COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION

JOINT PETITION OF

DOMINION ENERGY, INC.,
VIRGINIA ELECTRIC AND POWER COMPANY,
OSW PROJECT LLC,
CS HOLDCO, LLC, AND
NEXTERA ENERGY, INC.

For a disposition and acquisition of control of public utility

CASE NO. PUR-2026-00112

COMMENTS OF LYNNHAVEN RIVER NOW

Lynnhaven River NOW ("LRNow") respectfully submits these comments regarding the proposed combination of Dominion Energy and NextEra Energy and the resulting acquisition of control of Dominion Energy Virginia.

LRNow is a Virginia Beach-based nonprofit organization focused on clean water, healthy ecosystems, coastal resilience, and responsible environmental and energy policy. Our work has included engagement on offshore wind, clean energy policy, energy efficiency, and workforce development.

We recognize that the proposed transaction could bring new investment, workforce opportunities, and additional resources to Virginia. At the same time, a change in ownership of Virginia's largest electric utility will have long-term implications for ratepayers and the Commonwealth's energy future. Virginia law directs the Commission to consider whether a utility transaction will impair adequate service at just and reasonable rates.[1] Within that review, LRNow asks the Commission to give particular consideration to

three issues: Virginia's offshore wind investment and workforce, safeguards for ratepayers and the public interest, and continued implementation of Virginia's clean-energy requirements.

1. Protect Virginia's Offshore Wind Investment and Workforce

Virginia has made a substantial investment in offshore wind. The Coastal Virginia Offshore Wind project ("CVOW") is a roughly 2.6-gigawatt project off Virginia Beach approved for 176 turbines and three offshore substations.[2] Virginia law also provides a pathway for development of up to 5,200 megawatts of offshore wind capacity.[3]

For Hampton Roads, this investment is about more than electricity generation. Offshore wind has helped build expertise in maritime services, port infrastructure, construction, skilled trades, and other parts of the regional clean-energy economy. CVOW will also require a capable operations and maintenance workforce for decades.

LRNow therefore believes the combined company should make a clear commitment to being a responsible long-term steward of CVOW. That includes maintaining the workforce and technical capacity needed to operate and maintain the project safely and reliably.

We also believe offshore wind should remain part of Virginia's future energy planning where additional development is technically feasible, economically reasonable, legally available, and beneficial to customers. We are not asking the Commission to approve future offshore wind projects in advance or to favor wind regardless of cost. We are asking that a change in corporate ownership not result in offshore wind being removed from serious consideration as Virginia evaluates its future energy needs.

Federal uncertainty has made offshore wind development more difficult to plan. While federal leasing and permitting policy is outside the Commission's authority, LRNow also encourages the combined company to support stable and predictable federal processes for major energy infrastructure. Regulatory certainty benefits utilities, workers, suppliers, states, and ultimately ratepayers.

The companies' recent commitment to invest **$100 million in Virginia workforce development** creates an especially important opportunity.[4] LRNow believes a meaningful portion of that investment should support offshore wind and related clean-energy careers.

That would complement legislation enacted by the General Assembly in 2026. HB 67 directs the Virginia Department of Energy to develop offshore wind training resources for manufacturing, maritime workers, skilled trades, offshore wind suppliers, and other

occupations, while coordinating with educational institutions, apprenticeships, and workforce programs.[5]

Virginia should continue building a workforce capable not only of constructing major clean-energy projects, but of operating and maintaining them here for decades. A stronger in-state workforce can keep more economic benefits in Virginia, strengthen the regional supply chain, improve operational resilience, and potentially reduce costs associated with labor shortages and reliance on specialized workers from outside the Commonwealth.

2. Protect Ratepayers and Maintain Transparency

LRNow is also concerned about the increased corporate and political influence that could accompany a combination of two very large energy companies.

Both Dominion and NextEra maintain active political and governmental-affairs programs and publicly disclose political contributions and lobbying activity.[6] That activity is lawful, and broader campaign-finance policy is not the issue before the Commission.

Our concern is more direct: **Virginia ratepayers should not pay for political influence.**

Campaign contributions, lobbying expenses, political advocacy, and similar parent-company or affiliate costs should not be passed through to Dominion Energy Virginia customers. The increased size and complexity of the combined company should also not make it more difficult for regulators to determine what corporate and affiliate expenses are properly attributable to Virginia utility service.

The scale of the proposed company also raises understandable concerns about concentrated corporate influence over energy policy. The Commission cannot resolve every question associated with political spending through this proceeding, but it can protect ratepayers through strong accounting, affiliate-cost allocation, transparency, and reporting requirements.

LRNow therefore encourages the Commission to preserve clear separation between the cost of providing regulated electric service and political or corporate activities that should be supported by shareholders.

3. Maintain Meaningful Clean-Energy, Efficiency, and Affordability Commitments

Finally, the transaction should not weaken or delay Dominion Energy Virginia's obligations under the Virginia Clean Economy Act ("VCEA") and related state law.

