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December 30, 2024

Via Online Shareholder Proposal Form

Office of Chief Counsel
Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: Omission by Dominion Energy, Inc. of Shareholder Proposal Submitted by Freeda Lynne Cathcart

Ladies and Gentlemen:

We are writing on behalf of our client, Dominion Energy, Inc. ("Dominion Energy"), pursuant to Rule 14a-8(j)(1) promulgated under the Securities Exchange Act of 1934, as amended (the "Exchange Act"), to notify the U.S. Securities and Exchange Commission (the "SEC") of Dominion Energy's intention to exclude a shareholder proposal and the related supporting statement (together, the "Proposal") submitted by Freeda Lynne Cathcart (the "Proponent") from its proxy solicitation materials ("Proxy Materials") for its 2025 Annual Meeting of Shareholders (the "2025 Annual Meeting"). Dominion Energy requests confirmation that the staff of the SEC's Division of Corporation Finance (the "Staff") concurs with Dominion Energy's view that the Proposal may be excluded from its Proxy Materials or, alternatively, will not recommend to the SEC that enforcement action be taken if Dominion Energy omits the Proposal from its Proxy Materials in reliance on Rule 14a-8(i)(10) under the Exchange Act as described below.

This letter provides an explanation of why Dominion Energy believes that it may exclude the Proposal from its Proxy Materials and includes the attachments required by Rule 14a-8(j). A copy of this letter and its attachments are also being sent concurrently to the Proponent in accordance with Rule 14a-8(j), informing the Proponent of Dominion Energy's intention to omit the Proposal from its Proxy Materials. In addition, we wish to take this opportunity to inform the Proponent that if she submits additional correspondence to the Staff with respect to the Proposal, a copy of that correspondence should also be furnished to the undersigned on behalf of Dominion Energy pursuant to Rule 14a-8(k) and Staff Legal Bulletin No. 14D (Nov. 7, 2008).

This letter is being submitted not less than 80 calendar days before the anticipated filing of Dominion Energy's definitive proxy statement for the 2025 Annual Meeting in accordance with Rule 14a-8(j).

Pursuant to the guidance provided in Section F of Staff Legal Bulletin No. 14F (Oct. 18, 2011), we ask that the Staff provide its response to this request to the undersigned via email at the address noted in the last paragraph of this letter.

I. The Proposal

The Proposal sets forth the following proposed resolution to be voted upon by Dominion Energy's shareholders at the 2025 Annual Meeting:

> "**Resolved**: Shareholders request that Dominion issue a report by June 1, 2026 at reasonable cost and omitting proprietary information describing how it is responding to the liability risks associated with expanding natural gas based infrastructure and suppressing clean energy progress as the courts respond to cases holding gas companies responsible for extreme weather catastrophes."

Copies of the Proposal and the accompanying correspondence from the Proponent are attached hereto as Exhibit A.

II. Basis for Exclusion

Dominion Energy hereby respectfully requests that the Staff concur with its view that the Proposal may be excluded from its Proxy Materials pursuant to Rule 14a-8(i)(10) because the Proposal has been substantially implemented by Dominion Energy.

III. Background Regarding 2022 Proposal and Responsive Risk Assessment Report

In connection with Dominion Energy's 2022 Annual Meeting of Shareholders (the "2022 Annual Meeting"), the Proponent submitted a shareholder proposal (the "2022 Proposal") to be included in the related proxy materials that was substantially similar to the Proposal. Specifically, the 2022 Proposal set forth the following resolution to be voted on by Dominion Energy's shareholders at the 2022 Annual Meeting:

> "Shareholders request that Dominion issue a report at reasonable cost and omitting proprietary information describing how it is responding to the risk of stranded assets of planned natural gas based infrastructure and assets as the global response to climate change intensifies."

On January 24, 2022, Dominion Energy submitted a no-action letter to the Staff requesting that the Staff concur with Dominion Energy's position that its public disclosures and other publicly available reports already substantially implemented the 2022 Proposal and, as a result, it could exclude the 2022 Proposal from its proxy materials for the 2022 Annual Meeting.

