COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

AT RICHMOND, JANUARY 17, 2008

APPLICATION OF

VIRGINIA ELECTRIC AND POWER COMPANY CASE NO. PUE-2007-00089

For expedited approval of conservation, energy efficiency, education, demand response and load management Pilots

FINAL ORDER

On September 18, 2007, Virginia Electric and Power Company ("DVP" or "Company") filed an application for State Corporation Commission ("Commission") approval to implement nine new pilot projects ("Pilots") in its Virginia service territory.[1] The Pilots include five conservation and energy efficiency Pilots: (i) Standard Residential In-Home Energy Audits ("Residential Audit"), (ii) ENERGY STAR® Qualified Homes Energy Audits ("Energy Star"), (iii) Energy Efficiency Welcome Kits ("Welcome Kit"), (iv) PowerCost Monitor pilot ("PCM"), and (v) Small Commercial On-Site Energy Audits ("Commercial Audit"); and four demand response/load management Pilots: (i) Direct Load Control — Outdoor Air-Conditioning Control Device ("DLC"), (ii) Programmable Thermostats — Indoor Air-Conditioning Control Device ("PT"), (iii) Programmable Thermostats with Advanced Metering Infrastructure ("AMI") and Critical Peak Pricing ("CPP") (collectively "AMI/CPP"), and (iv) Distributed Generation/Load Curtailment Pilot ("DG/LC"). Seven of the Pilots are proposed to run through December 2008. The Programmable Thermostats with AMI and CPP Pilot would run through May 2009, and the Distributed Generation/Load Curtailment Pilots are proposed to run through December 31, 2014.

[1] On October 23, 2007, DVP filed revised pages 1 through 4 to replace original pages 1 through 5 of Attachment 8 to the application. These revisions are accepted in substitution of the designated portions of the application.

The application is filed pursuant to §§ 56-234 and 56-235.2 of the Code of Virginia, which allow the Commission to approve special or experimental rates where they are in the public interest. DVP contends that the Pilots are in the public interest, noting in its application that during the 2007 legislative session, the Virginia General Assembly passed Senate Bill 1416/House Bill 3068 (chapters 933/888 of the Acts of Assembly, or the "Legislation") to address energy conservation. Enacting clause 3 of the Legislation states, "That it is in the public interest, and is consistent with the energy policy goals in § 67-102 of the Code of Virginia, to promote cost-effective conservation of energy through fair and effective demand side management, conservation, energy efficiency, and load management programs, including consumer education." These programs may be conducted by utilities or public or private organizations. The Legislation also sets a goal for the Commonwealth to reduce, by 2022, electric energy consumption by retail customers by ten percent.[2]

Each of the Pilots is intended by DVP to collect and share with the Commission, data about conservation, energy efficiency, demand response, and load management options, including customer enthusiasm for and acceptance of such options. The Pilots are intended to encourage customer interest in energy-saving measures and to help customers better understand their own energy consumption patterns. DVP also intends these Pilots to test the effectiveness of and efficiencies to be gained by using the management capabilities of DVP-selected contractors.

The Company represents that some of the Pilots may fall within the scope of the Commission's Promotional Allowance Rules (20 VAC 5-303-10 through -60) and the Commission's Rules Governing Cost/Benefit Measures Required for Demand-Side Management Programs (20 VAC 5-304-10 through -40). To the extent that these rules require prior

[2] The Commission opened Case No. PUE-2007-00049 to develop a report to the Legislature which was delivered on December 14, 2007, indicating that reaching such a goal was possible.

Commission approval or waiver for aspects of any of the Pilots, including advertising associated with the Pilots, DVP requests such approval be granted herein.

The application notes that on August 30, 2007, the Company also notified the Commission's Division of Economics and Finance of its participation in a compact fluorescent light ("CFL") bulb price reduction program, which is part of a combined effort among public utilities and governmental agencies, such as the Commonwealth's Department of Mines, Minerals, and Energy, to inform the public of the importance of energy efficiency and conservation efforts. Through this program, DVP works with manufacturers and retail outlets to provide customers with CFL at discounted rates. During 2007, the Company reported buying down the cost of approximately 150,000 CFL packages at a cost to DVP of $1.50 per single bulb or $3.00 per multipack. DVP anticipates continuation of this program through 2008 and 2009, expanding it to include the buy-down of approximately 625,000 CFL annually. In addition to approval of the Pilots, the Company also requests all approvals necessary to continue participation in this CFL price reduction program through 2009.

