



COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

== COMMISSIONERS ==

KELSEY A. BAGOT • JEHMAL T. HUDSON • SAMUEL T. TOWELL

October 1, 2026

The Honorable Abigail D. Spanberger
Governor, Commonwealth of Virginia

The Honorable R. Creigh Deeds
Chair, Senate Committee on Commerce and Labor

The Honorable Jeion A. Ward
Chair, House Committee on Labor and Commerce

The Honorable David L. Bulova
Secretary of Natural and Historic Resources

The Honorable Carrie H. Chenery
Secretary of Commerce and Trade

Members of the Virginia General Assembly

Ladies and Gentlemen:

Please find enclosed the State Corporation Commission's Annual Report on Energy Efficiency Programs and the Annual Report on the Feasibility of Achieving Energy Efficiency Goals pursuant to Chapters 1193 and 1194 of the 2020 Virginia Acts of Assembly.

Please let us know if we may be of further assistance.

Respectfully submitted,

Kelsey A. Bagot
Chair

Jehmal T. Hudson
Commissioner

Samuel T. Towell
Commissioner

Enclosure

COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

Reports to the Governor of the Commonwealth of Virginia,
the Chair of the Senate Committee on Commerce and Labor,
the Chair of the House Committee on Labor and Commerce,
the Secretary of Natural and Historic Resources, and
the Secretary of Commerce and Trade



COMBINED REPORTS

INCLUDING:

Annual Report on Energy Efficiency Programs
Pursuant to Chapters 1193 and 1194 of the 2020 Virginia Acts of Assembly

Annual Report on the Feasibility of Achieving Energy Efficiency Goals
Pursuant to Chapters 1193 and 1194 of the 2020 Virginia Acts of Assembly

October 1, 2026

Table of Contents

EXECUTIVE SUMMARY.....	i
INTRODUCTION.....	1
Statutory Background.....	1
ENERGY EFFICIENCY PROGRAMS.....	2
VCEA EE Programs.....	4
Previous DSM Activities.....	11
FEASIBILITY OF ENERGY EFFICIENCY GOALS.....	16
Dominion.....	18
APCo.....	20
OTHER DSM RELATED UPDATES.....	24
Virginia Jurisdictional Specific Test.....	24
Senate Bill 43.....	26
House Bill 1062.....	26
House Bill 2.....	27
Energy Efficiency Potential Study.....	29
Virtual Power Plants.....	30
CLOSING.....	31
Appendix 1: 2025 DEV EM&V	
Appendix 2: 2025 APCo EM&V	
Appendix 3: Glossary of Terms	

EXECUTIVE SUMMARY

This document contains the combined reports (“Report”) of the Virginia State Corporation Commission (“Commission”) pursuant to Chapter 1193 of the 2020 Virginia Acts of Assembly.¹

The key highlights of this Report are as follows:

- In its sixth Demand-Side Management (“DSM”) application pursuant to the VCEA, Dominion filed for seven new demand response programs, and two new energy efficiency programs. All Company proposals were approved by the Commission. In its application, Dominion also presented its progress towards achieving the energy efficiency savings goals of the VCEA and the required proposed investment levels of the Grid Transformation and Security Act (“GTSA”).²
- In its fourth EE-RAC petition pursuant to the VCEA, APCo filed for six new energy efficiency programs, extension of five energy efficiency and demand response programs, enhancements to an energy efficiency program, increased funding for its low-income weatherization programs, and two new marketing services. This case is still pending before the Commission.³
- In Dominion’s 2025 DSM proceeding, the Commission evaluated Dominion’s performance in meeting the 2024 energy savings target pursuant to Code § 56-596.2. Dominion had total combined net savings of 1,275,955 megawatt-hour (“MWh”) in 2024, which represents 1.9% of 2019 total annual sales⁴ and is less than Dominion’s 2024 total annual savings target of 3.75%, or 2,558,675 MWh.

¹ Virginia Clean Economy Act (“VCEA”), 2020 Va. Acts chs. 1193, 1194. The VCEA explicitly references Phase I and Phase II utilities. For purposes of this report, the Commission will focus on Appalachian Power Company (“APCo”) as a Phase I utility and Dominion Energy Virginia (“DEV” or “Dominion”) as a Phase II utility. The Commission further notes that in 2023, Kentucky Utilities d/b/a Old Dominion Power Company (“KU/ODP”) filed a comprehensive Demand-Side Management (“DSM”) plan targeting at least a 0.02% decrease in total jurisdictional sales. The Commission, having not reached a majority decision in the matter, did not issue an order approving or rejecting KU/ODP’s application. *Application of Kentucky Utilities Company d/b/a Old Dominion Power Company for Implementation of a Demand-Side Management Program and Cost-Recovery Adjustment Clause*, Case No. PUR-2023-00096, 2024 S.C.C. Ann. Rept. 173, Order Closing Case (March 12, 2024).

² *Application of Virginia Electric and Power Company For approval of its 2025 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia*, Case No. PUR-2025-00210, Doc. Con. Cen No. 25120040, Final Order (Aug 3, 2026) (“Dominion 2025 DSM Final Order”).

³ *Petition of Appalachian Power Company, For approval to continue a rate adjustment clause, the EE-RAC, and for approval of new energy efficiency programs pursuant to §§ 56-585.1 A 5 c and 56-596.2 of the Code of Virginia*, Case No. PUR-2026-00031, Doc. Con. Cen. No. 260340028, Petition (Mar. 3, 2026) (“2026 EE-RAC Petition”).

⁴ Dominion’s 2019 Retail Sales were approximately 68,231,332 MWh.

- APCo had a total combined net savings of 375,658 MWh in 2025, which represents 2.6% of 2019 total annual sales,⁵ and is more than APCo’s 2025 total annual energy savings target of 2.0%, or 289,041 MWh.
- Calendar year 2025 was the fourth year in which the VCEA’s energy efficiency targets were in effect pursuant to Code § 56-596.2. The Commission received data related to Dominion’s pursuit of such targets in Dominion’s DSM application, as noted above, and in both Dominion and APCo’s evaluation, measurement, and verification (“EM&V”) reports.⁶
- The Commission has approved new energy efficiency targets for both Dominion and APCo for calendar years 2026-2029 as part of Case Nos. PUR-2023-00227 and PUR-2024-00134. Dominion’s targets are 3%, 4%, and 5% for 2026, 2027, and 2028 respectively, and APCo’s targets are 3%, 3.5%, and 4% for 2026, 2027, and 2028 respectively.⁷
- A number of initiatives are underway related to energy efficiency and demand response, including the introduction of a new cost benefit test model in 2029, a study of energy efficiency potential in Virginia, and the introduction of virtual power plants to the Commonwealth, among other new DSM-related legislation.

A glossary of terms is provided in Appendix 3.

⁵ APCo’s 2019 Retail Sales were approximately 14,452,000 MWh.

⁶ APCo filed its most recent EM&V Report on May 1, 2026, in Case No. PUE-2014-00039 (“APCo 2026 EM&V Report”). Dominion filed its most recent EM&V Report (“Dominion 2026 EM&V Report”) on June 15, 2026, in Case No. PUR-2023-00217. Please note that the 2026 Dominion EM&V Report contains data on the 2025 program year, and the APCo 2026 EM&V report contains data on the 2025 program year. The public version of documents filed with the Commission may be located on the Commission’s website, scc.virginia.gov/case-information, by clicking “Docket Search,” then clicking “Search by Case Information,” and entering the appropriate case number in the appropriate box.

⁷ Additionally, pursuant to Code § 56-596.2:2, the Commission established annual energy efficiency targets for programs targeting low-income, elderly, disabled, or veterans of military service for Dominion for the period 2025 through 2027. See *Commonwealth ex rel. State Corporation Commission, Ex Parte: In the matter of establishing energy efficiency savings targets for Virginia Electric and Power Company pursuant to VA Code section 56-596.2 B 3 and 56-596.2:2*, Case No. PUR-2023-00227, 2025 S.C.C. Ann. Rept. 157, Final Order (Feb. 27, 2025)

INTRODUCTION

The Commission appreciates the opportunity to provide this update on energy efficiency and DSM-related matters to the Governor and the General Assembly. The Commission has conducted the energy efficiency and DSM-related proceedings detailed below. In addition, the Commission's Staff has participated in multiple stakeholder meetings over the last year as required by recent legislation and Commission Order.⁸ Energy efficiency stakeholder meetings, required by SB 966,⁹ SB 1605,¹⁰ and HB 2293,¹¹ were held by both Dominion and APCo in the 2025 reporting period. APCo hosted four stakeholder meetings, while Dominion hosted two.¹²

Statutory Background

The statutory bases for this Commission Report on energy efficiency and DSM-related matters are the following:

- Energy Efficiency Programs: The VCEA added language to Code §56-585.1 A 5 c directing the Commission to monitor and report to the General Assembly annually on the performance of all programs approved pursuant to Code § 56-585.1 A 5 c;¹³ and,
- Feasibility of Energy Efficiency Goals: The VCEA added subsection B 3 to Code § 56-596.2. This subsection, among other things, directs that beginning October 1, 2022, and each year thereafter, the Commission shall review the feasibility of the energy efficiency program savings in Code § 56-596.2 and report to the Chairs of the House Committee on Labor and Commerce, the Senate Committee on

⁸ *Petition Of Virginia Electric and Power Company, For approval of its 2021 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia* Case No. PUR-2021-00247, 2022 S.C.C. Ann. Rept. 384, Final Order (August 10, 2022) ("2021 DSM Update Final Order").

⁹ 2018 Va. Acts ch. 296.

¹⁰ 2019 Va. Acts ch. 398.

¹¹ 2019 Va. Acts ch. 397.

¹² *The Report of the Independent Monitor on the Status of the Energy Efficiency Stakeholder Process*, Ted Knicker (Jun. 30, 2026) at iii.

¹³ Prior to 2022, the Commission previously included this annual report as part of its December 1 Combined Reports.

Commerce and Labor, the Secretary of Natural and Historic Resources, and the Secretary of Commerce and Trade on such feasibility.

ENERGY EFFICIENCY PROGRAMS

The VCEA establishes energy efficiency savings targets for Phase I and Phase II utilities through 2025¹⁴ and directs the Commission to establish new energy efficiency targets thereafter.¹⁵

The statutory targets through 2025 are as follows, expressed as a percentage of the average annual energy jurisdictional retail sales by that utility in 2019:

Year	Phase I Utility	Phase II Utility
2022	0.5%	1.25%
2023	1.0%	2.5%
2024	1.5%	3.75%
2025	2.0%	5.0%

The VCEA directs the Commission to award a margin for recovery on operating expenses for energy efficiency programs and pilot programs prior to January 1, 2022.¹⁶ After January 1,

¹⁴ Subject to certain conditions, the Commission is prohibited from approving construction of any new utility-owned generating facilities that emit carbon dioxide as a by-product of combusting fuel to generate electricity unless the utility has already met the energy savings goals prescribed above, and the Commission finds that supply-side resources are more cost-effective than demand-side or energy storage resources. Code § 56-585.1 A 5.

¹⁵ For this purpose, the Commission established Case No. PUR-2023-00227 to set Dominion’s targets and Case No. PUR-2024-00134 to set APCo’s targets, which were heard by the Commission in November of 2024 with final orders published in February of 2025. *See Commonwealth ex rel. State Corporation Commission, Ex Parte: In the matter of establishing energy efficiency savings targets for Virginia Electric and Power Company pursuant to VA Code section 56-596.2 B 3 and 56-596.2:2*, Case No. PUR-2023-00227, 2025 S.C.C. Ann. Rept. 157, Final Order (Feb. 27, 2025) (“2025 Dominion EE Savings Target Order”). *See Also Ex Parte: In the matter of establishing Energy efficiency savings targets for Appalachian Power Company Pursuant to Code § 56-596.2 B 3*, Case No. PUR-2024-00134, 2025 S.C.C. Ann. Rept. 251, Final Order (Feb. 28, 2025) (“2025 APCo EE Savings Target Order”).

¹⁶ Code § 56-585.1 A 5 c. Specifically, the Code states “[b]eginning January 1, 2022, and thereafter, if the Commission determines that the utility meets in any year the annual energy efficiency standards set forth in § 56-596.2, in the following year, the Commission shall award a margin on energy efficiency program operating expenses in that year, to be recovered through a rate adjustment clause, which margin shall be equal to the general rate of return on common equity determined as described in subdivision 2.

2022, the VCEA directs the Commission to award a margin on energy efficiency program operating expenses in the applicable year if a Phase I or Phase II utility achieves total savings equal to the energy efficiency savings targets set forth above.¹⁷ Further, energy efficiency pilot programs are declared to be in the public interest if they are of a limited scope, cost, and duration, and intended to determine whether a new or substantially revised program would be cost-effective.¹⁸

The VCEA also directs the Commission to monitor and annually report to the General Assembly on the performance of all energy efficiency programs approved pursuant to Code § 56-585.1 A 5 c, including each utility's compliance with the total annual savings required by Code § 56-596.2, as well as the annual and lifecycle net and gross¹⁹ energy and capacity savings, related emission reductions, and other quantifiable benefits of each program; total customer bill savings that the programs produce; utility spending on each program, including any associated administrative costs; and each utility's avoided costs and cost-effectiveness results.

In this regard, the Commission notes that APCo has filed four applications for approval of EE-RAC programs since the effective date of the VCEA (July 1, 2020) and Dominion has filed six DSM applications, which are discussed further below. For 2025, Dominion states that it had a total combined net MWh savings of 1,275,955 MWh, which represents 1.9% of 2019 total annual energy sales and is less than Dominion's 2025 total annual savings target of 5.00%, or 3,411,597 MWh.²⁰ For 2025, APCo states that it had a total combined net MWh savings of approximately

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ "Gross" refers to savings that are expected to occur independent of an energy efficiency program's implementation, *i.e.*, inclusive of free riders.

²⁰ Dominion 2026 EM&V Report at 1. This information has not been verified by the Commission at this time.

370,192 MWh, which represents 2.6% of 2019 total annual energy sales, and is more than APCo's 2025 total annual energy savings target of 2.0%, or 289,041 MWh.²¹

Due to the time involved for Dominion and APCo to prepare and file applications, for the Commission to conduct associated proceedings, and for each utility to implement the DSM programs and subsequently collect EM&V data, the Commission does not expect to complete verification of the 2025 reporting data outlined above until after the expected Dominion DSM proceeding in 2027 concludes. The Commission has included key metrics related to existing DSM and EE-RAC programs from each utility's most recent EM&V Report in Appendices 1 and 2.

