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COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION  
CASE NO.: PUR-2024-00184

VIRGINIA ELECTRIC AND POWER COMPANY'S  
INTEGRATED RESOURCE PLAN FILING  
PURSUANT TO VA CODE 56-597, et seq.

PRESIDING JUDGES: HON. JEHMAL T. HUDSON  
HON. KELSEY A. BAGOT  
HON. SAMUEL T. TOWELL

Conducted virtually  
Monday, April 14th, 2025  
10:01 a.m. to 12:02 p.m.

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Reported by: Dawn M. Hyde, Notary Public

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1 A P P E A R A N C E S

2

3 Vishwa B. Link, Esquire

4 Sarah B. Nielsen, Esquire

5 Nicholas A. Dantonio, Esquire

6 Nicole M. Allaband, Esquire

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8 Company (Dominion)

9 Nathaniel H. Benforado, Esquire

10 Rachel M. James, Esquire

11 Josephus M. Allmond, Esquire

12 Katherine King, Esquire

13 Emma Clancy, Esquire

14 Counsel to Appalachian Voices

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16 Claire M. Horan, Esquire

17 Evan D. Johns, Esquire

18 Dorothy E. Jaffe, Esquire

19 Counsel to Sierra Club and Natural  
20 Resources Defense Council (NRDC)

21

22



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1 APPEARANCES: (Cont'd)  
2 Katherine E. Pollard, Esquire  
3 Gregory Habeeb, Esquire  
4 Counsel to Advanced Energy United  
5 (Advanced Energy)  
6 William T. Reisinger, Esquire  
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10 Cassidy C. Galindo, Esquire  
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13 Carrie H. Grundmann, Esquire  
14 Counsel to Walmart, Inc. (Walmart)  
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16 Cale Jaffe, Esquire  
17 Ryan Carp, Esquire  
18 Peter Grema, Esquire  
19 Counsel to Piedmont Environmental Council  
20 (PEC)  
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1 APPEARANCES: (Cont'd)  
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4 (Microsoft)  
5 Andrew R. McRoberts, Esquire  
6 Adam B. Winston, Esquire  
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8 Kyle D. Eldridge, Esquire  
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10 (City)  
11 John E. Farmer, Jr., Esquire  
12 Carew S. Bartley, Esquire  
13 Counsel to Office of the Attorney  
14 General, Division of Consumer Council  
(Consumer Council)  
15  
16 Kiva Bland Pierce, Esquire  
17 Arlen Bolstad, Esquire  
18 Michael Zielinski, Esquire  
19 Counsel to Staff of the State Corporation  
20 Commission (Staff)  
21  
22

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1 P R O C E E D I N G S

2 \* \* \* \*

3 BAILIFF: Oyez, oyez. Silence is  
4 commanded while the Honorable State Corporation  
5 Commission is in session. God save the  
6 Commonwealth and this Honorable Commission.

7 Today's docket consists of case number  
8 PUR-2024-00184. Commonwealth of Virginia, ex rel.  
9 State Corporation Commission in re: Virginia  
10 Electric and Power Company's Integrated Resource  
11 Plan filing pursuant to Virginia code section  
12 56-597, et seq., the Honorable Jehmal T. Hudson,  
13 presiding.

14 JUDGE HUDSON: Thank you, Mr. Officer,  
15 for calling us to order. Good morning, everyone.  
16 This morning we begin the Commission's hearing on  
17 the 2024 Integrated Resource Plan filed by the  
18 Virginia Electric and Power Company which may also  
19 be referred to as "Dominion" or "The Company."  
20 The Integrated Resource Plan may be also referred  
21 to as the "IRP."

22 On November 18th of 2024, the Commission

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1 issued an order for notice and hearing  
2 establishing the procedural schedule in this case.  
3 That order scheduled an opportunity for the public  
4 to provide comment orally by telephone on  
5 Dominion's 2024 IRP.

6 We will receive those public comments  
7 now. I have a few instructions for commenters  
8 today. When the Commission calls you, you will  
9 see the number area code (804) 299-5840 appearing  
10 on your phone screen. Upon receiving a call from  
11 that number, please answer.

12 When you answer, turn down the volume --  
13 (Telephonic interruption.)

14 JUDGE HUDSON: Okay. Let's continue.  
15 When you answer, turn down the volume of webcast  
16 on your computer. This will minimize electronic  
17 interference. The bailiff will swear you in and  
18 then you may give your statement.

19 State and spell your name and state your  
20 address for the record. Then please proceed to  
21 give your comments. After you give your  
22 statement, it is possible that there will be



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1 follow-up questions. You will be excused when  
2 your testimony and any follow-up questions are  
3 completed and then the call will be disconnected.

4 At that time you may resume listening to  
5 the webcast of this hearing on your computer.  
6 With those instructions, I will ask Ms. Haynes to  
7 call the first public witness, Glen Besa, followed  
8 by Caroline Fuentes.

9 MR. BESA: Hi, this is Glen Besa.

10 BAILIFF: Good morning, Mr. Besa. This  
11 is Jabari Robinson from the State Corporation  
12 Commission. You signed up to provide testimony in  
13 case number PUR-2-24-00184 concerning the matter  
14 regarding Dominion's 2024 Integrated Resource  
15 Plan.

16 MR. BESA: Yes.

17 BAILIFF: Are you prepared to give  
18 testimony?

19 MR. BESA: Yes, I am.

20 BAILIFF: Then please note, Mr. Besa,  
21 that you will have five minutes to testify.

22 (Mr. Besa was sworn in.)

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1 JUDGE HUDSON: Well, good morning. Good  
2 morning, Mr. Besa, my name is Judge Jehmal Hudson.  
3 Thank you for being with us today. I need you  
4 right now to please state and spell your name and  
5 state your address for the record.

6 NARRATIVE TESTIMONY BY GLEN BESA

7 MR. BESA: My time is Glen Besa. That's  
8 G-L-E-N, last name, B-E-S-A. I reside at 4896  
9 Burnham Road, Chesterfield, Virginia 23234.

10 As a resident of Chesterfield County,  
11 together with other concerned residents, we formed  
12 the organization Friends of Chesterfield expressly  
13 to oppose Dominion Energy's proposed  
14 1,000-megawatt gas plant in the county, which is  
15 also before it the SCC as an application for a  
16 certificate of public convenience and necessity,  
17 case number PUR-2025-00037.

18 As residents of Chesterfield County and  
19 of Virginia, we are concerned with and opposed to  
20 Dominion's plans to build additional new source of  
21 air pollution that we would also be asked to bear  
22 the cost of in the CPN's proceeding, all for the



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1 benefit of the data industry which comprises some  
2 of the richest corporations in the world.

3 The IRP as proposed and if approved by  
4 the Commission would be a first step in Dominion's  
5 plans to build this new gas plant in Chesterfield  
6 County, as that gas plant would be consistent with  
7 the IRP as it's proposed.

8 In the matter of Dominion Energy's  
9 Integrated Resource Plan, I observe that Dominion  
10 has wholly abandoned compliance with the  
11 provisions of the Virginia Clean Economy Act  
12 related to the phase-out of reliance on fossil  
13 fuel generation.

14 Not only does Dominion now plan to not  
15 phase out any fossil fuel generation, it is in  
16 this IRP proposing another six gigawatts of new  
17 methane gas-fired generation starting with the gas  
18 plant proposed for Chesterfield County.

19 As Dominion argues that the reliability  
20 exception in the VCEA is sufficient justification  
21 for the Commission to adopt this IRP and is  
22 subsequently approve the Chesterfield gas plant

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1 and five more gigawatts of fossil fuel generation.

2 However, this exception is being used by  
3 Dominion Energy to in effect void the entire  
4 legislative intent of the underlying statute.

5 As the public policy objective of the  
6 Virginia Clean Economy Act is to reduce emissions  
7 of carbon pollution in order to address climate  
8 change, I submit that the current IRP, even with  
9 the exception for maintaining reliability, is  
10 legally inconsistent with the legislative intent  
11 of the VCEA.

12 As such, the Dominion Energy Integrated  
13 Research Plan should be rejected as a matter of  
14 law. I ask that you consider that Dominion's  
15 proposed IRP is such a departure from the  
16 underlying legislative intent of the General  
17 Assembly in adopting the Virginia Clean Economy  
18 Act, that this Commission should rule that it is  
19 not within its authority to approve the plan now  
20 before you. Thank you so much.

21 JUDGE HUDSON: Mr. Besa, thank you very  
22 much. Does anyone have cross-examination for this

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1 witness?

2 MS. LINK: Good morning. This is Vishwa  
3 Link with McGuireWoods. Just briefly if I may ask  
4 Mr. Besa a few questions.

5 JUDGE HUDSON: Please do.

6 MS. LINK: Okay. Thank you.

7 CROSS EXAMINATION BY COUNSEL FOR DOMINION ENERGY  
8 BY MS. LINK:

9 Q Good morning, Mr. Besa, this is Vishwa  
10 Link. How are you today?

11 A I'm fine, thank you.

12 Q Good. I just wanted to make sure you  
13 understood that this IRP proceeding is not asking  
14 for approval of the Chesterfield Energy  
15 Reliability Center.

16 A I am fully aware of that but the plan  
17 itself would basically -- if approved, would then  
18 establish a plan that the gas plant would be  
19 consistent with and I believe that this plan is  
20 inconsistent with the Virginia Clean Economy Act.

21 Q Okay. Thank you. But you're aware that  
22 we're not asking for a CPCN through this

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1 proceeding, correct?

2 A Clearly that was I think very clear in  
3 my statement.

4 MS. LINK: Okay. Thank you. No further  
5 questions, Your Honor.

6 JUDGE HUDSON: Thank you. Any other  
7 cross examination? Hearing none, Mr. Besa, we  
8 thank you so much for your time. You are now  
9 excused. And again, if you're listening on the  
10 webcast, you can turn that back up now if you want  
11 to. So again, thank you very much.

12 THE WITNESS: Thank you. This was very  
13 easy. I appreciate your cooperation. Thank you.

14 JUDGE HUDSON: Thank you. Have a great  
15 day.

16 I will now ask Ms. Haynes to please call  
17 Caroline Fuentes.

18 MS. HAYNES: I think we may have  
19 received a voicemail, Your Honor. I can try  
20 again.

21 JUDGE HUDSON: Yes, let's try it one  
22 more time before we move forward.



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1 MS. HAYNES: Okay. Yes, sir.

2 (Voicemail message played.)

3 JUDGE HUDSON: Thank you, Ms. Haynes.

4 So I believe that those are all the public  
5 witnesses that we have signed up today. So do we  
6 know of any other public witnesses to be called?

7 MS. HAYNES: No, sir, that's it.

8 JUDGE HUDSON: Thank you very much.

9 All right. So we will now turn over to  
10 the energy portion of today's hearing. I just  
11 want to go over a few logistical points. I've  
12 received a proposed order of presentation which I  
13 think all the parties have received as well. So  
14 please plan to speak in the order listed there.

15 The Commission session is being webcast  
16 today as well as transcribed by the court  
17 reporter, so be sure to notify the Commission if  
18 you need to go into confidential session so that  
19 the bailiff can take us off the webcast and the  
20 transcript can be appropriately marked.

21 If a confidential session is needed for  
22 a particular witness, please advise the Commission

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1 and we will have once all the public testimony and  
2 cross examination for the applicable witness has  
3 finished.

4 Also with respect to exhibits, when a  
5 party asks for an exhibit to be marked, the  
6 bailiff will identify the exhibit number and mark  
7 the exhibit. So please make sure to indicate if  
8 there's a confidential or externally sensitive  
9 version that was also being marked.

10 And on one final note, I understand that  
11 counsel for the City of Alexandria is unavailable  
12 today, at least one of the attorneys, so we will  
13 go through all the opening statements for the  
14 participants on this meeting, and I'll offer  
15 counsel for the city to provide their opening  
16 statement tomorrow, on Tuesday. Afterwards,  
17 Dominion will begin with their [inaudible] case.

18 So now I'd like counsel to introduce  
19 yourself and I'll ask lead counsel to name their  
20 co-counsel and we'll start with Dominion and go  
21 down the order of presentation.

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1 OPENING STATEMENT

2 MS. LINK: Thank you, Your Honor. Good  
3 morning. May it please the Commission. My name  
4 is Vishwa Link with the law firm of McGuireWoods,  
5 and appearing with me through this proceeding is  
6 my partner Nick Dantonio and Sarah Nielsen, who  
7 has been admitted pro hac vice by this Commission,  
8 and also Nicole Allaband who was an associate with  
9 my firm but is now in house at the Company. And,  
10 Your Honor, just she will -- Ms. Allaband will be  
11 delivering the opening statement at the  
12 appropriate time. Thank you.

13 JUDGE HUDSON: Thank you.

14 MR. BENFORADO: Good morning, Your  
15 Honor. May it please the Commission, Nate  
16 Benforado of the law firm Southern Environmental  
17 Law Center. We are representing Appalachian  
18 Voices in this matter, and I will be joined with  
19 my colleagues, Josephus Allmond who will be  
20 delivering our opening statement this morning, as  
21 well as Rachel James, Emma Clancy and Kat King.  
22 Thank you, Your Honor.



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1 JUDGE HUDSON: Thank you. Sierra Club?

2 MS. HORAN: Yes. My name is Claire  
3 Horan with Appalachian Mountain Advocates. I'll  
4 be together with Evan Johns, also with Appalachian  
5 Mountain Advocates and Dorothy Jaffe with Sierra  
6 Club and she's been admitted pro hac vice.  
7 Together we represent Sierra Club and NRDC.