On March 10, 2022, the Staff denied Dominion Energy's no-action request, stating that it was "unable to concur in your view that the Company may exclude the Proposal under Rule 14a-8(i)(10)." As a result, Dominion Energy included the 2022 Proposal in its proxy materials for the 2022 Annual Meeting and submitted the 2022 Proposal to a vote of its shareholders at the 2022 Annual Meeting. In the proxy statement, Dominion Energy's Board of Directors (the "Board") made no recommendation either "for" or "against" the 2022 Proposal because it believed that Dominion Energy had already provided the information requested by the 2022 Proposal. Dominion Energy's shareholders approved the 2022 Proposal.

In direct response to shareholder approval of the 2022 Proposal, Dominion Energy published *Dominion Energy's Natural Gas Assets: A Stranded Risk Assessment* (the "Risk Assessment Report") on February 10, 2023. As described below, the Risk Assessment Report implemented the 2022 Proposal and substantially implements the Proposal and, therefore, the Proposal may be excluded pursuant to Rule 14a-8(i)(10). This must be the case given (i) the Proposal and the 2022 Proposal, both submitted by the Proponent, are substantially similar given their focus on the same natural gas asset risks in light of potential environmental liabilities and the global response to climate change and (ii) the Risk Assessment Report was prepared and published in direct response to the 2022 Proposal.

A copy of the 2022 Proposal and supporting statement is attached to this letter as Exhibit B. A copy of the Risk Assessment Report is attached to this letter as Exhibit C.

IV. The Proposal May Be Excluded Pursuant to Rule 14a-8(i)(10) Because the Proposal Has Been Substantially Implemented

A. Background of Rule 14a-8(i)(10).

Rule 14a-8(i)(10) permits a registrant to exclude a shareholder proposal from its proxy materials if the registrant has already "substantially implemented the proposal." The SEC stated that the predecessor to Rule 14a-8(i)(10) was "designed to avoid the possibility of shareholders having to consider matters which already have been favorably acted upon by the management." *See* Exchange Act Release No. 34-12598 (July 7, 1976). Originally, the Staff narrowly interpreted the predecessor rule and granted no-action relief with respect to the exclusion of proposals on this basis only when the proposals were "'fully' effected" by the registrant. *See* Exchange Act Release No. 19135 (Oct. 14, 1982). However, by 1983, the SEC recognized that this "formalistic application of [the Rule] defeated its purpose" because proponents were successfully convincing the Staff to deny no-action relief by submitting proposals that differed from existing company policy in minor respects. *See* Exchange Act Release No. 20091 at § II.E.6 (Aug. 16, 1983). Therefore, the SEC adopted a revised interpretation of the rule to permit the omission of proposals that had been "substantially implemented." *Id*. The 1998 amendments to Rule 14a-8 codified this position. *See* Exchange Act Release No. 40018 (May 21, 1998), at n.30 and accompanying text.

Under this standard, when a registrant can demonstrate that it has already taken actions to address the underlying concerns and essential objectives of a shareholder proposal, the Staff has concurred that the proposal has been "substantially implemented" and may be excluded from the registrant's proxy materials as moot under Rule 14a-8(i)(10). The Staff has stated that, in determining whether a shareholder proposal has been "substantially implemented," it will consider if a registrant's particular policies, practices and procedures "compare favorably with the guidelines of the proposal." *See, e.g., Edison International* (Feb. 23, 2022) (concurring with exclusion of a proposal requesting the registrant adopt a policy requiring that the chair of the board of directors be an independent member of the board); *Visa, Inc.* (Oct. 11, 2019) (concurring with exclusion of a proposal recommending that the compensation committee reform the registrant's executive compensation philosophy to include social factors to enhance the registrant's social responsibility); *United Airlines Holdings, Inc.* (April 13, 2018) (concurring with exclusion of a proposal requesting the registrant to adopt an incentive pay recoupment policy); *Oshkosh Corp.* (Nov. 4, 2016) (concurring with exclusion of a proposal requesting six changes to the registrant's proxy access bylaw).