VCEA EE Programs

DEV

In its first DSM application pursuant to the VCEA ("2020 DSM Update"), Dominion filed for, and received approval of, nine energy efficiency ("EE") programs, one demand response program (collectively referred to as Dominion's "Phase IX Programs"), and a two-year extension of an existing demand response program.²² Additionally, the Commission approved a rooftop solar program application filed pursuant to legislation approved during the 2019 General Assembly Session.²³ The approved programs and associated cost caps are discussed below.

According to analysis provided by Dominion in its 2020 DSM Update, Dominion initially did not anticipate achieving the VCEA's energy savings targets beginning in 2023.²⁴ As such, the

²¹ APCo 2026 EM&V Report Cumulative Persistent Energy Savings at 1. This information has not been verified by the Commission at this time.

²² *Petition of Virginia Electric and Power Company, For approval of its 2020 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia*, Case No. PUR-2020-00274, 2021 S.C.C. Ann. Rept. 350, Final Order (September 7, 2021) ("2020 DSM Update Final Order").

²³ *Id.*; 2019 Va. Acts ch. 748 (House Bill 2789).

²⁴ See 2020 DSM Update Final Order at 11.

Commission directed Dominion to file, among other things, a long-term plan that included proposed program savings and budgets for the five-year period beginning January 1, 2022, sufficient to comply with the total energy savings targets in the VCEA and the investment levels in the GTSA. The Commission also directed Dominion to file a proposed plan and framework for consolidating, streamlining, and marketing the public-facing aspects of Dominion’s approved and proposed DSM programs to facilitate participation at the levels required to achieve VCEA targets.²⁵

In its second DSM application pursuant to the VCEA (“2021 DSM Update”), Dominion filed for, and received approval of, nine EE programs (referred to as its “Phase X Programs”).²⁶ In addition to its 2021 DSM Update, Dominion also presented a long-term plan to comply with the total energy savings targets in the VCEA and investment levels in the GTSA, among other things, as required by the 2020 DSM Update Final Order. As part of that plan, Dominion proposed restructuring its DSM portfolio and programs into approximately seven major programs, with seven sub-categories for distinct components and pathways. Dominion also committed to an annual investment of \$2.5 million from 2022 to 2026, directed at improving customer awareness and marketing.²⁷ The Commission approved Dominion’s proposed reorganization and consolidations of its DSM Portfolio consistent with Dominion’s long-term plan.²⁸

In its third DSM application pursuant to the VCEA (“2022 DSM Update”), Dominion filed for, and received approval of, five EE programs (referred to as its “Phase XI Programs”), as well

²⁵ *Id.* at 11-12.

²⁶ 2021 DSM Update Final Order at 384.

²⁷ Low program participation has historically served as a barrier to DSM program success.

²⁸ 2021 DSM Update Final Order at 386.

as four “program bundles.”²⁹ Dominion presented program bundles as a way to consolidate programs and program measures that would provide qualifying customers the opportunity to implement a wider variety of EE measures, with its goal being to provide a better customer experience and optimize participation in Dominion’s EE programs. Dominion also received approval to expand the eligibility of its Phase IV Agricultural Program to residential customers.

Regarding the implementation of the Long-Term Plan, the Commission directed Dominion to provide an annual Project Management Plan detailing what DSM tasks were completed in the last twelve months, what tasks would be completed in the next twelve months, and what tasks remain to be completed, to fully implement the Long-Term Plan.

In its fourth DSM application pursuant to the VCEA (“2023 DSM Update”), Dominion filed for, and received approval of, three energy efficiency programs, one demand response program (referred to as its “Phase XII Programs”), as well as modifications to two existing programs.³⁰ The Commission denied Dominion’s request to close the Non-Residential Distributed Generation program. Dominion proposed approximately \$102 million in energy efficiency programs. Further, the Commission required Dominion to continue providing Long-Term Plan reporting and stakeholder progress reporting.

Regarding Dominion’s progress in meeting the 2023 VCEA energy savings target, the Commission determined that Dominion had a total combined net savings of 1.42%, which is less than Dominion’s 2023 total annual savings target of 2.50%, or approximately 1,705,783 MWh. As

²⁹ *Petition of Virginia Electric and Power Company, For approval of its 2022 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia*, Case No. PUR-2022-00210, 2023 S.C.C. Ann. Rept. 330, 334, Final Order (Aug. 4, 2023) (“2022 DSM Update Final Order”).

³⁰ *Application of Virginia Electric and Power Company, For approval of its 2023 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia*, Case No. PUR-2023-00217, 2024 S.C.C. Ann. Rept. 239, Final Order (July 26, 2024).

such, the Commission did not approve the recovery of a bonus margin on the Dominion’s spending, pursuant to Code § 56-585.1 A 5 c.

In its fifth DSM application pursuant to the VCEA (“2024 DSM Update”), Dominion filed for one new energy efficiency program, one pilot program, five redesigned programs (referred to as its “Phase XIII Programs”), and a modification to the measure mix of the Phase XI Residential Income and Age Qualifying Bundled (EE) Program to supplement the overall Portfolio.³¹

In its sixth DSM application pursuant to the VCEA (“2025 DSM Update”), Dominion filed for, and received approval of, nine new energy efficiency and demand response programs as well as extensions to two energy efficiency programs.³² As of Dominion’s 2025 DSM Update, Dominion has proposed approximately \$1,090,900,000 billion compared to the \$870 million required by the GTSA.³³ Dominion appears to have exceeded its GTSA spending targets two years ahead of schedule, by approximately \$220.9 million.

Regarding the Dominion’s progress in meeting the 2022, 2023, 2024, and 2025 VCEA energy savings target, Dominion has reported the following net energy savings for each of those years:

³¹ *Application of Virginia Electric and Power Company for approval of its 2024 DSM Update pursuant to § 56-585.1 A 5 of the Code of Virginia*, Case No. PUR-2024-00222, Doc. Con. Cen. No. 241230073, Application at 2 (Dec. 13, 2024).

³² *Application of Virginia Electric and power Company for approval of its 2025 DSM Update pursuant to § 56-585.1 A 5 c of the Code of Virginia*, Case No. PUR-2024-00210, Doc. Con Cen. No. 260810017, Final Order (Aug 3, 2026)

³³ *Application of Virginia Electric and Power Company for approval of its 2025 DSM Update pursuant to § 56-585.1 A 5 c of the Code of Virginia*, Case No. PUR-2025-00210, Doc. Con. Cen. No. 260610012, Testimony of Staff witness Amanda A. Ricketts at 16.

Dominion Net Energy Savings and Percent Achievement of VCEA Target, 2022-2025

	2022³⁴	2023³⁵	2024³⁶	2025³⁷
Savings Target (MWh)	852,892	1,705,783	2,558,675	3,411,567
Total Energy Savings (MWh)	839,243	969,372	1,106,256	1,275,955
Percent Achievement Toward Dominion Virginia Target	98%	57%	43%	37%
Savings Based on 2019 Energy Retail Sales	1.2%	1.4%	1.6%	1.9%

APCo

In its first DSM application pursuant to the VCEA, APCo filed for, and received approval of, the creation of four EE programs, a demand response program, and a three-year voltage conservation pilot program.³⁸ Additionally, the Commission approved a five-year extension for two of APCo's existing DSM programs. The approved programs and associated cost caps are provided later in this report.

In its second DSM application pursuant to the VCEA, APCo filed for, and received approval of, one EE program.³⁹ Additionally, APCo requested, and received, approval to move to

³⁴ Dominion 2023 Evaluation, Measurement, and Verification Report at ii.

³⁵ Dominion 2024 Evaluation, Measurement, and Verification Report at 1.

³⁶ Dominion 2025 Evaluation, Measurement, and Verification Report at 1.

³⁷ Dominion 2026 Evaluation, Measurement, and Verification Report at 1. These values have not yet been verified by Commission Staff.

³⁸ *Petition of Appalachian Power Company, For approval to continue rate adjustment clause, the EE-RAC, and for approval of new energy efficiency programs pursuant to §§ 56-585.1 A 5 c and 56-596.2 of the Code of Virginia*, Case No. PUR-2020-00251, 2021 S.C.C. Ann. Rept. 325, Order Approving Rate Adjustment Clause (July 29, 2021).

³⁹ *Petition of Appalachian Power Company, For approval to continue rate adjustment clause, the EE-RAC, and for approval of new energy efficiency programs pursuant to §§ 56-585.1 A 5 c and 56-596.2 of the Code of Virginia*, Case

a biennial filing cadence for its energy efficiency program activities. APCo stated that it did not anticipate the immediate need to initiate any new programs in the interim. The Commission required APCo to file, in Case No. PUR-2021-00236 (“APCo’s 2021 EE-RAC Proceeding”), an updated report on program costs, revenues, participation levels, and other relevant information on or before November 30, 2022, and required the same report to be filed in the next docketed EE-RAC case.⁴⁰

As noted above, APCo received Commission approval to move to a biennial filing cadence and thus did not file a DSM-related application in 2022. As directed by the Commission, APCo filed an updated report on program costs, revenues, participation, and other relevant information on November 30, 2022.⁴¹

In its third application pursuant to the VCEA, APCo filed for, and received approval of, two new energy efficiency programs, enhancements to four existing programs, and five-year extensions of three programs. APCo proposed approximately \$87 million in energy efficiency spending. APCo met the GTSA goal of proposing at least \$140 million in energy efficiency programming in 2022.⁴²

No. PUR-2021-00236, 2022 S.C.C. Ann. Rept. 371, 372, Order Approving Rate Adjustment Clause (July 15, 2022) (“APCo’s 2021 EE-RAC Update Final Order”).

⁴⁰ *Id.* at 372.

⁴¹ See, e.g., APCo witness Diebel’s direct testimony, Schedule 2, filed in APCo’s 2021 EE-RAC Proceeding with its Petition. Note, however, that the Commission did not make any determination regarding APCo’s “achieved” savings at that time. *Petition of Appalachian Power Company, For approval to continue rate adjustment clause, the EE-RAC, and for approval of new energy efficiency programs pursuant to §§ 56-585.1 A 5 c and 56-596.2 of the Code of Virginia*, Case No. PUR-2021-00236, Doc. Con. Cen. No. 211180097, Petition (filed Nov. 30, 2021).

⁴² *Petition of Appalachian Power Company, For approval to continue rate adjustment clause, the EE-RAC, and for approval of new energy efficiency programs pursuant to §§ 56-585.1 A 5 c and 56-596.2 of the Code of Virginia*, Case No. PUR-2023-00169, 2024 S.C.C. Ann. Rept. 207, 211-212, Final Order (July 26, 2024) (“2023 EE-RAC Final Order”).

In its fourth application pursuant to the VCEA, APCo filed for approval of six new commercial & industrial energy efficiency programs, one Commercial & Industrial (“C&I”) marketing service, one residential marketing service, extensions to five existing residential programs, consolidation of two existing C&I programs to include a new compressed air measure, and enhancements to one program.⁴³ This case is still being considered by the Commission.

KU/ODP

As mentioned previously, the Commission required KU/ODP to file a comprehensive DSM plan, with a required target of at least 0.02% decrease in total jurisdictional sales. On June 1, 2023, KU/ODP filed for approval of a DSM pilot-program designed to benefit low-income customers, with an associated DSM rate mechanism. On March 12, 2024, the Commission issued an order closing the case as the Commission was not able to reach a majority decision on the matter. On March 12, 2025, Appalachian Voices filed a petition with the Commission requesting from the Commission a declaration that § 56-596.2 B 3 of the Code applies to KU/ODP, such that the Commission is required to establish new energy efficiency savings targets for KU/ODP for the time period 2026 through 2028.⁴⁴ On May 16, 2025, the Commission issued its Order on Petition denying Appalachian Voices request, and stating in part: “reading the subsections of Code § 56-596.2 *in pari materia* counsels against inserting an otherwise unreferenced utility, which the

⁴³ 2026 EE-RAC Petition.

⁴⁴ *Petition of Appalachian Voices, Petitioner, v. Kentucky Utilities Company d/b/a Old Dominion Power Company, Respondent, For declaratory judgement and an order establishing a proceeding pursuant to § 56-596.2 B 3 of the Code of Virginia*, Case No. PUR-2025-00047, Doc. Con. Cen. No. 250320061, Petition at 1 (Mar. 12, 2025).

General Assembly chose to exclude, into a statutory scheme to which it has not heretofore been subjected.”⁴⁵

PREVIOUS DSM ACTIVITIES

Historically, the Commission has approved, permitted modification of, or extended numerous DSM programs for both Dominion and APCo. A summary is provided below:

⁴⁵ *Petition of Appalachian Voices, Petitioner, v. Kentucky Utilities Company d/b/a Old Dominion Power Company, Respondent, For declaratory judgement and an order establishing a proceeding pursuant to § 56-596.2 B 3 of the Code of Virginia*, Case No. PUR-2025-00047, Doc. Con. Cen. No. 250530108, Order On Petition at 3 (May 16, 2025).

Table 1			
Dominion Energy Cases	Approved/Extended Programs		Cost Caps Approved (In Million \$)
	EE	Peak Shaving⁴⁶	
Case No. PUE-2009-00081	4	1	\$102.3
Case No. PUE-2011-00093	6	1	\$149.2
Case No. PUE-2012-00100	1	1	\$75.2
Case No. PUE-2013-00072	4		\$71.6
Case No. PUE-2014-00071	2		\$20.0
Case No. PUE-2015-00089	1	1	\$23.5
Case No. PUE-2016-00111	1	1	\$40.8
Case No. PUR-2017-00129	1		\$12.6
Case No. PUR-2018-00168	11		\$225.8 ⁴⁷
Case No. PUR-2019-00201	14	2	\$186.0
Case No. PUR-2020-00274	9	2	\$130.5
Case No. PUR-2021-00247	9		\$140.0
Case No. PUR-2022-00210	7	2	\$145.0
Case No. PUR-2023-00217	4		\$102.0
Case No. PUR-2024-00222	6		\$222.3
Case No. PUR-2025-00210	2	7	\$220.6
Totals	82	18	\$1,867.4⁴⁸
Appalachian Power Cases			
Case No. PUE-2014-00026	1	1	\$7.1
Case No. PUE-2014-00039	5		\$27.3
Case No. PUR-2017-00094	1	1	\$7.1
Case No. PUR-2017-00126	6		\$39.0
Case No. PUR-2019-00122	3		\$43.2
Case No. PUR-2020-00252	7	1	\$57.4
Case No. PUR-2021-00236	1		\$6.9
Case No. PUR-2023-00169	5		\$78.0
Totals	29	3	\$266.0⁴⁹

⁴⁶ Pursuant to Code § 56-576, peak-shaving means “measures aimed solely at shifting time of use of electricity from peak-use periods to times of lower demand by inducing retail customers to curtail electricity usage during periods of congestion and higher prices in the electrical grid.”