8 JUDGE HUDSON: Thank you.

9 MR. HABEEB: Good morning, Your Honor,  
10 this is Greg Habeeb with Gentry Locke. I'm joined  
11 today by my colleague Kate Pollard representing  
12 Advanced Energy United, who we will refer to as  
13 United throughout this proceeding. And  
14 Ms. Pollard will be delivering our opening today.

15 JUDGE HUDSON: Thank you.

16 MR. REISINGER: Good morning, Your  
17 Honor, this is Will Reisinger and I'm here  
18 representing the respondent Clean Virginia.

19 JUDGE HUDSON: Thank you.

20 MR. MURPHEY: Good morning, Your Honor,  
21 I along with my colleague Cassidy Galindo with the  
22 law firm Williams Mullen. We will -- we're here

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1 on behalf of the Data Center Coalition and I will  
2 be providing the opening statement.

3 JUDGE HUDSON: Thank you.

4 MS. GRUNDMANN: Good morning, Your  
5 Honor. Carrie Grundmann from the law firm of  
6 Spilman Thomas and Battle. Here this morning on  
7 behalf of Walmart, Inc.

8 JUDGE HUDSON: Thank you.

9 MR. JAFFE: Good morning, Your Honor.  
10 My name is Cale Jaffe, I'm a law professor at the  
11 University of Virginia where I run the  
12 environmental law and community engagement clinic.  
13 Our clinic today is representing the Piedmont  
14 Environmental Council.

15 Joining me in the case are two law  
16 students who've been admitted under Virginia's  
17 third-year-practice certificate rule. That is  
18 Ryan Carp and Peter Grema, and Peter will be  
19 giving our opening statement today.

20 JUDGE HUDSON: Thank you.

21 MS. ROBB: Good morning, Your Honor,  
22 Cliona Robb with ThompsonMcMullan law firm and I'm

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1 here today on behalf of Microsoft Corporation.

2 JUDGE HUDSON: Thank you.

3 MR. ELDRIDGE: Morning, Your Honor. My  
4 name is Kyle Eldridge, and I am one of the  
5 attorneys representing the City of Alexandria  
6 along with Andrew McRoberts and Adam Winston with  
7 Sands Anderson. We're also joined by Bryan  
8 MacAvoy who is with the City of Alexandria, and my  
9 colleague Adam Winston will be delivering the  
10 opening statement tomorrow. Thank you.

11 JUDGE HUDSON: Thank you.

12 MR. FARMER: Good morning, Your Honor,  
13 John Farmer, along with my co-counsel Carew  
14 Bartley for the Office of Attorney General's  
15 Division of Consumer Council.

16 JUDGE HUDSON: Thank you.

17 MS. PIERCE: Good morning, Your Honor,  
18 Kiva Bland Pierce. I'm here with Arlen Bolstad  
19 and Michael Zielinski. We represent the  
20 Commission Staff.

21 JUDGE HUDSON: Thank you.

22 All right. So before we begin with

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1 opening statements, are there any preliminary  
2 matters?

3 MR. BENFORADO: Your Honor, just I know  
4 that scheduling has been difficult with so many  
5 parties and witnesses but I was -- we put in a  
6 request or an option for our witness Mr. Wilson  
7 who has some travel constraints. And he would be  
8 able to appear remotely on Wednesday afternoon if  
9 that were acceptable to the Commission, otherwise  
10 the earliest he would be able to get to Richmond  
11 is Thursday morning.

12 So I just wanted to check in to see if  
13 that had been resolved in any way.

14 JUDGE HUDSON: Thank you, Counsel. So  
15 we are still working on that but we will certainly  
16 make sure we give you a response in a reasonable  
17 amount of time so that when your witness has to  
18 make a decision, they will know whether to do it  
19 remotely or be here in person.

20 MR. BENFORADO: Thank you, Your Honor.  
21 I appreciate that.

22 JUDGE HUDSON: Thank you.



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1 MS. LINK: Your Honor, just on that  
2 point, the Company strongly prefers that all the  
3 respondent and Staff witnesses go before the  
4 Company's rebuttal testimony. So the reason we  
5 raise concern about Mr. Wilson not being available  
6 until Thursday morning was on the potential that  
7 we perhaps would have gotten to him in the lineup  
8 and we were ready for Company rebuttal and we  
9 prefer to go before Mr. Wilson is heard.

10 JUDGE HUDSON: Thank you, Counsel. Duly  
11 noted.

12 MS. LINK: Thank you.

13 JUDGE HUDSON: All right. Hearing no  
14 other --

15 MS. ROBB: One other. Has the  
16 Commission decided whether they would prefer  
17 closing arguments or post-hearing briefs in this  
18 matter?

19 JUDGE HUDSON: This matter I would like  
20 post-hearing briefs and I'll certainly give you  
21 more details at the end of the evidentiary  
22 hearing.

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1 MS. ROBB: Thank you very much.

2 JUDGE HUDSON: Thank you. All right.

3 Hearing no other preliminary matters, we'll now  
4 begin with opening statements. Again, we're  
5 following the order of presentation. So Dominion,  
6 please proceed.

7 MS. ALLABAND: Morning, Your Honor. Can  
8 you see and hear me okay?

9 JUDGE HUDSON: Yes, Counsel, we can see  
10 you and hear you.

11 OPENING STATEMENT

12 MS. ALLABAND: Thank you so much. May  
13 it please the Commission. On behalf of the  
14 Virginia Electric and Power Company, my name is  
15 Nicole Allaband.

16 Before the Commission today is Dominion  
17 Energy Virginia's 2024 Integrated Resource Plan  
18 which was filed on October 15th, 2024. Pursuant  
19 to Virginia Code Section 56-599(e), the Commission  
20 is to make a determination as to whether the 2024  
21 IRP is reasonable and in the public interest as a  
22 filing document.

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1           The Company has been presenting its  
2 Integrated Resource Plan to the Commission on a  
3 regular basis since 2009. The Company's mission  
4 remains the same, to provide [inaudible] --

5           COURT REPORTER: I'm sorry, you just cut  
6 out. "The Company's mission remains the same, to  
7 provide..."

8           MS. ALLABAND: Oh, can you hear me now?

9           JUDGE HUDSON: Yes.

10          MS. ALLABAND: Will start that sentence  
11 over.

12          The Company's mission remains the same,  
13 to provide reliable, affordable and increasingly  
14 clean power to its customers. Here in Virginia,  
15 the 2020 Virginia Clean Economy Act or VCEA  
16 embodies the Commonwealth's commitment to a clear  
17 energy future.

18          The VCEA instituted a mandatory  
19 renewable energy portfolio standard program, the  
20 RPS program, incentivized the significant  
21 development of solar, wind and energy storage  
22 resources, requires the retirement of certain



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1 existing generating units unless there are threats  
2 to reliability or security and established energy  
3 efficiency targets.

4 The 2024 IRP represents the Company's  
5 next iterative plan and the Company is committed  
6 to meeting the goals of the VCEA while maintaining  
7 the reliability and affordability that customers  
8 and this Commission expect. Based on the current  
9 snapshot in time, to do so will repair supportive  
10 legislative and regulatory policies, technological  
11 advances and broader investments across the  
12 economy.

13 The modeling for the 2024 IRP  
14 demonstrates that the Company needs to maximize  
15 all commercially feasible technologies and market  
16 purchases of capacity and energy to maintain  
17 reliability under normal weather. Importantly,  
18 the Company must also plan to meet customers'  
19 needs during non-normal weather.

20 Although the IRP provides a long-term  
21 plan for the next 15 years, there is uncertainty  
22 surrounding new technologies in the outer years

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1 and the Company fully expects new technologies  
2 could and should take the place of many existing  
3 technologies.

4 The Company's five-year reliability plan  
5 presented in section 3.8 demonstrates that the  
6 Company is proactively positioning itself to meet  
7 its commitment to provide reliable, affordable and  
8 increasingly clean energy for its customers over  
9 the long term.

10 The 2045 retirement date for  
11 carbon-emitting resources is 20 years away and the  
12 Company is not requesting a waiver to operate  
13 those units beyond 2045 at this time. The Company  
14 will continue to pursue all available technologies  
15 and will update its IRP each year to keep the  
16 Commission informed about the status of its  
17 existing carbon-emitting resources and the  
18 reliability need for them.

19 The Company will demonstrate that the  
20 2024 IRP is reasonable and in the public interest  
21 and should be found so as a filing document  
22 through the direct testimony of witnesses Shane

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1 Compton, Joseph Bocanegra who will adopt the  
2 testimony of Abhijit Rajan, Michael Hubbard,  
3 Katelynn Vance, Harrison Potter, Mohammed  
4 Alfayyumi, Todd Flowers, Kourtnie Sunkins and  
5 Kathryn MacCormick.

6 The rebuttal testimony of Company  
7 witnesses Compton, Bocanegra, Flowers, Vance,  
8 Hubbard and Sunkins as well as Company witnesses  
9 Stan Blackwell and Brandon Martin and Maria  
10 Scheller of ICF Resources, LLC.

11 As a regulated public utility, the  
12 Company has an obligation to serve all customers  
13 within its service territory, both during normal  
14 and extreme weather, with reasonably adequate  
15 service at just and reasonable rates on a  
16 nondiscriminatory manner.

17 Reliability is paramount to the Company  
18 and has two facets: reliability of the  
19 transmission grid, and the availability of  
20 sufficient generation resources with certain  
21 capabilities to meet customers' energy and  
22 capacity needs at all hours of the year.

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1           In the 2024 IRP the Company identified  
2       several challenges to reliability over the 15-year  
3       planning period, including the significant local  
4       growth expected and certain market changes in PJM  
5       Interconnection, LLC.

6           First, the low forecast. As previously  
7       directed by the Commission in 2018, the Company  
8       used PJM's low forecast scaled down to the  
9       Dominion load-serving entity. The Company refers  
10      to this as the PJM-derived load forecast. The  
11      down zone is the fastest growing zone in PJM.  
12      Notably the top 20 all-time system peaks in the  
13      down zone have occurred in the last two and a half  
14      years.

15           This growth is primarily driven by data  
16      centers and electric vehicles, although some  
17      parties in this case have contested the amount of  
18      projected load growth as it pertains to data  
19      centers. The Company presented extensive  
20      information including historical data and  
21      forward-looking customer intelligence to support  
22      its data center forecast. The PJM-derived load



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1 forecast including the data center forecast should  
2 be found reasonable for purposes of the 2024 IRP.

3 Company witness Bocanegra will provide  
4 additional information on the PJM-derived load  
5 forecast, and Company witness Blackwell supports  
6 the reasonableness of the data center forecast.

7 Second, certain changes to the PJM  
8 market have affected the planning environment. As  
9 a member of PJM, the Company is obligated to  
10 purchase sufficient capacity to maintain overall  
11 system reliability which is determined by PJM  
12 using its annual load forecast and reserve margin.

13 In 2024 PJM updated the effective  
14 load-carrying capability for ELCC values for  
15 renewable energy storage resources and assigned  
16 ELCC values to dispatchable resources for the  
17 first time.

18 ELCC is a reliability metric and is a  
19 measure of the additional load that a particular  
20 generator can supply without a change in  
21 reliability. The ELCC values for renewable  
22 resources and shorter duration energy storage

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1 resources were significantly decreased. The  
2 decreased ELCC values for renewable resources and  
3 shorter duration energy storage combined with  
4 challenges to bringing new resources online, we  
5 have existing and future dispatchable resources  
6 are needed to ensure continued reliability.

7 Additionally for the 2025-2026 delivery  
8 down zone was modeled separately which resulted in  
9 capacity [audio glitch] 60 percent higher than in  
10 a regional transitional organization and 15 times  
11 higher than the previous delivery year clearing  
12 price.

13 The results demonstrated there was  
14 insufficient capacity offered into the base  
15 residual auction and that investment in new  
16 dispatchable generation resources and new  
17 transmission infrastructure is needed to continue  
18 to reliably serve the Company's customers.

19 Finally, new environmental regulations  
20 include energy policies in other states are  
21 incentivizing the retirement of dispatchable  
22 resources and investment in renewables and energy

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1 storage across PJM. These regulations and  
2 policies increase the risk that energy and  
3 capacity might not be available for purchase in  
4 the coming years, especially during times of  
5 extreme weather.

6 In recent years the Company has  
7 purchased slightly more than 20 percent of its  
8 energy needs from PJM's market. While market  
9 purchases will continue to be a part of the  
10 Company's approach to meeting customers' needs,  
11 energy independence is a key consideration to  
12 ensure reliability. To reliably meet the  
13 significant increase in load and address the  
14 changes in PJM's market, then all of the above  
15 approach is necessary, including new generation,  
16 demands on management and transmission and  
17 distribution upgrades.

18 Utilizing PLEXOS, an appropriate tool  
19 for long-term capacity expansion modeling, the  
20 2024 IRP presented four primary portfolios and  
21 many sensitivities.

22 Pursuant to the prior Commission orders,



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1 the REC RPS-only portfolios meet only applicable  
2 carbon regulations and the mandatory RPS program  
3 requirements in code section 56-585.5(c).  
4 Consistent with the Commission's prior directives  
5 in these portfolios, the Company did not force the  
6 PLEXOS model to select or exclude any resource.  
7 All resources were selected on a least-cost  
8 optimization basis.

9 The Company does not consider these  
10 portfolios to be viable paths forward because they  
11 do not meet the VCEA development targets for  
12 solar, wind and energy storage resources and they  
13 rely too heavily on third-party power purchase  
14 agreements or PPAs.