A registrant does not need to implement a proposal in exactly the same manner set forth by the proponent. The Staff has permitted registrants to exclude proposals from their proxy materials pursuant to Rule 14a-8(i)(10) where they have satisfied the essential objective of the proposal, even if they did not take the exact action requested by the proponent, did not implement the proposal in every detail or exercised discretion in determining how to implement the proposal. *See, e.g., Exxon Mobil Corp.* (March 20, 2024) (concurring with exclusion of a proposal requesting the registrant amend the registrant's recoupment policy); *Eli Lilly & Co.* (March 14, 2024) (concurring with the exclusion of a proposal requesting the registrant amend its governing documents to implement a simple majority voting standard); *Comcast Corp.* (April 9, 2021) (concurring with exclusion of a proposal requesting a report assessing the registrant's diversity and inclusion efforts); *Entergy Corp.* (Feb. 14, 2014) (concurring with the exclusion of a proposal calling for a report on policies the registrant could adopt to take additional near-term actions to reduce its greenhouse gas ("GHG") emissions); *Duke Energy Corp.* (Feb. 21, 2012) (concurring with the exclusion of a proposal requesting that an independent board committee prepare a report on the registrant's action to reduce GHG and other emissions).

Applying these standards, the Staff has consistently concurred with the exclusion of shareholder proposals that, like the Proposal, request a report containing information that the registrant has already publicly disclosed. For example, in *Exxon Mobil Corp.* (March 9, 2021), the Staff allowed the registrant to exclude a proposal that requested a report describing how it was reducing the risk of stranded assets related to the environmental impacts of its petrochemical investments because the registrant already provided the information requested by the proposal in the registrant's annual energy and carbon summary and sustainability report. Similarly, in *PNM Resources, Inc.* (March 30, 2018), the Staff allowed the registrant to exclude a proposal that requested a report identifying generation assets that may become stranded due to global climate change because the registrant's disclosures in its generation portfolio report, climate change report and publicly available integrated resource plans substantially implemented the proposal. In *Alliant Energy Corp.* (March 30, 2023), the Staff concurred with the exclusion of a proposal pursuant to Rule 14a-8(i)(10) that asked the registrant to provide an annual report to shareholders about the registrant's actual progress toward, and ongoing feasibility of its announced goal of reaching net-zero carbon dioxide emissions by 2050 for the electricity it generates, because the registrant published an environmental, social and governance summary, climate report and responsibility report that, combined, substantially implemented the proposal. In *IDACORP, Inc.* (April 1, 2022), the Staff permitted the registrant to exclude a proposal requesting a report disclosing short-, medium- and long-term GHG targets because the registrant's existing public disclosures substantially implemented the proposal. In *Chevron Corporation* (March 30, 2021), the Staff permitted the registrant to exclude a proposal requesting a report on the Scope 3 emissions from its liquid natural gas operations and how the registrant plans to offset, pay carbon taxes on or eliminate via technology these emissions to meet post-2050 Paris Accord carbon emission reduction goals to which the registrant had publicly committed because the registrant published on its website disclosures regarding its Scope 3 emissions and its plans to offset, pay carbon taxes on or remove via technology these emissions. In *Hess Corp.* (April 11, 2019), the Staff permitted the registrant to exclude a proposal requesting a report on how it could reduce its carbon footprint in alignment with GHG reductions necessary to achieve the Paris Accord's goals because the registrant already published information regarding reducing its carbon footprint in its sustainability report and other public disclosures. Finally, specific to Dominion Energy, the Staff, in *Dominion Energy, Inc.* (March 6, 2020), allowed Dominion Energy to exclude a proposal requesting Dominion Energy to report on its response to the risk of stranded assets of planned natural gas-based infrastructure and assets because the requested information was substantially implemented through relevant information in Dominion Energy's public disclosures.

B. The Risk Assessment Report Substantially Implements the Proposal

The Proposal asks Dominion Energy to issue a report responding to the liability risks associated with expanding natural gas-based infrastructure and suppressing clean energy progress as the courts respond to cases holding gas companies responsible for extreme weather catastrophes. At its core, the Proposal is asking Dominion Energy to disclose the same information that the 2022 Proposal asked for: a report describing how Dominion Energy is responding to the potential risk that its natural gas-based infrastructure and assets will become stranded due to legal and governmental responses to climate change.

