

**PART D**

**Summary of the Testimony of Jason Brannick**

1        My testimony addresses the request for a certificate of public convenience and  
2        necessity (“CPCN”) by Appalachian Power Company’s (“APCo” or “Company”), to  
3        acquire and operate a utility-scale battery energy storage system (“BESS”) project totaling  
4        approximately 52.2 megawatts of energy storage, and associated facilities (together,  
5        “Wythe BESS”). Specifically, my testimony addresses certain issues identified with the  
6        CPCN request.

7        My conclusions are the following:

- 8        • Although Staff cannot support approval of the Wythe BESS project due to its  
9        negative net present value, as noted by Staff witness Dalton, if the project were to  
10       be approved by the Commission, then Staff submits that a CPCN would need to be  
11       issued to APCo for the ownership and operation of the Wythe BESS facility, and  
12       from a technical/engineering perspective, Staff does not oppose such issuance.
- 13       • APCo withdrew its request for a CPCN for the Generation-Tie (“Gen-Tie”) Line  
14       during the course of this proceeding. Staff agrees that a CPCN for the existing  
15       shared Gen-Tie Line is not required in this particular circumstance.

**PRE-FILED TESTIMONY  
OF  
JASON BRANNICK**

**PETITION OF APPALACHIAN POWER COMPANY  
FOR APPROVAL OF ITS 2025 RPS PLAN UNDER  
§ 56-585.5 OF THE CODE OF VIRGINIA AND RELATED REQUESTS**

**CASE NO. PUR-2025-00049**

**July 16, 2025**

**INTRODUCTION**

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

3   **A.   My name is Jason Brannick, and I am a Utilities Engineer in the Commission's**  
4       **Division of Public Utility Regulation.**

5   **Q.   WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

6   **A.   My testimony addresses the request for a certificate of public convenience and**  
7       **necessity ("CPCN") by Appalachian Power Company's ("APCo" or "Company"),**  
8       **to acquire and operate a utility-scale battery energy storage system ("BESS")**  
9       **project totaling approximately 52.2 megawatts ("MW") of energy storage and**  
10      **associated facilities (together, "Wythe BESS") pursuant to § 56-585.5 E 1 of the**  
11      **Code of Virginia ("Code"), 20 VAC 5-335-30 A of the Commission's Regulations**  
12      **Governing the Deployment of Energy Storage,<sup>1</sup> and the Utility Facilities Act, Code**

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<sup>1</sup> 20 VAC 5-335-10 *et seq.*

1           § 56-265.1 *et seq.*<sup>2</sup> Specifically, my testimony addresses certain issues identified  
2           with this CPCN request.

3   **Q.   PLEASE DESCRIBE THE WYTHE BESS PROPOSED IN THE**  
4   **COMPANY’S PETITION.**

5   **A.**   APCo states that the Wythe BESS consists of 52.2 MW / 208.8 megawatt-hours  
6           (“MWh”) of installed nameplate capacity, located in Wythe County, Virginia.<sup>3</sup> The  
7           Wythe BESS is proposed to be located near 669 Electric Lane, Max Meadows, VA  
8           24360, on previously developed privately owned land.<sup>4</sup> It is an approximately  
9           17-acre parcel near the intersection of Payne Town Road and Interstate 77.<sup>5</sup>

10                 According to the Company, a PJM Interconnection, LLC (“PJM”)  
11           Interconnection Service Agreement (“ISA”) for the Wythe BESS was executed in  
12           April 2025.<sup>6</sup> The proposed in-service date for the Wythe BESS is June 15, 2027.<sup>7</sup>

13   **Q.   PLEASE IDENTIFY THE DEVELOPER OF THE WYTHE BESS**  
14   **PROJECT.**

15   **A.**   The project developer is RWE Clean Energy (“RWE”).<sup>8</sup>

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<sup>2</sup> Petition at 1-2.

<sup>3</sup> Direct Testimony of Company witness Sebastian Grisales (“Grisales Direct”) at 3.

<sup>4</sup> *Id.* at 4.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.* at 6 and Schedule 5 p.3. PJM is the regional transmission organization of which APCo is a member.

<sup>7</sup> Grisales Direct at 3.

<sup>8</sup> Direct Testimony of Company witness Seth L. Miller (“Miller Direct”) at 4.



1 **Q. PLEASE PROVIDE A STATUS UPDATE OF THE APPROVALS**  
 2 **REQUIRED FOR THE WYTHE BESS PROJECT.**

3 **A.** According to the Company, a BESS Siting Agreement has been received from  
 4 Wythe County.<sup>9</sup> The Company also states that RWE will be responsible for  
 5 obtaining all remaining necessary permits prior to the construction of the Wythe  
 6 BESS, including the Permit-By-Rule (“PBR”) from the Virginia Department of  
 7 Environmental Quality (“DEQ”).<sup>10</sup> In response to Staff Interrogatory No. 5-146,  
 8 the Company has indicated that the Wythe BESS facility was approved through the  
 9 DEQ PBR process and received a letter of authorization on June 13, 2025.<sup>11</sup>

10 **Q. HAS THE COMPANY ENTERED INTO AN AGREEMENT FOR THE**  
 11 **PURCHASE OF THE WYTHE BESS PROJECT.**

12 **A.** Yes. The Company reports that it has entered into a Purchase and Sale Agreement  
 13 (“PSA”) with RWE for the purchase of 100% of the equity interests of the Wythe  
 14 BESS project.<sup>12</sup>

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<sup>9</sup> Grisales Direct at 5.

<sup>10</sup> *Id.* According to the Company, the collection substation for the Wythe BESS project is included in the PBR. *See* Company response to Staff Interrogatory No. 5-146. All responses to interrogatories are provided in Attachment 1 to my testimony.

<sup>11</sup> By letter dated July 3, 2025, DEQ confirmed that no separate environmental review of the Wythe BESS Project by DEQ’s Office of Environmental Impact Review would be necessary. *See* Letter from Bettina Rayfield, Manger, Environmental Impact Review and Long Range Priorities Program Virginia Department of Environmental Quality, Doc. Con. Cen. No. 25071011 (July 3, 2025).

<sup>12</sup> Grisales Direct at 4.

1 **Q. ACCORDING TO THE PSA, WHO WILL CONSTRUCT THE WYTHE**  
 2 **BESS PROJECT?**

3 **A.** The Company states that under the terms of the PSA, RWE will be responsible for  
 4 constructing the Wythe BESS facility.<sup>13</sup> RWE will procure all necessary  
 5 equipment, including the BESS containers (Direct-Current block and BESS  
 6 management system), pad-mount transformers, generation step-up transformers,  
 7 cabling, and medium-voltage circuit breakers, as applicable.<sup>14</sup> Additionally, RWE  
 8 will secure the construction contracts required for the facility, as outlined in the  
 9 PSA.<sup>15</sup>

10 The Company reports that it will acquire the project at Mechanical  
 11 Completion, which occurs before the facility is placed in service and just prior to  
 12 energization.<sup>16</sup>

13 **Q. GIVEN THAT THE WYTHE BESS PROJECT HAS BEEN APPROVED**  
 14 **UNDER THE DEQ PBR AND CONSTRUCTION WILL BE CARRIED OUT**  
 15 **BY RWE, PLEASE CLARIFY WHAT THE COMPANY IS SEEKING**  
 16 **FROM THE COMMISSION THROUGH ITS CPCN REQUEST.**

17 **A.** In response to Staff Interrogatory No. 5-146, the Company confirms that it is  
 18 seeking a CPCN solely to own and operate the Wythe BESS facility once  
 19 construction is complete.

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<sup>13</sup> Miller Direct at 11.

<sup>14</sup> *Id.* at 13.

<sup>15</sup> *Id.*

<sup>16</sup> *Id.* at 11.