15 The VCEA portfolios include the  
16 development targets for solar, wind and energy  
17 storage resources as set forth in code section  
18 56-585.5(d)(2), including the requirement of 1,100  
19 megawatts of distributed solar resources and the  
20 65/35 split between Company-owned and third-party  
21 PPAs.

22 The model then allowed -- the PLEXOS

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1 model then allowed resources to optimize on a  
2 least-cost basis. Given the significant  
3 uncertainty surrounding recent environmental  
4 regulations from the Environmental Protection  
5 Agency, the Company presented portfolios with and  
6 without the regulations to show the impacts and  
7 bookends of potential pathways.

8 The portfolios include resources that  
9 are proposed as well as those that are previously  
10 approved and then select generic resources and  
11 market purchases to meet low growth.

12 Each portfolio's sensitivity complies  
13 with the law and prior Commission orders and  
14 includes reasonable assumptions founded in the  
15 Company's experience and expertise for resource  
16 selection, resource build limits and commodity and  
17 resource costs.

18 While the resulting build plans for each  
19 portfolio and sensitivity look fairly similar,  
20 this is not surprising given the amount of demand  
21 to be met and the reasonable modeling assumptions  
22 the Company made.

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1           The models were extremely  
2 capacity-constrained and therefore needed almost  
3 every resource available across all technologies  
4 including market purchases to meet customers'  
5 energy and capacity needs. All primary portfolios  
6 include a significant development of renewable  
7 generation and energy storage resources as well as  
8 maximize new offshore wind, nuclear small-modular  
9 reactors and natural gas-fired resources.

10           The portfolios demonstrate the  
11 dispatchable generation is essential for ensuring  
12 reliability. The various primary portfolios'  
13 insensitivities conducted demonstrate the  
14 reasonableness of the Company's 2024 IRP.

15           Company witness Compton will provide  
16 more information about the Company's modeling and  
17 portfolios. Company witnesses Flowers, Martin and  
18 Hubbard and Ms. Scheller of ICF will support the  
19 reasonableness of the modeling assumptions and  
20 inputs.

21           I would also like to highlight one of  
22 the sensitivities modeled in the 2024 IRP. Prior

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1 to filing the 2024 IRP and pursuant to code  
2 section 56-599(d), the Company conducted a  
3 stakeholder process. Various stakeholders,  
4 including Commission Staff; local, state and  
5 federal government officials; nongovernmental  
6 organizations; tribes; nonprofit groups;  
7 representatives from the military and defense  
8 sector; unions; businesses and large energy users;  
9 citizens and many others were invited to and did  
10 participate in the process.

11 The stakeholder process included  
12 multiple meetings with large and small groups that  
13 were facilitated by a third party and included  
14 presentations from the Company on the process,  
15 modeling and key inputs, reliability and  
16 environmental justice.

17 Stakeholders were provided the  
18 opportunities for discussions, question and  
19 feedback throughout the process. Based on the  
20 feedback received during the process, the Company  
21 included the stakeholder input case which builds  
22 no additional fossil generation and assumes the



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1 existing carbon-emitting generation will retire by  
2 2045 or will be in compliance with existing laws.

3           However, given the unreasonable  
4 assumptions required to solve this model run, the  
5 Company does not believe it to be a reliable path  
6 forward at this time. Appendix 1 of the 2024 IRP  
7 provides additional details on the stakeholder  
8 process and the stakeholder input case.

9           The Company appreciates the  
10 participation of all stakeholders and their  
11 feedback and looks forward to continuing the  
12 stakeholder process for future IRPs.

13           Importantly, an IRP is a snapshot in  
14 time and this is a dynamic industry with rapidly  
15 changing laws, regulations and technologies, many  
16 of which have come right before or after the  
17 Company locked down its planning assumptions for  
18 the 2024 IRP last summer.

19           Notably, the 2024 IRP is not seeking  
20 approval of any particular resource and in finding  
21 that the IRP is reasonable and in the public  
22 interest as a filing document does not create a



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1 presumption that resource options contained in the  
2 IRP will be approved in a future CPCM proceeding.

3 At the appropriate time and in the  
4 appropriate proceeding, the Company will petition  
5 the Commission for approval of specific resources  
6 and will bear the burden of proof to meet all  
7 applicable laws and regulations and support of  
8 those resource approval requests.

9 The Company will continue to evaluate,  
10 refine and update its assumptions in future IRP  
11 updates and filings, and with this Commission's  
12 oversight, the Company will transform its system  
13 in compliance with the VCEA while maintaining the  
14 reliability and affordability its customers have  
15 come to expect and deserve.

16 The Company welcomes the Commission's  
17 direction and believes the Commission's final  
18 order in this proceeding will help guide the  
19 Company in preparing future plan and update  
20 filings. The Company looks forward to developing  
21 the record during the course of this hearing and  
22 urges the Commission to find the 2024 IRP both

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1 reasonable and in the public interests for the  
2 specific and limited purpose as a filing document.  
3 Thank you, Your Honors.

4 JUDGE HUDSON: Thank you. Appalachian  
5 Voices.

6 MR. ALLMOND: Good morning, Your Honor.  
7 Can you see and hear me okay?

8 JUDGE HUDSON: Yes, Counsel, we can.  
9 Thank you.

10 OPENING STATEMENT

11 MR. ALLMOND: May it please the  
12 Commission, my name is Josephus Allmond with the  
13 Southern Environmental Law Center, along with my  
14 colleagues Nate Benforado, Rachel James, Emma  
15 Clancy and Kat King on behalf of Appalachian  
16 Voices.

17 For over a decade now, Appalachian  
18 Voices has [inaudible] Integrated Resource Plan  
19 proceedings.

20 COURT REPORTER: I'm sorry, you're  
21 fading in and out a bit. Sorry, this is the Court  
22 Reporter.

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1 MR. ALLMOND: Can you hear me all right  
2 now?

3 COURT REPORTER: I can but you were  
4 fading in and out. Okay. Go ahead.

5 MR. ALLMOND: Okay. That consistent  
6 intervention over the last several proceedings has  
7 led to several meaningful improvements to the  
8 planning process. Given the record load growth  
9 Virginia is facing as well as Virginia's  
10 commitment to a zero-carbon electricity grid for  
11 its two investor-owned utilities, this year's  
12 Integrated Resource Plan is especially critical.

13 The plans developed in this proceeding  
14 can set Virginia on a path to successfully keeping  
15 that commitment. A path that would result in a  
16 modernized, reliable, nimble grid. A grid that  
17 provides stable, predictable, affordable bills for  
18 customers. A system that increases Virginia's  
19 energy independence and a grid that doesn't  
20 pollute the air for nearby communities, avoiding  
21 billions of dollars of public health costs.

22 Or we can follow the path that Dominion

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1 has proposed. A path that would make it much more  
2 difficult if not impossible to adhere to  
3 Virginia's clean energy requirements. The path  
4 that leaves customers at risk of huge stranded  
5 costs, vulnerable to huge bill increases as we  
6 increase our reliance on gas and a path that  
7 increases air pollution, imposing significant  
8 public harms on Virginia communities.

9 In this proceeding, Dominion breaks with  
10 its longstanding practicing of submitting both 15-  
11 and 25-year plans and instead presents only  
12 15-year plans to the Commission. The effect of  
13 this myopic planning approach combined with overly  
14 restricted resource build limits is supposedly  
15 several plans that are really just one plan.

16 Not only does each of the Company's  
17 portfolios keep 12 gigawatts of fossil fuel  
18 generation online through 2039, they also all  
19 build nearly six gigawatts of new methane gas  
20 generation. Despite touting its portfolios as  
21 increasingly clean, the Company offers not a  
22 single detail about how or even whether it plans



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1 to retire and replace or decarbonize this 18  
2 gigawatts of fossil generation just six years  
3 after the current planning period.

4 As Commission Staff witness Boehnlein  
5 rightly observes in his testimony, "It is unclear  
6 how the VCEA's portfolios build plans could  
7 possibly be in the customers' best interest unless  
8 the Commission issued reliability waivers for  
9 these new units, hence Staff's assessment that the  
10 Company is practically guaranteeing that such  
11 waiver requests will be required in the future."

12 In other words, accepting this plan  
13 would wed Virginia to an even dirtier  
14 carbon-emitting grid, the very outcome the VCEA is  
15 designed to protect Virginians from.

16 Despite this vision of noncompliance  
17 offered by the Company, there is alternative  
18 modeling in the record before you from Dr. Nick  
19 Laws at IdeaSmiths that shows at least two  
20 feasible paths to keeping our zero carbon  
21 commitments in a reliable and cost-effective way,  
22 all while meeting record load growth.



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1           As a threshold matter, due to the  
2           proprietary and costly nature of PLEXOS, Dr. Laws  
3           and his team had to spend months to essentially  
4           replicate Dominion's work in a free open-source  
5           model known as GenX before beginning work on  
6           alternative modeling in earnest.

7           Respondents should not have to spend  
8           hundreds of thousands of dollars and countless  
9           hours just to be able to provide this Commission  
10          with an alternative model.

11          IdeaSmiths' alternative modeling does  
12          offer several key insights for the Commission's  
13          consideration in this IRP. First, it is  
14          imperative to plan with the 2045 zero-carbon  
15          requirement in mind. But since that requirement  
16          is 20 years in the future, it does not fall within  
17          Dominion's 15-year modeling horizon which ends in  
18          2039.

19          Modeling that cannot see this  
20          requirement produces plans likely to result in  
21          significant hidden costs because Dominion would  
22          either need to replace 18 gigawatts of fossil

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1 generation or retrofit it to eliminate emissions.  
2 All in just six years, from 2039 to 2045.

3 The paltry analysis Dominion provides in  
4 the IRP about the benefits of hydrogen blending  
5 does not provide the Commission with a clear  
6 picture of what decarbonizing these units would  
7 truly entail, let alone whether hydrogen blending  
8 at scale would even be feasible on the tight  
9 timeline Dominion is creating for itself.

10 Simply put, Dominion's plan does not put  
11 us on a legally compliant path. It puts us on a  
12 path that guarantees that in 2045 either (a)  
13 Dominion has a polluting and costly grid for which  
14 the Commission has no choice but to grant numerous  
15 waivers for the Company's fossil-reliant fleet;  
16 or (b) customers will face huge bills as the  
17 Company retires its noncompliant fossil fleet,  
18 including six gigawatts of new gas built in the  
19 2030s and must replace it with noncarbon-emitting  
20 assets.

21 As IdeaSmiths' modeling shows, when the  
22 model can see the 2045 requirement, it actually

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1 plans to meet it. To do this, the Company's  
2 arbitrary assumptions around build limits must be  
3 relaxed. Testimony submitted by Michael Goggin at  
4 Grid Strategies shows that these relaxed build  
5 limits are reasonable and achievable for the  
6 Company and notes several ways that the Company  
7 could achieve these higher numbers: through the  
8 use of Surplus Interconnection Service,  
9 provisional interconnection service, Energy  
10 Resource Interconnection Service and  
11 Grid-Enhancing Technologies.

12 Other intervenors corroborate  
13 Mr. Goggin's testimony that Dominion's build  
14 limits are arbitrary and unreasonably low and echo  
15 his suggestions regarding integrating higher  
16 levels of [inaudible] --

17 COURT REPORTER: I'm sorry, higher  
18 levels of...

19 MR. ALLMOND: Higher levels of  
20 renewables.

21 COURT REPORTER: Thank you.

22 MR. ALLMOND: Second, the through line

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1 of the IdeaSmiths' modeling is that despite  
2 uncertainty around future load growths, energy  
3 storage is a no-regrets proposition. Dominion can  
4 meet the 2045 zero-carbon requirement but only if  
5 it starts deploying a significant amount of energy  
6 storage in the near and medium term, even beyond  
7 the minimum petition requirements in the VCEA.

8 As Mr. Goggin notes, the small and  
9 modular footprint and flexibility of storage  
10 helps mitigate concerns regarding land use and  
11 permitting challenges while facilitating  
12 interconnection. Energy storage resources also  
13 offer far more flexibility than thermal generators  
14 and generally can match or exceed the other  
15 reliability services contributions of thermal  
16 generators.

17 While new nuclear is likely needed,  
18 IdeaSmiths' modeling shows that it is not needed  
19 until the end of the planning period. That window  
20 allows time to responsibly plan this development  
21 and assess how the load forecast comes to  
22 fruition, giving the Commission close to a decade



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1 to determine to what extent new capacity is needed  
2 and whether nuclear or some still emerging  
3 technology is best equipped to fill that. In  
4 rebuttal, Dominion does not respond to either of  
5 the compliant portfolios that Dr. Laws submits.

6 Third, Dr. Laws' modeling fills a  
7 glaring omission in the Company's resource plan.  
8 Dr. Laws quantifies the harm that the Company's  
9 fossil fleet places on local communities, between  
10 \$7.4 and \$13.9 billion depending on the portfolio.  
11 Due to the Company's history of development, most  
12 of these harms occur in environmental justice  
13 communities and affect some of our most vulnerable  
14 citizens.

15 In addition, IdeaSmiths' modeling also  
16 quantifies the total damages from CO2 emissions  
17 from the Company's fossil fleet at \$10.4 to \$12.2  
18 billion, again depending on the portfolio. As  
19 Dr. Laws explains in the IdeaSmiths' report, both  
20 of these estimates are conservatively low.  
21 Because the two compliant portfolios submitted by  
22 Dr. Laws reach zero emissions by 2045, we can



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1 assume that under the compliant portfolios, these  
2 CO2 damages and harms to local communities cease  
3 in 2045.