On October 10, 2007, the Commission issued an Order Prescribing Notice and Inviting Comments and Requests for Hearing ("October 10, 2007 Order") which also directed the Commission Staff ("Staff") to review the application and file a report with its findings.[3]

Pursuant to the October 10, 2007 Order, nine parties and/or interested persons filed comments, including one provisional request for a hearing: Northern Virginia Regional Commission ("NVRC"), Piedmont Environmental Council ("Piedmont"), Commonwealth Sustainability Works, Barbara Kessinger, Barbara Von Elm, EnerNOC, Ocean Air Enterprises,

[3] On November 16, 2007, DVP filed proof of notice and service as required by Ordering Paragraphs (3) and (4) of the October 10, 2007 Order.

Division of Consumer Counsel of the Office of the Attorney General ("Consumer Counsel"), and the Virginia Chapter of the Sierra Club ("Sierra Club").

On December 5, 2007, the Staff of the Commission ("Staff") filed a Staff Report. On December 12, 2007, PEC filed further comments addressing the Staff Report. On December 20, 2007, DVP filed its response to the Staff Report and comments by other participants. We now review the record thus made, beginning with the Staff's description of the purposes of the nine Pilots.

Staff described the purpose of DVP's conservation and energy efficiency Pilots (including Residential Audit, Energy Star, Welcome Kit, Commercial Audit, PCM, and Compact Fluorescent Lights) as helping to evaluate the most effective way to assist customers in learning to use energy more efficiently and better understand their energy consumption patterns. The conservation and energy efficiency Pilots are directed toward reductions in energy consumption over all hours rather than during the peak period only. This group of Pilots will be developed, implemented, and administered through a contractor acting on behalf of DVP, and the contractor will randomly select residential and small commercial customers to target for participation.

Staff described the purpose of DVP's demand response/load management Pilots (including DLC, PT, AMI/CPP, and DG/LC) as designed to evaluate effective reductions of load during peak periods when energy demand is greatest. Participants receive some type of equipment without charge to bring the customer to awareness of what peak load is and the differential in the cost of purchasing energy during such peaks versus the cost during the other hours. Such awareness, it is hoped, will result in a customer's decision to reduce usage during high cost periods and experience lower energy costs. This group of Pilots will be developed, implemented, and administered through a contractor acting on behalf of DVP. The contractor will randomly select residential customers living in single family residences with electric central air-conditioning and will also be responsible for all communications and equipment installations. The DG/LC Pilot will be open to large non-residential customers randomly selected by the contractor.

Staff described two additional elements of DVP's Pilot proposal, measurement and verification ("M&V"), and reporting requirements. The M&V process defines the elements of each pilot to be tested, ensures that necessary energy measures or devices are properly installed, and accurately determines the actual results achieved from implementation of each pilot. The basic determination will be the savings, if any, measured by the level of energy used before and after initiation of the pilot. Other elements of the M&V process will include variables such as customer response to audits and welcome kits, hours that demand response and DG/LC curtailment was initiated, and amount of corresponding load curtailed, customer satisfaction, and pilot costs. Staff reports that DVP expects to contract with an external party, independent of the contractor, to provide an audit verifying that the variables measured in each pilot are accurately measured and reported. This information will then be reported to the Commission on a semi-annual basis on July 1, 2008 and January 1, 2009, with final evaluation of the Pilots by July 1, 2009. The DG/LC Pilot will continue such semi-annual reports through the end of the program.

In its comments, NVRC expressed concern that DVP's pilot proposals are too modest and include testing demand side management ("DSM") applications that have already been proven effective in Virginia. NVRC concludes that DVP's pilot proposals are inadequate for reaching the Commonwealth's goal of reducing energy demand 10% by 2022.

Piedmont's comments criticize DVP's Pilots as not going nearly far enough, characterizing them as too modest and inadequate. Piedmont suggests that "in light of [DVP's] asserted concerns about reliability and the risk to the national security, [DVP] should be much more aggressive in developing demand side management and energy efficiency programs." Piedmont believes that there is already sufficient information to implement DSM programs, such that "there is no need to run a discrete pilot to test many of the proven DSM programs." Piedmont urges more aggressive development of DSM and energy efficiency programs particularly as anticipated power shortages in Northern Virginia are being addressed with DVP's high voltage transmission line which Piedmont opposes in Case No. PUE-2007-00031.[4] Piedmont criticizes the absence of any commercial and industrial energy efficiency programs in the DVP Pilots which give large customers only the option to participate in the DG/LC program.