1   **Q.    BASED ON THE INFORMATION PROVIDED, WHAT IS STAFF’S**  
2       **OPINION ON THE COMPANY’S CPCN REQUEST?**

3   **A.**    The Company requests issuance of a CPCN to own and operate the Wythe BESS  
4       facility. However, as noted by Staff witness Dalton, Staff cannot support approval  
5       of the Wythe BESS project due to its negative net present value. Nevertheless,  
6       should the Commission approve the Wythe BESS project, then from a  
7       technical/engineering perspective, Staff does not oppose the issuance of a CPCN  
8       for APCo to own and operate the Wythe BESS facility.

9   **Q.    IS THE COMPANY REQUESTING A CPCN FOR THE**  
10       **GENERATION-TIE LINE (“GEN-TIE LINE”) FOR THE WYTHE BESS**  
11       **PROJECT?**

12   **A.**    No. In its Petition, the Company originally requested a CPCN for both the BESS  
13       facility and the associated gen-tie line.<sup>17</sup> However, in a subsequent letter dated July  
14       1, 2024, the Company withdrew its request for a CPCN for the Gen-Tie Line.

15   **Q.    DOES STAFF AGREE THAT THE GEN-TIE LINE DOES NOT REQUIRE**  
16       **A CPCN?**

17   **A.**    Yes. The Company states that the Gen-Tie Line for the Wythe BESS project is an  
18       existing 0.15-mile transmission line currently in operation and owned by Wythe  
19       County Solar Project, LLC.<sup>18</sup> Under the Wythe BESS PSA, APCo and the  
20       developer are going to use commercially reasonable efforts to execute a Shared

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<sup>17</sup> Grisales Direct at 2.

<sup>18</sup> *Id.* at 6; Company response to Staff Interrogatory No. 5-145. The existing generation-tie line is a non-certificated line.

1 Facilities Agreement, which would provide APCo with shared ownership and use  
2 of the existing Gen-Tie Line.<sup>19</sup> Since the Gen-Tie Line is non-certificated, already  
3 in service, and the Company will share the existing infrastructure with no need for  
4 new facilities, Staff agrees that a CPCN for the existing shared Gen-Tie Line is not  
5 required in this particular circumstance.

6 **Q. PLEASE SUMMARIZE THE CPCN THAT WILL BE REQUIRED FOR**  
7 **THE WYTHE BESS PROJECT IF APPROVED.**

8 **A.** If approved, a CPCN would need to be issued to APCo for the ownership and  
9 operation of the Wythe BESS facility.

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

11 **A.** Yes.

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<sup>19</sup> Company response to Staff Interrogatory No. 5-145.

**ATTACHMENTS**

**Attachment 1**

**Company's Responses to Interrogatories**



**COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION  
APPLICATION OF  
APPALACHIAN POWER COMPANY  
SCC CASE NO. PUR-2025-00049  
Interrogatories and Requests for the Production  
of Documents by the STAFF OF THE STATE CORPORATION COMMISSION  
Staff Set 5  
To Appalachian Power Company**

Interrogatory Staff 5-145:

Please refer to page 2 of Grisales Direct, which states that the Company is requesting approval of a Certificate of Public Convenience and Necessity (“CPCN”) for the Wythe Battery Storage Project and the existing shared generation tie line. Please provide the following information:

- (a) Please confirm whether the Company is seeking a CPCN for the existing generation tie line.
- (b) Please identify who currently owns and operates the existing generation tie line.
- (c) If the Company is seeking a CPCN for the generation tie line, please clarify whether the line will be shared or exclusively owned and operated by APCo.
- (d) Please provide any documentation indicating that the current owner of the existing generation tie line has approved APCo’s shared ownership and use of the generation tie line.

Response Staff 5-145:

(a) Please see attached letter, Staff 5-145 Attachment 2, withdrawing request for CPCN of the joint facilities, filed July 1, 2025.

(b) Wythe County Solar Project, LLC.

(c) N/A.

(d) Pursuant to the Wythe BESS PSA, and as a condition to the purchase and sale of the project company, APCo and the developer shall use commercially reasonable efforts to execute the Shared Facilities Agreement (the “SFA”), which gives APCo shared ownership and use of the Shared Facilities, including the existing generation-tie line. A form of the SFA is attached as Exhibit W to the Wythe BESS PSA (refer to Staff 5-145 Confidential Attachment 1).

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The foregoing response is made by Sebastian Grisales, Dir Projects, and Seth L. Miller, Dir Regulated Infrstr Dev, on behalf of Appalachian Power Company.

**COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION  
APPLICATION OF  
APPALACHIAN POWER COMPANY  
SCC CASE NO. PUR-2025-00049  
Interrogatories and Requests for the Production  
of Documents by the STAFF OF THE STATE CORPORATION COMMISSION  
Staff Set 5  
To Appalachian Power Company**

Interrogatory Staff 5-146:

Please refer to page 11 of Miller Direct, which states that the Purchase and Sale Agreement governs the construction of the Wythe BESS facility by RWE Solar Development, LLC (“RWE”). Additionally, please refer to Schedule 4 of Grisales Direct, which provides the Permit-by-Rule (“PBR”) Application for the Wythe BESS project. Please provide the following information:

- (a) Please confirm whether the Wythe BESS facility is being approved through the Department of Environmental Quality’s PBR process and indicate whether the project has received such approval.
- (b) Please confirm that RWE will construct the Wythe BESS facility and that the Company is seeking a CPCN only to own and operate the BESS facility.
- (c) Please confirm whether the collection substation for the Wythe BESS project is included in the PBR Application. If it is not included, provide a detailed description of the substation, including all proposed equipment, the size of the substation, and any other relevant details.

Response Staff 5-146:

- (a) Confirmed. The Wythe BESS facility was approved through the PBR and it received a letter of authorization on June 13, 2025. Please refer to Staff 5-146 Attachment 1 for the letter of authorization.
- (b) Confirmed.
- (c) Confirmed.

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The foregoing response is made by Sebastian Grisales, Dir Projects, on behalf of Appalachian Power Company.



**PART E**

**Summary of the Prefiled Testimony of Tanner S. Katsarelis**

1 My testimony addresses the following topics and provides the following conclusions related  
2 to Appalachian Power Company's ("Company") 2025 Renewable Energy Portfolio Standard  
3 ("RPS") Plan:

- 4 1. The combined bill impact of the proposed A.5 RPS RAC<sub>D&E</sub>, A.5 RPS RAC<sub>F</sub>, A.5  
5 PCAP, and A.6 RPS RAC on a typical residential customer using 1,000 kilowatt-hours  
6 ("kWh") per month, as calculated by the Company, is an increase of \$4.36 or 2.5% when  
7 compared to their current monthly bill. The total cost of the RPS-related RACs would  
8 be \$5.63 per month for these customers.
- 9 2. The bill impact of the proposed Rider NBC on an SGS (secondary) and GS (secondary)  
10 customer based on their class average monthly kWh usage is an increase of \$0.19 and  
11 \$2.64 respectively. The total cost of the Rider NBC would be (\$0.62) and (\$8.43)  
12 respectively per month for these customers.
- 13 3. Staff does not oppose the Company's environmental justice analysis and screening  
14 performed on its proposed resources in the instant case.
- 15 4. Staff does not oppose the Company's cost allocation and rate design methodologies  
16 used to develop the proposed charges in this case. Should the Commission approve a  
17 revenue requirement that differs from the Company's requested revenue requirement,  
18 Staff recommends that the RPS charges be adjusted proportionately.  
19
- 20 5. Staff recommends that the Commission direct the Company to submit into the RPS cost  
21 allocation and RAC recovery framework in its next VCEA filing, its plan to implement  
22 possible future RPS program compliance cost exemptions for certain new Accelerated  
23 Renewable Energy Buyers, as directed by Chapter 707 of the 2025 Virginia Acts of  
24 Assembly.  
25

**PREFILED TESTIMONY  
OF  
TANNER S. KATSARELIS**

**PETITION OF APPALACHIAN POWER COMPANY  
FOR APPROVAL OF ITS 2025 RPS PLAN UNDER § 56-585.5  
OF THE CODE OF VIRGINIA AND RELATED REQUESTS**

**CASE NO. PUR-2025-00049**

**July 16, 2025**

1 **Q. PLEASE STATE YOUR NAME AND POSITION WITH THE STATE**  
2 **CORPORATION COMMISSION (“COMMISSION”).**

3 **A.** My name is Tanner S. Katsarelis, and in the Commission's Division of Public Utility  
4 Regulation (“PUR”) I am a PUR Analyst.