4 On the other hand, because Dominion does  
5 not present any plans to retire or carbonize its  
6 fossil fleet, it must be assumed that these harms  
7 will continue indefinitely under the Company's  
8 approach. In rebuttal, Dominion does not respond  
9 to these identified harms.

10 Now, let's just acknowledge that  
11 IdeaSmiths' modeling shows that we can achieve the  
12 VCEA targets and meet unconstrained demand. We  
13 don't have to choose between meeting demand and  
14 complying with the VCEA. But there's also reason  
15 to expect that the path to compliance will be  
16 easier than these alternative portfolios suggest.

17 The testimony of Jim Wilson highlights  
18 questions around both the power needs and the  
19 geographic concentration of future data centers in  
20 Northern Virginia as reasons to doubt that  
21 Dominion's data center load growth will actually  
22 come to fruition as projected. Mr. Wilson's

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1 testimony concludes that either of these buckets  
2 of uncertainty could substantially alter the data  
3 center load growth seen in Dominion's service  
4 territory.

5 Dominion's forecast simply does not  
6 grapple with this vast variation in possible  
7 outcomes. Instead, it assumes continued high  
8 growth for years on end. The Commission needs a  
9 better analysis of future data center load  
10 possibilities.

11 At the end of this proceeding, we will  
12 ask the Commission to enter an order finding that  
13 the Company's 2024 IRP is neither reasonable or in  
14 the public interest and require the Company to  
15 file its next IRP with a number of corrective  
16 actions. I will highlight some of those  
17 recommended corrections in a moment but until  
18 there's a fully vetted IRP that fixes all of these  
19 issues.

20 The Company needs guidance for its  
21 business plans. For that reason, we will ask that  
22 the findings of the IdeaSmiths' modeling guide the

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1 Company's decision-making until such time as we  
2 have a corrected, vetted and approved plan.  
3 Specifically the legally compliant scenario  
4 presented by Dr. Laws demonstrates that a  
5 reasonable short-term action plan would include  
6 deploying a significant amount of storage in the  
7 near term beyond the minimum petition requirements  
8 in the VCEA.

9 And likewise that the Company should not  
10 be investing in new gas at this juncture. This  
11 approach will keep the Company on a path to  
12 compliance with the law and represents an  
13 [inaudible] path for customers, providing the  
14 Company with a reliable grid that can adapt as we  
15 learn more about data center load growths.

16 Now, as to the correction for future IRP  
17 filings, we stand by all the recommendations made  
18 in our experts' prefiled testimony. I'd like to  
19 highlight a few here.

20 First is to engage a qualified,  
21 independent forecaster to provide a detailed study  
22 of data center loads based on forward-looking

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1 research and analysis, showing a broader range of  
2 possible future long-run scenarios. Or  
3 alternatively, conduct its own analysis in a  
4 manner that properly accounts for the enormous  
5 [inaudible] and lack of --

6 COURT REPORTER: I'm sorry, sir, you're  
7 fading in and out quite a bit.

8 MR. ALLMOND: I can start back that  
9 first recommendation.

10 JUDGE HUDSON: That would be helpful,  
11 Counsel, yes, thank you.

12 COURT REPORTER: Thank you.

13 MR. ALLMOND: First is to engage a  
14 qualified independent forecaster to provide a  
15 detailed study of future data center loads based  
16 on forward-looking research and analysis and  
17 showing a broader range of possible future  
18 long-run scenarios. Or alternatively, conduct its  
19 own analysis in a manner that properly accounts  
20 for the enormous uncertainties and lack of firm  
21 commitments to particular load levels.

22 Second, transition away from PLEXOS to a



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1 free open-source software like GenX that would  
2 allow Dominion and intervenors to provide the  
3 Commission with a better sense of what is  
4 possible. Alternatively, Dominion should be  
5 required to fund intervenor licenses for PLEXOS  
6 and the necessary commercial solvers and provide  
7 access to the compute resources required to  
8 operate the model.

9 Third, the Commission should direct the  
10 Company to expand the planning period for IRPs to  
11 be inclusive of at least the 2045 retirement date  
12 for all carbon- or carbon dioxide-emitting  
13 generation resources.

14 Four, not rely on hydrogen for  
15 compliance for the 2045 zero-carbon requirement  
16 unless the full life cycle emissions of hydrogen  
17 blending are taken into consideration.

18 Five, increase the annual build limits  
19 for solar and storage and utilize a number of  
20 tools to expedite storage interconnections  
21 including Surplus Interconnection Service and  
22 grid-enhancing technologies.



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1           Six, expand the types of supply-side  
2 resources available to the model to include  
3 traditional nuclear, as recommended by Commission  
4 Staff, as well as long-duration storage, solar  
5 plus storage and virtual power plants.

6           Seven, deploy a significant amount of  
7 storage in the near term beyond the minimum  
8 petition requirements in the VCEA.

9           And eight, quantitatively assess across  
10 all IRP portfolios the damages from CO2 emissions  
11 and public health harms to local communities  
12 [inaudible] --

13           COURT REPORTER: I'm sorry, "from local  
14 communities"...

15           MR. ALLMOND: -- from increased air  
16 pollution.

17           COURT REPORTER: Thank you.

18           MR. ALLMOND: Regardless of the  
19 Commission's determination as to the  
20 reasonableness of this year's IRP, these  
21 directives will improve the IRP process for future  
22 years when many of these same issues are likely to

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1 occur. These directives will serve as guardrails  
2 to ensure that Dominion's planning exercise  
3 incorporates all relevant information, utilizes  
4 all available resources and maximizes stakeholder  
5 input and participation.

6 Simply put, there are very real pathways  
7 that comply with the law, mitigate and reduce  
8 customer risk and result in a clean, reliable and  
9 affordable electric system. But we won't get  
10 there if we follow Dominion's plan and misguided  
11 approach to planning.

12 We thank the Commission for its careful  
13 attention to these important matters and look  
14 forward to developing the record.

15 JUDGE HUDSON: Thank you, Counsel.

16 Sierra Club and NRDC.

17 OPENING STATEMENT

18 MS. HORAN: Good morning, Your Honors,  
19 and may it please the Commission. My name is  
20 Claire Horan, here with Evan Johns and Dora Jaffe  
21 on behalf of Sierra Club and NRDC.

22 Developing an IRP in the present

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1 circumstances is not an easy task. Even before  
2 the pandemic, Virginia was anticipating  
3 significant load growth from data centers and  
4 electrification. Since that time, advances in  
5 artificial intelligence have accelerated the value  
6 of and the demand for compute power.

7 Virginia is also more sensitive than  
8 most peers to dramatic swings in federal energy,  
9 economic and environmental policy. Tariffs  
10 threaten to harm existing supply chains and now  
11 even more than when Dominion filed its IRP, state  
12 and federal energy policy are pulling the  
13 Commonwealth in opposite directions.

14 With these challenges this hearing  
15 should focus on innovative approaches to resource  
16 modeling, the effect that equitable distribution  
17 of costs will have on the low forecast, tools for  
18 building flexibility into the Company's load and  
19 how to leverage emerging technologies to meet  
20 demand while respecting the General Assembly's  
21 commitment to clean energy.

22 The Commission will hear testimony on

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1 those issues, while at the same time much of this  
2 hearing will unfortunately revolve around several  
3 all-too-familiar issues, including ones the  
4 Commission has ruled on before.

5 The Company continues to handpick only  
6 the regulatory environments it prefers. The  
7 Company continues to take as granted, rather than  
8 attempting to establish, the reliability issues  
9 that it claims justify increasing the pollution  
10 from its generation fleet.

11 And the Company again takes as granted  
12 the logistical constraints of adding clean energy  
13 resources to the grid while it omits the  
14 logistical constraints of the fossil fuel  
15 infrastructure required by its carbon-heavy growth  
16 plans.

17 And Dominion once again slow walks  
18 investment and demand-side management, even as the  
19 Commission has now definitively concluded that the  
20 Company can and should be doing more.

21 In other words, while we recognize the  
22 challenge of putting together an IRP in this



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1 climate, this document fails to hit even the easy  
2 marks. If Dominion is going to meet this  
3 important moment in an even-handed, cost-effective  
4 and sustainable way, it is important to get this  
5 right.

6 In order to address both the new and  
7 perennial issues with this IRP, the Sierra Club  
8 and NRDC submitted testimony from two witnesses,  
9 both of whose testimony has been stipulated to and  
10 will enter the record without objection. Devi  
11 Glick of Synapse Energy Economics, an expert in  
12 energy systems models, will testify about her  
13 independent modeling and her development for an  
14 alternative build plan to meet the needs of  
15 Dominion's high/low forecast. Ms. Glick's  
16 testimony is frank about the challenges in  
17 constructing a least-cost VCEA-compliant plan.

18 But after justifying her inputs and  
19 other assumptions, Ms. Glick presents an  
20 alternative resource plan. Her modeling shows  
21 that with greater reliance on energy storage and  
22 renewable generation and by meeting the achievable

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1 energy efficiency targets recently set by the  
2 Commission, Dominion can reduce costs to  
3 ratepayers by more than \$1 billion over the  
4 planning period, all while reducing CO2 emissions  
5 by eight percent.

6 While her modeling accepts Dominion's  
7 data center load forecast, for the sake of  
8 comparison, Ms. Glick also discusses several  
9 qualitative factors that the Commission should  
10 consider in evaluating projections of that sector.

11 Given the particular manner in which  
12 data centers impact system reliability and costs  
13 to other ratepayers, she concludes that Dominion  
14 cannot continue to approach data centers in the  
15 same way as every other customer for which the  
16 Company has a duty to serve.

17 Accordingly, she concludes by reviewing  
18 the strategies that regulators in other states are  
19 implementing to address data center growth.

20 The Sierra Club and NRDC will also  
21 submit testimony from Dr. William Shobe, an  
22 economist and research professor at the University

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1 of Virginia.

2 Dr. Shobe provided testimony on modeling  
3 Virginia's participation in the Regional  
4 Greenhouse Gas Initiative, or RGGI, in Dominion's  
5 2023 IRP. He returns this year to provide a brief  
6 update on developments since then which have made  
7 Virginia's reentry into RGGI more likely.

8 In light of those developments, he  
9 encourages the Commission to adopt the hearings  
10 and recommendation from the 2023 IRP, requiring  
11 Dominion to model Virginia both in and out of RGGI  
12 for its base case assumptions.

13 Dr. Shobe's testimony also addresses the  
14 social cost of carbon. Its theory, its use in  
15 policymaking, its treatment under the VCEA, the  
16 Company's history of mishandling the concept in  
17 its resource modeling and its complete absence  
18 from the 2024 IRP.

19 Dr. Shobe urges the Commission to adopt  
20 the hearing examiner's recommendation from the  
21 2023 IRP which would require Dominion's report the  
22 social cost of carbon of its various build plans.

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1 But he also explains that reporting the back-end  
2 calculation of social cost of carbon is an  
3 incomplete solution because it doesn't allow for  
4 incorporating social cost of carbon into resource  
5 decision-making.

6 Accordingly, Dr. Shobe recommends the  
7 Commission order that Dominion model a scenario in  
8 which the social cost of carbon is included as a  
9 shadow price of dispatch.

10 Given the IRP's shortcomings, which are  
11 identified in Sierra Club and NRDC's testimony, in  
12 the testimony of Staff, in and out of their fellow  
13 respondents, Sierra Club and NRDC are forced to  
14 ask the Commission to once again deny Dominion's  
15 IRP as neither reasonable nor in the public  
16 interest.

17 The IRP is unreasonable because of  
18 Dominion's failure to take state-level climate  
19 policy seriously. It is unreasonable because of  
20 its dismissive treatment of clean energy solutions  
21 like long-duration storage and demonstrably  
22 achievable energy efficiency, and it's



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1 unreasonable because it keeps the public and  
2 policymakers in the dark about the full impacts of  
3 Dominion's proposed build out.

4 Rather than the public interest, this  
5 document appears to serve instead the interests of  
6 the Company in an industry that stands to  
7 turbocharge cash flows after an era of foretelling  
8 demand. We do not need an economist to testify  
9 that there is ultimately no free lunch.

10 To the extent data centers are queuing  
11 up based on assumptions about cost allocation or  
12 an absolute duty to serve them, then where and on  
13 what terms they demand, the IRP process is an  
14 opportunity to begin signaling to the contrary.

15 Accordingly, we ask the Commission to  
16 reject IRP as unreasonable and not in the public  
17 interest because it puts Dominion's and data  
18 centers' interest above all others. We will also  
19 include in our post-hearing brief specific  
20 requests that flows from our experts' testimony.  
21 Thank you, Your Honors.

22 JUDGE HUDSON: Thank you, Counsel.

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1 United.

2 OPENING STATEMENT

3 MS. POLLARD: Good morning, Your Honors,  
4 and may it please the Commission. My name is Kate  
5 Pollard from the law firm of Gentry Locke and I  
6 represent Advanced Energy United in this matter  
7 along with Greg Habeeb.

8 Advanced Energy United or United  
9 represents the full range of advanced energy  
10 technologies and services at both utility and  
11 distributed scale. United seeks to educate,  
12 engage and advocate for policies that allow member  
13 companies to compete to power the United States  
14 with a hundred percent clean energy.

15 This case presents a pivotal opportunity  
16 to ensure that Dominion's long-term resource  
17 planning aligns with the Commonwealth statutory  
18 mandates as well as protects ratepayers from  
19 unnecessary cost and risk. While Dominion is  
20 facing a complex planning challenge with  
21 increasing load, resource development challenges,  
22 policy uncertainty and tight market conditions, as

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1 detailed in Dr. Roumpani's expert testimony and as  
2 will be further developed during this hearing,  
3 Dominion's proposed plan fails to present a  
4 least-cost/least-risk path forward.