Piedmont further criticizes DVP's residential critical peak pricing ("CPP") pilot for using a 12 hour peak period in the summer (i.e. 10 a.m. to 10 p.m.) instead of a shorter on-peak period that Piedmont believes would make it less difficult for residential customers to manage their energy use. Piedmont believes that there are many proven successful energy efficiency programs ignored in the DVP Pilot. Piedmont believes the design of the CPP should be updated to provide customers better opportunities to benefit by shifting energy use from high cost to low cost periods every day of the year. Piedmont concludes that DVP should be expending its efforts to bring state-of-the-art demand side management and energy efficiency programs online now and not studying what others have established already works.

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[4] Piedmont asserts in its Comments filed December 12, 2007, that Northern Virginia's need for power is directly correlated to the scope and effectiveness of DSM in Virginia, and requests the Commission to direct DVP to implement different or additional DSM proposals in this case or in PUE-2007-00031. Piedmont further requests in its responsive comments that the Commission make "implementation of the [DVP] Proposal subject to revision based on information generated by the programs and Commission Case No. PUE-2007-00031, et al., in which

Finally, Piedmont requests the Commission to grant a hearing if the Commission does not believe that the record provides sufficient basis for it to direct DVP to implement such programs as Piedmont requests in its comments.

The comments of the Commonwealth Sustainability Works, offered by Mr. Andrew Grigsby, refer to many utility conservation programs found by the commenter on a Google search of the Internet, which have been initiated by state utility boards, public utilities, universities, municipalities, and the federal government. Mr. Grigsby states that such conservation programs as have already been established obviate the need for DVP to enter any pilot phase for the introduction of its conservation programs. Commonwealth Sustainability Works also notes that there are numerous and effective energy saving strategies that do not require any customer behavior changes, including sealing duct boots, closing and conditioning crawlspaces, weatherization, and adding attic insulation. In the opinion of Mr. Grigsby, an electric utility would have the advantage in selling such home energy efficiency improvement programs. The commenter concludes by calling for the immediate full-scale implementation of electricity conservation strategies, including each of the nine Pilots proposed by DVP.

The comments of Barbara Kessinger are generally supportive of DVP's pilot proposals except that she recommends that DVP should expand its introduction of energy audit kits to offer them to a much larger percentage of its customer base. Ms. Kessinger notes that her utility, NOVEC, provides energy audits for all of its residential customers requesting them.
Ms. Kessinger does object to DVP's proposed residential direct load control pilot (DLC), which she characterizes as unnecessary for introduction of this load management program to its customers. Ms. Kessinger cites the ready acceptance of NOVEC's residential load management

[DVP] and Trans-Allegheny Interstate Line Company ("TrAILCo") seek Approval and Certification of a Meadowbrook-Loudon 500 kV Transmission Line Project." DVP, in its response, opposes any linkage of the cases.

program, including the current experience within the Dominion Valley community in Northern Virginia, as evidence of customer enthusiasm for and acceptance of residential load management. In lieu of a pilot, Ms. Kessinger recommends that DVP take steps to make a direct load control program available to all of its residential customers as soon as possible.

The comments of Barbara Von Elm applaud DVP for its Pilot programs. She encourages the Company to do everything it can to cut back on power usage and expressed a desire to participate.

EnerNOC's comments focus on the proposed six-year 100 MW demand response pilot program (Distributed Generation/Load Curtailment Pilots) for commercial and industrial customers. EnerNOC commends certain aspects of this pilot, but questions the adequacy of the financial incentives proposed to attract customer participation. EnerNOC recommends that either the financial incentives be increased or the number of program hours of demand response availability be reduced. Finally, EnerNOC further recommends with regard to the Distributed Generation/Load Curtailment Pilots that the program hours and program payments should be made competitive with the existing PJM program, that "pure curtailment" demand response be encouraged and that the number of customer sites using on-site generation should be increased.[5]

The comments of Ocean Air Enterprises assert that DVP has already amassed considerable usage data from its customers on DVP's Time-of-Use, demand based schedules, and faults DVP's omission of any analysis of this data in the pilot proposals. The commenter also notes that DVP's Schedule 1 S customers have load profile meters installed, which should provide DVP with usage data that DVP ought to evaluate in their pilot proposal. Finally, the

[5] DVP proposes in its application 10-50 customer sites for on-site generation.

commenter questions DVP's design of peak pricing, and criticizes DVP for employing excessive hours of peak pricing.