5 **Q. WHAT ARE YOUR PRESENT RESPONSIBILITIES?**

6 **A.** My duties as a PUR Analyst include reviewing utility renewable energy portfolio standard  
7 (“RPS”) plans, integrated resource plan applications, and rate increase applications  
8 regarding cost of service, rate design, and terms and conditions of service. I am also  
9 responsible for presenting testimony as a Commission Staff (“Staff”) witness and making  
10 alternate proposals to the Commission when appropriate.

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

12 **A.** My testimony addresses the petition of Appalachian Power Company (“APCo” or  
13 “Company”) for approval of its 2025 RPS Plan under § 56-585.5 of the Code of Virginia  
14 (“Code”) (“2025 RPS Plan”). Specifically, my testimony examines the Company’s  
15 proposed assignment and allocation of costs, rate design, and bill impacts of the rate  
16 adjustment clauses (“RACs”) designated A.5 RPS-RAC, A.5 PCAP-RAC, A.6 RPS-RAC,

and APCo's Cost Net of Benefits Rider ("Rider NBC"). Additionally, I discuss how the Company addressed environmental justice ("EJ") in its 2025 RPS Plan.

### RPS RACs

**Q. PLEASE DESCRIBE THE RACS THROUGH WHICH THE COMPANY CURRENTLY RECOVERS RPS-RELATED COSTS.**

**A.** The five RACs the Company currently uses to recover RPS-related costs ("RPS RACs") are as follows:

1. **A.5 RPS-RAC**, consisting of the **A.5 RPS-RAC<sub>D&E</sub>** and **A.5 RPS-RAC<sub>F</sub>**: recovers the non-energy, non-ancillary services, non-capacity costs (*i.e.* renewable attributes) for all Company-owned facilities, purchased power agreements ("PPAs"), and renewable energy certificate ("REC") purchases;
2. **A.5 RPS-PCAP-RAC**: recovers the costs of the capacity purchases through PPAs;
3. **A.6 RPS-RAC**: recovers the costs of capacity and energy from renewable facilities owned by the Company;
4. **Rider NBC**: recovers the costs, net of benefits of RPS compliance, from shopping customers not otherwise exempt from RPS cost responsibility that are also not subject to the Fuel Factor; and
5. **Fuel Factor**: recovers the costs of energy purchases through PPAs, and energy revenue benefits received from PPAs and Company-owned resources.

In the instant case, the Company is seeking cost recovery for the A.5 RPS-RAC, the A.5 RPS-PCAP-RAC, the A.6 RPS-RAC, and Rider NBC. The Fuel Factor RAC will be the subject of a separate proceeding in the future.

The revenue requirements associated with the A.5 RPS-RAC, the A.5 RPS-PCAP-RAC, the A.6 RPS-RAC, and Rider NBC each consist of three components: Actual Costs through January 31, 2025, a Bridge Period between February 1, 2025 and February 28,

2026, and the VCEA<sup>1</sup> Rate Year period between March 1, 2026 and February 28, 2027.<sup>2</sup>

Staff witness Sean Welsh further discusses the revenue requirements of each of these RPS RACs and will provide Staff's findings and recommendations regarding their associated revenue requirements in this case.

**Q. HAS THE COMMISSION PREVIOUSLY ADDRESSED THE RPS RAC FRAMEWORK AND COST ALLOCATION OF RPS RESOURCES?**

**A.** Yes. In Case No. PUR-2022-00166, the Commission addressed the appropriate framework for cost recovery, the allocation of costs net of benefits pursuant to Code § 56-585.5 F, and class and jurisdictional cost allocation for RPS-related costs.<sup>3</sup> Additionally, the Commission approved two proposed changes<sup>4</sup> to the Company's cost recovery framework to address Company-owned resources and PPAs in Case No. PUR-2024-00020 ("2024 RPS Case").<sup>5</sup>

Company witness Cost states that the cost allocation methodologies used in the instant case are consistent with the RPS Cost Allocation Order and the modifications that

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<sup>1</sup> The Virginia Clean Economy Act ("VCEA"), passed during the 2020 Regular Session of the Virginia General Assembly. 2020 Va. Acts, Chapters 1193 and 1194.

<sup>2</sup> Direct Testimony of Company witness Jaclyn N. Cost ("Cost Direct") at 1-2.

<sup>3</sup> *Filing of Appalachian Power Company, For consideration of the appropriate framework for cost recovery, the allocation of costs net of benefits, pursuant to Code § 56-585.5 F, and class and jurisdictional cost allocation*, Case No. PUR-2022-00166, 2024 S.C.C. Ann. Rept. 266, Final Order (Sep. 15, 2023) ("RPS Cost Allocation Order").

<sup>4</sup> The first change is for Company-owned costs beginning in the Rate Year. Costs are first apportioned to RECs based on current market values for the RECs produced by the resource. Then, all the remaining costs are considered capacity and recovered through the A.6 RPS RAC. The second change is for the cost of PPA resources. The REC component is determined first as described above for Company-owned resources. Then, remaining costs are split between energy (fuel factor) and capacity (A.5 PCAP-RAC) based on relative values of each based on near-term market values.

<sup>5</sup> *Petition of Appalachian Power Company, For approval of its 2024 RPS Plan under § 56-585.5 of the Code of Virginia and related requests*, Case No. PUR-2024-00020, 2024 S.C.C. Ann. Rept. 297, 298 Final Order (Oct. 21, 2024).

were approved in the 2024 RPS Case.<sup>6</sup> A description of how the cost recovery mechanism for each of the Company's RPS RACs is applied to the Company's resources is contained in Table 1 below.<sup>7</sup>

**Table 1 – Cost Recovery Mechanisms of Proposed RACs**

Resource	State	A.6 RPS- RAC	A.5 RPS- RAC <sub>D&amp;E</sub>	A.5 RPS- RAC <sub>F</sub>	A.5 PCAP RAC	FAC	Rider NBC		Ownership
							NBC	PCAP	
Amherst Solar	VA	16.55%	83.45%						Company Owned
Top Hat Wind	IL	27.88%		72.12%					Company Owned
Grover Hill Wind	OH	64.99%		35.01%					Company Owned
Mountain Brook Solar	VA		66%		32%	2%	6.04%	93.96%	PPA
River Trail Solar	VA		67.76%		17.90%	14.34%	44.48%	55.52%	PPA
Sunny Rock Solar	VA		67.73%		20.91%	11.35%	35.19%	64.81%	PPA
Shifting Sands Solar	VA		67.74%		20.90%	11.36%	35.22%	64.78%	PPA
Elliot Solar	VA		59.91%		26.27%	13.81%	34.46%	65.54%	PPA
Green Acres Solar	VA		54.52%		29.22%	16.26%	35.75%	64.25%	PPA
Leatherwood Solar	VA			100% <sup>1</sup>	29.09%	70.91%	70.91%	29.09%	Contracted
Wytheville Solar	VA			100% <sup>1</sup>	30.92%	69.08%	69.08%	30.92%	Contracted
Depot Solar	WV			100% <sup>2</sup>			30.12%	69.88%	Contracted
Bluff Point Wind	IN			89.56%	2.58%	7.87%	75.30%	24.70%	Contracted
Camp Grove Wind	IL			48.02%	16.36%	35.62%	68.53%	31.47%	Contracted
Fowler Ridge Wind	IN			47.09%	17.64%	35.27%	66.66%	33.34%	Contracted
Approved Projects that are not in the current Rate Year and have not been re-allocated under the Cost Allocation Proceeding methodology.									
Pleasant Prairie Solar	OH			21%	18%	62%			PPA

<sup>1</sup>Contracted REC purchase costs. Energy and capacity related costs are split between the PCAP and FAC.