5 Dr. Roumpani's testimony shows that the  
6 Company has not adequately considered the full  
7 range of available strategies to reduce costs,  
8 mitigate risk and meet the mandates of the  
9 Virginia Clean Economy Act.

10 Dominion's failure to meaningfully  
11 incorporate additional demand-side management  
12 options such as energy efficiency, demand  
13 response, distributed energy resources and virtual  
14 power plants has led to an inflated projection of  
15 the need for new supply-side resources.

16 And for these new supply-side resources,  
17 Dominion continues to rely on traditional  
18 capital-intensive fossil fuel generation rather  
19 than prioritizing faster and more cost-effective  
20 deployment of renewable energy and energy storage.

21 As a result, the Company's proposed  
22 portfolios are neither least-cost nor least-risk

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1 and they fall short of state policy requirements.  
2 Accordingly, United recommends that this  
3 Commission not approve the Company's 2024 IRP in  
4 its current form as it is unreasonable and not in  
5 the public interest.

6 Instead, Dominion should be directed  
7 to revise the analysis in accordance with the  
8 recommendations laid out in Dr. Roumpani's  
9 testimony. Including ensuring every portfolio  
10 meets all VCEA requirements, including a carbon  
11 price reflecting the social cost of carbon,  
12 incorporating additional demand-side management  
13 options and introducing medium and long duration  
14 energy storage options as a selectable resource in  
15 the Company's capacity expansion modeling.

16 We look forward to developing the record  
17 on all of these issues in Dr. Roumpani's expert  
18 testimony. Thank you for the opportunity to  
19 participate in this case.

20 JUDGE HUDSON: Thank you, Counsel.  
21 Clean Virginia.

22 MR. REISINGER: Thank you, Your Honor.



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1 And before I begin, can you hear me and see me all  
2 right?

3 JUDGE HUDSON: Yes to both, loud and  
4 clear.

5 OPENING STATEMENT

6 MR. REISINGER: All right. Thank you,  
7 sir, and may it please the Commission. Again, my  
8 name is William Reisinger and I'm here appearing  
9 on behalf of the Respondent Clean Virginia.

10 I would like to start by referencing the  
11 statute that applies to this case, in particular  
12 subsection (e) of code section 56-599 which  
13 requires the Commission to review this Integrated  
14 Resource Plan and make a determination as to  
15 whether it is reasonable and in the public  
16 interest.

17 Now, this statute has been amended a  
18 number of times since it was originally enacted in  
19 2008 but that operative language has remained the  
20 same. That is, the Commission has always been  
21 required to review the Integrated Resource Plan  
22 and make the determination as to whether it is

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1 "reasonable and in the public interest."

2 I would note that the last three times  
3 Dominion filed an Integrated Resource Plan, in  
4 2018, in 2020 and in 2023, the Commission declined  
5 to find that plan to be either reasonable or in  
6 the public interest.

7 A Commission hearing examiner identified  
8 a number of concerns with Dominion's 2023 IRP,  
9 including Dominion's decision to include new gas  
10 resources in its short-term action plan and in all  
11 modeled scenarios. The examiner recommended that  
12 the Commission should not find Dominion's 2023  
13 plan to be reasonable or in the public interest.

14 The evidence will show that Dominion's  
15 2024 plan suffers from many of the same  
16 deficiencies as the 2023 plan. The 2024 IRP does  
17 not provide a plan to comply with all provisions  
18 of the Virginia Clean Economy Act. It does not  
19 appropriately value or consider demand-side  
20 management or battery storage resources, including  
21 long-duration storage. And it should not be  
22 accepted as a plan that is reasonable or in the

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1 public interest.

2 To address some of the deficiencies in  
3 Dominion's 2024 IRP, Clean Virginia will present  
4 the direct testimony of Mr. Simon Key from the  
5 firm Greenlink Analytics. Mr. Key reviewed  
6 Dominion's modeling of demand-size resources and  
7 battery storage and found the Company's analysis  
8 in these areas to be severely lacking. Mr. Key  
9 will testify that more aggressive deployment of  
10 DSM resources, demand response and battery storage  
11 could mitigate the need for substantial amounts of  
12 new gas resources that are included in Dominion's  
13 five-year reliability plan.

14 To provide just one example, Mr. Key  
15 will testify that if Dominion achieved an annual  
16 incremental energy savings target of just two  
17 percent, that alone would eliminate the need for  
18 most if not all of the new gas capacity that the  
19 Company claims it needs by 2030. And he will  
20 testify that a two-percent target is feasible  
21 based on the results from utilities in other  
22 states.

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1           Mr. Key's calculations on this point are  
2 not rebutted in Dominion's rebuttal testimony.  
3 Mr. Key will recommend that DSM demand response  
4 and battery storage should be the Company's first  
5 and primary tool for managing reliability concerns  
6 in the near term.

7           Next, Your Honor, I want to address  
8 another issue that we're going to explore in this  
9 case. As you may know, this was the first utility  
10 resource plan in Virginia that was developed  
11 following a stakeholder process. Virginia code  
12 section 56-599 was amended by the 2023 General  
13 Assembly. It now requires utilities to engage the  
14 public in a stakeholder review process before  
15 filing an IRP. The law, among other things,  
16 requires utilities to "provide opportunities for  
17 the public to contribute information, input and  
18 ideas on utilities Integrated Resource Plan,  
19 including the plan's development, methodology,  
20 modeling inputs and assumptions."

21           Clean Virginia is concerned that the  
22 stakeholder review process did not accomplish the



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1 goals of the statute because the utility did not  
2 incorporate some of the most substantial inputs  
3 proposed by stakeholders. We also have concerns  
4 that the utility did not allow stakeholders to  
5 sufficiently review modeling inputs before the IRP  
6 was finalized and filed with the Commission. And  
7 we intend to explore these issues further during  
8 the hearing.

9 Finally, Your Honor, I want to mention  
10 that the General Assembly has recently given the  
11 Commission some guidance regarding how future  
12 utility IRPs could be improved. The 2025 General  
13 Assembly passed House Bill 2413 which contained  
14 several amendments to the IRP statutes.

15 This bill was ultimately not signed by  
16 the governor. Nonetheless, the governor's veto  
17 message does conclude that the State Corporation  
18 Commission has the expertise and the authority to  
19 make requirements and changes to the Integrated  
20 Resource Planning process. This legislation was a  
21 recommendation from the General Assembly's  
22 Commission on Electric Utility Regulation, and the

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1 bill would among other things require utilities to  
2 plan to meet the energy savings targets identified  
3 in code section 56-596.2.

4 It would require modeling scenarios that  
5 actually exceed those minimum energy savings  
6 targets. It would require utilities to consider  
7 the social cost of carbon when modeling the costs  
8 and benefits of new fossil-generated facilities,  
9 and they would require utilities to consider  
10 demand-shifting measures such as virtual power  
11 plants.

12 The bill also includes guidance on how  
13 to improve the stakeholder process. For example,  
14 the bill states that stakeholders should have  
15 access to the same modeling software, modeling  
16 assumptions and modeling inputs used by the  
17 utility in its Integrated Resource Plan.

18 So, Your Honor, at the end of this case  
19 we are going to offer that House Bill 2413  
20 provides useful guidance for the Commission. This  
21 was a bill and recommendations that was developed  
22 with the expertise of the General Assembly's

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1 Commission on Electric Utility Regulation.

2 We believe that many of these policy  
3 changes, if adopted by the Commission, could  
4 improve Dominion's future resource plans and  
5 perhaps solve some of the problems that we are  
6 going to hear about over the next few days.

7 That concludes my opening statement,  
8 Your Honor. Thank you for your attention and we  
9 look forward to participating in this case.

10 JUDGE HUDSON: Thank you, Counsel.

11 Data Center Coalition.

12 OPENING STATEMENT

13 MR. MURPHEY: Thank you, Your Honor, and  
14 good morning again, and may it please the  
15 Commission. Again, my name is Cody Murphey with  
16 the law firm of Williams Mullen. I'm here on  
17 behalf of the Data Center Coalition, which I'll  
18 refer to as DCC or The Coalition.

19 DCC is a national membership association  
20 for the data center industry, representing leading  
21 data center owners and operators to maintain data  
22 center infrastructure across the country and

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1 globe. DCC empowers and champions the data center  
2 community through public policy advocacy, thought  
3 leaderships, stakeholder outreach and community  
4 engagement.

5 As the voice of the data center  
6 industry, DCC also advocates for a highly skilled  
7 and diverse technology workforce. Greater access  
8 to clean energy in a competitive business  
9 environment to support the growth and success of  
10 this essential business sector.

11 With about 35 percent of the world's  
12 hyperscale data market found in Virginia, the  
13 Commonwealth has the highest concentration of data  
14 centers in the world. DCC members own and operate  
15 facilities in Dominion service area and are proud  
16 contributors to Virginia economies and  
17 communities.

18 Data centers play a crucial role in  
19 everyday activities. Ensuring secure financial  
20 transactions and supporting essential public  
21 services, data centers are not merely hubs;  
22 they're technical hubs. They're an integral



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1 component in upholding the infrastructure of our  
2 digital economy.

3 As such, the data center industry has a  
4 track record of working proactively with utilities  
5 to design innovative solutions to challenging  
6 problems and stands ready to work constructively  
7 on comprehensive solutions. DCC's interest in  
8 this proceeding is to ensure that Dominion's bulk  
9 power system can provide a reliable and affordable  
10 supply of electricity essential to retain, grow  
11 and support the substantial investments by DCC  
12 members and the Commonwealth.

13 DCC takes no position as to whether  
14 Dominion 2024 IRP is reasonable and in the public  
15 interest. The purpose of DCC's participation in  
16 this proceeding is to ensure the data center  
17 industry as vital stakeholders in this process  
18 have the opportunity to outline its significant  
19 contributions to Virginia's economy, iterate its  
20 needs from Dominion and emphasize the need for  
21 regulatory certainty from the Commission.

22 DCC will have two asks in this case.

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1 First, DCC recommends that the Commission  
2 accurately account for data center growth in the  
3 IRP and reject arguments made by third parties  
4 suggesting data center load growth is not  
5 legitimate or that data center load growth cannot  
6 be met.

7 Like all of Dominion's customers, data  
8 centers require stable, affordable and  
9 reasonable-priced energy, and data centers look  
10 forward to contributing their fair share of costs  
11 for needed infrastructure and the resources to  
12 meet genuine demand.

13 Second, DCC also recommends the  
14 Commission direct Dominion to continue working  
15 collaboratively and proactively with data center  
16 stakeholders to ensure right-side forecasting and  
17 planning, including but not limited to  
18 infrastructure buildout and interconnection  
19 speeds.

20 In the Commonwealth, the data center  
21 industry is a key driver of economic impact -- or  
22 growth, excuse me, which is there's further

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1 examination in future IRPs as part of the  
2 "economic development consideration" required by  
3 Virginia code 56-599.

4 Although Dominion did not have the  
5 benefit of the JLARC report prior to filing its  
6 IRP, the JLARC findings on the data center  
7 industry's economic impact on Virginia as a whole  
8 nevertheless deserves recognition and  
9 consideration as part of the IRP process.

10 According to the JLARC report, data  
11 centers provide positive benefits to Virginia's  
12 economy mostly because of the industries of  
13 substantial capital investments which exceed  
14 \$24 billion in fiscal year 2023.

15 Overall, the data center industry is  
16 estimated to contribute 74,000 jobs, \$5.5 billion  
17 in labor income and \$9.1 billion in GET to  
18 Virginia's economy annually.

19 Data center investment represents 84  
20 percent of the total capital investment across all  
21 economic development projects announced by the  
22 Virginia Economic Development Partnership between

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1     fiscal year 2022 and fiscal year 2024.

2             Additionally, the data center industry  
3     is a substantial source of local tax revenue. It  
4     is therefore essential to Virginia's economy that  
5     Dominion's IRP load forecast fully and accurately  
6     account for data center load growth in order to  
7     retain, grow and support the substantial  
8     investments by DCC's members and the Commonwealth.

9             To ensure the accuracy in Dominion's  
10    load forecasting, greater communication,  
11    collaboration and transparency is necessary. DCC  
12    participated in Dominion stakeholder process for  
13    the 2024 IRP made by the 2023 General Assembly and  
14    suggests that the Commission direct Dominion to  
15    continue working collaboratively and proactively  
16    with data center stakeholders to develop the most  
17    accurate load forecast, effectively plan for and  
18    address rapidly growing electric demand,  
19    transmission constraints and resource adequacy.

20            This period of rapid load growth  
21    requires great communication, collaboration and  
22    transparency among utilities, regulators,



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1 customers and other stakeholders to accurately  
2 forecast load which is critical for resource  
3 infrastructure planning.

4 Although some respondents call into  
5 question the growth of the data center industry in  
6 Virginia, the record will show that data center  
7 growth which is used to inform the IRP load  
8 forecast is legitimate.

9 For example, data center load growth is  
10 supported by Dominion's Q4 2024 earnings call  
11 during which it announced a contract demand  
12 center -- a contract data center capacity grew 88  
13 percent as compared to July 2024, caused by a  
14 19-gigawatt jump in substation engineering letters  
15 of authorizations requests received by Dominion.

16 Accurately accounting for data center  
17 growth in the load forecast is imperative to  
18 adequately plan future resource and infrastructure  
19 requirements, which in turn impacts cost  
20 allocation and rate designs.