⁴⁷ Three programs (Smart Thermostat EE, Smart Thermostat DR, and Residential Customer Engagement) were approved for cost recovery by the Commission in Case No. PUR-2018-00168 and later withdrawn by Dominion. Dominion then reapplied for these same programs in Case No. PUR-2019-00201, which the Commission reapproved.

⁴⁸ Note that the \$870 million investment level set by the GTSA applicable to DEV includes only energy efficiency programs and only spending starting July 1, 2018. The \$1,867.4 million shown in the table includes cost caps for peak shaving and energy efficiency programs from the time DEV first began offering such programs. The proposed program costs associated with the Residential Smart Thermostat EE, Smart Thermostat DR, and Residential Customer Engagement programs are only counted once in the total.

Dominion

Dominion's currently approved and operating programs are listed below:⁵⁰

Table 2		
Dominion Energy Active DSM Programs		
Phase and Case No.	Program Name	Program Type
Phase II		
PUE-2011-00093	<i>Non-Residential Distributed Generation Program</i>	<i>Demand Response</i>
Phase VII		
PUR-2018-00168	<i>Residential Efficient Products Marketplace Program</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Lighting Systems & Controls Program</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Heating & Cooling Efficiency Program</i>	<i>Energy Efficiency</i>
Phase VIII		
PUR-2019-00201	<i>Residential Energy Efficiency Kits Program</i>	<i>Energy Efficiency</i>
	<i>Residential Electric Vehicle Program</i>	<i>Energy Efficiency</i>
	<i>Residential Electric Vehicle Program</i>	<i>Demand Response</i>
	<i>Residential Electric Vehicle Program</i>	<i>Peak Shaving</i>
	<i>Residential/Non-Residential Multi-Family Program</i>	<i>Energy Efficiency</i>
	<i>Residential New Construction Program</i>	<i>Energy Efficiency</i>
	<i>Residential Home Retrofit Program</i>	<i>Energy Efficiency</i>
	<i>Residential HB2789 (Heating and Cooling/Health and Safety) Program⁵¹</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Midstream Energy Efficiency Products Program</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Small Business Improvement Enhanced Program</i>	<i>Energy Efficiency</i>
	<i>Residential Customer Engagement Program</i>	<i>Energy Efficiency</i>
	<i>Residential Smart Thermostat Management Program</i>	<i>Energy Efficiency</i>

⁴⁹ Note that the \$140 million investment level set by the GTSA applicable to APCo includes only energy efficiency programs, and only spending starting from July 1, 2018. The \$266 million shown in the table includes cost caps for peak shaving and energy efficiency programs from the time APCo first began offering such programs.

⁵⁰ It should be noted that there is a lag between when a new program is approved, and when EM&V reporting for the approved program becomes available.

⁵¹ This program was closed on December 31, 2023.

	<i>Residential Smart Thermostat Management Program</i>	<i>Peak Shaving⁵²</i>
	<i>Residential Manufactured Housing Program</i>	<i>Energy Efficiency</i>
	<i>Non-Residential New Construction</i>	<i>Energy Efficiency</i>
Phase IX		
PUR-2020-00274	<i>Residential IAQHIP Program⁵³</i>	<i>Energy Efficiency</i>
	<i>Residential Smart Home Program</i>	<i>Energy Efficiency</i>
	<i>Residential Virtual Audit Program</i>	<i>Energy Efficiency</i>
	<i>Residential Water Savings</i>	<i>Energy Efficiency</i>
	<i>Residential Water Savings</i>	<i>Demand Response</i>
	<i>Non-Residential Agriculture Program</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Building Automation Program</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Building Optimization Program</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Engagement Program</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Prescriptive Program</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Distributed Generation Program Extension</i>	<i>Demand Response</i>
Phase X		
PUR-2021-00247	<i>Residential Income and Age Qualifying Home Energy Report</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Income and Age Qualifying</i>	<i>Energy Efficiency</i>
	<i>Program for Health Care and Rental Property Owners</i>	<i>Energy Efficiency</i>
	<i>Small Business Behavioral</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Data Centers and Server Rooms</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Hotel and Lodging</i>	<i>Energy Efficiency</i>
	<i>Voltage Optimization</i>	<i>Energy Efficiency</i>
	<i>Enhancement of the Residential Income and Age Qualifying Home Improvement</i>	<i>Energy Efficiency</i>
	<i>Extension of the Non-residential Lighting Systems & Controls Program</i>	<i>Energy Efficiency</i>
Phase XI		
PUR-2022-00210	<i>Residential Customer Engagement</i>	<i>Energy Efficiency</i>
	<i>Residential Efficient Products Marketplace</i>	<i>Energy Efficiency</i>
	<i>Residential Peak Time Rebate</i>	<i>Demand Response</i>
	<i>Residential Electric Vehicle Telematics Program</i>	<i>Demand Response</i>
	<i>Non-Residential Custom</i>	<i>Energy Efficiency</i>
	<i>Residential Income and Age Qualifying Bundle</i>	<i>Energy Efficiency</i>
	<i>Residential Home Retrofit Bundle</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Income and Age Qualified Bundle</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Prescriptive Bundle</i>	<i>Energy Efficiency</i>

⁵² Concerning the Residential Smart Thermostat Management Program, the energy efficiency component is the smart thermostat's ability to automatically adjust heating and cooling temperature settings in the home for optimal performance. The peak shaving component provides Dominion access to cycle the thermostat off during peak load events.

⁵³ The acronym "IAQHIP" stands for "Income and Age-Qualifying Home Improvement Program."

Phase XII		
PUR-2023-00217	<i>Residential New Construction</i>	<i>Energy Efficiency</i>
	<i>Residential Smart Thermostat Purchase</i>	<i>Energy Efficiency</i>
	<i>Residential Smart Thermostat</i>	<i>Energy Efficiency</i>
	<i>Non-Residential New Construction</i>	<i>Energy Efficiency</i>
Phase XIII		
PUR-2024-00222	<i>Residential Smart Thermostat Program</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Data Center Program</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Curtailment Program</i>	<i>Demand Response</i>
	<i>Non-Residential Small Business Improvement Program</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Enhanced Prescriptive Program</i>	<i>Energy Efficiency</i>
	<i>Non-Residential Distributed Generation Program</i>	<i>Demand Response</i>
Phase XIV		
PUR-2025-00210	<i>Residential Home Energy Services</i>	<i>Energy Efficiency</i>
	<i>Non-residential Energy Services</i>	<i>Energy Efficiency</i>
	<i>Residential Battery Energy Storage Pilot</i>	<i>Demand Response</i>
	<i>Residential Electric Vehicle Managed Charging Pilot</i>	<i>Demand Response</i>
	<i>Residential Electric Vehicle Managed Charging Pilot TOU</i>	<i>Demand Response</i>
	<i>Residential Income and Age Qualifying Battery Storage Pilot</i>	<i>Demand Response</i>
	<i>Residential Income and Age Qualifying Battery Storage Purchase Pilot</i>	<i>Demand Response</i>
	<i>Non-residential HVAC for Small and Medium Sized Business Customers</i>	<i>Demand Response</i>
	<i>Bring-your-own-device Aggregator Access Pilot</i>	<i>Demand Response</i>

A summary of key findings of Dominion's 2026 EM&V report is reproduced and attached as Appendix 1.⁵⁴

⁵⁴ This data was provided by Dominion and has not yet been reviewed or validated by the Commission.

APCo

APCo's currently approved and operating programs are listed below:

Table 3		
Appalachian Power Active DSM Programs		
Case No.	Program Name	Program Type
PUR-2019-00122	<i>Low Income Single Family</i>	<i>Energy Efficiency</i>
	<i>Low Income Multifamily</i>	<i>Energy Efficiency</i>
PUR-2020-00252	<i>Business Energy Solutions</i>	<i>Energy Efficiency</i>
	<i>Bring Your Own Thermostat Extension</i>	<i>Demand Response</i>
	<i>Home Performance</i>	<i>Energy Efficiency</i>
	<i>Efficient Products</i>	<i>Energy Efficiency</i>
	<i>Energy Efficiency Kits</i>	<i>Energy Efficiency</i>
	<i>Home Energy Reports</i>	<i>Energy Efficiency</i>
	<i>Small Business Direct Install Extension</i>	<i>Energy Efficiency</i>
	<i>Volt VAR Optimization Pilot Program</i>	<i>Energy Efficiency</i>
PUR-2021-00236	<i>Commercial & Industrial Custom Pilot Program</i>	<i>Energy Efficiency</i>
PUR-2023-00169	<i>Residential School Kits Program</i>	<i>Energy Efficiency</i>
	<i>Residential Multifamily In-Unit Program</i>	<i>Energy Efficiency</i>

A summary of key findings of APCo's 2026 EM&V report is reprinted and attached as Appendix 2.⁵⁵

FEASIBILITY OF ENERGY EFFICIENCY GOALS

Pursuant to Code § 56-596.2 B, a Phase I and Phase II utility must implement energy efficiency programs and measures to achieve the following total annual energy savings:

For a Phase I utility:

- In calendar year 2022, at least 0.5 percent of the average annual energy jurisdictional retail sales by that utility in 2019;

⁵⁵ This data was provided by APCo and has not yet been reviewed or validated by the Commission.

- In calendar year 2023, at least 1.0 percent of the average annual energy jurisdictional retail sales by that utility in 2019;
- In calendar year 2024, at least 1.5 percent of the average annual energy jurisdictional retail sales by that utility in 2019; and
- In calendar year 2025, at least 2.0 percent of the average annual energy jurisdictional retail sales by that utility in 2019.

For a Phase II utility:

- In calendar year 2022, at least 1.25 percent of the average annual energy jurisdictional retail sales by that utility in 2019;
- In calendar year 2023, at least 2.5 percent of the average annual energy jurisdictional retail sales by that utility in 2019;
- In calendar year 2024, at least 3.75 percent of the average annual energy jurisdictional retail sales by that utility in 2019; and
- In calendar year 2025, at least 5.0 percent of the average annual energy jurisdictional retail sales by that utility in 2019.⁵⁶

Additionally, for the time period 2026 through 2028, and for every successive three-year period thereafter, the statute directs the Commission to establish new energy efficiency savings targets.⁵⁷ The VCEA further directs the Commission to annually review the feasibility of the energy efficiency program savings in Code § 56-596.2 and report on such feasibility.⁵⁸

On the issue of whether net or gross savings should be used to measure compliance with the energy efficiency targets, the Commission examined both DEV and APCo's compliance with the 2022 VCEA savings target in their respective 2023 energy efficiency proceedings. In both

⁵⁶ Additionally, pursuant to Code § 56-596.2:2, the Commission established annual energy efficiency targets for programs targeting low-income, elderly, disabled, or veterans of military service for Dominion for the period 2025 through 2027. *See* 2025 Dominion EE Savings Target Order.

⁵⁷ New energy efficiency targets for 2026-2029 were established by the 2025 Dominion EE Savings Target Order and the 2025 APCo EE Savings Target Order.

⁵⁸ Enactment Clause 4 of the 2021 Va. Acts of Assembly ch. 263 (Spec. Session 1) further provides that: "the State Corporation Commission may exclude energy jurisdictional retail sales related to zero-emission vehicles and hybrid electric vehicles from energy jurisdictional retail sales calculated pursuant to § 56-596.2 of the Code of Virginia."

cases, the Commission concluded that net savings is the appropriate measurement of total annual energy saving required by Code § 56-596.2.⁵⁹

Dominion

In its most recent DSM proceeding, Dominion provided data related to its achievement of the 2024 total annual savings target of 3.75%, or 2,558,675 MWh. Dominion reported 1,106,256 MWh of net savings, or approximately 1.6% of 2019 sales for calendar year 2024. Additionally, the Dominion's most recent EM&V Report provided estimated savings for calendar year 2025, included in the table below. Regarding Dominion's progress in meeting the 2022, 2023, 2024, and 2025 VCEA energy savings target, Dominion has reported the following net energy savings for each year:

⁵⁹ 2023 DSM Update Final Order at 245-246, 2023 EE-RAC Update Final Order at 212.

Dominion Net Energy Savings and Percent Achievement of VCEA Target, 2022-2025

	2022⁶⁰	2023⁶¹	2024⁶²	2025⁶³
Savings Target (MWh)	852,892	1,705,783	2,558,675	3,411,567
Total Energy Savings (MWh)	839,243	969,372	1,106,256	1,275,955
Percent Achievement Toward Dominion Virginia Target	98%	57%	43%	37%
Savings Based on 2019 Energy Retail Sales	1.2%	1.4%	1.6%	1.9%

Dominion also presented its expected achievement of future VCEA energy efficiency as part of its 2026 DSM EM&V Report. That data is reproduced below:

Table 4 – DEV EE Targets⁶⁴

Year	VCEA Target MWh	VCEA Target %	DSM 1-10 MWh	DSM Phase 11 MWh	DSM Phase 12 MWh	DSM Phase 13 MWh	DSM Phase 14 MWh	Opt-Outs MWh	Total DSM MWh	DSM %
2025	3,411,567	5%	1,140,039	70,352	1,118	-	-	64,446	1,359,966	2.0%
2026	2,046,940	3%	1,289,773	100,989	21,852	54,695	-	64,915	1,532,224	2.2%
2027	2,729,253	4%	1,381,628	143,822	63,137	148,838	27,009	65,384	1,829,817	2.7%
2028	3,411,567	5%	1,407,233	184,394	117,136	244,583	75,301	65,853	2,094,499	3.1%

⁶⁰ Dominion 2023 Evaluation, Measurement, and Verification Report at ii.

⁶¹ Dominion 2024 Evaluation, Measurement, and Verification Report at 1.

⁶² Dominion 2025 Evaluation, Measurement, and Verification Report at 1.

⁶³ Dominion 2026 Evaluation, Measurement, and Verification Report at 1. These values have not yet been verified by Commission Staff.

⁶⁴ 2026 DSM Update 2025 EM&V Report at 1.