In the context of climate change, "stranded assets" are "any assets that suffer unanticipated or premature write-downs, devaluations, or conversions to liabilities due to climate-change-related impacts."[1] By asking about the "liability risks" for natural gas-based infrastructure, the Proponent is requesting the same information already provided in the Risk Assessment Report, which directly responded to the Proponent's prior request for a report on how Dominion Energy "is responding to the risk of stranded assets of planned natural gas based infrastructure and assets." Additionally, the "global response to climate change" described in the

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[1] *See* Considerations for climate stranded assets, *available at* https://kpmg.com/us/en/articles/2022/considerations-for-climate-stranded-assets.html.

2022 Proposal inherently includes "courts respond[ing] to cases holding gas companies responsible for extreme weather catastrophes" described in the Proposal.

Given that the Proposal and the 2022 Proposal are the same – seeking the same ultimate outcome (i.e., a report) concerning the same potential risk (i.e., liability risk associated with natural gas-based infrastructure assets due to legal and governmental responses to climate change), the Risk Assessment Report must address the "underlying concerns" and satisfy the "essential objective" of the Proposal. Accordingly, Dominion Energy believes that it has already substantially implemented the Proposal and, therefore, can exclude the Proposal from the Proxy Materials pursuant to Rule 14a-8(i)(10).

The Risk Assessment Report describes the steps Dominion Energy is taking to mitigate the risk that its natural gas-based infrastructure becomes stranded. As detailed in the Risk Assessment Report, Dominion Energy's strategy hinges on modernizing and replacing less efficient natural gas infrastructure, expanding leak detection programs, improving processes, procedures and systems, pursuing a wide range of voluntary initiatives, investing in innovation and striving towards best-in-class technical excellence.[2] These six "proactive measures" are intended to help ensure existing and future natural gas infrastructure aligns with both Dominion Energy's Net Zero Commitment[3] and the objectives of the Paris Accord, which supports the ongoing use of the natural gas-based infrastructure and mitigates the associated risk.[4]

While Dominion Energy believes the Proposal is requesting the same information the 2022 Proposal requested, to the extent there is any difference between the Proposal and the 2022 Proposal, it is that the 2022 Proposal requested information regarding Dominion Energy's "planned" natural gas-based infrastructure assets and the Proposal is requesting information regarding its "expanding" natural gas-based infrastructure assets. However, this difference does not preclude the Proposal from being substantially implemented, as the Risk Assessment Report also addresses Dominion Energy's mitigation efforts for its future and expanding natural gas-based infrastructure assets. For example, under the heading "Promoting Natural Gas Sustainability," Dominion Energy discloses its strategy for its continued expansion of its natural gas-based infrastructure and how it is taking measures in response to the risks involved with this expansion. The Risk Assessment Report notes that "it would be imprudent" for Dominion Energy "not to prepare its natural gas infrastructure accordingly."[5] The Risk Assessment Report also describes how Dominion Energy is further mitigating the risk of its continued use and expansion of its natural gas-based infrastructure by "advocat[ing] for its upstream gas suppliers to adopt their own net zero goals, promote disclosure of their emissions and development of sustainability plans, and encourag[ing] them to bring responsibly sourced gas[6] . . . to market."[7]

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[2] Risk Assessment Report at 6.
[3] Dominion Energy's Net Zero Commitment is its commitment to achieve net zero carbon and methane emissions by 2050.
[4] Risk Assessment Report at 6.
[5] Risk Assessment Report at 14.
[6] "Responsibly sourced gas" is gas certified as produced at a lower emissions intensity.
[7] Risk Assessment Report at 7.