21 Dominion has a statutory obligation to  
22 serve all classes of customers within its service

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1 territory. Therefore, planning for data center  
2 customers is necessary. However, the Commission  
3 direct that IRP supplement would remove data  
4 center load group from other large-load customers.  
5 This approach does not allow for a full  
6 understanding of the large-load landscape across  
7 the Commonwealth. It could lead to discriminatory  
8 rate-paying if left unchecked.

9 As the data center industry grows and  
10 infrastructure is built out to meet that growth,  
11 data center customers look forward to continuing  
12 to pay their full share of their cost to serve.  
13 That said, data centers are not currently the only  
14 growing industry of large-load customers and will  
15 not be the last large industry to grow.

16 DCC's members emphasize the need to  
17 fully and fairly account for their current and  
18 future load for resource infrastructure planning  
19 purposes.

20 Dominion itself acknowledges that  
21 resource planning is designed around certain load  
22 obligations across the system. The mandated

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1 exercise of isolating and culling out forecasts in  
2 growth for one segment of customers is not a  
3 realistic planning model because, as Dominion  
4 explains in the IRP supplement, resource planning  
5 is designed around serving the load obligation for  
6 the entire system.

7           Developing an accurate load forecast  
8 requires understanding and specific  
9 characteristics of data center growth, including  
10 timelines for interconnection which is best  
11 accomplished through stakeholder engagement.

12           Dominion must work collaboratively with  
13 data center stakeholders to ensure that its  
14 forecasting models accurately reflect the current  
15 and future load growth of data centers as well as  
16 other large-load customers to provide a  
17 comprehensive picture of the Commonwealth's energy  
18 needs.

19           It's critical that there's no disconnect  
20 between Dominion's reported load growth and data  
21 centers in the longer term load forecasts that  
22 drive planning decisions.

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1           Without a clear understanding of the  
2           anticipated load growth, transmission planners  
3           cannot make prudent and effective decisions for  
4           expanding the grid. Enhanced transparency in  
5           forecasting, interconnection processes and  
6           scenario planning can ensure that we are not only  
7           developing the right infrastructure but also  
8           protecting customers from any inefficiencies and  
9           unnecessary costs.

10           Accordingly, DCC suggests refining the  
11           forecasting tools and approaches in order to build  
12           a more resilient, reliable and efficient grid that  
13           meets the needs of Virginia. Specifically,  
14           Dominion should improve information sharing and  
15           seek early input from data center operators to  
16           better inform its forecasting, planning and  
17           resource allocation decisions.

18           The Commission should therefore direct  
19           Dominion to continue working collaboratively and  
20           proactively with the data center stakeholders in  
21           developing its load forecasts and in addressing  
22           infrastructure and interconnection challenges.



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1           Moving on to the resource mixed  
2   diversity in the 2024 IRP, DCC applauds the  
3   significant investment in wind, solar and small  
4   modular reactors or SMRs Dominion includes in its  
5   IRP. The data center industry, through its  
6   commitment to sustainable industry -- energy, has  
7   been a powerful market actor, signing power  
8   purchase agreements and using other methods to  
9   commit as long-term customers to future clean  
10  energy generation projects that bring capacity to  
11  the grid for the data center industry and all  
12  other energy customers.

13           Dominion's IRP outlines a plan to bring  
14  roughly 21.1 gigawatts in clean capacity online  
15  over the next 15 years. These carbon-free  
16  resources represent approximately 78 percent of  
17  the new generation in Dominion's portfolios. The  
18  aggressive investment in clean energy is in line  
19  with the data center industry's sustainability  
20  goals.

21           Some DCC members have committed to  
22  achieving carbon neutrality in supporting their

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1 operations with one hundred percent clean energy  
2 within the next ten years. DCC's member are also  
3 actively supporting next-generation clean  
4 electricity technologies from utility-scale  
5 hydrothermal power and long duration storage to  
6 the development of SMRs and nuclear fusion  
7 efforts.

8 DCC supports Dominion's deployment with  
9 SMRs by early to mid 2030s but believes that  
10 Dominion can do more. First, DCC's members would  
11 like to see Dominion expedite the speed in which  
12 SMRs are developed and come online.

13 Second, DCC believes Dominion should  
14 partner with stakeholders on SMR development.  
15 Specifically Dominion should work with data center  
16 customers to advocate for better cost scenarios,  
17 citing and permitting.

18 That being said, building out new  
19 transmission infrastructure is critical and  
20 necessary to meet demand as sustainably as  
21 possible. Keep Virginia on course to achieving  
22 decarbonation goals -- decarbonization goals and

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1 allow DCC's members to meet their sustainability  
2 commitments.

3 The record will demonstrate that the IRP  
4 does not consider in sufficient detail the impact  
5 of transmission constraints and the ability to  
6 meet the forecast of load growth. For instance,  
7 Staff observes that Dominion's model effectively  
8 removes the transmission element from the problem  
9 to be solved. Yes, the down zone is the most  
10 transmission constrained zone within the PJM  
11 footprint as evidenced by the fact that Dominion  
12 placed in the highest level of congestion charges  
13 and curtailments in PJM.

14 DCC's members experience these  
15 constraints and express concerns about the speed  
16 of new transmission or resources buildout to  
17 reliably meet future load growth. Interconnection  
18 speeds make or break data center's availability to  
19 seek investment, operate and contribute to  
20 Virginia's economy. Dominion must ultimately be a  
21 more active partner in an industrywide pursuit of  
22 improving interconnection times and bringing

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1 transmission infrastructure online so that data  
2 centers connect to and be served by new  
3 carbon-free resources.

4 The IRP also identifies a request for  
5 reliance on demand-side management resources and  
6 grid-enhancing technologies. DCC members are  
7 excellent participants in demand-side DSM programs  
8 and have advocated for grid-enhancing technologies  
9 at scale. DCC supports continued exploration into  
10 innovative technologies and strategies that can  
11 help manage demand-side utility investments and  
12 reduce costs.

13 DCC recommends that Dominion continue to  
14 include these technologies and featured IRPs.  
15 However, DCC members emphasize that these  
16 technologies are not substitutes for the new  
17 system infrastructure needed in the Commonwealth.

18 Dominion's planning should of course  
19 utilize demand-side management programs  
20 integrating advancing technologies, but the record  
21 will show that these technologies should not  
22 detract from the necessary buildout of



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1 transmission infrastructure.

2 New grid infrastructure coupled with  
3 improved interconnection times is needed to inject  
4 capacity from new carbon-free resources into the  
5 region to meet demand as sustainably as possible.  
6 Ultimately, Dominion must be an active and vocal  
7 partner in industrywide pursuit for  
8 decarbonization, [inaudible] benefits and Virginia  
9 Clean Economy Act attainment, which can only  
10 materialize with improved interconnection times  
11 and additional grid infrastructure that allow data  
12 centers to connect to and be served by these new  
13 carbon-free resources.

14 In conclusion, DCC reiterates its  
15 commitment to working collaboratively with  
16 Dominion, the Commission and other stakeholders,  
17 to ensure that this IRP process, Dominion's filing  
18 a review and future Commission proceedings result  
19 in a comprehensive and forward-looking energy plan  
20 for Virginia. Data center contributions are vital  
21 to Virginia's economy and digital infrastructure  
22 and therefore must be fairly and appropriately

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1 represented in Dominion's planning, resource  
2 allocation and ultimate grid design.

3 DCC looks forward to continuing its  
4 partnership with Dominion to address opportunities  
5 to grow Virginia's economy, address challenges of  
6 load growth, spur right-side infrastructure  
7 development and lead decarbonization efforts to  
8 benefit all Virginians.

9 DCC appreciates the opportunity to  
10 participate in this proceeding and looks forward  
11 to developing the record throughout the hearing.

12 Thank you, Your Honor.

13 JUDGE HUDSON: Thank you, Counsel.

14 Walmart.

15 OPENING STATEMENT

16 MS. GRUNDMANN: Good morning, Your  
17 Honors. My name is Carrie Grundmann with the law  
18 office of Spilman Thomas and Battle here on behalf  
19 of Walmart, Inc.

20 Walmart is a participant in this case as  
21 a customer of Dominion and as an entity that  
22 partially shops for its generation for some of its

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1 locations within Dominion's service territory. So  
2 Walmart brings these perspectives to bear when it  
3 looks at the IRP that Dominion has filed and asks  
4 that the Commission find is reasonable and in the  
5 public interest.

6 Walmart also brings to this proceeding  
7 the perspective as a customer who participates  
8 around the country in numerous proceedings before  
9 regulatory bodies in multiple states, many of whom  
10 also have had IRP proceedings. As numerous  
11 parties have already indicated, the law obligates  
12 the Commission to determine whether the Company's  
13 IRP is reasonable and in the public interest.

14 Walmart is concerned that the Company  
15 has placed its hand too heavily on one side of the  
16 scale to enable the Commission to determine that  
17 the plan here is reasonable. For example, the  
18 record will reflect that there are numerous  
19 commercially feasible technologies that were not  
20 considered.

21 Georgia has put into place Vogtle. It  
22 is a standard-size nuclear power plant. While

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1     there were certainly issues associated with  
2     Vogtle, there are examples around the country of  
3     these large-scale nuclear plants in operation.  
4     Rather than allowing this Commission to assess  
5     whether traditional nuclear was the better option  
6     as compared to SMR, to which there is no single  
7     SMR in operation anywhere in the country, the  
8     Company elected to exclude that resource as an  
9     option for selection in model.

10             It likewise included numerous other  
11     limitations that inhibited the model for making  
12     selections. In counsel for the Company's opening,  
13     they indicated that their plan suggests that there  
14     are supportive legislative policies needed in  
15     order for them to carry out the IRP and the  
16     resources set forth in it.

17             The problem with that, Your Honors, is  
18     that we are determining what those supportive  
19     legislative processes might be based on a limited  
20     view of the resources that might be necessary to  
21     serve customer needs. And while the Company has  
22     noted that it wants you to view this document as a



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1 filing document, Walmart believes that that  
2 understates what an IRP is. While the IRP itself  
3 may not check a box on whether a CPCN should be  
4 granted, it does tell the parties to this  
5 proceeding and the Commission what it should  
6 expect in future proceedings.

7 For example, the Company filed its IRP  
8 in 2024 and shortly thereafter it filed case  
9 number PUR-2025-00037 to seek approval of  
10 944 megawatts of new natural gas, a number, 944,  
11 which appears in the IRP before this Commission.

12 Thus in determining that the IRP itself  
13 is reasonable, that ask necessarily tells the  
14 Commission and other parties what it should expect  
15 to see in future requests. From Walmart's  
16 perspective, while we understand that -- and zero  
17 constraint on the model can be very challenging  
18 from a practical reality of how long model run  
19 times take and what other limitations may exist,  
20 we also believe that you go too far when you  
21 overly constrain the model, and the evidence here  
22 suggests that it is overly constrained.

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1 Walmart is particularly concerned by the  
2 lack of demand-side management contained within  
3 the plan and viewed on a forward-looking horizon.  
4 As set forth in the direct testimony of Lisa V.  
5 Perry, the director of utility partnerships  
6 regulatory for Walmart, whose parties have  
7 indicated they've all waived cross and we will  
8 move for the admission of her testimony into the  
9 record at the appropriate time, she indicates that  
10 there is a need for additional DSM both energy  
11 efficiency and demand -- and DPR-type resources.

12 Quite frankly, the reason for those is  
13 twofold. A kWh not used is a kWh saved. And for  
14 customers in Dominion's territory, that has two  
15 benefits. Number one, they do not need to pay for  
16 this cost of that resource. Number two, the  
17 number of kWh upon which the total electric energy  
18 is calculated for purposes of Dominion's  
19 obligations under the Virginia Clean Economy Act  
20 is also lowered, which means that as Dominion  
21 seeks to comply with its obligations under the  
22 VCEA, its customers are able to put forward more

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1 effort to use less energy; it has a dual effect to  
2 the benefit of customers.

3 I indicated at the outset of my opening  
4 that Walmart is a participant in numerous dockets  
5 around the country. We believe that one of the  
6 dockets that broke this Commission's attention is  
7 some of what we're seeing applicable to Duke Energy  
8 Carolinas and Duke Energy Progress before the North  
9 Carolina Utilities Commission. Because Duke Energy,  
10 much like Dominion, are subject to a state law that  
11 obligates the utility to achieve carbon-free  
12 compliance by the mid 2050. There is a slight  
13 difference in compliance.

14 But what you will see in those dockets  
15 are two things that we believe would assist in  
16 improving in the IRP process for Dominion. Number  
17 one, in that case the Commission undertook to  
18 raise stakeholder process to revise Commission  
19 Rule R8-60. That rule obligates the utility, as  
20 soon as it has filed its case, to share all  
21 modeling inputs with appropriate parties after  
22 they have signed appropriate confidentiality.

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1 That gives those parties near-immediate access to  
2 the inputs to allow them to perform their own  
3 modeling.

4 Number two, if we were to look at the  
5 most recent carbon plan IRP proceeding that was  
6 filed by Duke Energy in North Carolina, which was  
7 decided in November of this year, one of the  
8 biggest differences we will see between the  
9 Dominion filing and the Duke filing is the sheer  
10 number of portfolios and modeling sensitivities.  
11 Duke Energy conducted 33 separate resource  
12 portfolios, 13 portfolio variants and ten  
13 sensitivity analysis.