The Consumer Counsel's comments recognizes the modest reach of DVP's pilot programs relative to the Company's customer base while generally supporting the implementation of all the proposed pilot programs.[6] The Consumer Counsel draws attention to the Virginia Energy Plan's call for Virginia to "initiate an aggressive set of actions to expand use of energy efficiency, conservation, and demand management to affect electric demand and use."[7] Finally, the Consumer Counsel takes no position on DVP's postponed recovery of the estimated $10 million in program costs for 2008.[8]

The Sierra Club's comments, submitted by Mr. Richard Ball, urge that there is sufficient experience with energy savings policies and measures proven successful in other states to warrant DVP moving ahead immediately on a broader basis to implement these programs. The Sierra Club questions the fairness of DVP's proposed Pilot programs as a test of program effectiveness (i.e. customer acceptance), based upon what it perceives to be a poor program design and lack of aggressive implementation. The commenter states the fairness of such Pilot programs to test the effectiveness of energy conservation measures in Virginia would be enhanced if they were designed and operated fairly and transparently with sufficient outside input and overview. The Sierra Club suggests that an advisory committee be appointed with members drawn from the outside, who have the necessary expertise to advise and observe all

[6] The proposed programs will be available to DVP's residential and commercial customers in the Northern, Central, and Eastern regions of DVP's territory as noted by Consumer Counsel from the application.

[7] The Virginia Energy Plan (September 12, 2007) at 9.

[8] Virginia Code §§ 56-585.1 A.5.b and A.7 specifically address the ability of utilities to recover the costs of demand-side management, conservation, energy efficiency, and load management programs, including the timing of the request and when such costs may be deferred.

stages of the pilot programs' design, implementation, and evaluation. The Sierra Club calls for the Commission to designate and hire outside consultants for this purpose, also. The Sierra Club offers criticisms on the specific pilot programs and generally concludes that DVP should be asked to go back to the drawing board and design a better program.

The Staff observed of the commenters generally that they were most concerned with DVP's unnecessary use of the Pilot program for implementation of proven energy conservation measures and, secondly, they were very concerned with the modest customer participation levels proposed for the Pilots. The Staff does not disagree with either of these concerns. Staff concluded that while the small scale of the Pilots (prior to DVP's commitment to greater expenditures) might appear to be insufficient, nevertheless Staff believes the pilot proposals to be prudent.

Regarding DVP's use of a pilot phase, Staff notes that although studies have been performed and many programs now exist elsewhere that substantiate energy savings can be realized, Staff is not convinced that all such programs will have similar results for Virginia or be cost-effective as required by Virginia's legislature. The Staff does believe the Commonwealth should now embark on finding cost-effective alternatives to reduce energy demand and the harmful detriments to our environment and it appears to Staff that DVP's Pilots are timely and on-point for this purpose. Staff also considered the critical timeline to deploy these Pilots in order to collect information during the peak periods of 2008 in weighing whether to support implementation of the Pilots without hearing. Staff concluded that implementation of the Pilots should not be delayed. Therefore, the Staff believes that the Pilots are in the public interest and recommends that the Commission approve these Pilots without hearing.

The Staff agreed with the following suggestions from commenters above and urged DVP to consider these suggestions to enhance the success and effectiveness of particular Pilots:

- Audit and Welcome Kits will likely provide little customer benefit without a more assertive follow-up program to ensure action to remedy audit findings.
- Providing information to better educate the customer so that he understands the alignment between energy use and associated costs is essential to the future balance of energy demand and supply and associated effect on customer bills.
- Consider using a shorter on-peak period (i.e. less than 12 hours) for the AMI/CPP Pilot to assist customers in shifting usage patterns.[9]
- The DG/LC Pilot should better balance the number of hours to curtail load and the associated payments; using PJM's RPM capacity price as a proxy payment for this Pilot, the number of hours in which curtailment may occur are excessive.

With respect to the Company's request to waive application of the Commission's Promotional Allowance Rules, (20 VAC 5-303-10 through -60) and the Rules Governing Cost/Benefit Measures Required for Demand-Side Management Programs (20 VAC 5-304-10 through -40), the Staff recommended both requested waivers be granted to move forward with the proposed Pilots.

The Staff reported sales in DVP's discount CFL bulb program have exceeded the Company's goal and that DVP has asked approval to continue and expand the program through 2009. The Staff does not object to the continuation of the program, while reserving judgment on its cost effectiveness. Staff notes that it remains unknown how the CFL bulbs have been deployed by customers or how the program costs will be recovered by DVP. Staff also notes that to the extent that electrical resources are saved by the program, the financial values of such resources have not been quantified.