APCo

In its most recent EE-RAC Proceeding, filed on March 13, 2026, APCo provided data related to its achievement of the 2023, 2024, and 2025 total annual savings targets of 1.0%, 1.5%, and 2.0% respectively of 2019 jurisdictional retail sales. For calendar year 2025, APCo projected 408,064 MWhs of net savings, or approximately 2.8% of 2019 sales. This information is contained in the table below:

APCo Virginia Projected Achievements Under the VCEA⁶⁵

Variable	2023	2024	2025
2015-2024 Programs Cumulative Persistent Net Energy Savings (MWh)	219,643	230,027	202,194
2025 Programs Preliminary Estimated Cumulative Persistent Net Energy Savings (MWh)	-	-	55,785
2026-2028 Non- PUR-2026-00031 Programs Targeted Cumulative Persistent Net Energy Savings (MWh)	-	-	-
Targeted PUR-2026-00031 Program Cumulative Persistent Energy Savings (MWh)	-	-	-
Opt Out Customer Savings (MWh)	129,072	150,085	150,085
Estimated Total Annual Energy Savings (MWh)	348,715	380,112	408,064
Savings Goal (Percentage of 2019 Energy Retail Sales)	1.0%	1.5%	2.0%
Energy Savings Goal (MWh)	144,521	216,781	289,041
Percent Achievement toward APCo EERS Mandates	241.3%	175.3%	141.2%
Customer Bill Savings (\$ Millions)	\$ 43.14	\$ 47.40	\$ 43.70
Avoided Carbon Emissions (Metric Tons)	234,896	256,045	274,873
Savings as Percentage of 2019 Energy Retail Sales	2.4%	2.6%	2.8%

APCo's 2026 EM&V Report, containing the results for net energy savings for calendar year 2025, was published on May 1, 2026. The 2026 EM&V Report indicates that APCo achieved 375,658 MWh of cumulative persistent net energy savings.⁶⁶ Regarding the APCo's progress in

⁶⁵ *Petition of Appalachian Power Company For approval to continue a rate adjustment clause, the EE-RAC, and for approval of new energy efficiency programs pursuant to §§ 56-585.1 A 5 c and 56-596.2 of the Code of Virginia*, Case No. PUR-2026-00031, Doc. Con. Cen. No. 260340029, pre-filed testimony of Tammy C. Stafford (Mar. 13, 2026) at 17. This matter is still pending before the Commission.

⁶⁶ 2026 APCo EM&V Report, APCo 2015-2025 Cumulative Persistent Energy Savings at 1.

achieving the 2022, 2023, 2024, and 2025 VCEA energy savings target, APCo has reported the following net energy savings for each year:

Table 5 - APCo Net Energy Savings and Precent Achievement of VCEA Target, 2022-2025

	2022⁶⁷	2023⁶⁸	2024⁶⁹	2025⁷⁰
Savings Target (MWh)	72,260	144,521	216,781	289,041
Total Energy Savings (MWh)	255,057	348,715	380,112	370,192
Percent Achievement Toward APCo Virginia Target	353.0%	241.3%	175.3%	128.1%
Savings Based on 2019 Energy Retail Sales	1.8%	2.4%	2.6%	2.6%

Code § 56-596.2.2 Energy Efficiency Targets

Code § 56-596.2.2 directs that:

For the time period 2026 through 2028, the Commission shall, after notice and hearing, establish new energy efficiency savings targets measured as a percentage of the average annual energy jurisdictional retail sales by that utility in 2019.

⁶⁷ *Petition of Appalachian Power Company for approval to continue a rate adjustment clause, the EE-RAC, and for approval of new energy efficiency programs pursuant to §§ 56-585.1 A 5 C and 56-596.2 of the Code of Virginia*, Doc. Con. Cen. No. 240860036, Direct Testimony of Staff witness Tanner R. Brunelle (Apr. 9, 2024), at 9.

⁶⁸ *Petition of Appalachian Power Company, For approval to continue a rate adjustment clause, the EE-RAC, and for approval of new energy efficiency programs pursuant to §§ 56-585.1 A 5 c and 56-596.2 of the Code of Virginia*, Doc. Con. Cen. No. 260340029, Direct Testimony of Company witness Stafford at 17 (Mar. 3, 2026)

⁶⁹ *Id.*

⁷⁰ APCo 2026 EM&V Report, APCo EM&V 2015-2025 Cumulative Persistent Energy Savings at 1.

As such, the Commission established two separate proceedings for Dominion⁷¹ and APCo's⁷² respective energy savings targets to be considered. The evidentiary hearing for the Dominion case occurred on October 15, 2024, and the evidentiary hearing for the APCo case occurred on November 4, 2024. In February 2025, the Commission approved the energy efficiency targets outlined below.

Table 6 - New Dominion and APCo Energy Efficiency Savings Targets by Percent

Year	Dominion Target⁷³	APCo Target⁷⁴
2026	3.00%	3.00%
2027	4.00%	3.50%
2028	5.00%	4.00%

The Hearing Examiner, in the 2025 Dominion EE Savings Target Case, found that:⁷⁵

- (1) For purposes of establishing Dominion's energy savings targets pursuant to Code § 56-596.2 B 3, the record can support a range of *feasible* targets for 2026, 2027, and 2028. (emphasis added)
- (2) The energy savings targets proposed by Dominion (2.10%, 2.41%, and 2.73%) and presented in Staff's Scenario A1 (2.37%, 2.54%, and 2.71%) establish a reasonable low-end of feasible targets pursuant to Code § 56-596.2 B 3.
- (3) The energy savings targets proposed by Appalachian Voices (3.80%, 5.40%, and 7.00%) are a reasonable high-end boundary for feasible targets pursuant to Code § 56-596.2 B 3.

⁷¹ *Commonwealth of Virginia, ex rel. State Corporation Commission, Ex Parte: In the matter of establishing energy efficiency savings targets for Virginia Electric and Power Company pursuant to Code §§ 56-596.2 B 3 and 56-596.2:2*, Case No. PUR-2023-00227, Doc. Con. Cen. No. 240740083, Order Establishing Procedural Schedule at 4 (July 26, 2024).

⁷² *Ex Parte: In the matter of establishing Energy efficiency savings targets for Appalachian Power Company Pursuant to Code § 56-596.2 B 3*, Case No. PUR-2024-00134, Doc. Con. Cen. No. 240740084, Order Establishing Procedural Schedule at 4 (July 26, 2024).

⁷³ 2025 Dominion EE Savings Target Order at 10.

⁷⁴ 2025 APCo EE Savings Target Order at 11.

⁷⁵ 2025 Dominion EE Savings Target Order at 3-4.

- (4) Pursuant to Code § 56-596.2 B 3, it would be reasonable to establish for Dominion Energy savings targets of 3.00%, 4.00%, and 5.00% for 2026, 2027, and 2028, respectively...

The Commission ultimately adopted the findings and recommendations of the Hearing Examiner's report.⁷⁶ Further, as part of the Final Order in Dominion's 2024 DSM case, the Commission directed Dominion to "prepare and file with its next DSM update, and each subsequent DSM update, a plan that details the specific steps Dominion will take to comply with the statutory energy savings targets in 2026 – 2028, including how these proposed steps will lead to achievement of the savings targets established by the Commission and how Dominion will achieve the VCEA-mandated 15% budget proposal for IAQ Programs."⁷⁷

The Hearing Examiner in the 2025 APCo EE Savings Target Case noted that "the record does not support a finding that APCo's *feasible* energy savings - achievable through a combination of cost-effective programs, low-income programs not required to be cost-effective, and LGS customer opt-outs – have effectively already plateaued at a level slightly above APCo's actual 2022 savings."⁷⁸ Further, the Hearing Examiner made the following findings and recommendations:⁷⁹

- (1) For purposes of establishing APCo's energy savings targets pursuant to Code § 56-596.2 B 3, the record can support a range of *feasible* targets for 2026, 2027, and 2028. (emphasis added)
- (2) The energy savings targets proposed presented in Staff Scenario B1 (2.50%, 3.00%, and 3.50%) establish a reasonable low-end of feasible targets pursuant to Code § 56-596.2 B 3.

⁷⁶ 2025 Dominion EE Savings Target Order at 10.

⁷⁷ Dominion 2024 DSM Final Order at 10.

⁷⁸ 2025 APCo EE Savings Targets Case, Hearing Examiner's Report at 32.

⁷⁹ 2025 APCo EE Savings Targets Order at 4.

- (3) The energy savings targets presented in Staff Scenario C2 (3.77%, 4.66%, and 5.56%) establish a reasonable high-end boundary for feasible targets pursuant to Code § 56-596.2 B 3.
- (4) Pursuant to Code § 56-596.2 B 3, it would be reasonable to establish for APCo energy savings targets of 3.00%, 3.50%, and 4.00%, for 2026, 2027, and 2028, respectively...

The Commission ultimately adopted the findings and recommendations of the Hearing Examiner's report.⁸⁰

Other DSM-Related Updates

Virginia Jurisdictional Specific Test

On July 17, 2024, the Commission issued an Order Initiating Stakeholder Process pursuant to Chapters 794 and 818 of the 2024 Acts of Assembly, which amended and reenacted §§ 56-576 and 56-596.2 of the Code of Virginia to direct the Commission to “promulgate regulations establishing a single, consistent cost-effectiveness test for use in evaluating proposed energy efficiency programs.”⁸¹

On September 16, 2025, the Commission issued an Order Adopting Regulations approving the use of a new Jurisdictional Specific Test (“JST”) for the purposes of evaluating energy efficiency programs.⁸² The JST will replace the four tests that have historically been used to

⁸⁰ 2025 APCo EE Savings Targets Order at 10.

⁸¹ *Commonwealth of Virginia, ex rel. State Corporation Commission Ex Parte: In the matter of promulgating regulations establishing a single, consistent cost-effectiveness test for use in evaluating proposed energy efficiency programs*, Case No. PUR-2024-00120, Doc. Con. Cen. No. 240720139, Order Initiating Stakeholder Process (Jul 17, 2024)

⁸² *Commonwealth of Virginia, ex rel. State Corporation Commission Ex Parte: In the matter of promulgating regulations establishing a single, consistent cost-effectiveness test for use in evaluating proposed energy efficiency programs*, Case No. PUR-2024-00120, 2025 S.C.C. Ann. Rept. 236, Order Adopting Regulations (“Order Adopting Regulations”) (Sep. 16, 2025)

evaluate energy efficiency programs.⁸³ The JST will be utilized to evaluate energy efficiency plans beginning in 2029.⁸⁴ As required by the Order Adopting Regulations, Commission Staff has worked within each utility's stakeholder workgroups on the quantification and verification process for certain metrics.⁸⁵ The utilities must still seek Commission approval of such processes in subsequent DSM proceedings.

⁸³ The four tests mentioned are the Participant Cost Test, Utility Cost Test, Total Resource Cost Test, and Ratepayer Impact Measure Test. However, § 56-576 indicates that, for programs proposed for the 2029 program year and all subsequent years, the Commission shall establish targets pursuant to subdivision B 4 of § 56-596.2, and a program shall be approved if the Commission determines it is cost-effective pursuant to applicable Commission regulations and that the net present value of the benefits exceeds the net present value of the costs as determined by the *Total Resource Cost Test*. As such, the Order Adopting Regulations also incorporated rules that include a reference to the Total Resource Cost Test.

⁸⁴ 20VAC5-304-20.

⁸⁵ Order Adopting Regulations at 237.

2026 General Assembly Session - Senate Bill 43

The 2026 General Assembly approved Chapter 874 of the 2026 Acts of Assembly. This legislation calls for the Department of Energy, in consultation with the Commission, to evaluate and assess the benefits and impacts of, and best practices and implementation recommendations for, demand response programs in the Commonwealth. The Department of Energy will be submitting a report on this topic to the Senate Committee on Commerce and Labor and House Committee on Labor and Commerce no later than November 1, 2026. Commission Staff has been in contact with the Department of Energy regarding this matter.

2026 General Assembly Session - House Bill 1062

The 2026 General Assembly approved Chapter 727 of the 2026 Acts of Assembly. This legislation requires Dominion and APCo to petition the Commission for approval to design, implement, and operate a pilot program for electric energy conservation, solar energy generation, and energy storage resources for low-income, elderly, and disabled individuals in their respective service territories in the Commonwealth, no later than December 31, 2026. Commission Staff has begun discussions of such programs within the utilities' stakeholder workgroups.

Pursuant to this legislation, for the first year, Dominion is required to operate such a program at an amount of \$23 million and must continue the pilot program at increasing levels of funding each year, at a specified rate. Such funding shall be incremental to existing programs or funding streams targeted at low-income, elderly, and disabled individuals by Dominion. For the first year for APCo, it must operate such program at an amount of \$5 million and continue the pilot program at increasing levels of funding each year, at a specified rate. Such funding shall be incremental to existing programs or funding streams targeted at low-income, elderly, and disabled individuals by APCo.

Further, this legislation included an Enactment Clause 2, which requires the Commission to, no later than November 1, 2026, convene a technical conference to evaluate the creation of a program that is modeled after the essential elements and minimum program requirements of the *Pay As You Save* program, as developed and maintained by the Energy Efficiency Institute, Inc., and consistent with the essential customer protections listed on the U.S. Environmental Protection Agency's inclusive utility investment website at the time of program design. If the Commission determines that such a program is feasible for implementation by Dominion and APCo, and in the public interest, the Commission shall require the utilities to petition the Commission for approval to implement such program, the requirements of which shall be determined by the Commission, by May 1, 2027. The Commission's work on this technical conference is on-going.

2026 General Assembly Session - House Bill 2

The 2026 General Assembly approved Chapter 1030 of the 2026 Acts of Assembly. This legislation states that it shall be the policy of the Commonwealth to reduce, wherever feasible and cost-effective, heating-related costs of living for low-income residents. In furtherance of this policy, and in addition to other policies and programs to improve energy efficiency and lower costs of living for residents of the Commonwealth, Dominion and APCo are required to make best, reasonable efforts to provide, by December 31, 2031, prescriptive efficiency measures and related efficiency improvements to:

- at least 30 % of the qualifying households identified by the utility, or in the case of APCo to 2,000 qualifying households, whichever is less, provided that such measures and improvements are determined by the Commission to be in the public interest. and;
- at least 30 % of the qualifying households identified by the utility, or in the case of Dominion to 8,400 qualifying households, whichever is less, provided that such measures and improvements are determined by the Commission to be in the public interest.

Dominion and APCo shall incorporate prescriptive efficiency measures in their next applicable income-qualified and age-qualified energy efficiency program filing with the Commission, which are expected in Q4 2026 for Dominion and Q2 2028 for APCo. Further, the utilities must implement such prescriptive efficiency measures for qualifying households that are reasonably expected to:

- (i) lower each household's total annual heating-related energy costs, which determination shall be subject to Commission review and approval, and based upon widely available and credible energy consumption and cost data, including data from the U.S. Department of Energy, as appropriate, and taking into account the housing stock and other relevant factors in the utility's service territory and,
- (ii) reduce onsite air pollution, with special emphasis on improving indoor air quality where feasible.