14 With such a robust amount of data, it  
15 gave the North Carolina Utilities Commission a  
16 wide variety of information in front of it based  
17 on a wide variety of resources. Walmart would  
18 encourage this Commission to ask Dominion to do  
19 the same here because unfortunately, while the  
20 Company has alleged that there are four or  
21 four-plus portfolios, the constraints, as I  
22 mentioned previously, are so similar that the



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1 portfolios are so similar. Thus the question is  
2 has the Commission really been given the options  
3 that exist.

4 All of this is relevant because as this  
5 Commission knows, the Company's biennial rate case  
6 has recently been filed and the resources that are  
7 proposed in this case that subsequently seek  
8 approval in a CPC and subsequently are sought for  
9 cost recovery, all of those ultimately make their  
10 way into customer bills.

11 Additionally I do want to just note for  
12 the Commission's perspective that the Company has  
13 taken the position that certain portfolios are  
14 problematic because they do not meet the  
15 development targets of the VCEA. Virginia Code  
16 56-585.5 sets the -- in subsections (c) and (d) --  
17 an obligation that Dominion make annual filings  
18 for the approval of resources.

19 Walmart questions the description of  
20 those annual filings as development targets  
21 because the Commission at all times retains the  
22 discretion as to whether or not to approve a

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1 project. While Dominion is obligated to propose  
2 for approval approximately 16,000 megawatts,  
3 nothing obligates the Commission to approve 16,000  
4 megawatts. Does that beg the question if the IRP  
5 planning process is required to select 16,000  
6 megawatts and new renewable energy, that is  
7 imposing a requirement that is not specified in  
8 the VCEA.

9 Walmart does not dispute that by the  
10 time we make our way to the 15th year of those  
11 required filings, that the Company's numbers  
12 should add up to 16,000 megawatts of proposed new  
13 generation, but nothing says that at the end of  
14 the day the Commission must approve that. If the  
15 General Assembly wanted the Commission to approve  
16 16,000 megawatts of new generation, the VCEA would  
17 have said, and the Commission shall find that  
18 these projects are in the public interest, and  
19 approve them. But that is not what the code says.  
20 And since it's not what the code says, it bears  
21 directly upon the reasonableness of the portfolios  
22 before the Commission.

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1           Thus, for purposes of this proceeding,  
2 Walmart does believe that this Commission could  
3 determine that the IRP is neither reasonable nor  
4 in the public interest. We also believe that the  
5 Commission needs to ask Dominion to do more, to  
6 analyze more to ensure that the decision that this  
7 Commission makes and the subsequent proceedings  
8 that will flow as a result of it are in the best  
9 interest of customers. Yes, the IRP statute has  
10 been in place since 2009, and while it has had  
11 some changes, it has been fundamentally the same.

12           The issue isn't what the IRP statute  
13 says, it is the practical reality in which we find  
14 ourselves. And the reality is that the load  
15 growth in Dominion's system, the constraints in  
16 Dominion's system, these are new challenges that  
17 require new thinking by all parties including the  
18 Company.

19           We appreciate the opportunity to  
20 participate in this proceeding and look forward to  
21 developing the record.

22           JUDGE HUDSON: Thank you, Counsel.

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1 PEC.

2 MR. GREMA: Morning, Your Honors. Can  
3 you hear me okay?

4 JUDGE HUDSON: I can hear you and see  
5 you fine.

6 OPENING STATEMENT

7 MR. GREMA: May it please the  
8 Commission, my name is Peter Grema, here on behalf  
9 of the Piedmont Environmental Council or PEC. PEC  
10 was founded in 1972, one of Virginia's oldest  
11 environmental and conservation groups, with the  
12 mission focused on the nine-county region in the  
13 Virginia Piedmont. Some of those counties are  
14 bearing the brunt of the data center explosion.

15 Indeed, the area that's come to be known  
16 as Data Center Alley near Ashburn, Virginia, is  
17 now expanding into the rural areas of Loudoun,  
18 Fauquier, Culpeper, Orange and Prince William  
19 counties, as well as dozens of sites across  
20 Virginia that have high conservation value that  
21 PEC has worked to protect for more than half a  
22 century.



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1           There are multiple environmental  
2 concerns related to the construction of millions  
3 of square feet of data center facilities and the  
4 land required for new energy infrastructure.  
5 There are direct and indirect impacts on prime  
6 farm soils, intact forests, historic sites,  
7 national state and local park resources, water  
8 supply and water quality and local and regional  
9 air quality.

10           Dominion has not adequately addressed in  
11 this IRP the threats to the environment nor the  
12 impact on the reliability and reasonable cost of  
13 electricity to our customers due to forecasted  
14 increase of managed demand from data centers. The  
15 risk from data center expansion to Virginia's  
16 electric system and environment are why PEC is  
17 here today in this docket.

18           And we're asking the Commission to  
19 reject Dominion's 2024 IRP because it is not  
20 reasonable nor in the public interest as required  
21 by Virginia code section 56-599(e). There are two  
22 reasons why the Company's IRP is insufficient, and

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1 both of these reasons are connected to data center  
2 expansion. The first relates to the Company's  
3 bilateral contracts with data center businesses  
4 and the second relates to the forecast for data  
5 center growth.

6 For these reasons, we're asking the  
7 Commission to direct the Company to refile a new  
8 IRP that includes modeling for pausing the  
9 in-service dates for data center contracts until  
10 we can be assured that the transmission and  
11 generation assets are in place to meet projected  
12 loads.

13 Going to the first point. The Company  
14 has failed to provide the Commission with the  
15 information it needs to assess the risks posed by  
16 data center expansion. Dominion's IRP refers to  
17 several different types of data center contracts.  
18 There's substation engineering letters of  
19 authorization, construction letters of  
20 authorization and electric service agreements.  
21 These are all different bilateral contracts  
22 between the Company and data center-related

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1 businesses. And the evidence to be presented in  
2 this case will show that the Company had sought  
3 out these contracts. Dominion was talking about  
4 being a, quote, true partner in growing your data  
5 center footprint.

6 In other words, Dominion's pursuit of  
7 these contracts had pushed the Commission to where  
8 we are now, having to reconcile potential impacts  
9 on the grid and other utility customers.  
10 Dominion's IRP shows what the Company has already  
11 executed 8,000 megawatts of electric service  
12 agreement contracts, over 5,800 megawatts of  
13 construction letters of authorization, and over  
14 7,500 megawatts of substation engineering letters  
15 of authorization. And all of that would be  
16 delivered over the next seven years.

17 The projected costs and the potential  
18 impact on other ratepayers are enormous, as  
19 documented by Dominions filings. Those costs are  
20 directly related to the rapid expansion of  
21 generation and transmission infrastructure from  
22 the nearly 22,000 megawatts of demand represented

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1 by unreviewed contracts.

2 All of these agreements have been signed  
3 with no Commission oversight, and that's why PEC  
4 is worried that we are facing a crisis by contract  
5 as these agreements go unexamined. Virginia code  
6 section 56-234(a) states that, "It shall be the  
7 duty of every public utility to furnish reasonably  
8 adequate service and facilities at reasonable and  
9 just rates." That begs the question, what would  
10 be unreasonable?

11 It's PEC's view that the data center  
12 buildout forecasted by the Company in this IRP  
13 would require an unreasonable buildout of new  
14 infrastructure and lead to an unjust increase in  
15 rates.

16 For just that risk, the Company should  
17 be required to model pausing the in-service dates  
18 for data center contracts. The second failure in  
19 the IRP is that Dominion's forecast for data  
20 center load is uncertain. That uncertainty risks  
21 setting the Company and its customers up to spend  
22 money on fossil fuel infrastructure, increasing



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1 the risk of stranded assets to be paid for down  
2 the road.

3 And that uncertainty is another reason  
4 why Dominion should model their forecast with  
5 pausing the in-service dates for data center  
6 contracts.

7 We look forward to hearing for some of  
8 the witnesses who speak on both of these issues,  
9 our concern about contracts and data center  
10 modeling. One of these witnesses is Commission  
11 Staff witness Kenneth Curtis with the engineering  
12 consulting firm Enverus. He has prepared an  
13 independent data center forecast that is less  
14 optimistic than the Company's.

15 And we look forward from hearing from  
16 Appalachian Voices's witness James Wilson. He  
17 testifies about the data center load growth.

18 There are other reports and evidence  
19 that we expect will come before the Commission in  
20 this case. First is the prefiled testimony from  
21 Sierra Club witness Devi Glick discussing data  
22 centers. Second, the Commission is already aware

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1 of the JLARC report on data centers in Virginia.  
2 That report, which we intend to introduce as  
3 evidence in this docket, finds out that Northern  
4 Virginia alone has more operational capacity data  
5 centers than London, Tokyo and the San Francisco  
6 Bay Area combined.

7 And third, there's a new study that came  
8 out in March from Harvard University titled,  
9 "Extracting Profits from the Public. How Utility  
10 Ratepayers are Paying for Big Tech's Power." All  
11 three of these exhibits shed light on the  
12 uncertainty surrounding the Company's data center  
13 forecast.

14 In conclusion, we ask the Commission to  
15 reject Dominion's IRP as unreasonable and not in  
16 the public interest. We ask the Commission to  
17 require Dominion to reevaluate its modeling of  
18 future load growth in data centers with more  
19 reasonable in-service dates that give the utility  
20 time to build and allocate the cost of the  
21 infrastructure. Adding a more realistic time  
22 frame ensures that the buildout is done

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1 sustainably and with continued reliability.

2 We want to ensure that the assets  
3 Dominion will put in place are consistent with the  
4 Virginia Clean Economy Act. And we'll ask the  
5 Commission to require Dominion to provide greater  
6 detail, transparency and a role for Commission  
7 oversight when it comes to these data center  
8 agreements that have created a crisis by contract.

9 Again, our most important request is to  
10 require new modeling that looks at a more  
11 realistic rate of the data center buildout. That  
12 model's pausing in-service dates for data center  
13 contracts until we can be assured that the  
14 transmission and generation assets are in place to  
15 meet projected loads. Thank you.

16 JUDGE HUDSON: Thank you.

17 Microsoft.

18 OPENING STATEMENT

19 MS. ROBB: Thank you, Your Honor. May  
20 it please the Commission, my name is Cliona Mary  
21 Robb with the ThompsonMcMullan law firm. I'm here  
22 today on behalf of Microsoft Corporation.

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1           The positions of Microsoft on Dominion's  
2   IRP are set forth in the testimony of Dr. Oliver  
3   Stover. Dr. Stover is an associate principal at  
4   Charles River Associates, which is a globally  
5   recognized leader with deep experience in load  
6   forecasting, resource adequacy and integrated  
7   resource planning.

8           Based on Dr. Stover's analysis, he  
9   recommends that the 2024 IRP be adopted as is and  
10   further recommends that Dominion make investments  
11   in improving and expanding its planning approaches  
12   in future IRP cycles.

13          Microsoft's interest in this proceeding  
14   stems from its significant presence in Virginia  
15   through its operations anchored by data centers  
16   that rely on affordable, reliable and sustainable  
17   electricity. With electricity as its largest  
18   operating cost and its ambitious sustainability  
19   goals, Microsoft has a direct interest in the  
20   future of Dominion's resource planning.

21          Northern Virginia is currently the  
22   largest data center market in the world. Dominion



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1 has been at the forefront of serving this market  
2 while also making real progress towards  
3 decarbonization, including through significant  
4 solar development and the advancement of the  
5 Coastal Virginia Offshore Wind Project.

6 In its 2024 IRP, Dominion has adopted  
7 many best practices and established a reliable  
8 planning foundation. Yet Dominion is facing  
9 headwinds in the coming years due to evolving  
10 market conditions. The Dominion zone has begun  
11 experiencing transmission stress in recent years  
12 which has limited load growth and caused the  
13 Dominion zone to clear at a higher capacity price  
14 from the rest of PJM in the most recent capacity  
15 auction.

16 That capacity auction results in  
17 unusually high prices, a signal of tightening  
18 supply/demand conditions. These conditions are  
19 driven by three main factors.

20 One, substantial systemwide load growth.  
21 Two, the retirement of coal generation, and three,  
22 PJM's recent improvements to capacity

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1 accreditation under the new ELCC framework. These  
2 developments call for Dominion to expand its  
3 all-of-the-above approach and continue to explore  
4 creative pathways for bringing new generation and  
5 transmission resources online.

6 Dr. Stover urges the Commission and  
7 Dominion to undertake these five steps in future  
8 IRP cycles. One, increase transparency in the  
9 load forecasting process to ensure alignment with  
10 PJM's supplemental process and annual load  
11 forecasts. Two, expand system modeling to account  
12 for interactions with other load-serving entities  
13 in the Dominion zone and the broader PJM grid.

14 Three, incorporate integrated system  
15 planning that would bridge the gap between  
16 generation and transmission planning to unlock  
17 greater efficiencies by jointly planning those  
18 systems. Four, adopt Staff witness Steven Smith's  
19 recommendation to model the Dominion zone in  
20 smaller geographic subzones, enabling better  
21 assessments of congestion and locational  
22 constraints.

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1 And, fifth, collaborate actively with  
2 other load-serving entities, the Commission and  
3 large-load customers to identify and pursue  
4 creative pathways for new resource development.

5 Microsoft very much appreciates the  
6 Commission's consideration of its perspective on  
7 the 2024 IRP. Dr. Stover's recommendations are  
8 aimed at supporting Dominion and identifying  
9 innovative modeling approaches as Dominion charts  
10 a path to meet this unprecedented era of growth  
11 with a power system that is reliable, affordable  
12 and increasingly clean. Thank you.