Further, as discussed above, the Proposal asks that the report respond to the liability risks associated with suppressing clean energy progress. In support of the assertion that Dominion Energy is "suppressing" clean energy progress, the Proponent, in her supporting statement, points to the Risk Assessment Report, which includes the following statement: "[w]e acknowledge the risks associated with natural gas bans in certain jurisdictions, and the company is working with policymakers to maintain customers' access to natural gas in accordance with their preferences and expectations. Legislation preserving customer choice has already been passed in many of the states in which our gas business operates."[8] However, the Proposal ignores the later part of the Risk Assessment Report under the heading "The Broader Clean-Energy Context," which highlights Dominion Energy's efforts to support renewable energy resources,[9] including:

- investing in renewable energy resources that further mitigates the risks associated with Dominion Energy's natural gas-based infrastructure;
- seeking to secure a vital source of zero-carbon baseload power for years to come by extending the operating lives of nuclear units and by exploring advanced nuclear technologies such as small modular reactors;[10]
- Dominion Energy's operation of the first utility-owned offshore wind turbines in federal waters;[11] and
- Dominion Energy's up to $50 billion investment in zero-carbon generation and energy storage through 2035, in order to prepare for the possibility of more stringent emissions regulations.[12]

The disclosure of the renewable energy initiatives that Dominion Energy is undertaking further demonstrate that Dominion Energy has already substantially implemented the Proposal by preparing and publishing the Risk Assessment Report. As the Risk Assessment Report clearly already provides all of the information that the Proposal is requesting, including the information relating to clean energy progress, Dominion Energy believes that the Proposal is excludable from the Proxy Materials under Rule 14a-8(i)(10) as substantially implemented.

C. Dominion Energy Has Substantially Implemented the Proposal, Notwithstanding the Proponent's Critique of the Information and Conclusions Presented in the Risk Assessment Report.

The Proponent's supporting statement for the Proposal acknowledges that Dominion Energy, as requested by the 2022 Proposal, prepared the Risk Assessment Report; however, the Proponent states that it was "inadequate in addressing [Dominion Energy's] liability risks." Additionally, as discussed above, it includes a direct quote from the Risk Assessment Report

[8] Risk Assessment Report at 5.
[9] Risk Assessment Report at 13.
[10] Risk Assessment Report at 13-14.
[11] Risk Assessment Report at 13.
[12] Risk Assessment Report at 14.

used to bolster the Proponent's position that Dominion Energy is "suppressing" clean energy progress. Further, the Proponent includes a statement that Dominion Energy "has supported Power For Tomorrow which was responsible for scaring voters to oppose clean energy legislation" and is "lobbying the state legislature" in South Carolina "to support a 2,000-megawatt natural gas power plant despite regulatory concerns." The Proponent also states that shareholders are concerned that future state court rulings could "lead to a 'tidal wave' of new cases, similar to the nationwide push that forced tobacco companies to pay billions under a settlement reached in the 1990s." These statements do not identify any new topics that are absent from Dominion Energy's current disclosures in the Risk Assessment Report. Instead, the Proponent's statements demonstrate that rather than a report responding to the liability risks associated with expanding natural gas-based infrastructure and suppressing clean energy progress, which Dominion Energy has provided in line with the requirements of the Proposal and in direct response to the 2022 Proposal, the Proponent simply disagrees with certain actions and assumptions of Dominion Energy underlying the information provided in the Risk Assessment Report. The Proponent simply disagrees with Dominion Energy's business judgment and analysis with respect to the risks associated with its natural gas-based infrastructure and wants Dominion Energy to prepare a new report on the exact same topic but reach a different conclusion. The Board oversees Dominion Energy's risk profile and management's processes for assessing and managing the risks associated with Dominion Energy's use of natural gas-based infrastructure and clean energy through extensive analysis that balances many complex and competing considerations, including the regulatory obligation to serve customers, the availability and cost of new generation resources, legal and other permitting requirements, system operation and energy integration, grid balancing and other factors. These determinations are correctly within the scope of the Board and management's discretion and are made using their good faith business judgment. Dominion Energy understands that the Proponent may disagree with aspects of Dominion Energy's business and mitigation strategy and may indeed think that it is "inadequate"; however, that does not mean that the information requested by the Proposal has not already been provided.

The Proposal itself does not require that Dominion Energy disclose specific information relating to its risk mitigation efforts, nor what the Proponent would consider to be adequate. Instead, the Proposal requests a report responding to the liability risks associated with expanding natural gas-based infrastructure and suppressing clean energy progress, which Dominion Energy has provided in the Risk Assessment Report. Given the publication of the Risk Assessment Report in direct response to the 2022 Proposal submitted by the Proponent, Dominion Energy believes that it has satisfied the Proposal's essential objective.