<sup>2</sup>The Depot facility's REC-related cost is greater than the projected energy/capacity cost.

<sup>3</sup>Rider NBC is the energy cost of the RPS resources after extracting the REC and capacity costs for shopping customers which avoid the FAC.

<sup>6</sup> Cost Direct at 4.

<sup>7</sup> Table 1 is replicated from the Company's response to Staff Interrogatory No. 4-130, *See* Staff 4-130 Attachment 1.



**Table 2 – Jurisdictional and Class Allocators**

Jurisdictional Class	RECs-A.5 RPS RAC 2 Components		A.5 RPS – PPA Capacity	Company Owned Generation-A.6 RPS RAC		Fuel Factor	Rider NBC
	A.5 RPS – RAC <sub>D&amp;E</sub>	A.5 RPS – RAC <sub>F</sub>		A.6 RPS - RAC			
	Annual Energy	Annual Energy		Annual Energy			
	Annual Energy	Annual Energy	6CP (Demand)	6CP (Demand)		Annual Energy	Annual Energy

**Q. PLEASE DESCRIBE THE COMPANY’S COST ALLOCATION METHODOLOGIES USED FOR APCO’S RPS-RELATED RACS.**

**A.** The Company’s jurisdictional and class cost allocation methodologies for each RAC are shown in Table 2 above.<sup>8</sup> All costs are allocated to the APCo Virginia Retail Jurisdiction based on the Company’s Annual Energy allocator, utilizing actual energy usage for the twelve-month period ended December 31, 2024.<sup>9</sup> Class allocation factors utilize either an annual energy allocation or a 6 coincidental peak (“6 CP”)<sup>10</sup> demand allocation methodology, depending on whether the costs are energy-related or capacity-related.<sup>11</sup> Both the class energy and 6 CP allocators are based on 2023 calendar year load and usage

<sup>8</sup> Cost Direct at 4.

<sup>9</sup> *Id.* The Company’s annual energy allocation factor allocates costs based on the loss adjusted class energy used during the period compared to the total energy used by all classes.

<sup>10</sup> At a high level, coincident peak cost allocation refers to the process of determining each class’s hourly demand contribution to the Company’s monthly peak demand. The Company’s 6 CP demand allocator refers to the assignment of costs to the customer classes based on each customer classes’ contribution to the six-monthly peaks during the test period. These six months are the summer/winter months of December, January, February, June, July, and August. The 6 CP demand factor was developed utilizing data based on the 2023 calendar year.

<sup>11</sup> Cost Direct at 5.

data.<sup>12</sup> Additionally, the Company has complied with the RPS Cost Allocation Order by removing the expected value of RECs of the Company-owned facilities from the revenue requirement of the A.6 RPS-RAC and then class allocating the remainder using the 6 CP demand allocator.<sup>13</sup> Table 3 below identifies the classification, allocation methodology, and applicable RAC to each RPS related cost.

**Table 3 – Classification of Cost Type**

<b>Cost Type</b>	<b>Classification</b>	<b>Allocator</b>	<b>RAC</b>
Renewable Attributes and REC Purchases	Energy	Annual Energy	A.5 RPS
PPA Capacity	Demand	6 CP	A.5 RPS-PCAP
Company owned capacity	Demand	6 CP	A.6 RPS
Company owned energy	Energy	6 CP	A.6 RPS
RPS compliance costs net of benefits	Energy	Annual Energy	Rider NBC

**Q. DOES STAFF HAVE ANY COMMENTS ON THE COMPANY’S PROPOSED PPA COST ALLOCATION METHODOLOGY USED IN THE INSTANT CASE?**

**A.** Yes. The Company proposed a slight change to its PPA cost allocation methodology that was approved in the 2024 RPS Case. Consistent with the approved cost allocation methodology in the 2024 RPS Case, for PPAs, the Company first extracts the REC value based on the amount of energy the resource produces, multiplied by the REC market price. The remaining revenue requirement is then split based on capacity and energy value stream percentages. Staff witness Welsh discusses the Company’s methodology and value stream percentages in more detail in his direct testimony.

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<sup>12</sup> *Id.*

<sup>13</sup> Cost Direct at 8.



**Q. WHAT IS THE RESULTING BILL IMPACT OF THESE RACS ON A TYPICAL RESIDENTIAL CUSTOMER?**

**A.** The individual monthly bill impacts of each of the Company's RPS-related RACs for a typical residential customer who uses 1,000 kilowatt-hours ("kWh") per month are reported in Table 4 below:

**Table 4 - RAC Bill Impacts**

	<b>A.5 RPS- RAC</b>	<b>A.5 RPS- RAC</b>	<b>A.5 RPS- PCAP</b>	<b>A.6 RPS</b>	<b>Total</b>
<b>Current Rates</b>	\$ 0.00028	\$ 0.00075	\$ 0.00013	\$ 0.00011	\$ 0.00127
<b>Proposed Rates</b>	\$ 0.00039	\$ 0.00285	\$ 0.00047	\$ 0.00192	\$ 0.00563
<b>Rate Increase</b>	\$ 0.00011	\$ 0.00210	\$ 0.00034	\$ 0.00181	\$ 0.00436
<b>Bill Impact (1,000 kWh)</b>	\$ 0.11	\$ 2.10	\$ 0.34	\$ 1.81	\$ 4.36

As shown in Table 4, for a residential customer using 1,000 kWh per month, the proposed RPS surcharges in the Rate Year will result in a monthly bill increase of \$4.36, or an increase of 2.5% when compared to current monthly bills.<sup>14</sup> The total bill impact for the proposed RPS surcharges would be \$5.63 per month for these customers.

**Q. PLEASE DESCRIBE THE COMPANY'S RIDER NBC.**

**A.** The Company's Rider NBC was proposed and approved in APCo's 2024 RPS Case to recover RPS-related costs, net of benefits, for the Company's shopping customers.<sup>15</sup> As

<sup>14</sup> Cost Direct at 13. Total bill impact comparisons for Residential Schedule, Sanctuary worship service, small general service, general service (secondary and primary), large power service (secondary, primary, subtransmission, and transmission) are shown in Schedule 4 of Company witness Cost's direct testimony.

<sup>15</sup> *Id.* See also 2024 RPS Case.

1 stated by Company witness Cost, the Rider NBC rate calculation is consistent with the  
 2 previously approved methodology in APCo's 2024 RPS Case, using an estimate of the  
 3 energy component of the RPS-related PPAs for the rate year, an estimate of the avoided  
 4 energy costs for the rate year, a reversal of the prior period estimates, and the prior period  
 5 actual VCEA costs and actual avoided/off-system energy purchases and energy sales.<sup>16</sup>

6 **Q. WHAT IS THE BILL IMPACT OF THE COMPANY'S RIDER NBC?**

7 **A.** Rider NBC is only applicable to a subset of Company shopping customers who take service  
 8 on the Company's O.A.D Tariff and who are not exempt from non-bypassable charges.  
 9 Total NBC rates for outdoor lighting, small general service (primary and secondary),  
 10 general service (primary and secondary), and large power service (primary) customers are  
 11 shown in Schedule 5 of Company witness Stevens' direct testimony. For customers taking  
 12 service under Rider NBC, the proposed monthly RPS surcharges in the Rate Year for SGS  
 13 (secondary) and GS (secondary) customers based on their class average monthly kWh  
 14 usage, are (\$0.62) and (\$8.43) respectively.<sup>17</sup> This will result in a monthly rate increase of  
 15 \$0.19 for a SGS (secondary) customer and an increase of \$2.64 for a GS (secondary)  
 16 customer, or an increase of 23.88% when compared to current rates.<sup>18</sup>

17 **Q. DOES STAFF HAVE ANY COMMENTS REGARDING THE GOVERNANCE OF**  
 18 **ACCELERATED RENEWABLE ENERGY BUYERS ("ARBS")?**

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<sup>16</sup> *Id.*

<sup>17</sup> See Company's response to Staff Interrogatory 5-147, for the average monthly kWh usage, by class, based on calendar year 2024 for customers taking service under the NBP Rider O.A.D. VCEA – NBC.