13 JUDGE HUDSON: Thank you, Counsel.

14 City of Alexandria will be going  
15 tomorrow, so let's move to Consumer Council.

16 OPENING STATEMENT

17 MR. FARMER: Thank you. Good morning,  
18 Your Honor. May it please the Commission. I'm  
19 John Farmer on behalf of Consumer Council.  
20 Consumer Council has reviewed the Company's  
21 Integrated Resource Plan or IRP as well as the  
22 filed testimony and various discovery responses in

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1       this case.

2               Consumer Council has not sponsored  
3       testimony of its own. Code section 56-597 defines  
4       an IRP as a plan that is "to promote reasonable  
5       prices, reliable service, energy independence and  
6       environmental responsibility."

7               There can be tension between these  
8       attract principles, a fact made plain by recent  
9       developments in PJM and in the Company's service  
10      territory related to increase in load associated  
11      with specific large-use customers.

12              Particularly in view of these  
13      developments, it is important for the Commission  
14      to evaluate how the plan presented may promote the  
15      principles contained in code section 56-597.

16              In that vein, Commission Staff, through  
17      several witnesses, is sponsoring recommendations  
18      aimed at improving forecasting, addressing  
19      uncertainty and providing a more comprehensive  
20      picture of the range of outcomes over the planning  
21      period, particularly from a cost perspective.

22              Consumer Council generally finds merit



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1 in these recommendations aimed at bolstering  
2 future IRPs. The Commission is required under  
3 code section 56-599(e) to determine whether the  
4 Company's plan is reasonable and in the public  
5 interest. As an IRP proceeding does not involve  
6 associated requests for approval on actual  
7 iron-in-the-ground investments, the Commission's  
8 determination is simply whether the IRP is  
9 reasonable and prudent as a planning document.

10 But no project as well as this  
11 [inaudible] program is proposed for approval in  
12 this or any IRP case before the Commission. Given  
13 that context, we're acknowledging continued room  
14 for improving the Company's IRP process moving  
15 forward.

16 Consumer Council does not at this time  
17 oppose the Company's IRP for the limited purposes  
18 for which it is filed under the IRP statutes.  
19 There are important questions to consider in this  
20 case, and even if they don't concern specific  
21 proposed investments, they may inform Commission's  
22 future consideration of specific proposed

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1 investments.

2 And to that end, we look forward to  
3 developing the record in this case. Thank you.

4 JUDGE HUDSON: Thank you, Counsel.

5 And finally, Commission Staff.

6 MS. PIERCE: Good morning. Can you see  
7 and hear me okay, Your Honor?

8 JUDGE HUDSON: Yes, now we can. Thank  
9 you.

10 OPENING STATEMENT

11 MS. PIERCE: All right. Thank you. And  
12 again, may it please the Commission, Kiva Bland  
13 Pierce on behalf of the Commission Staff, along  
14 with Arlen Bolstad and Michael Zielinski.

15 As directed by the Commission's order  
16 for notice in hearing, Commission Staff  
17 investigated the 2024 IRP. We filed the testimony  
18 of six witnesses on March 11th, 2025. Staff  
19 raises concerns with certain elements of the IRP  
20 filing. However, Staff does not make a  
21 recommendation that the 2024 IRP be found  
22 unreasonable.

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1           Staff review recognizes the IRP for what  
2   it is. It's for a snapshot in time. Staff's  
3   noted concerns and recommendations are made so  
4   that in future IRP proceedings, that snapshot  
5   represents a clear image.

6           I will briefly highlight a few areas of  
7   Staff's testimony and recommendations. Beginning  
8   with the load price forecast, Staff again hired  
9   Enverus Inc. to perform comparison forecasts for  
10   commodities, energy, capacity and RECs. Enverus  
11   also produced a data center load forecast.

12           The good news is that there are  
13   similarities between their forecasts. For  
14   example, across various commodities, the Enverus  
15   and Dominion forecasts were similar. Two of the  
16   areas where Enverus and Dominion did not align  
17   were data center load growth and capacity price  
18   forecast. In the longer term, Enverus is less  
19   optimistic about data center load forecast  
20   compared to the Company.

21           While Enverus acknowledges the Company's  
22   efforts on data center load forecasting, there

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1 does not appear to be a transparent way to account  
2 for data center load entities also applying for  
3 service elsewhere in the Dom LSE and in other PJM  
4 transmission zones.

5 Generally Enverus cautions against using  
6 demand sales forecasts that rely too heavily on  
7 one sector of demand such as the commercial  
8 sector. On capacity prices, Enverus foresees  
9 weaker capacity prices beyond 2030 in PJM.

10 However, Enverus does acknowledge risks to its  
11 forecast and therefore provides an alternative,  
12 more bullish scenario that captures a tightening  
13 supply/demand balance.

14 Mr. Kenneth Curtis, the director of  
15 power markets of Enverus, will appear during the  
16 hearing to address the Company's rebuttal  
17 testimony on the differences in their forecasts.

18 Next, Staff witness Katsarelis addresses  
19 the Company's input assumptions for the 2024 IRP  
20 model. The Company chose to use SMRs or nuclear  
21 small modular reactors as a supply-side generation  
22 resource available in the model, while noting that



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1 this technology has not yet been deployed at  
2 scale. The Company did not use long-duration  
3 energy storage or LDES as an available generation  
4 resource. Staff recommends that the Company do so  
5 in the next IRP.

6 Staff does not object to SMRs being an  
7 input, though it is not yet a true or proven  
8 technology. It's Staff's position that if SMRs  
9 are an available resource option, then LDES should  
10 be as well. The fact that Dominion has an  
11 approved long-duration battery storage pilot  
12 project already in existence substantiates Staff's  
13 recommendation that it is reasonable to include  
14 LDES as an available generation resource in future  
15 IRPs.

16 Importantly, Staff is not directing the  
17 Company on the type of LDES that should be  
18 included in modeling inputs. Staff is just  
19 recommending that some type of long-duration  
20 energy storage be made available to the model.

21 The Company would still have the  
22 discretion to set the specific planning parameters

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1 on the LDES resource as it does with the  
2 characteristics of other resources that the  
3 Company models.

4 Next, Staff Witness Smith reviewed the  
5 Company's outputs and discusses Staff's concerns  
6 with those outputs and the methodologies that  
7 produced them. He notes that the Company's four  
8 primary portfolios all build significant amounts  
9 of new resources and are nearly identical in their  
10 resource totals and mix.

11 He also observes that the net present  
12 values of the total system cost are approximately  
13 50 percent higher on average than the Company's  
14 2023 IRP estimates for all primary portfolios.  
15 Staff Witness Smith discusses his concerns with  
16 the portfolios' assumptions related to solar, gas,  
17 wind and energy capacity imports and how the model  
18 ignores locational and transition elements.

19 On the locational modeling, it appears  
20 from rebuttal testimony that the Company  
21 misunderstood Staff's position. While Mr. Smith  
22 sets out four levels of more specificity that the

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1 Commission could order the Company to model in  
2 future IRPs, Staff's recommendation is that the  
3 Company -- is that the Commission requires the  
4 Company to model four Virginia-specific regional  
5 loads: northern, eastern, western and southern, in  
6 order to account for the specific characteristics  
7 of those regions.

8 Staff's recommendation is not that  
9 the Company be required to model every  
10 supply-and-demand load, though in discovery the  
11 Company indicates that PLEXOS is capable of  
12 performing such modeling. In the current IRP, the  
13 Company only models the Dom LSE as a single load  
14 and for more generic import loads.

15 Staff believes such modeling ignores the  
16 very real impact of the location of load growth  
17 and existing transmission limitations such as  
18 congestion. The Company's model assumes that all  
19 energy imported or produced by PPAs or by  
20 company-owned resources is interchangeable in its  
21 ability to serve any and all loads within the Dom  
22 LSE regardless of geographic and transmission

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1 realities.

2           Staff's recommendations include that the  
3 Company provide information such as congestion  
4 charges, curtailments and details about generation  
5 that produces at zero or negative LMPs or  
6 locational marginal pricing.

7           Including historical data, it showed  
8 patterns and locational margin prices is not only  
9 reasonable, but according to the Department of  
10 Energy, it is considered a best practice for IRPs.  
11 After all, we need to learn from history so we  
12 aren't forced to repeat it.

13           Next, Jeff L. Dodson addresses  
14 transmission and distribution planning and  
15 evaluates the Company's assessments of the  
16 potential application of grid-enhancing technology  
17 or GETs. Generally, Staff did not have concerns  
18 with the Company's planning approach from a  
19 technical standpoint. Staff does note, however,  
20 that the Company did not address advanced  
21 conductors in either transmission or distribution  
22 planning.



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1           Staff recommends that in future IRPs,  
2           the Company include a more comprehensive  
3           discussion of the application of GETs and advanced  
4           conductors. Staff Witness Boehnlein reviewed the  
5           SCC directive 2024 IRP supplement that was filed  
6           in November 2024.

7           The stakeholder process report and the  
8           Company's compliance were very [inaudible] of the  
9           VCEA. He recommends that the Commission, number  
10          one, direct the Company to expand the planning  
11          period in future IRPs to at least the 2045  
12          retirement date for a carbon or carbon  
13          dioxide-emitting generation resource.

14          Number two, direct the Company  
15          to include at least one model run that  
16          contemplates retirements of all carbon or  
17          carbon dioxide-emitting generation by 2045. And  
18          number three directs the Company to identify which  
19          fossil fuel units could be retired and replaced in  
20          the aggregate using known nonemitting generation  
21          resources.

22          Regarding the recommendation that the

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1 Company's model extend beyond the 15-year plan  
2 horizon, Staff agrees and acknowledges that code  
3 section 56-597 only requires the Company to  
4 provide a 15-year planning document. However,  
5 that requirement does not preclude the Company  
6 from going beyond 15 years.

7 In fact, in prior IRP filings the  
8 Company voluntarily provided longer planning  
9 periods but it chose not to do so this year. 2045  
10 is only six years beyond the curve planning period  
11 end date of 2039. What the Company did not  
12 address, the mandatory retirements. With 2045  
13 fast approaching, Staff believes it is reasonable  
14 and in fact prudent for the Company to be planning  
15 for how it will handle those mandatory  
16 retirements.

17 Turning to the county side, Staff  
18 Witness Welsh filed testimony on the bill impacts  
19 for Dominion customers based on the IRP  
20 portfolios. I know the Commission directed  
21 methodology, the Company's BCA with EPA portfolio  
22 will result in an increase in bills for our

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1 residential customer using a valid 1,000 kilowatt  
2 hours of energy per month from \$140.18 as of  
3 December 2024 to \$315.36 as of December of 2039.  
4 Staff Witness Welsh makes two recommendations for  
5 the bill impact analysis and future IRP  
6 proceedings.

7 First, he recommends that the Commission  
8 direct Dominion to project base rate bill impact  
9 analysis in future IRP proceedings. Second,  
10 should the Commission require the Company to model  
11 a different time frame in future IRP cases, Staff  
12 recommends that the bill impact analysis period be  
13 updated to align with that time frame.

14 Based on rebuttal testimony, it's  
15 Staff's understanding that the Company agrees to  
16 this second recommendation. Staff believes it's  
17 important to reiterate that with IRP cases, a  
18 finding by the Commission that a plan that's  
19 reasonable does not equate to an automatic  
20 approval of everything or anything contemplated  
21 within that plan. And you've heard a little bit  
22 about this already this morning.

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1           Future applications filed by the Company  
2     will be reviewed and analyzed on the basis of the  
3     facts and circumstances in that particular case.  
4     Finally, Staff understands that an IRP requires a  
5     lot of work by the Company and that the various  
6     portfolios and scenarios required even more time  
7     and effort.

8           Staff appreciates all the information  
9     that the Company provided with the IRP filing and  
10    the many rounds of discovery. In making its  
11    recommendations, Staff is trying to provide  
12    clarity on how the Company intends to move the  
13    challenge of a suitable -- substantial increase in  
14    load growth while adhering to the provisions of  
15    the VCEA. Such clarity and information is  
16    especially important when the next litigated IRP  
17    will be filed in October of 2026. The filing  
18    later this year will just be an update.

19           Staff asks that you adopt the various  
20    recommendations for the Company's future IRP  
21    filings so that the Commission, the parties and  
22    the staff may have a clearer image of the



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1 Company's plan. As of right now, that is not  
2 sharp. It's fuzzy around the edges. Thank you.

3 JUDGE HUDSON: Thank you, Counsel.

4 Okay. So what we're going to do is stop  
5 right here and we're going to reconvene tomorrow  
6 at 10:00 a.m. in courtroom C.

7 So again, thank you everyone for your  
8 attention today and we stand in recess.

9 (Off the record at 12:02 p.m.)

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2 STATE OF DELAWARE

3 SUSSEX COUNTY

4 I, Dawn Michele Hyde, a Notary Public of  
5 the State of Delaware, Sussex County, do hereby  
6 certify that the above-captioned proceeding took  
7 place before me at the time and place herein set  
8 out.

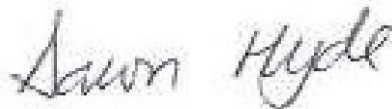
9 I further certify that the proceeding was  
10 recorded stenographically by me and this transcript  
11 is a true record of the proceedings.

12 I further certify that I am not of counsel  
13 to any of the parties, nor an employee of counsel,  
14 nor related to any of the parties, nor in any way  
15 interested in the outcome of the action.

16 As witness my hand and seal this 19th day  
17 of April, 2025.

18

19



20

Dawn Michele Hyde

21

My Commission Expires 4/5/2029

22