It shall be the duty of the utility or its designated agent, and shall not be the duty of an installer, to make best efforts to identify qualifying households in its respective territory and to make the determinations specified in clauses (i) and (ii) above.

Further, the Commission may, in its discretion, provide performance-based incentives to the utilities in furtherance of this act, including early action credit for prescriptive efficiency measures installed before January 1, 2030, and the Commission may, at any time before January 1, 2030, make a determination on whether the target of 30% (or 2,000 households for APCo and 8,400 households for Dominion) is feasible and, based on that determination, may adjust the target at its sole discretion. The Commission shall not penalize a utility for its inability to meet the targets.

Finally, by January 1, 2028, and annually thereafter, and in any recurring filing that the Commission deems appropriate, each utility shall report to the Commission its activities, plans, and progress regarding the provisions of this act. In any such filing and at least triennially, each utility shall also report updated and aggregated ratepayer data regarding bill and energy savings

from all energy efficiency and demand response programs, including actual and potential savings across each customer class, which may include actual and potential avoided costs of grid and transmission upgrades, pollution allowances, energy, capacity, and imported fuel purchases.

Energy Efficiency Potential Study

Pursuant to § 56-596.2 B 4, the Commission hired an independent contractor to perform an energy efficiency potential study for APCo and DEV. The independent contractor expects to publish its final report for Dominion's energy efficiency potential by December 18, 2026, and its final report for APCo's energy efficiency potential by December 31, 2026. As required by § 56-596.2 B 4, the Commission must establish new energy efficiency savings targets for the period 2029 through 2031, and every successive 3-year period thereafter, measured as a percentage of the average annual energy jurisdictional retail sales by that utility in 2019, which shall be the greatest level of energy savings that the Commission finds is feasible and cost-effective pursuant to the Commission's cost-effectiveness test regulations.

Further, in advance of the effective date of the 2029-2031 targets, the Commission shall, after notice and opportunity for hearing, initiate proceedings to establish such targets. As part of such proceeding, the Commission shall consider the feasibility of achieving energy efficiency goals and future energy efficiency savings through cost-effective programs and measures. This proceeding is currently expected to take place in the 2027-2028 time period, in advance of the 2029 target year.

Virtual Power Plants

Dominion

Code § 56-585.1:16, otherwise known as the Community Energy Act, established the requirement for Dominion to prepare and propose a Virtual Power Plant (“VPP”) Pilot program. The VPP is an aggregation of demand response resources that can be activated to help address grid constraints and reduce peak loads. The Commission issued its Final Order on August 3, 2026, and approved seven demand response programs to be included within the VPP Pilot.⁸⁶ The initial phase of the VPP Pilot will last approximately 18 months, at which point Dominion will file a subsequent petition related to the future of the VPP program.

APCo

The 2026 General Assembly approved Chapter 860 of the 2026 Acts of Assembly (HB 1467). This legislation requires APCo, no later than July 1, 2027, to petition the Commission for approval to conduct a pilot program to evaluate methods to optimize demand through various technology applications including the establishment of VPP(s). APCo is in the early stages of developing its VPP Pilot proposal and hosted its first stakeholder meeting on the topic on July 23, 2026.

Further, no later than June 15, 2028, APCo shall petition the Commission for a program tariff, or variations of a tariff structure, through which residential and C&I customers may enroll, either directly or through an aggregator.

Each of these pilot programs shall conclude its initial phase by February 1, 2030, at which time the Commission shall review the data and results of the pilot programs and evaluate the

⁸⁶ *Application of Virginia Electric and Power Company for approval of its Virtual Power Plant Pilot Program under § 56-585.1:16 of the Code of Virginia*, Case No. PUR-2025-00211, Doc. Con. Cen. No. 260810018, Final Order (Aug. 3, 2026)

effectiveness of the pilot programs in providing grid services during times of peak demand. As part of its evaluation, the Commission shall initiate a proceeding to establish a permanent program for the electric utility, which shall include procurement targets applicable to APCo for each such permanent program with corresponding performance metrics associated with either achievement of such targets or failure to achieve such targets.

Electric Cooperatives

The 2026 General Assembly approved Chapter 44 of the 2026 Acts of Assembly (HB 562). This legislation allows Virginia's electric cooperatives to, without Commission approval and upon an affirmative resolution of its board of directors, and without the requirement of any filing other than as required by the new legislation, propose, establish, and implement a VPP program, provided that such program adheres to the requirements of the section. This regulated, tariffed program shall be reviewable by the Commission at the electric cooperative's next general rate proceeding. An electric cooperative shall recover the costs of such VPP program through a new rate schedule established by this section or otherwise through the electric cooperative's rates. An electric cooperative establishing such a program shall file a copy of any such new rate schedule with the Commission for informational purposes.

CLOSING

The Commission appreciates the opportunity to provide this update to the Governor and the General Assembly on energy efficiency and DSM-related matters. The Commission conducted energy efficiency and DSM-related proceedings as detailed herein. In particular, in 2026 to date, the Commission approved seven new demand response programs, two new energy efficiency programs, and Dominion's new VPP Pilot program. APCo's most recent EE-RAC petition is pending, and it requests approval for six new energy efficiency programs, extension of five energy

efficiency and demand response programs, increased funding for two energy efficiency programs, enhancements to one energy efficiency program, consolidation of two existing energy efficiency programs, and two new marketing services.. In addition, the Commission's Staff has participated as stakeholders in multiple stakeholder meetings over the last year as required by recent legislation and Commission Order. The Commission has also included herein information related to the utilities' progress towards meeting the energy efficiency targets contained in Code § 56-596.2. The Commission will review these EM&V results during each utility's upcoming energy efficiency proceeding and will provide additional data related to the feasibility of achieving these energy efficiency goals in future reports.

The Commission will continue to monitor each of the specified areas for reporting and stands ready to provide any additional information or assistance if requested.

APPENDIX 1

Dominion EM&V Tables

Table 1. New incremental net annual savings in Virginia

Sector	Year	Reported net incremental savings (MWh)	% of planned savings	% of total annual net incremental savings across portfolio
Residential programs	2023	23,565	11%	17%
	2024	50,742	28%	29%
	2025	67,912	41%	24%
Income and Age Qualifying programs	2023	4,569	47%	3%
	2024	5,541	119%	3%
	2025	2,846	109%	1%
Non-Residential programs	2023	107,851	61%	80%
	2024	92,089	51%	52%
	2025	123,957	56%	44%
Voltage Optimization program (serving all sectors)	2024	26,075	16%	16%
	2025	88,318	40%	31%

APPENDIX 1

Table 2. Virginia summary program metrics - BC ratios of residential and income and age qualified programs (cumulative through December 31, 2025)^{1,2}

DSM phase	Program	Benefit cost ratios				Filing year
		Participant	Utility	TRC	RIM	
Residential programs (energy efficiency)						
VIII	Electric Vehicle Energy Efficiency	0.75	0.29	0.14	0.14	2025
	Home Energy Evaluation	4.22	3.83	2.29	0.64	2026
	Kits	∞	0.00	2.10	0.00	2026
	Manufactured Housing	1.15	0.19	0.17	0.15	2025
	Multifamily	1.95	1.64	0.82	0.43	2025
	New Construction	5.67	4.62	2.73	0.47	2024
XII	New Construction	2.85	2.60	2.01	0.73	2026
VIII	Thermostat Purchase and WeatherSmart	5.92	2.27	1.59	0.40	2024
XII	Smart Thermostat Purchase	4.07	1.42	1.15	0.31	2026
IX	Smart Home	1.25	0.60	0.34	0.25	2026
	Virtual Energy Audit	38.52	6.21	11.16	0.35	2026
	Water Savings	4.10	2.23	1.82	0.46	2026
XI	Customer Engagement (Extension)	5.27	1.53	1.14	0.56	2026
	Efficient Products Marketplace (Redesign)	3.70	3.65	1.69	0.37	2026
Residential programs (demand response)						
VIII	Electric Vehicle Rewards	20.46	0.21	0.31	0.20	2025
	Smart Thermostat Rewards	∞	3.42	5.98	3.24	2025
IX	Water Savings Demand Response	0.32	0.59	0.31	0.59	2025
XI	EV Telematics Pilot	20.07	0.09	0.11	0.09	2026
	Peak Time Rebate	13.85	0.32	0.61	0.31	2026
Income and Age Qualifying programs (energy efficiency)						
IX	Residential IAQ Solar	∞	0.38	0.38	0.22	2024
X	Residential IAQ Target Report	67.08	0.00	0.00	0.00	2026
XI	Residential IAQ Bundle	∞	1.54	1.54	0.59	2026
	Non-Residential IAQ Bundle	∞	3.90	3.90	1.16	2026

APPENDIX 1

Table 3. Virginia summary program metrics - BC ratios of non-residential programs (cumulative through December 31, 2025)¹³

DSM phase	Program	Benefit cost ratios				Filing year
		Participant	Utility	TRC	RIM	
Non-Residential programs (energy efficiency)						
VIII	Midstream Energy Efficiency Products	1.43	3.68	1.47	1.00	2026
	Multifamily	28.07	16.11	12.17	0.58	2025
	New Construction	10.49	4.75	4.64	0.56	2024
XII	New Construction	7.26	3.35	3.56	0.50	2025
VIII	Small Business Improvement Enhanced	6.28	4.17	3.33	0.62	2025
IX	Agricultural Energy Efficiency	81.55	64.76	49.39	1.29	2026
	Building Automation System	1.99	1.09	0.88	0.60	2026
	Building Optimization	3.34	1.14	1.00	0.43	2026
	Engagement	∞	0.19	0.30	0.17	2026
	Prescriptive Enhanced Bundle	2.94	2.55	2.39	0.98	2025
X	Data Server Rooms	0.97	0.04	0.04	0.04	2025
	Healthcare Energy Solutions	5.54	0.68	1.27	0.41	2026
	Hotel and Lodging Energy Solutions	8.15	0.70	1.42	0.42	2026
	Lighting Systems & Controls	1.83	4.75	1.90	0.99	2026
	Small Business Behavioral	2.55	0.20	0.21	0.18	2026
XI	Custom	3.71	5.03	4.47	1.47	2026
Non-Residential programs (demand response)						
II	Distributed Generation	∞	2.73	7.71	2.49	2025
Program serving all sectors (energy efficiency)						
X	Voltage Optimization	∞	2.45	2.43	0.79	2026

Table 4. Virginia program avoided costs in Program Years 2023-2025

Year	Avoided Costs			Avoided T&D Demand Costs					
	Average (\$/kWh)	Capacity (\$/kW-year)	Reserve Margin Forecast Pool Requirement (FPR) (%)	Transmission			Distribution		
				Avoided Transmission Cost (\$/kW-year)	Avoided Transmission Summer Split (%)	Avoided Transmission Winter Split (%)	Avoided Distribution Cost (\$/kW-year)	Avoided Transmission Summer Split (%)	Avoided Transmission Winter Split (%)
2023	\$0.049	\$14.87	10%	\$33.12	0%	100%	\$18.80	50%	50%
2024	\$0.040	\$10.56	10%	\$33.83	0%	100%	\$19.20	50%	50%
2025	\$0.054	\$162.15	8%	\$34.95	0%	100%	\$19.84	50%	50%

Table 5. Virginia energy efficiency program annual levelized cost of saved energy (LCSE)

All programs	LCSE (\$/kWh)		
	2023	2024	2025
Including IAQ	\$0.070	\$0.076	\$0.045
Excluding IAQ	\$0.051	\$0.047	\$0.032

APPENDIX 1

Table 6. Virginia summary program metrics - participation and financials of residential and income and age qualified programs (cumulative through December 31, 2025)^{16, 17, 18}

DSM phase	Program	Program operation years	Participation		Financial				
			Participants (in 1,000s)	No. measures (in 1,000s)	Expenditures (\$M)	Administrative expenditures (\$M)	Budget (\$M)	Spending as % of budget	Program cost per participant
VIII	Electric Vehicle Energy Efficiency	6	1.76	1.77	\$1.49	\$0.10	\$2.49	60%	\$843
	Home Energy Evaluation	6	2.21	56	\$7.81	\$0.59	\$19	41%	\$3,542
	Kits	6	142	243	\$6.55	\$0.43	\$10	68%	\$46
	Manufactured Housing	6	0.93	7.41	\$3.58	\$0.24	\$8.32	43%	\$3,836
	Multifamily	6	5.03	15	\$3.90	\$0.26	\$11	36%	\$774
	New Construction	6	10	10	\$11	\$0.71	\$19	60%	\$1,092
XII	New Construction	1	1.59	1.59	\$2.76	\$0.30	\$5.99	46%	\$1,735
VIII	Thermostat Purchase and WeatherSmart	6	22	26	\$3.88	\$0.22	\$5.15	75%	\$173
XII	Smart Thermostat Purchase	1	0.83	0.75	\$0.29	\$0.03	\$0.74	39%	\$344
IX	Smart Home	5	0.59	1.71	\$2.41	\$0.16	\$10	23%	\$4,103
	Virtual Energy Audit	5	41	1,554	\$7.09	\$0.53	\$13	54%	\$171
	Water Savings	5	1.35	1.35	\$1.38	\$0.10	\$6.15	22%	\$1,020
XI	Customer Engagement (Extension)	2	322	322	\$3.61	\$0.31	\$3.79	95%	\$11
	Efficient Products Marketplace (Redesign)	2	579	587	\$5.61	\$0.51	\$5.27	106%	\$10
Residential programs, total			1,132	2,828	\$62	\$4.48	\$119	52%	\$54
IX	Residential IAQ Solar	5	0.60	0.60	\$21	\$1.43	\$31	67%	\$34,968
X	Residential IAQ Target Report	2	22	22	\$3.48	\$0.28	\$3.92	89%	\$161
XI	Residential IAQ Bundle	2	6.04	2,596	\$36	\$3.09	\$35	104%	\$5,991
	Non-Residential IAQ Bundle	2	0.01	11	\$0.77	\$0.07	\$1.13	68%	\$64,176
Income and Age Qualifying programs, total			28	2,630	\$61	\$4.88	\$71	86%	\$2,167

APPENDIX 1

Table 7. Virginia summary program metrics - participation and financials of non-residential programs
(cumulative through December 31, 2025)^{19, 20}