The Risk Assessment Report also provides that Dominion Energy will provide additional information regarding "[a]ny shift in [its] strategy for achieving Net Zero, including the company's thinking relative to existing and planned natural gas infrastructure," through a "variety of recurring disclosures."[13] Dominion Energy intends to fulfill this undertaking through its Sustainability & Corporate Responsibility Report, Climate Report, Summary Annual Report

[13] Risk Assessment Report at 15.

and state-level Integrated Resource Plans, among other publicly available resources. Accordingly, even to the extent there have been updates since the recent publication of the Risk Assessment Report, that updated information will also be publicly disclosed through Dominion Energy's regular recurring disclosure documents.

As a result, even if the Proposal were approved by Dominion Energy's shareholders at the 2025 Annual Meeting, there is no additional information for Dominion Energy to disclose in a new report. Shareholders would not need to wait until June 1, 2026 for Dominion Energy to issue the report called for by the Proposal, as Dominion Energy would simply point shareholders to the existing Risk Assessment Report, given this report already expressly addresses each of the elements called for by the Proposal. Therefore, Dominion Energy believes that its current disclosures as set forth in the Risk Assessment Report, at an absolute minimum, compare favorably with those requested by the Proposal and thereby substantially implement the Proposal.

Based on the above, Dominion Energy believes the Proposal may be excluded from its Proxy Materials pursuant to Rule 14a-8(i)(10) as substantially implemented.

V. Conclusion

Based on the foregoing, we respectfully request that the Staff concur with Dominion Energy's view or, alternatively, not recommend enforcement action to the SEC if Dominion Energy excludes the Proposal from its Proxy Materials pursuant to Rule 14a-8(i)(10).

Should the Staff have any questions regarding this matter or need any additional information, please do not hesitate to contact me at 804-775-4711 or by email at lway@mcguirewoods.com.

Very truly yours,

Lawton B. Way

Enclosures

cc: Freeda Lynne Cathcart
Amanda B. Tornabene, Dominion Energy, Inc.
Noopur N. Garg, Dominion Energy, Inc.
Karen Doggett, Dominion Energy, Inc.
Meredith S. Thrower, Dominion Energy, Inc.
Amanda W. Shannon, Dominion Energy, Inc.

Hannah Thompson Frank, McGuireWoods LLP
W. Lake Taylor, Jr., McGuireWoods LLP
Sean W. Patterson, McGuireWoods LLP

EXHIBIT A

(Copy of the Proposal and Accompanying Correspondence)

Dominion Energy 2024 Shareholder Resolution

Report on liability risk for natural gas infrastructure expansion and interference with state legislatures

Whereas:

Shareholders voted by over 80% at the 2022 Dominion Energy (the Company) annual meeting for the resolution asking for the Company to prepare a *Report on the risk and impacts of natural gas use*. The resulting *2023 Dominion A Stranded Risk Assessment* was inadequate in addressing the Company's liability risk.

The April 2024 Congressional Joint Staff Report on Denial, Disinformation, and Doublespeak: Big Oil's Evolving Efforts To Avoid Accountability For Climate Change revealed the following information:

- "New documents demonstrate that Big Oil companies:
  - seek to position natural gas as a "bridge fuel" between coal and cleaner, renewable energy, while enmeshing natural gas in the U.S. energy economy for the long-term;
  - seek to portray natural gas as a green, climate-friendly fuel, while internally acknowledging that there is significant scientific evidence that the lifecycle emissions from gas are as bad as coal and are incompatible with scientific emissions reduction targets;...
  - privately lobby—either directly or through their trade associations—against pro-climate legislation and regulations that they publicly claimed to support;...
- The fossil fuel industry relies on trade associations to spread confusing and misleading narratives and to lobby against climate action. Fossil fuel companies use trade associations, think tanks, and other nonprofits to influence public policy proposals and messaging…"

In 2023 the Supreme Court ruled that the cases holding fossil fuel companies liable for extreme weather destruction must be heard through the state courts.