Virginia's clean-energy framework includes requirements for renewable generation, offshore wind, energy storage, energy efficiency, and the transition away from carbon-emitting generation. Current law also requires substantial development or procurement of physical solar, wind, and storage resources.[7]

NextEra and Dominion have stated that the combined company intends to accelerate solar, storage, and other resources in Virginia to advance the VCEA.[8] LRNow welcomes that commitment and believes it should result in measurable clean-energy deployment.

We recognize that Renewable Energy Certificates, or RECs, are expressly authorized under Virginia's Renewable Portfolio Standard and have a legitimate role in compliance. Our concern is not with lawful use of RECs. Rather, Virginia should continue seeing **real investment in physical clean-energy resources** alongside the use of those compliance mechanisms.

Growing electricity demand makes that investment more important, not less. Virginia needs a diverse portfolio that includes clean generation, storage, transmission, energy efficiency, and demand-side resources. Offshore wind should remain part of that discussion alongside other resources.

Energy efficiency and affordability programs are equally important. Virginia law requires investor-owned utilities to operate energy-efficiency programs and directs at least 15 percent of proposed program costs toward programs benefiting low-income, elderly, disabled, or veteran customers.[9] These investments can lower household energy use and bills while reducing pressure on the broader electric system.

The companies' proposal to add $100 million in shareholder-funded EnergyShare assistance through 2038 is a positive commitment.[10] That support should supplement - not replace - existing efficiency, weatherization, and low-income programs required under Virginia law.

Conclusion

LRNow recognizes that the proposed combination may bring meaningful benefits to Virginia. We also believe those benefits should be matched by clear accountability.

If the Commission approves the transaction, we respectfully encourage it, within its authority, to ensure that:

- Virginia's existing offshore wind investment receives strong long-term operations and maintenance support, while future offshore wind remains eligible for fair consideration;
- a meaningful portion of the proposed $100 million workforce investment supports offshore wind and other clean-energy career pathways in Virginia;
- political, lobbying, and inappropriate parent or affiliate costs are not borne by Virginia ratepayers, with sufficient transparency to verify that protection;
- the transaction does not delay or weaken implementation of the VCEA, including material investment in clean generation, storage, energy efficiency, weatherization, and low-income programs; and
- significant merger commitments relied upon during this proceeding are subject to reasonable reporting and accountability after the transaction closes.

Virginia is entering a period of significant growth and change in its electric system. Whatever corporate structure ultimately serves the Commonwealth, Virginia ratepayers should receive reliable and affordable service while the state continues building a cleaner, more resilient, and increasingly diversified energy system.

Lynnhaven River NOW appreciates the Commission's consideration of these comments.

Respectfully submitted,

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Footnotes

1. Va. Code § 56-90. Under Virginia's Utility Transfers Act, the State Corporation Commission may authorize a transaction when satisfied that adequate service to the public at just and reasonable rates will not be impaired or jeopardized.

2. Bureau of Ocean Energy Management, *Coastal Virginia Offshore Wind*. BOEM approved the CVOW Construction and Operations Plan in January 2024. The approved project has an estimated capacity of approximately 2,600 MW and includes 176 wind turbines and three offshore substations approximately 23.5 nautical miles east of Virginia Beach.

3. Va. Code § 56-585.5; Va. Code § 56-585.1:11. Current Virginia law provides for a Phase II utility to petition for offshore wind facilities with aggregate capacity of up to 5,200 MW, subject to applicable statutory and Commission requirements.

4. NextEra Energy, Inc. and Dominion Energy, Inc., *NextEra Energy and Dominion Energy announce transformational Virginia benefits package that puts customers first and positions the Commonwealth as a global energy leader* (Sept. 14, 2026). The companies announced a $100 million Virginia workforce development fund involving unions, apprenticeship and training programs, and Virginia educational institutions.

5. 2026 Va. Acts ch. 361 (HB 67), approved Apr. 8, 2026. HB 67 directs the Virginia Department of Energy to develop training resources to advance the offshore wind workforce, including manufacturing, maritime, skilled-trade, and offshore wind supply-chain occupations.

6. Dominion Energy, *Political Contributions & Participation*; NextEra Energy, Inc., *Corporate Political Engagement*. Both companies publicly describe political-engagement and lobbying programs and provide disclosures concerning political contributions and lobbying expenditures.

7. Va. Code § 56-585.5. The statute establishes Virginia's Renewable Portfolio Standard and additional requirements concerning development or procurement of solar, onshore wind, offshore wind, and energy-storage resources.

8. NextEra Energy, Inc. and Dominion Energy, Inc., Sept. 14, 2026 Virginia benefits package. The companies state that they intend to accelerate solar, storage, and other resources in Virginia to advance the Virginia Clean Economy Act.

9. Va. Code § 56-596.2. Virginia law requires incumbent investor-owned electric utilities to develop energy-efficiency programs and requires at least 15 percent of proposed program costs to be allocated to programs benefiting low-income, elderly, or disabled individuals or veterans.

10. NextEra Energy, Inc. and Dominion Energy, Inc., Sept. 14, 2026 Virginia benefits package. The companies announced an additional $100 million in shareholder-funded EnergyShare assistance through 2038.