<sup>18</sup> See Attachment TSK-2.

1    **A.**    Yes. Chapter 707 of the 2025 Virginia Acts of Assembly ("Chapter 707") amends  
2           § 56-585.5 and states, in part:<sup>19</sup>

3                   An accelerated renewable energy buyer may also contract with a Phase I or  
4                   Phase II Utility, or a person other than a Phase I or Phase II Utility, to obtain  
5                   capacity from energy storage facilities located within the network service  
6                   area of the Phase II Utility pursuant to this subsection, provided that the  
7                   costs of such resources are not recovered from any of the utility's customers  
8                   who have not voluntarily agreed to pay for such costs. Such accelerated  
9                   renewable energy buyer shall be exempt from the assignment of non-  
10                  bypassable RPS Program compliance costs specifically associated with  
11                  energy storage facilities pursuant to this subsection in proportion to the  
12                  customer's total capacity demand on an annual basis.

13  
14          Staff's understanding of this new Code provision is that it would apply to eligible ARBs  
15          within APCo's service territory who contract for energy storage facilities. Staff notes that  
16          the Company does not currently have ARB customers nor any energy storage costs. Should  
17          APCo procure energy storage resources in the future and should APCo further receive any  
18          ARBs with contracts for energy storage facilities, then it appears to Staff that such future  
19          ARBs could be partially or fully exempt from the assignment of APCo's energy storage  
20          costs under Chapter 707. Therefore, Staff recommends that the Commission direct the  
21          Company to submit, in its next VCEA filing, its plan to implement any such exemptions  
22          into its RPS cost allocation and RAC recovery framework.

23    **Q.    DOES STAFF HAVE ANY ADDITIONAL COMMENTS REGARDING THE RPS-**  
24    **RAC CHARGES PROPOSED IN THIS PROCEEDING?**

25    **A.**    Yes. Staff does not oppose the cost allocation and rate design methodologies used to  
26           develop the proposed charges in this proceeding. Should the Commission approve a  
27           revenue requirement that differs from the Company's requested revenue requirement, Staff

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<sup>19</sup> 2025 Va. Acts of Assembly, Ch. 707 (2025 Reconvened Session).



recommends that the corresponding RPS-RAC charges should be adjusted in accordance with the Company's proposed cost allocation and rate design methodology. This recommendation is intended to maintain the revenue apportionment and rate design methodology proposed by the Company in this case.

### **Environmental Justice**

**Q. PLEASE PROVIDE AN OVERVIEW OF THE REQUIREMENTS CONCERNING EJ CONTAINED IN THE CODE.**

**A.** The Virginia Environmental Justice Act ("VEJA") states:

It is the policy of the Commonwealth to promote environmental justice and ensure that it is carried out throughout the Commonwealth, with a focus on environmental justice communities and fenceline communities.<sup>20</sup>

Code § 2.2-234 defines "environmental justice communities" and "fenceline communities" as follows:

"Environmental justice community" means any low-income community or community of color.

"Fenceline community" means an area that contains all or part of a low-income community or community of color and that presents an increased health risk to its residents due to its proximity to a major source of pollution.<sup>21</sup>

Additionally, Code § 56-585.1 A 6 states:

The Commission shall ensure that the development of new, or expansion of existing, energy resources or facilities does not have a disproportionate adverse impact on historically economically disadvantaged communities.<sup>22</sup>

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<sup>20</sup> Code § 2.2-235.

<sup>21</sup> Code § 2.2-234 also provides definitions for "low income" and "low-income communities."

<sup>22</sup> Under Code § 56-576, "'Historically economically disadvantaged community' means (i) a community in which a majority of the population are people of color or (ii) a low-income geographic area."

Enactment Clause 7 of the VCEA further provides:

That it shall be the policy of the Commonwealth that the State Corporation Commission, Department of Mines, Minerals and Energy, and Virginia Council on Environmental Justice, in the development of energy programs, job training programs, and placement of renewable energy facilities, shall consider whether and how those facilities and programs benefit local workers, historically economically disadvantaged communities that are located near previously and presently permitted fossil fuel facilities or coal mines.<sup>23</sup>

**Q. DID THE COMPANY ADDRESS EJ IN ITS ANALYSES OF THE PROPOSED COMPANY-OWNED GENERATION RESOURCES AND PPAS?**

**A.** Yes. As stated in Company witness Long’s direct testimony, “the Company evaluated the communities within a one-mile radius of the Projects’ proposed sites to determine the presence of any low-income communities, communities of color, and fenceline communities.”<sup>24</sup> The Company conducted EJ analyses and screenings for the proposed HCE Collier Solar PPA facility and the Company-owned Wythe BESS Project, both of which are located in Virginia.<sup>25</sup> Staff witnesses Little and Dalton address these proposed

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<sup>23</sup> Code § 56-576 defines “low-income geographic area” as “any locality, or community within a locality, that has a median household income that is not greater than 80 percent of the local median household income, or any area in the Commonwealth designated as a qualified opportunity zone by the U.S. Secretary of the Treasury via his delegation of authority to the Internal Revenue Service.”

<sup>24</sup> Direct Testimony of Company witness Hallie L. Long (“Long Direct”) at 3; Company’s Response to Staff Interrogatory No. 1-70. *See* Attachment TSK-1 at 2. The Company’s response to Staff Interrogatory No. 1-70 states that the Company performed EJ screening within a one-mile radius around proposed facilities because this provides a more relevant analysis of the community that may be directly impacted by Project activity, and because the 1-mile radius buffer is consistent with Dominion Energy Virginia’s environmental justice screening provided in Dominion’s 2024 RPS Plan (Case No. PUR-2024-00147). Company’s Response to Staff Interrogatory No. 1-70. *See also Petition of Virginia Electric and Power Company, For approval of its 2024 RPS Development Plan under § 56-585.5 D 4 of the Code of Virginia and related requests*, Case No. PUR-2024-00147, Doc. Con. Cen. No. 241070146, Direct Testimony of Kathryn E. MacCormick at 5 (Nov. 16, 2024).

<sup>25</sup> Long Direct at 2.

resources more fully in their direct testimonies. Additionally, the Company requested bidders to address the provisions of the VEJA in its 2024 Request For Proposal responses.<sup>26</sup>

**Q. DID THE COMPANY ADDRESS EJ IN ITS ANALYSES OF NON-SPECIFIC RESOURCES AND PPAS?**

**A.** No. In the Company's response to Staff Interrogatory No. 1-37, the Company stated that, "[it] did not perform screenings for environmental justice or fenceline communities for resources where a specific site has not been identified."<sup>27</sup>

**Q. DID THE COMPANY ADDRESS THE COMMONWEALTH'S CLEAN ENERGY POLICY CONTAINED IN CODE § 45.2-1706.1 C?**

**A.** Yes. In the Company's response to Staff Interrogatory No. 1-38, the Company described how it plans to conform to Code § 45.2-1706.1 C for Company-owned resources and PPAs that are proposed in the instant case. Consistent with the Commonwealth Clean Energy Policy's objective of fostering economic competitiveness and workforce development in an equitable manner, APCo stated that "as the Company transitions to clean energy sources, it is the hope that locating non-polluting, green energy sources, such as solar and storage projects, in EJ communities will support the creation of direct and indirect employment opportunities in the local economy."<sup>28</sup> The Company further stated:

Resources are selected on the bases of achieving the requirements in the VCEA, consistent with the Clean Energy Policy, while minimizing costs for customers. Resources will either be located in Virginia or out-of-state but within PJM footprint based on the

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<sup>26</sup> *Id.* at 3.