DSM phase	Program	Program operation years	Participation		Financial				
			Participants (in 1,000s)	No. measures (in 1,000s)	Expenditures (\$M)	Administrative expenditures (\$M)	Budget (\$M)	Spending as % of budget	Program cost per participant
VIII	Midstream Energy Efficiency Products	6	0.53	5.18	\$4.57	\$0.34	\$9.39	49%	\$8,607
	Multifamily	6	0.13	6.10	\$1.37	\$0.09	\$2.37	58%	\$10,278
	New Construction	6	0.05	0.15	\$10	\$0.81	\$8.37	117%	\$204,503
XII	New Construction	1	0	0	\$0.36	\$0.04	\$8.11	4%	N/A
VIII	Small Business Improvement Enhanced	6	2.89	58	\$19	\$1.20	\$18	104%	\$6,570
IX	Agricultural Energy Efficiency	5	0.03	21	\$2.99	\$0.21	\$3.39	88%	\$110,651
	Building Automation System	5	0.01	0.01	\$1.77	\$0.13	\$3.62	49%	\$147,149
	Building Optimization	5	0.23	4.14	\$4.66	\$0.35	\$4.16	112%	\$20,434
	Engagement	5	0.01	0.01	\$3.39	\$0.28	\$5.90	57%	\$260,837
	Prescriptive Enhanced Bundle	5	1.66	57	\$24	\$1.57	\$20	121%	\$14,433
X	Data Server Rooms	3	0.01	0.07	\$3.09	\$0.30	\$2.01	154%	\$281,355
	Healthcare Energy Solutions	2	0.03	5.66	\$1.63	\$0.14	\$16	10%	\$49,381
	Hotel and Lodging Energy Solutions	2	0.12	23	\$3.10	\$0.28	\$14	21%	\$25,854
	Lighting Systems & Controls	3	1.57	243	\$14	\$1.15	\$29	49%	\$9,062
	Small Business Behavioral	2	40	40	\$2.76	\$0.22	\$3.44	80%	\$69
XI	Custom	2	0.04	0.10	\$3.06	\$0.30	\$8.47	36%	\$74,592
Non-Residential programs, total			47	464	\$100	\$7.40	\$157	64%	\$2,113
X	Voltage Optimization	2	0.11	0.11	\$5.96	\$0.16	\$7.53	79%	\$56,802
Program serving all sectors, total			0.11	0.11	\$5.96	\$0.16	\$7.53	79%	\$56,802
All programs, total			1,208	5,922	\$228	\$17	\$355	64%	\$189

APPENDIX 1

Table 8. Virginia summary program metrics - energy impacts of residential and income and age qualified programs (cumulative through December 31, 2025)

DSM phase	Program	Gross energy impacts				Net energy impacts			
		Total annualized gross energy savings (MWh/yr)	Cumulative gross energy savings (MWh)	Cumulative lifetime gross energy savings (MWh)	Total summer gross peak demand reductions (MW)	Total annualized net energy savings (MWh/yr)	Cumulative net energy savings (MWh)	Lifetime net energy savings (MWh)	Total summer net peak demand reductions (MW)
VIII	Electric Vehicle Energy Efficiency	225	392	2,250	0	180	314	1,800	0
	Home Energy Evaluation	3,248	3,982	44,174	0.51	2,924	2,061	39,756	0.46
	Kits	16,042	40,752	89,991	1.42	9,625	24,451	53,995	0.85
	Manufactured Housing	291	417	2,351	0.07	262	375	2,116	0.06
	Multifamily	1,343	2,805	14,319	0.34	1,208	2,525	12,887	0.31
	New Construction	25,674	58,983	641,906	11	22,336	51,315	558,458	9.38
XII	New Construction	3,193	1,186	79,833	1.18	2,874	1,067	71,850	1.06
VIII	Thermostat Purchase and WeatherSmart	6,740	14,246	35,809	2.25	5,718	11,397	28,823	2.14
XII	Smart Thermostat Purchase	246	62	1,871	0	201	51	1,534	0
	Smart Home	228	293	1,648	0.01	194	249	1,401	0.01
IX	Virtual Energy Audit	32,870	50,438	320,302	3.17	19,722	30,263	192,181	1.90
	Water Savings	1,862	2,920	21,158	0.32	1,676	2,628	19,042	0.29
XI	Customer Engagement (Extension)	50,418	39,865	48,058	28	57,099	45,139	55,288	32
	Efficient Products Marketplace (Redesign)	45,561	39,961	587,543	4.28	28,704	25,175	370,152	2.70
Residential programs, total		187,941	256,302	1,891,213	52	152,723	197,010	1,409,284	51
IX	Residential IAQ Solar	3,500	5,426	87,503	1.26	2,800	4,341	70,003	1.01
X	Residential IAQ Target Report	0	0	0	0	0	0	0	0
XI	Residential IAQ Bundle	6,270	6,417	128,180	1.52	6,208	6,353	126,898	1.50
	Non-Residential IAQ Bundle	69	46	1,258	0.01	68	45	1,246	0.01
Income and Age Qualifying programs, total		9,839	11,888	216,941	2.79	9,075	10,739	198,146	2.52

APPENDIX 1

Table 9. Virginia summary program metrics - energy impacts of non-residential programs (cumulative through December 31, 2025)

DSM phase	Program	Gross energy impacts				Net energy impacts			
		Total annualized gross energy savings (MWh/yr)	Cumulative gross energy savings (MWh)	Cumulative lifetime gross energy savings (MWh)	Total summer gross peak demand reductions (MW)	Total annualized net energy savings (MWh/yr)	Cumulative net energy savings (MWh)	Lifetime net energy savings (MWh)	Total summer net peak demand reductions (MW)
VIII	Midstream Energy Efficiency Products	9,478	15,414	167,676	4.19	8,530	13,872	150,909	3.77
	Multifamily	1,249	1,920	10,782	0.07	1,124	1,728	9,704	0.06
	New Construction	94,708	120,614	1,421,749	8.15	85,237	108,553	1,279,574	7.33
XII	New Construction	0	0	0	0	0	0	0	0
VIII	Small Business Improvement Enhanced	21,951	52,963	222,287	4.94	17,690	43,887	179,037	3.90
IX	Agricultural Energy Efficiency	7,214	18,560	78,355	1.19	6,998	18,003	76,004	1.15
	Building Automation System	863	1,126	5,026	0.05	776	1,014	4,523	0.04
	Building Optimization	40,670	63,296	218,525	1.30	36,603	56,967	196,673	1.17
	Engagement	91	30	453	0.00	82	27	408	0
	Prescriptive Enhanced Bundle	37,249	80,662	249,488	23	33,525	61,767	224,539	21
X	Data Server Rooms	7,384	3,801	81,069	0.85	6,645	3,421	72,962	0.76
	Healthcare Energy Solutions	861	445	7,337	0.19	732	378	6,237	0.16
	Hotel and Lodging Energy Solutions	8,530	6,581	74,459	0.30	7,251	5,594	63,290	0.25
	Lighting Systems & Controls	93,811	128,360	953,915	16	84,430	115,524	858,524	15
	Small Business Behavioral	16,070	8,856	15,517	8.89	7,292	617	617	4.03
XI	Custom	8,381	2,974	92,992	0.94	7,040	2,498	78,113	0.79
Non-Residential programs, total		348,509	505,603	3,599,630	71	303,954	433,850	3,201,113	59
X	Voltage Optimization	114,393	57,923	57,923	36	114,393	57,923	57,923	36
Program serving all sectors, total		114,393	57,923	57,923	36	114,393	57,923	57,923	36
All programs, total		660,681	831,716	5,765,708	161	580,146	699,521	4,866,466	148

APPENDIX 1

Table 10. Virginia summary program metrics – other impacts of residential and income and age qualified programs (cumulative through December 31, 2025)

DSM phase	Program	Bill savings (\$M/yr)	Carbon emissions avoided (metric tons CO ₂ /yr)	O&M NEIs (\$M/yr)	Water savings (Mgal/yr)
VIII	Electric Vehicle Energy Efficiency	\$0.01	107	\$0	0
	Home Energy Evaluation	\$0.25	1,345	\$0.39	0.37
	Kits	\$0.39	8,059	\$0.03	4.83
	Manufactured Housing	\$0.02	145	\$0.05	0.19
	Multifamily	\$0.02	716	\$0.0002	0.26
	New Construction	\$0.57	14,178	\$0	0
XII	New Construction	\$0.48	709	\$0	0
VIII	Thermostat Purchase and WeatherSmart	\$0.02	2,516	\$0	0
XII	Smart Thermostat Purchase	\$0	37	\$0	0
IX	Smart Home	\$0.02	94	\$0	0
	Virtual Energy Audit	\$1.37	16,457	\$3.18	153
	Water Savings	\$0.08	883	\$0	0
XI	Customer Engagement (Extension)	\$3.43	14,888	\$0	0
	Efficient Products Marketplace (Redesign)	\$3.84	19,398	\$0	83
Residential programs, total		\$10.50	79,533	\$3.65	241
IX	Residential IAQ Solar	\$0.05	1,924	\$0	0
X	Residential IAQ Target Report	\$0	0	\$0	0
XI	Residential IAQ Bundle	\$0.38	2,760	\$0.16	1.64
	Non-Residential IAQ Bundle	\$0.01	26	\$0.001	0
Income and Age Qualifying programs, total		\$0.43	4,711	\$0.16	1.64

APPENDIX 1

Table 11. Virginia summary program metrics - other impacts of non-residential programs (cumulative through December 31, 2025)

DSM phase	Program	Bill savings (\$M/yr)	Carbon emissions avoided (metric tons CO ₂ /yr)	O&M NEIs (\$M/yr)	Water savings (Mgal/yr)
VIII	Midstream Energy Efficiency Products	N/A	4,415	-\$0.34	5.73
	Multifamily	\$0.06	502	-\$0.0003	0
	New Construction	\$4.10	40,563	\$0	0
XII	New Construction	\$0	0	\$0	0
VIII	Small Business Improvement Enhanced	\$0.47	13,056	\$0.04	0
IX	Agricultural Energy Efficiency	\$0.11	2,970	\$0.005	0
	Building Automation System	\$0.04	394	\$0	0
	Building Optimization	\$0.55	17,090	\$0	0
	Engagement	\$0.01	22	\$0	0
	Prescriptive Enhanced Bundle	\$0.87	18,835	-\$0.03	0.02
X	Data Server Rooms	\$0.58	3,365	\$0	0
	Healthcare Energy Solutions	\$0.10	319	-\$0.05	0
	Hotel and Lodging Energy Solutions	\$0.001	3,719	-\$0.06	0
	Lighting Systems & Controls	\$4.07	42,196	\$0.09	0
	Small Business Behavioral	\$1.07	4,609	\$0	0
XI	Custom	\$0.73	2,590	\$0	0
Non-Residential programs, total		\$13	154,645	-\$0.35	5.75
X	Voltage Optimization	\$9.14	32,055	\$0	0
Program serving all sectors, total		\$9.14	32,055	\$0	0
All programs, total		\$33	270,944	\$3.46	249

APPENDIX 1

Table 12. Annualized program progress for residential Phase VIII energy efficiency programs (cumulative from program start through December 31, 2025) in Virginia and North Carolina^{25, 26, 27}

Program	Metric	Virginia			North Carolina		
		Expenditures (\$M)	Gross participants (1,000s)	Total annualized net energy savings (MWh/yr)	Expenditures (\$M)	Gross participants (1,000s)	Total annualized net energy savings (MWh/yr)
Phase VIII							
Electric Vehicle Energy Efficiency	Actual	\$1.49	1.76	180			
	Planned	\$2.49	6.66	2,502			
	% of Plan	60%	26%	7.19%			
Home Energy Evaluation	Actual	\$5.13	1.99	2,462	\$0.29	0.09	105
	Planned	\$14	24	31,789	\$0.75	1.56	2,029
	% of Plan	38%	8.15%	7.74%	38%	6.03%	5.18%
Kits	Actual	\$6.55	142	9,625	\$0.35	7.57	504
	Planned	\$10	141	37,297	\$0.57	9.00	2,381
	% of Plan	68%	101%	26%	62%	84%	21%
Manufactured Housing	Actual	\$3.58	0.93	262			
	Planned	\$8.32	10	18,440			
	% of Plan	43%	8.98%	1.42%			
Multifamily	Actual	\$3.90	5.03	1,208			
	Planned	\$11	65	57,607			
	% of Plan	36%	7.74%	2.10%			
New Construction	Actual	\$11	10	22,336			
	Planned	\$19	24	33,572			
	% of Plan	60%	43%	67%			
New Construction (Phase XII)	Actual	\$2.76	1.59	2,874			
	Planned	\$5.99	3.55	7,202			
	% of Plan	46%	45%	40%			
Thermostat Purchase and WeatherSmart	Actual	\$3.88	22	4,658	\$0.15	0.68	169
	Planned	\$5.15	41	17,088	\$0.31	2.60	1,091
	% of Plan	75%	55%	27%	47%	26%	15%
Smart Thermostat Purchase (Phase XII)	Actual	\$0.29	0.83	201			
	Planned	\$0.74	7.86	1,624			
	% of Plan	39%	11%	12%			

APPENDIX 1

Table 13. Annualized program progress for residential Phases IX and XI energy efficiency programs (cumulative through December 31, 2025) in Virginia and North Carolina

Program	Metric	Virginia			North Carolina		
		Expenditures (\$M)	Gross participants (1,000s)	Total annualized net energy savings (MWh/yr)	Expenditures (\$M)	Gross participants (1,000s)	Total annualized net energy savings (MWh/yr)
Phase IX							
Smart Home	Actual	\$2.41	0.59	194	\$0.12	0.02	8.96
	Planned	\$10	34	39,943	\$0.52	2.16	2,549
	% of Plan	23%	1.74%	0.49%	22%	0.83%	0.35%
Virtual Energy Audit	Actual	\$7.09	41	19,722	\$0.40	2.14	1,251
	Planned	\$13	183	54,550	\$0.62	12	3,482
	% of Plan	54%	23%	36%	65%	18%	36%
Water Savings	Actual	\$1.38	1.35	1,676	\$0.06	0.05	67
	Planned	\$6.15	12	22,943	\$0.32	0.74	1,464
	% of Plan	22%	12%	7.30%	19%	6.99%	4.54%
Phase XI							
Customer Engagement (Extension)	Actual	\$3.61	550	53,577			
	Planned	\$3.79	610	97,848			
	% of Plan	95%	90%	55%			
Efficient Products Marketplace (Redesign)	Actual	\$5.61	579	28,315	\$0.17	8.82	501
	Planned	\$5.27	407	19,465	\$0.24	26	1,242
	% of Plan	106%	142%	145%	69%	34%	40%
All Residential programs							
Total	Actual	\$59	781	147,290	\$1.53	11	2,604
	Planned	\$114	1,162	441,870	\$3.34	28	14,239
	% of Plan	52%	67%	33%	46%	38%	18%

