2023-00227, Doc. Con. Cen. No. 241120046, Report of D. Mathias Roussy, Jr., Hearing Examiner at 54 (Nov. 12, 2024).

modeling in this case.<sup>24</sup> Rather, the Commission accepted a finding that “it would be reasonable to establish for Dominion[,] energy savings targets of 3.00%, 4.00%, and 5.00%, for 2026, 2027, and 2028, respectively.”<sup>25</sup> Accordingly, consistent with the requirements for the Company’s RPS planning, we direct Dominion to model achievement of the final savings targets approved in Case No. PUR-2023-00227.

### *Bill Analysis*

The Commission directs Dominion to include a base rate component in the Company’s bill impact analyses in future IRP filings. The bill impact analyses shall include this base rate component even if doing so necessarily requires acknowledgment of a degree of imprecision.<sup>26</sup>

### *Grid Enhancing Technologies (“GETs”)*

The Commission agrees with Staff’s recommendation that Dominion provide in future IRPs a clearer alignment and a more comprehensive discussion of the application of GETs and advanced conductors.<sup>27</sup> We direct Dominion to include in its next IRP filing a narrative discussion of GETs and advanced conductors on the Company’s system, particularly regarding their role in ensuring grid reliability and safeguarding cybersecurity and physical security of the electric distribution grid.

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<sup>24</sup> *Commonwealth of Virginia, ex rel. State Corporation Commission, Ex Parte: In the matter of establishing energy efficiency savings targets pursuant to Code §§ 56-596.2 B 3 and 56-596.2:2*, Case No. PUR-2023-00227, Doc. Con. Cen. No. 250240063, Final Order at 3, 10 (Feb. 27, 2025).

<sup>25</sup> *Id.* at 4, 9-10.

<sup>26</sup> *See*, Tr. at 993-94 (Welsh) (“There are certainly complexities involved in base rate cases that may make them more difficult to estimate or project than isolated rate adjustment clauses. . . . but there are critical elements of the IRP portfolio for which the costs or benefits are in base rates.”).

<sup>27</sup> Ex. 57 (Dodson Direct) at 8.



*Solar Build Limits*

The Commission accepts Dominion's solar build limits, given the land use challenges and the Company's explanation for the limits that it selected for purposes of this IRP and future IRP filings.<sup>28</sup>

*Future Filing Requirements*

At the hearing, Staff and the participants were asked to submit a list of any Commission-ordered IRP requirements "from a prior Commission order [that] ha[ve] grown stale through the passage of time" and identify if good cause exists to remove such requirements from future IRP filings.<sup>29</sup> After reviewing Staff's and participants' filings addressing this request, the Commission sunsets the following filing requirements:<sup>30</sup> 14, 16, 18, 19, 20, 21,<sup>31</sup> and 25. The Commission modifies filing requirement 23 to state: "In future IRPs, the Company shall: . . . 2. Continue to use the PJM load forecast, reduced by the Commission-approved VCEA energy efficiency targets, and separately identify the load associated with data centers."

Accordingly, IT IS SO ORDERED and this matter IS DISMISSED.

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.

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<sup>28</sup> See, e.g., Tr. at 1326-28 (Flowers); Ex. 2 (2024 IRP) at 26-27; Ex. 71 (Flowers Rebuttal) at 2-3; Ex. 73 (Martin Rebuttal) at 2-3.

<sup>29</sup> Tr. 1464.

<sup>30</sup> The following numbers correspond to Attachment B found in Dominion's Post-Hearing Brief under the subheading "The Company Requests Relief from these VSCC Requirements[.]"

<sup>31</sup> Requirement 21 is sunset based upon our approval of the proposed change to "Requirement 2 to add 'broad band of prices' and effluent prices (NOx and SOx)."