<sup>27</sup> Company's Response to Staff Interrogatory No. 1-37. *See* Attachment TSK-1 at 3.

<sup>28</sup> Company's Response to Staff Interrogatory No. 1-38. *See* Attachment TSK-1 at 4-5.



economics of the project. The location of projects will depend on the availability of projects and their relative economics.<sup>29</sup>

**Q. DOES STAFF HAVE ANY COMMENTS REGARDING THE COMPANY'S ENVIRONMENTAL JUSTICE SCREENING?**

**A.** Yes. Staff performed an EJ screening report for the HCE Collier Solar PPA facility and the proposed Company-owned Wythe BESS facility, using the Virginia Department of Environmental Quality's EJScreen+ tool. The results were consistent with the Company's screening reports for both facilities. Specifically, Staff's analysis identified two census block groups as low-income EJ communities for the proposed HCE Collier Solar PPA facility, while one census block group was identified as a low-income EJ community for the proposed Wythe BESS facility.<sup>30</sup> These results match the results of the Company's analysis.<sup>31</sup> As such, Staff does not oppose the Company's EJ analysis and screening reports in the instant case.

**Conclusions and Recommendations**

**Q. PLEASE PROVIDE A SUMMARY OF STAFF'S CONCLUSIONS AND RECOMMENDATIONS IN THE INSTANT CASE.**

**A.** Staff provides the following conclusions and recommendations for the Commission's consideration:

1. The combined bill impact of the proposed A.5 RPS RAC<sub>D&E</sub>, A.5 RPS RAC<sub>F</sub>, A.5 PCAP, and A.6 RPS RAC on a typical residential customer using 1,000 kWh per

<sup>29</sup> *Id.* For a full description of how the Company addresses Code § 45.2-1706.1 C, please see the Company's response to Staff Interrogatory No. 1-38 in Attachment TSK-1 at 4-5.

<sup>30</sup> See Attachment TSK-3 for Staff replicated EJ screening reports.

<sup>31</sup> See Long Direct at Schedule 1.

1 month as calculated by the Company is an increase of \$4.36 or 2.5% when  
2 compared to their current monthly bill.

- 3 2. The bill impact of the proposed Rider NBC on an SGS (secondary) and GS  
4 (secondary) customer based on their class average monthly kWh usage is an  
5 increase of \$0.19 and \$2.64 respectively. The total cost of the Rider NBC would  
6 be (\$0.62) and (\$8.43) respectively per month for these customers.
- 7 3. Staff does not oppose the Company's EJ analysis and screening performed on its  
8 proposed resources in the instant case.  
9
- 10 4. Staff does not oppose the Company's cost allocation and rate design methodologies  
11 used to develop the proposed charges in this case. Should the Commission approve  
12 a revenue requirement that differs from the Company's requested revenue  
13 requirement, Staff recommends that the RPS charges be adjusted proportionately.  
14
- 15 5. Staff recommends that the Commission direct the Company to submit into the RPS  
16 cost allocation and RAC recovery framework, in its next VCEA filing, its plan to  
17 implement possible future RPS program compliance cost exemptions for certain  
18 new Accelerated Renewable Energy Buyers, as directed by Chapter 707 of the 2025  
19 Virginia Acts of Assembly.

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

21 **A.** Yes.



ATTACHMENT TSK-1

EXHIBIT OF CITED INTERROGATORIES

**COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION  
APPLICATION OF  
APPALACHIAN POWER COMPANY  
SCC CASE NO. PUR-2025-00049  
Interrogatories and Requests for the Production  
of Documents by the STAFF OF THE STATE CORPORATION COMMISSION  
Staff Set 4  
To Appalachian Power Company**

Interrogatory Staff 4-130:

Please refer to the prefiled testimony of Staff witness Matthew S. Glattfelder in Case No. PUR-2024-00020, page 29, specifically “Table 8 - Recovery Mechanisms of Proposed RACs”. In a similar format, provide the recovery percentages in each of the proposed RACs (i.e, the A.5 RPS-RACD&E, A.5 RPS-RACF, A.5 RPS-PCAP-RAC, A.6 RPS-RAC, Rider NBC, and the Fuel Factor), of all generating and storage resources previously approved as part of the Company’s prior RPS proceedings.

Response Staff 4-130:

Please see attachment Staff 4-130 Attachment 1.

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The foregoing response is made by Jaclyn N. Cost, Regulatory Consultant Staff, on behalf of Appalachian Power Company.

**COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION  
APPLICATION OF  
APPALACHIAN POWER COMPANY  
SCC CASE NO. PUR-2025-00049  
Interrogatories and Requests for the Production  
of Documents by the STAFF OF THE STATE CORPORATION COMMISSION  
Staff Set 1  
To Appalachian Power Company**

Interrogatory Staff 1-70:

Please refer to Long Direct at 3. Provide a narrative explanation for why the Company chose a one-mile radius buffer for the proposed Virginia-based units, as opposed to the 5-mile buffer utilized by the Company in Case No. PUR-2023-00001.

Response Staff 1-70:

The Company has historically provided screening results for both 5-mile and 1-mile radius buffers for proposed Virginia project sites. The Company believes the 1-mile screening provides a more relevant analysis of the community that may be directly impacted by Project activity, such as construction traffic. Additionally, the 1-mile radius buffer is consistent with Dominion's environmental justice screenings provided in Case No. PUR-2024-00147.

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The foregoing response is made by Hallie L. Long, Regulatory Consultant Sr, on behalf of Appalachian Power Company.

**COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION  
APPLICATION OF  
APPALACHIAN POWER COMPANY  
SCC CASE NO. PUR-2025-00049  
Interrogatories and Requests for the Production  
of Documents by the STAFF OF THE STATE CORPORATION COMMISSION  
Staff Set 1  
To Appalachian Power Company**

Interrogatory Staff 1-37:

Please refer to Code § 2.2-234 and 2.2-235. Provide the following information: (a): For each of the non-specific resources and PPAs (i.e., those resources and PPAs that are considered for future periods and not proposed in the instant case) contained in Portfolios A through 2S and the VCEA Portfolio presented by the Company in the instant case, did the Company's Environmental Justice analysis include screening for both "environmental justice communities" and "fenceline communities," as defined in Code § 2.2-234, or only for "environmental justice communities"? If the latter, please provide a narrative explanation of why "fenceline communities" were not considered in the Company's Environmental Justice analysis. (b): For each of the Company's non-specific resources and PPAs (i.e., those resources and PPAs that are considered for future periods and not proposed in the instant case) contained in Portfolios A through 2S and the VCEA Portfolio presented by the Company in the instant case, did the Company's Environmental Justice analysis include "a focus on . . . fenceline communities," as stated in Code § 2.2-235? If not, provide a narrative explanation of why not.

Response Staff 1-37:

The Company did not perform screenings for environmental justice or fenceline communities for resources where a specific site has not been identified.

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The foregoing response is made by Hallie L. Long, Regulatory Consultant Sr, on behalf of Appalachian Power Company.



**COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION  
APPLICATION OF  
APPALACHIAN POWER COMPANY  
SCC CASE NO. PUR-2025-00049  
Interrogatories and Requests for the Production  
of Documents by the STAFF OF THE STATE CORPORATION COMMISSION  
Staff Set 1  
To Appalachian Power Company**

Interrogatory Staff 1-38:

Please refer to Code § 45.2-1706.1 C. Provide the following information, as applicable, regarding each of the specific projects and PPAs proposed by the Company in the instant case: (a): Subsection C 1: how the project or PPA equitably incorporates requirements for technical, policy, and economic analyses and assessments that recognize the unique attributes of different energy resources and delivery systems to identify pathways to net-zero carbon that maximize Virginia's energy reliability and resilience, economic development, and jobs; (b): Subsection C 2: how the project or PPA achieves pathways to net-zero greenhouse gas emissions on the basis of technical, policy, and economic analysis to maximize their effectiveness, optimize Virginia's economic development, support industrial employment, and create quality jobs while minimizing adverse impacts on public health, affected communities, and the environment; (c): Subsection C 3: how the project or PPA ensures an adequate energy supply and a Virginia-based energy production capacity, while also optimizing intrastate and interstate use of energy supply and delivery to maximize energy availability, reliability, and price opportunities to the benefit of all user classes and the Commonwealth's economy; (d): Subsection C 5: how the project or PPA ensures the availability of reliable energy at costs that are reasonable and in the quantities that will support the Commonwealth's economy; (e): Subsection C 6: how the project or PPA ensures reliable energy availability in the event of a disruption occurring to a portion of the Commonwealth's energy matrix to address the needs of businesses during the transition to clean energy; (f): Subsection C 7: how the project or PPA minimizes the Commonwealth's long-term exposure to volatility and increases in world energy prices by expanding the use of innovative clean energy technology within the Commonwealth; (g): Subsection C 8: how the project or PPA creates training opportunities and green career pathways for local workers and workers in historically economically disadvantaged communities in onshore and offshore wind, solar energy, electrification, energy efficiency, clean transportation, and other emerging clean energy industries; (h): Subsection C 9: how the project or PPA supports the repurposing and development of clean energy resources on previously developed project sites as defined in Code § 56-576; (i): Subsection C 10: how the project or PPA ensures that decision making is transparent and includes opportunities for full participation by the public; (j): Subsection C 11: how the project or PPA explores approaches to maximizing and leveraging the capacity of lands and waters in the Commonwealth to store energy; and (k): Subsection C 12: how the project or PPA increases the Commonwealth's reliance on and production of sustainably produced biofuels made from traditional agricultural crops and other feedstocks, such as winter cover crops, warm season grasses, fast-growing trees, algae, or other suitable feedstocks grown in the commonwealth that will (i) create jobs and income, (ii): produce clean-burning fuels that will

help to improve air quality, and (iii): provide the new markets for Virginia's silvicultural and agricultural products needed to preserve farm employment, conserve farmland and forestland, and increase implementation of silvicultural and agricultural best management practices to protect water quality.

Response Staff 1-38:

(a) As the Company transitions to clean energy sources, it is the hope that locating non-polluting, green energy sources, such as solar and storage projects, in EJ communities will support the creation of direct and indirect employment opportunities in the local economy. (b) Resources are selected on the bases of achieving the requirements in the VCEA, consistent with the Clean Energy Policy, while minimizing costs for customers. (c) Resources will either be located in Virginia or out-of-state but within PJM footprint based on the economics of the project. The location of projects will depend on the availability of projects and their relative economics. (d) See the response to part (b.) (e) Any additional generation projects within an energy portfolio serve to increase the reliability of the generation supply in aggregate. In addition, energy storage devices directly address reliability issues. (f) Renewable resources do not use fuels that trade on international markets and thus are immune from market-based supply disruptions and price volatility. (g) See the response to part (a.). (h) The proposed Wythe battery storage project is located on previously developed land. The proposed Collier solar project is not located on a previously developed project site. (i) The Company has and adheres to its ESJ Policy which requires opportunities for public input. (j) The Company has not proposed any pumped storage facilities in this case. (k) The Company has not proposed any facilities that burn biofuels.

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The foregoing response is made by John A. Stevens, Regulatory Consultant Staff, and Hallie L. Long, Regulatory Consultant Sr, on behalf of Appalachian Power Company.

**COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION  
APPLICATION OF  
APPALACHIAN POWER COMPANY  
SCC CASE NO. PUR-2025-00049  
Interrogatories and Requests for the Production  
of Documents by the STAFF OF THE STATE CORPORATION COMMISSION  
Staff Set 5  
To Appalachian Power Company**

Interrogatory Staff 5-147:

Please refer to the direct testimony of Company witness John Stevens, Schedule 5, Sheet No. NBP-6D. Please identify the average usage in kWh for each customer class taking service under the NBP Rider O.A.D. VCEA – NBC (Open Access Distribution – VCEA Costs Net of Benefits).

Response Staff 5-147:

See the average monthly kWh usage, by class, based on calendar year 2024.

OAD SGS Secondary (Tariff Code 830):	1,206 kWh
OAD SGS Primary (Tariff Code 831):	1,570 kWh
OAD MGS Secondary (Tariff Code 840);	9,843 kWh
OAD LPS Primary (Tariff Code 861):	820,461 kWh
OAD GS Secondary (Tariff Code 870):	16,527 kWh
OAD GS Primary (Tariff Code 871):	310,513 kWh

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The foregoing response is made by John A. Stevens, Regulatory Consultant Staff, on behalf of Appalachian Power Company.

ATTACHMENT TSK-2

RIDER NBC RATES

STAFF WORKPAPER



**Rider NBC Rates**

	<b>Current NBC</b>	<b>Proposed NBC</b>	<b>Impact</b>	<b>Percent Change</b>
<b>Bill Impact</b>	\$ (0.00067)	\$ (0.00051)	\$ 0.00016	-23.88%
SGS (Secondary) 1,206 kWh	\$ (0.81)	\$ (0.62)	\$ 0.19296	-23.88%
GS (Secondary) 16,527 kWh	\$ (11.07)	\$ (8.43)	\$ 2.64432	-23.88%