APPENDIX 1

Table 14. Annualized program progress for active income and age qualifying energy efficiency programs (cumulative through December 31, 2025) in Virginia and North Carolina

Program	Metric	Virginia			North Carolina		
		Expenditures (\$M)	Gross participants (1,000s)	Total annualized net energy savings (MWh/yr)	Expenditures (\$M)	Gross participants (1,000s)	Total annualized net energy savings (MWh/yr)
Phase IX							
Residential IAQ Solar	Actual	\$21	0.60	2,800			
	Planned	\$31	1.67	6,114			
	% of Plan	67%	36%	46%			
Phase X							
Residential IAQ Target Report	Actual	\$3.48	47	0			
	Planned	\$3.92	11	3,675			
	% of Plan	89%	443%	0%			
Phase XI							
Residential IAQ Bundle	Actual	\$36	6.05	6,201	\$1.61	0.15	236
	Planned	\$35	27	2,755	\$1.78	1.70	176
	% of Plan	104%	23%	225%	90%	8.89%	134%
Ion-Residential IAQ Bundle	Actual	\$0.77	0.01	68			
	Planned	\$1.13	0.42	41			
	% of Plan	68%	2.86%	167%			
All Income and Age Qualifying programs							
Total	Actual	\$61	53	9,069	\$1.61	0.15	236
	Planned	\$71	39	12,584	\$1.78	1.70	176
	% of Plan	86%	136%	72%	90%	8.89%	134%

APPENDIX 1

Table 15. Annualized program progress for active non-residential Phases VIII and IX energy efficiency programs (cumulative through December 31, 2025) in Virginia and North Carolina²⁸

Program	Metric	Virginia			North Carolina		
		Expenditures (\$M)	Gross participants (1,000s)	Total annualized net energy savings (MWh/yr)	Expenditures (\$M)	Gross participants (1,000s)	Total annualized net energy savings (MWh/yr)
Phase VIII							
Midstream Energy Efficiency Products	Actual	\$4.57	0.53	8,523			
	Planned	\$9.39	1.50	19,171			
	% of Plan	49%	35%	44%			
Multifamily	Actual	\$1.37	0.13	1,124			
	Planned	\$2.37	8.00	13,684			
	% of Plan	58%	1.66%	8.21%			
New Construction	Actual	\$10	0.05	85,237	\$0.22	0.003	85
	Planned	\$8.37	0.44	21,584	\$0.54	0.03	1,367
	% of Plan	117%	11%	395%	40%	11%	6.19%
New Construction (Phase XII)	Actual	\$0.36	0	0			
	Planned	\$8.11	0.05	30,399			
	% of Plan	4%	0%	0%			
Small Business Improvement Enhanced	Actual	\$19	2.89	17,673	\$0.99	0.10	2,058
	Planned	\$18	3.17	45,996	\$1.08	0.21	2,975
	% of Plan	104%	91%	38%	91%	48%	69%
Phase IX							
Agricultural Energy Efficiency	Actual	\$2.99	0.03	6,998			
	Planned	\$3.39	0.60	7,492			
	% of Plan	88%	4.47%	93%			
Building Automation System	Actual	\$1.77	0.01	776	\$0.08	0	0
	Planned	\$3.62	0.11	15,120	\$0.18	0.01	1,080
	% of Plan	49%	11%	5.13%	48%	0%	0%
Building Optimization	Actual	\$4.66	0.23	36,603	\$0.10	0.001	1.83
	Planned	\$4.16	0.11	18,435	\$0.20	0.01	1,317
	% of Plan	112%	204%	199%	49%	13%	0.14%
Engagement	Actual	\$3.39	0.01	82	\$0.23	0	0
	Planned	\$5.90	0.22	15,902	\$0.31	0.01	883
	% of Plan	57%	6.02%	0.51%	76%	0%	0%
Prescriptive Enhanced Bundle	Actual	\$8.14	0.68	11,977	\$0.35	0.03	932
	Planned	\$12	1.32	40,889	\$0.64	0.08	2,610
	% of Plan	70%	52%	29%	54%	39%	36%

APPENDIX 1

Table 16. Annualized program progress for active non-residential Phases X and XI and all-sector energy efficiency programs (cumulative through December 31, 2025) in Virginia and North Carolina²⁹

Program	Metric	Virginia			North Carolina		
		Expenditures (\$M)	Gross participants (1,000s)	Total annualized net energy savings (MWh/yr)	Expenditures (\$M)	Gross participants (1,000s)	Total annualized net energy savings (MWh/yr)
Phase X							
Data Server Rooms	Actual	\$3.09	0.01	6,645			
	Planned	\$2.01	0.03	4,542			
	% of Plan	154%	39%	146%			
Healthcare Energy Solutions	Actual	\$1.63	0.03	732			
	Planned	\$16	0.75	50,932			
	% of Plan	10%	4.41%	1.44%			
Hotel and Lodging Energy Solutions	Actual	\$3.10	0.12	7,251			
	Planned	\$14	0.63	42,976			
	% of Plan	21%	19%	17%			
Lighting Systems & Controls	Actual	\$14	1.57	84,420	\$0.65	0.05	5,427
	Planned	\$29	2.74	189,410	\$1.47	0.17	12,046
	% of Plan	49%	57%	45%	44%	28%	45%
Small Business Behavioral	Actual	\$2.76	75	7,256			
	Planned	\$3.44	115	43,750			
	% of Plan	80%	66%	17%			
Phase XI							
Custom	Actual	\$3.06	0.04	7,040			
	Planned	\$8.47	0.14	29,190			
	% of Plan	36%	29%	24%			
All Non-Residential programs							
Total	Actual	\$84	81	282,337	\$2.62	0.18	8,504
	Planned	\$149	134	589,473	\$4.42	0.52	22,278
	% of Plan	56%	61%	48%	59%	35%	38%
Program serving all sectors							
Voltage Optimization (Phase X)	Actual	\$5.96	0.11	114,393			
	Planned	\$7.53	0.69	384,016			
	% of Plan	79%	15%	30%			
All programs							
Total	Actual	\$210	916	553,089	\$5.77	11	11,344
	Planned	\$341	1,336	1,427,942	\$10	30	36,692
	% of Plan	62%	69%	39%	60%	36%	31%

APPENDIX 1

Table 17. Portfolio spending and net summer peak shaving potential by program (cumulative through December 31, 2025 and for both states, where applicable)^{31, 32}

DSM phase	Program	Metric	Expenditures (\$M)	Participants (1,000s)	Peak shaving potential (kW)
Residential					
VIII	Electric Vehicle Rewards	Actual	\$1.10	2.74	550
		Planned	\$1.96	2.79	2,792
		% of Plan	56%	98%	20%
	Smart Thermostat Rewards	Actual	\$11	45	54,579
		Planned	\$12	45	72,103
		% of Plan	88%	99%	76%
IX	Water Savings Demand Response	Actual	\$0.49	0.11	0
		Planned	\$1.59	8.35	4,347
		% of Plan	31%	1.35%	0%
XI	Electric Vehicle Telematics Pilot	Actual	\$0.48	1.00	210
		Planned	\$0.48	0.33	333
		% of Plan	102%	301%	63%
	Peak Time Rebate	Actual	\$6.19	53	7,195
		Planned	\$10	56	31,500
		% of Plan	60%	95%	23%
Non-Residential					
II	Distributed Generation	Actual	\$8.26	0.004	4,367
		Planned	\$17	0.01	5,880
		% of Plan	49%	65%	74%
Total					
All Programs	Actual	\$27	102	66,901	
	Planned	\$43	113	116,955	
	% of Plan	63%	90%	57%	

APCo EM&V Tables**APCo Commercial and Industrial Programs:***Table 1-4 Summary of C&I Portfolio Energy Savings*

<i>Program Name</i>	<i>Ex Ante Annual kWh Savings</i>	<i>Ex Post Annual Gross kWh Savings</i>	<i>Gross Realization Rate</i>	<i>Ex Post Annual Net kWh Savings</i>	<i>Net-to-Gross Ratio</i>	<i>Lifetime Gross Ex Post kWh Savings</i>	<i>Lifetime Net Ex Post kWh Savings</i>
Business Energy Solutions Program	5,236,879	5,250,807	100%	2,739,445	52%	60,823,657	36,763,531
Small Business Direct Install Program	3,212,410	2,477,466	77%	2,240,863	90%	17,625,487	15,932,404
Custom C&I Pilot Program	9,335,823	9,276,922	99%	7,151,036	77%	140,259,488	108,938,841
Opt Out Customers	112,213,385	112,213,385	100%	112,213,385	100%	112,213,385	112,213,385
C&I Portfolio Totals	129,998,497	129,218,580	99%	124,344,729	96%	330,922,018	273,848,161

Table 1-5 Summary of C&I Portfolio Peak Demand Impacts

<i>Program Name</i>	<i>Expected kW Savings</i>	<i>Gross Realized kW Savings</i>	<i>Gross Realization Rate</i>	<i>Net Realized kW Savings</i>	<i>Net-to-Gross Ratio</i>
Business Energy Solutions Program	981.78	2,495.01	254%	1,753.47	70%
Small Business Direct Install Program	57.96	57.42	99%	52.40	91%
Custom C&I Pilot Program	1,025.88	510.25	50%	397.68	78%
Opt Out Customers	-	-	N/A	-	N/A
C&I Portfolio Totals	2,065.62	3,062.68	148%	2,203.55	72%

Table 5-1 Summary of Opt Out Customer Energy Efficiency Savings

<i>Category</i>	<i>Number of Customer Accounts</i>	<i>Ex Ante Gross kWh Savings</i>	<i>Ex Post Gross kWh Savings</i>	<i>Gross Realization Rate</i>	<i>Ex Post Net kWh Savings</i>	<i>Net-to-Gross Ratio</i>
Customer-Directed Programs (Updated Customer Submissions – PY2025)	12	101,923,927	101,923,927	100%	101,923,927	100%
Customer-Directed Programs (Persistent Savings from Prior Submissions)	3	10,289,458	10,289,458	100%	10,289,458	100%
Customer-Directed Programs (Total)	15	112,213,385	112,213,385	100%	112,213,385	100%

APPENDIX 2

Table 6-2 Business Energy Solutions Program – Lighting Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ 280,554			\$ 280,554		\$ 280,554		
Program Installation Costs				\$ -		\$ -		\$ -
Bill Savings (NPV)	\$ 2,934,174							
Lost Revenue (NPV)						\$ 1,913,038		
Avoided Energy Costs (NPV)			\$ 854,728		\$ 854,728		\$ 1,161,022	
Avoided Capacity Costs (NPV)			\$ 1,362,219		\$ 1,362,219		\$ 1,818,211	
Avoided T&D Costs (NPV)			\$ 1,691,725		\$ 1,691,725		\$ 2,337,708	
Incremental Costs		\$ 285,645						\$ 285,645
Program Overhead Costs				\$ 563,234		\$ 563,234		\$ 563,234
Total Benefits	\$ 3,214,728		\$ 3,908,672		\$ 3,908,672		\$ 5,316,941	
Total Costs	\$ 285,645		\$ 843,788		\$ 2,756,826		\$ 848,879	
Test Score	11.25		4.63		1.42		6.26	

Table 6-3 Business Energy Solutions Program – Non-Lighting Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ 102,226			\$ 102,226		\$ 102,226		
Program Installation Costs				\$ -		\$ -		\$ -
Bill Savings (NPV)	\$ 797,211							
Lost Revenue (NPV)						\$ 498,620		
Avoided Energy Costs (NPV)			\$ 234,684		\$ 234,684		\$ 307,215	
Avoided Capacity Costs (NPV)			\$ 600,240		\$ 600,240		\$ 782,054	
Avoided T&D Costs (NPV)			\$ 736,427		\$ 736,427		\$ 990,796	
Incremental Costs		\$ 137,392						\$ 137,392
Program Overhead Costs				\$ 205,230		\$ 205,230		\$ 205,230
Total Benefits	\$ 899,437		\$ 1,571,352		\$ 1,571,352		\$ 2,080,064	
Total Costs	\$ 137,392		\$ 307,457		\$ 806,077		\$ 342,623	
Test Score	6.55		5.11		1.95		6.07	

Table 6-4 Business Energy Solutions Program - Total Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ 382,780			\$ 382,780		\$ 382,780		
Program Installation Costs				\$ -		\$ -		\$ -
Bill Savings (NPV)	\$ 3,731,385							
Lost Revenue (NPV)						\$ 2,411,657		
Avoided Energy Costs (NPV)			\$ 1,089,412		\$ 1,089,412		\$ 1,468,238	
Avoided Capacity Costs (NPV)			\$ 1,962,459		\$ 1,962,459		\$ 2,600,265	
Avoided T&D Costs (NPV)			\$ 2,428,152		\$ 2,428,152		\$ 3,328,503	
Incremental Costs		\$ 423,038						\$ 423,038
Program Overhead Costs				\$ 768,464		\$ 768,464		\$ 768,464
Total Benefits	\$ 4,114,165		\$ 5,480,024		\$ 5,480,024		\$ 7,397,005	
Total Costs	\$ 423,038		\$ 1,151,245		\$ 3,562,902		\$ 1,191,502	
Test Score	9.73		4.76		1.54		6.21	

APPENDIX 2

Table 6-5 Small Business Direct Install Program Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ 82,084			\$ 82,084		\$ 82,084		
Program Installation Costs				\$ -		\$ -		\$ -
Bill Savings (NPV)	\$ 1,804,780							
Lost Revenue (NPV)						\$ 1,632,656		
Avoided Energy Costs (NPV)			\$ 527,658		\$ 527,658		\$ 640,415	
Avoided Capacity Costs (NPV)			\$ 60,267		\$ 60,267		\$ 80,758	
Avoided T&D Costs (NPV)			\$ 75,027		\$ 75,027		\$ 104,111	
Incremental Costs		\$ 86,389						\$ 86,389
Program Overhead Costs				\$ 382,939		\$ 382,939		\$ 382,939
Total Benefits	\$ 1,886,864		\$ 662,951		\$ 662,951		\$ 825,284	
Total Costs		\$ 86,389		\$ 465,023		\$ 2,097,679		\$ 469,328
Test Score	21.84		1.43		0.32		1.76	