Concerning the reporting requirements for the Pilots, Staff has had continued discussions with DVP and supports the Company's proposal to issue formal reports on a semi-annual basis but also believes more frequent updates are needed in light of the short duration of the Pilots. The Staff reports that an agreement has been reached with the Company whereby it will be given status reports as requested. Staff is satisfied that with its ongoing monitoring of the Pilots and the Company's hiring of an external auditor, adequate and unbiased review of the Pilots' effectiveness will be given.

DVP's responsive comments reject the several calls for expansion of the Pilots, arguing that although energy efficiency and demand-side management efforts have been successful outside Virginia, success there does not automatically mean those same programs will be effective in DVP's Virginia service territory. DVP avers that its customers receiving service under rate caps have not had the economic incentives to try demand-side management and energy efficiency programs that have been offered elsewhere and therefore their responsiveness to such programs is unknown. The Company also believes that with significant developments in new technologies, the Company ought to be given the opportunity to test customer responses to varying levels of incentives, as well as the Company's ability to monitor, control, and receive larger quantities of data before undertaking large scale programs.

The Company addressed specific concerns raised in the comments with its Pilots but rejected making changes.[10]

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[9] Staff recognizes that DVP's existing tariffs may not be adequate to this type of program and will need revision in order to advance this Pilot on a broader scale.

[10] The Company did agree with Staff to submit reporting on a quarterly, rather than semi-annual basis.

With respect to the CPP/AMI Pilots, the Company maintained that the excessive rating periods complained of in comments actually relate to only 125 hours a year, leaving 8,635 hours (98.6% of the time) subject to lower rates than the Company's current Residential Schedule 1. With respect to criticism that the rating periods are too long, the Company maintains that rarely will critical peak periods last more than 5 hours (and 10 hours on a very rare occasion) with an annual limitation of 125 hours (1.4% of the time).

The Company addressed concerns over the terms offered in the distributed generator pilot programs (DG/LC), explaining that the compensation provided is designed to include a reimbursement to customers for their fuel and variable operation and maintenance expenses which should allow the customer to be economically indifferent as to how the on-site generator is used.

The Company also disagreed with EnerNOC's comment that use of the PJM Reliability Pricing Model ("RPM") to determine a basis for the capacity component incentive payment may not be a sufficient proxy for the capacity component of the Pilot given that the Pilot requires a higher number of program hours to be curtailed than the PJM Demand Response Program. The Company explains that the purpose for using RPM clearing prices is to recognize the value of the capacity as load is reduced on the Company's system through the dispatch and operation of the generator. This value, the Company maintains, is best determined through an assessment of the market value of obtaining additional capacity resources in order to meet the Company's capacity obligation to PJM. The value is contingent on the Company's system load being reduced during those specific hours that will be used to determine capacity obligations for future years. The Company believes that absent problems with the distributed generators, the value of those generators for relieving future capacity obligations can be approximated by the RPM clearing price for the PJM Delivery Year. Finally, with regard to the alleged inconsistency between a significant number of hours being curtailed with insufficient payments, making the PJM Emergency Load Response program more attractive to end-use customers, DVP maintains that its Pilot provides a value that may not be readily available in the PJM programs. The DVP Pilot is intended to reduce the cost of back-up generation in order to make such generation available to customers with critical power supply needs but that are financially unable to install such back-up generators otherwise.

Concerning Piedmont's criticism of the absence of any commercial and industrial energy efficiency programs in DVP's Pilots, the Company stated that it already maintains a staff of Key Account Managers to work with its largest commercial and industrial customers. Many of these Key Account Managers are Certified Energy Managers who assist large commercial and industrial customers in designing and implementing energy efficiency/energy conservation and demand response measures.[11]

DVP responded to EnerNOC's suggestion to offer pure curtailment to its C&I customers that it provides such pure curtailment opportunities, such as through a pure curtailment tariff, Schedule CS, to large C&I customers (with loads above 500 kW). The Company also offers a form of critical peak pricing, Schedule 10, to its large C&I customers also.[12]

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[11] The Company reports that "a number of C&I customers have also expressed to Company representatives that they are less interested in funding large scale energy efficiency/energy conservation programs that could benefit competing businesses and are more interested in implementing their own internal energy efficiency/energy conservation programs using individualized support from the Company representatives." Therefore, the Company concluded that Pilots focused sharply on energy efficiency/energy conservation and demand response in the C&I sector would not likely yield significant information beyond what the Company knows today.