ATTACHMENT TSK-3

STAFF EJ SCREENING

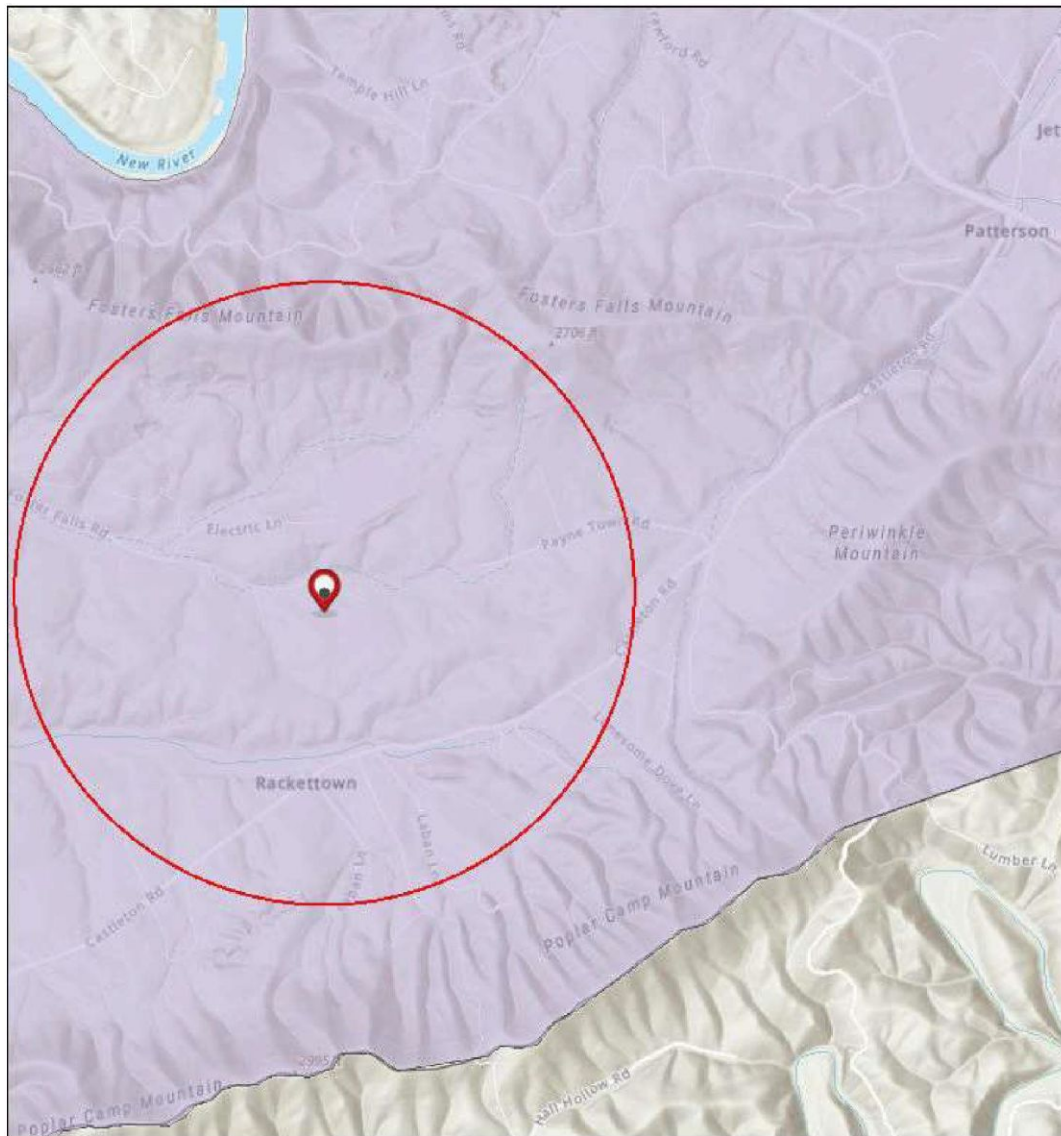


## Staff Screening of Wythe BESS

### Area of Interest (AOI) Information

Area : 87,513,003.29 ft<sup>2</sup>

Jun 23 2025 14:35:34 Eastern Daylight Time



Low Income Communities: 30% or More of Population Under HUD 80% AMI and Under Two Times Federal Poverty Level (2011-2018 ACS)  
Legend:  
- 0.467 - 0.61  
- Virginia County Boundaries

1:36,112  
0 0.25 0.5 1 mi  
0 0.38 0.75 1.5 km

Virginia Department of Environmental Quality, Esri, NASA, NGA, USGS, FEMA, Sources: Esri, TomTom, Garmin, FRC, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Summary

Name	Count	Area(ft²)	Length(ft)
Low Income Communities- 30% or More of Population Under HUD 80% AMI and Under Two Times Federal Poverty Level (2011-2018 ACS)	1	87,513,003.29	N/A
Communities of Color - Over Statewide Average (37.8%)	0	0	N/A

Low Income Communities- 30% or More of Population Under HUD 80% AMI and Under Two Times Federal Poverty Level (2011-2018 ACS)

#	GEO ID	Block Group Number	Total Population	% Below 2x Fed Poverty Level	% Below HUD 80% AMI	Area(ft²)
1	511970504023	Block Group 3, Census Tract 504.02, Wythe County, Virginia	1301	64.87	56.88	87,513,003.29

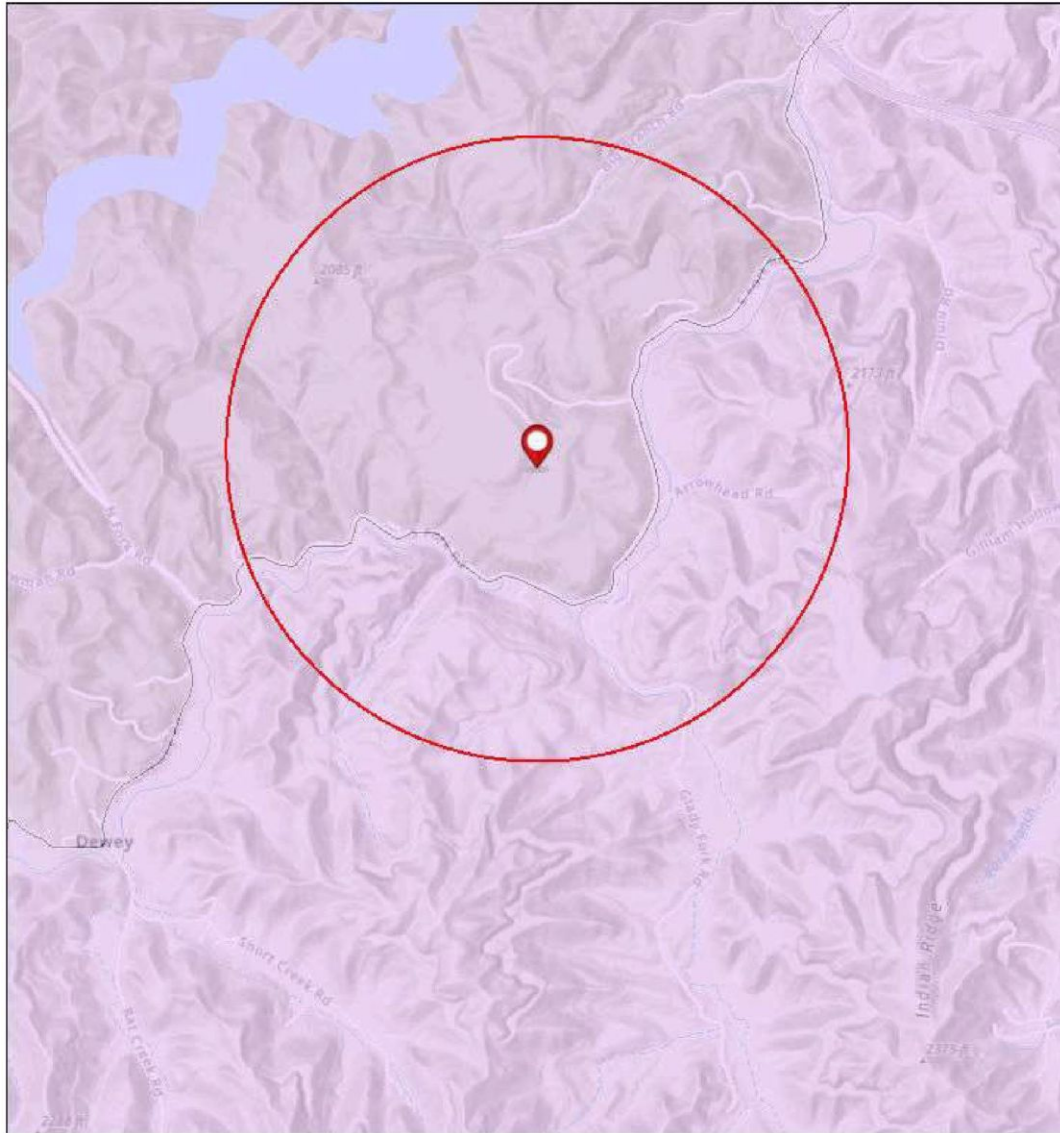


## Staff Screening of Collier Solar

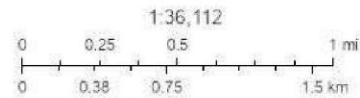
### Area of Interest (AOI) Information

Area : 87,513,003.6 ft<sup>2</sup>

Jun 23 2025 14:31:42 Eastern Daylight Time



Low Income Communities: 30% or More of Population Under HUD 80% AMI and Under Two Times Federal Poverty Level (2011-2018 ACS)  
0.3 - 0.467  
Virginia County Boundaries



Virginia Department of Environmental Quality, Esri, NASA, NGA, USGS, FEMA, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community



## Summary

Name	Count	Area(ft²)	Length(ft)
Low Income Communities- 30% or More of Population Under HUD 80% AMI and Under Two Times Federal Poverty Level (2011-2018 ACS)	2	87,513,004.07	N/A
Communities of Color - Over Statewide Average (37.8%)	0	0	N/A

## Low Income Communities- 30% or More of Population Under HUD 80% AMI and Under Two Times Federal Poverty Level (2011-2018 ACS)

#	GEO ID	Block Group Number	Total Population	% Below 2x Fed Poverty Level	% Below HUD 80% AMI	Area(ft²)
1	511959308001	Block Group 1, Census Tract 9308, Wise County, Virginia	1230	53.01	42.42	38,401,692.14
2	511959308002	Block Group 2, Census Tract 9308, Wise County, Virginia	864	43.38	46.24	49,111,311.92