Table 6-6 Custom C&I Pilot Program Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ 147,047			\$ 147,047		\$ 147,047		
Program Installation Costs				\$ -		\$ -		\$ -
Bill Savings (NPV)	\$10,527,142							
Lost Revenue (NPV)						\$ 8,224,986		
Avoided Energy Costs (NPV)			\$ 3,055,313		\$ 3,055,313		\$ 4,323,685	
Avoided Capacity Costs (NPV)			\$ 451,021		\$ 451,021		\$ 620,567	
Avoided T&D Costs (NPV)			\$ 562,951		\$ 562,951		\$ 807,745	
Incremental Costs		\$ 368,911						\$ 368,911
Program Overhead Costs				\$ 916,408		\$ 916,408		\$ 916,408
Total Benefits	\$ 10,674,189		\$ 4,069,284		\$ 4,069,284		\$ 5,751,998	
Total Costs		\$ 368,911		\$ 1,063,454		\$ 9,288,441		\$ 1,285,318
Test Score	28.93		3.83		0.44		4.48	

Table 7-1 Avoided Carbon Emissions (Metric Tons)

Program Name	MWh Savings Referenced			
	Annual Ex Post Gross	Annual Ex Post Net	Lifetime Ex Post Gross	Lifetime Ex Post Net
Business Energy Solutions Program	3,537	1,845	40,971	24,764
Small Business Direct Install Program	1,669	1,509	11,873	10,732
Custom C&I Pilot Program	6,249	4,817	94,479	73,382
Opt Out Customers	75,587	75,587	75,587	75,587
C&I Portfolio Totals	87,042	83,759	222,910	184,465

APPENDIX 2

APCo Residential Programs:

Table 1-3 Summary of Residential Portfolio Energy Savings

Program Name	Ex Ante kWh Savings	Ex Post Gross kWh Savings	Gross kWh Savings Realization Rate	Ex Post Net kWh Savings	Estimated Net-to-Gross Ratio	Lifetime Gross Ex Post kWh Savings	Lifetime Net Ex Post kWh Savings
Home Performance Program	2,911,390	1,669,604	57%	1,398,447	84%	24,100,072	20,180,803
In-Unit Multifamily Program	1,357,903	1,140,130	84%	1,124,393	99%	9,881,889	9,729,692
Low-Income Single Family Program	990,358	1,217,550	123%	1,217,550	100%	19,477,756	19,477,756
Low-Income Multifamily Program	354,431	660,856	186%	660,856	100%	7,995,468	7,995,468
Efficient Products Program	10,130,695	10,204,502	101%	6,147,280	60%	150,768,222	90,710,422
Energy Efficiency Kits Program	277,663	251,696	91%	252,178	100%	2,614,671	2,618,083
School Energy Efficiency Kits Program	1,895,227	3,829,200	202%	3,829,200	100%	35,368,573	35,368,573
Home Energy Reports Program	32,871,765	32,871,765	100%	32,871,765	100%	32,871,859	32,871,859
Bring Your Own Thermostat Program	199,508	199,508	100%	230,915	116%	199,508	230,915
Residential Portfolio Totals	50,988,939	52,044,810	102%	47,732,583	92%	283,278,018	219,183,572

Table 1-4 Summary of Residential Portfolio Peak Demand Impacts

Program Name	Ex Ante Gross kW Savings	Ex Post Gross kW Savings	Gross Realization Rate	Ex Post Net kW Savings	Net-to-Gross Ratio
Home Performance Program	1,223.54	273.68	22%	219.05	80%
In-Unit Multifamily Program	155.66	129.65	83%	127.71	99%
Low-Income Single Family Program	352.77	138.60	39%	138.60	100%
Low-Income Multifamily Program	117.78	172.41	146%	172.41	100%
Efficient Products Program	83.25	329.46	396%	254.85	77%
Energy Efficiency Kits Program	22.52	18.59	83%	18.80	101%
School Energy Efficiency Kits Program	201.80	382.78	190%	382.78	100%
Home Energy Reports Program	5,957.67	5,957.67	100%	5,957.67	100%
Bring Your Own Thermostat Program	5,741.62	5,741.62	100%	5,741.62	100%
Residential Portfolio Totals	13,856.60	13,144.45	95%	13,013.47	99%

Table 11-2 Home Performance Program Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ 909,772			\$ 909,772		\$ 909,772		
Program Installation Costs				\$ -		\$ -		\$ -
Bill Savings (NPV)	\$ 2,499,855							
Lost Revenue (NPV)						\$ 2,100,025		
Avoided Energy Costs (NPV)			\$ 576,490		\$ 576,490		\$ 793,760	
Avoided Capacity Costs (NPV)			\$ 249,877		\$ 249,877		\$ 335,347	
Avoided T&D Costs (NPV)			\$ 310,745		\$ 310,745		\$ 432,168	
Incremental Costs		\$ 640,151						\$ 640,151
Program Overhead Costs				\$ 1,247,721		\$ 1,247,721		\$ 1,247,721
Total Benefits	\$ 3,409,627		\$ 1,137,112		\$ 1,137,112		\$ 1,561,274	
Total Costs		\$ 640,151		\$ 2,157,492		\$ 4,257,517		\$ 1,887,872
Test Score	5.33		0.53		0.27		0.83	

APPENDIX 2

Table 11-3 Residential In-Unit Multifamily Program Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ 909,772			\$ 909,772		\$ 909,772		
Program Installation Costs				\$ -		\$ -		\$ -
Bill Savings (NPV)	\$ 2,499,855							
Lost Revenue (NPV)						\$ 2,100,025		
Avoided Energy Costs (NPV)			\$ 576,490		\$ 576,490		\$ 793,760	
Avoided Capacity Costs (NPV)			\$ 249,877		\$ 249,877		\$ 335,347	
Avoided T&D Costs (NPV)			\$ 310,745		\$ 310,745		\$ 432,168	
Incremental Costs		\$ 640,151						\$ 640,151
Program Overhead Costs				\$ 1,247,721		\$ 1,247,721		\$ 1,247,721
Total Benefits	\$ 3,409,627		\$ 1,137,112		\$ 1,137,112		\$ 1,561,274	
Total Costs	\$ 640,151	\$ 2,157,492		\$ 4,257,517			\$ 1,887,872	
Test Score	5.33		0.53		0.27		0.83	

Table 11-4 Efficient Products Program Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ 547,799			\$ 547,799		\$ 547,799		
Program Installation Costs				\$ -		\$ -		\$ -
Bill Savings (NPV)	\$11,220,488							
Lost Revenue (NPV)						\$ 7,159,498		
Avoided Energy Costs (NPV)			\$ 2,588,967		\$ 2,588,967		\$ 3,569,188	
Avoided Capacity Costs (NPV)			\$ 295,066		\$ 295,066		\$ 397,648	
Avoided T&D Costs (NPV)			\$ 368,026		\$ 368,026		\$ 514,112	
Incremental Costs		\$ 948,105						\$ 948,105
Program Overhead Costs				\$ 767,405		\$ 767,405		\$ 767,405
Total Benefits	\$ 11,768,287		\$ 3,252,059		\$ 3,252,059		\$ 4,480,948	
Total Costs	\$ 948,105	\$ 1,315,204		\$ 8,474,702			\$ 1,715,509	
Test Score	12.41		2.47		0.38		2.61	

Table 11-5 Energy Efficiency Kits Program Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ 28,723			\$ 28,723		\$ 28,723		
Program Installation Costs				\$ -		\$ -		\$ -
Bill Savings (NPV)	\$ 357,394							
Lost Revenue (NPV)						\$ 358,065		
Avoided Energy Costs (NPV)			\$ 85,042		\$ 85,042		\$ 107,274	
Avoided Capacity Costs (NPV)			\$ 17,295		\$ 17,295		\$ 21,035	
Avoided T&D Costs (NPV)			\$ 20,382		\$ 20,382		\$ 25,351	
Incremental Costs		\$ -						\$ -
Program Overhead Costs				\$ 114,086		\$ 114,086		\$ 114,086
Total Benefits	\$ 386,118		\$ 122,719		\$ 122,719		\$ 153,660	
Total Costs	\$ -	\$ 142,809		\$ 500,874			\$ 114,086	
Test Score	N/A		0.86		0.25		1.35	

APPENDIX 2

Table 11-6 School Energy Efficiency Kits Program Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ 115,506			\$ 115,506		\$ 115,506		
Program Installation Costs				\$ -		\$ -		\$ -
Bill Savings (NPV)	\$ 4,818,210							
Lost Revenue (NPV)						\$ 4,818,210		
Avoided Energy Costs (NPV)			\$ 1,135,523		\$ 1,135,523		\$ 1,432,423	
Avoided Capacity Costs (NPV)			\$ 248,388		\$ 248,388		\$ 293,344	
Avoided T&D Costs (NPV)			\$ 281,675		\$ 281,675		\$ 340,074	
Incremental Costs		\$ -						\$ -
Program Overhead Costs				\$ 426,201		\$ 426,201		\$ 426,201
Total Benefits	\$ 4,933,716		\$ 1,665,586		\$ 1,665,586		\$ 2,065,841	
Total Costs	\$ -		\$ 541,707		\$ 5,359,918		\$ 426,201	
Test Score	N/A		3.07		0.31		4.85	

Table 11-7 Home Energy Reports Program Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ -			\$ -		\$ -		
Program Installation Costs				\$ -		\$ -		\$ -
Bill Savings (NPV)	\$ 5,657,183							
Lost Revenue (NPV)						\$ 5,657,183		
Avoided Energy Costs (NPV)			\$ 1,177,217		\$ 1,177,217		\$ 1,177,217	
Avoided Capacity Costs (NPV)			\$ 729,172		\$ 729,172		\$ 729,172	
Avoided T&D Costs (NPV)			\$ 832,166		\$ 832,166		\$ 832,166	
Incremental Costs		\$ -						\$ -
Program Overhead Costs				\$ 651,392		\$ 651,392		\$ 651,392
Total Benefits	\$ 5,657,183		\$ 2,738,555		\$ 2,738,555		\$ 2,738,555	
Total Costs	\$ -		\$ 651,392		\$ 6,308,575		\$ 651,392	
Test Score	N/A		4.20		0.43		4.20	

Table 11-8 Bring Your Own Thermostat Program Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ 458,620			\$ 458,620		\$ 458,620		
Program Installation Costs				\$ -		\$ -		\$ -
Bill Savings (NPV)	\$ 39,740							
Lost Revenue (NPV)						\$ 45,996		
Avoided Energy Costs (NPV)			\$ 8,543		\$ 8,543		\$ 8,543	
Avoided Capacity Costs (NPV)			\$ 702,731		\$ 702,731		\$ 702,731	
Avoided T&D Costs (NPV)			\$ 801,990		\$ 801,990		\$ 801,990	
Incremental Costs		\$ -						\$ -
Program Overhead Costs				\$ 577,574		\$ 577,574		\$ 577,574
Total Benefits	\$ 498,360		\$ 1,513,264		\$ 1,513,264		\$ 1,513,264	
Total Costs	\$ -		\$ 1,036,194		\$ 1,082,190		\$ 577,574	
Test Score	N/A		1.46		1.40		2.62	

APPENDIX 2

Table 11-9 Low-Income Single-Family Program Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ 3,540,850			\$ 3,540,850		\$ 3,540,850		
Program Installation Costs				\$ 59,400		\$ 59,400		\$ 59,400
Bill Savings (NPV)	\$ 2,295,849							
Lost Revenue (NPV)						\$ 2,295,849		
Avoided Energy Costs (NPV)			\$ 529,710		\$ 529,710		\$ 767,886	
Avoided Capacity Costs (NPV)			\$ 173,054		\$ 173,054		\$ 245,307	
Avoided T&D Costs (NPV)			\$ 220,021		\$ 220,021		\$ 325,411	
Incremental Costs		\$ -						\$ -
Program Overhead Costs				\$ 1,039,906		\$ 1,039,906		\$ 1,039,906
Total Benefits	\$ 5,836,699		\$ 922,784		\$ 922,784		\$ 1,338,604	
Total Costs	\$ -	\$ 4,640,155				\$ 6,936,004	\$ 1,099,306	
Test Score	N/A		0.20		0.13		1.22	

Table 11-10 Low-Income Multifamily Program Cost Effectiveness Test Results

Variable	PCT		UCT		RIM		TRC	
	Benefit	Cost	Benefit	Cost	Benefit	Cost	Benefit	Cost
Incentives	\$ 5,920,527			\$ 5,920,527		\$ 5,920,527		
Program Installation Costs				\$ 5,250		\$ 5,250		\$ 5,250
Bill Savings (NPV)	\$ 998,949							
Lost Revenue (NPV)						\$ 998,949		
Avoided Energy Costs (NPV)			\$ 232,512		\$ 232,512		\$ 318,398	
Avoided Capacity Costs (NPV)			\$ 219,272		\$ 219,272		\$ 312,693	
Avoided T&D Costs (NPV)			\$ 279,694		\$ 279,694		\$ 416,132	
Incremental Costs		\$ -						\$ -
Program Overhead Costs				\$ 2,089,760		\$ 2,089,760		\$ 2,089,760
Total Benefits	\$ 6,919,476		\$ 731,478		\$ 731,478		\$ 1,047,223	
Total Costs	\$ -	\$ 8,015,537				\$ 9,014,486	\$ 2,095,010	
Test Score	N/A		0.09		0.08		0.50	

Table 12-1 Avoided Carbon Emissions (Metric Tons)

Program Name	MWh Savings Referenced			
	Annual Ex Post Gross	Annual Ex Post Net	Lifetime Ex Post Gross	Lifetime Ex Post Net
Home Performance Program	1,125	942	16,234	13,594
In-Unit Multifamily Program	768	757	6,656	6,554
Low-Income Single Family Program	820	820	13,120	13,120
Low-Income Multifamily Program	445	445	5,386	5,386
Efficient Products Program	6,874	4,141	101,558	61,103
Energy Efficiency Kits Program	170	170	1,761	1,764
School Energy Efficiency Kits Program	2,579	2,579	23,824	23,824
Home Energy Reports Program	22,143	22,143	22,143	22,143
Bring Your Own Thermostat Program	134	156	134	156
Residential Portfolio Totals	35,058	32,153	190,817	147,643

APPENDIX 3

Glossary of Terms

APCo	Appalachian Power Company
Code	Code of Virginia
Commission	Virginia State Corporation Commission
C&I	Commercial & Industrial
DEV	Virginia Electric and Power Company d/b/a Dominion Energy Virginia
Dominion	Virginia Electric and Power Company d/b/a Dominion Energy Virginia
DSM	Demand Side Management
EE	Energy Efficiency
EM&V	Evaluation, Measurement and Verification
General Assembly	Virginia General Assembly
GTSA	Grid Transformation and Security Act
IAQHIP	Income and Age-Qualifying Home Improvement Program
KU/ODP	Kentucky Utilities d/b/a Old Dominion Power Company
MWh	Megawatt-hour
Staff	State Corporation Commission Staff
VCEA	Virginia Clean Economy Act
VPP	Virtual Power Plant