[12] DVP explains that Schedule 10 provides a strong incentive during high cost/high load days to encourage load reductions. These load reductions may be achieved through curtailment based on short term reductions in electrical usage or curtailment facilitated through the use of existing on-site generation.

NOW THE COMMISSION, upon consideration of the foregoing, is of the opinion and finds that the Company's nine new Pilots are necessary in order to acquire information which is or may be in furtherance of the public interest, specifically how the Commonwealth's goal of reducing energy demand by 10% by 2022 may be reached. The Commission further finds that the public interest is served by approving the application without hearing so that implementation of the Pilots and collection of the data for 2008 will not be delayed. The Commission finds that Piedmont's provisional request for a hearing should be denied for the reason that the request for hearing did not detail reasons why such issues cannot be adequately addressed in written comments, as required by the Commission's October 10, 2007 Order (Ordering Paragraph (8)). The Commission further finds that there should be no linkage between the proceedings in this instant case and Case No. PUE-2007-00031, as suggested by Piedmont in its comments.

The Commission further finds that DVP's request to continue its CFL bulb program for 2008, as reported by Staff, should be approved. As the Company defers seeking recovery of the costs of its Pilots and CFL bulb program and the Consumer Counsel and Staff take no position on such recovery of costs at this time, the Commission does not at this time address such cost recovery.

Finally, the Commission finds that the Company should be prepared to quickly expand any elements of these Pilots proven to be cost effective. The Commission shares the expectation of Staff that the Company must quickly follow up its Pilots with aggressive action to expand use of energy efficiency, conservation, and demand management programs as called for in the Virginia Energy Plan.

Accordingly, IT IS ORDERED THAT:

(1) The application to implement the Pilots is hereby approved for the periods proposed.

(2) The requests by Piedmont for a hearing and to link this case with Case No. PUE-2007-00031 are hereby denied, consistent with the findings above.

(3) The Company shall file quarterly reports with the Clerk of the Commission commencing July 1, 2008, and shall provide updates to Staff upon request. Additionally, a final detailed and comprehensive report, including specific plans to expand or alter each Pilot program, shall be filed within 90 days following the end of each respective Pilot program.

(4) The Company shall submit to the Division of Energy Regulation for approval, applicable tariffs or tariff changes necessary to implement any Pilot program.

(5) The Company shall obtain further Commission approval before changing any of the Pilots.

(6) The Commission makes no order regarding any recovery of costs incurred by the Company for the Pilots, consistent with the findings above.

(7) This case shall remain open to receive the reports required by this Order.

AN ATTESTED COPY hereof shall be sent by the Clerk of the Commission to: Karen L. Bell, Esquire, and M. Renae Carter, Esquire, Dominion Resources, Inc., 120 Tredegar Street, P.O. Box 26532, Richmond, Virginia 32361-6532; C. Meade Browder, Jr., Senior Assistant Attorney General, and Kiva Bland Pierce, Assistant Attorney General, Division of Consumer Counsel, Office of Attorney General, 900 East Main Street, 2nd Floor, Richmond, Virginia 23219; Barbara Kessinger, 15033 Walking Stick Way, Haymarket, Virginia 20169; Gerald E. Connolly, 3060 Williams Drive, Suite 510, Fairfax, Virginia 22031; Richard Ball, 4022 Downing Street, Annandale, Virginia, 22003-2014, William D. Kee, 109B 84th Street, Virginia Beach, Virginia 23451; Barbara Von Elm, 3429 Fenny Hill Road, Delaplane, Virginia 20144; Brett Perlman, Vice President, Regulatory Affairs, EnerNOC, Inc., 1010 Lamar Street, Suite 1040, Houston, Texas 77002; John W. Montgomery, Esquire, Montgomery & Simpson LLP, 2116 Dabney Road, Suite A-1, Richmond, Virginia 23230; Bernard L. McNamee, Esquire, McGuireWoods, LLP, One James Center, 901 East Cary Street, Richmond, Virginia 23218-4030, James C. Dimitri, Esquire, McGuireWoods LLP, One James Center, 901 East Cary Street, Richmond, Virginia 23219-4030, and the Commission's Office of General Counsel, and Divisions of Energy Regulation, Public Utilities Accounting, and Economics and Finance.

A True Copy
Teste: Joel H. Peck
Clerk of the
State Corporation Commission