Shareholders are concerned that future state court rulings could "lead to a "tidal wave" of new cases, similar to the nationwide push that forced tobacco companies to pay billions under a settlement reached in the 1990s".

Even though methane accelerates extreme weather events, the Company is continuing to work on building new gas infrastructure and interfering with state legislatures, both activities that increase the Company's liability risk.

The *2023 Dominion A Stranded Risk Assessment* included this statement “We acknowledge the risks associated with natural gas bans in certain jurisdictions, and the company is working with policymakers to maintain customers’ access to natural gas in accordance with their preferences and expectations. Legislation preserving customer choice has already been passed in many of the states in which our gas business operates.”.

In South Carolina, Dominion Energy and Santee Cooper are lobbying the state legislature to support a 2,000-megawatt natural gas power plant despite regulatory concerns. Farther north, Dominion also plans new gas generation in Virginia. The Company has supported Power For Tomorrow which was responsible for scaring voters to oppose clean energy legislation.

Resolved:

Shareholders request that Dominion issue a report by June 1, 2026 at reasonable cost and omitting proprietary information describing how it is responding to the liability risks associated with expanding natural gas based infrastructure and suppressing clean energy progress as the courts respond to cases holding gas companies responsible for extreme weather catastrophes.

From: Karen Doggett (Services - 6)
Sent: Monday, November 25, 2024 4:35 PM
To: Andrew R Klimek (Services - 6)
Subject: FW: [EXTERNAL] Resolution for 2025 annual meeting
Attachments: 2024 Letter of Intent for Dominion Energy Resolution (1).pdf; Dominion Energy 2024 Report on liability risks for natural gas infrastructure expansion and interference with state legislatures.pdf

Karen W. Doggett
Assistant Corporate Secretary and Director-Governance
Dominion Energy Services, Inc.
600 East Canal Street, Richmond, VA 23219
[redacted]

From: Freeda Cathcart [redacted]
Sent: Friday, November 22, 2024 3:46 PM
To: Karen Doggett (Services - 6) [redacted]
Cc: Amanda B Tornabene (Services - 6) [redacted]
Subject: [EXTERNAL] Resolution for 2025 annual meeting

Dear Corporate Secretary,

Attached is a resolution to be presented at the 2025 Dominion Energy annual shareholder meeting. Also attached is the required shareholder letter of intent to continue to hold the required shares through the 2025 annual meeting.

I have a very flexible schedule and will work with the Company's representatives to find a time to meet with them according to the SEC rules. The first week in December I have the most flexibility. I'm **not** available the morning of December 3, December 5 from 1:00-2:30 and December 6 from 12:00-2:00. I prefer to communicate via email.

All the best,
Freeda Cathcart
Dominion Energy shareholder
(she/her)
--
[redacted]

RE: Intent to Hold Shares

To Whom It May Concern:

By this letter I hereby express my intent to hold a sufficient value of Dominion Energy stock (as defined within SEC Rule 14a-8) from the time of filing a shareholder proposal through the date of the subsequent annual meeting of shareholders. Broadridge shareholder services holds my shares which I have owned continuously for decades first as South Carolina Gas and Electric before it merged into SCANA and then merged with Dominion Energy.

This statement of intent acknowledges this responsibility under SEC rules, and applies to the shares of any company that I own at which a shareholder proposal is filed (whether directly or on my behalf). This statement of intent is intended to be durable, and forward-looking as well as retroactive.

I have a very flexible schedule and will work with the Company to find a time to meet with them to discuss the resolution according to the SEC rules. The first week in December I have the most flexibility. I'm **not** available the morning of December 3, December 5 from 1:00-2:30 and December 6 from 12:00-2:00.

Sincerely,

Freeda Lynne Cathcart

Freeda Lynne Cathcart
November 22, 2024

Dominion Energy 2024 Shareholder Resolution

Report on liability risk for natural gas infrastructure expansion and interference with state legislatures

Whereas:

Shareholders voted by over 80% at the 2022 Dominion Energy (the Company) annual meeting for the resolution asking for the Company to prepare a *Report on the risk and impacts of natural gas use*. The resulting *2023 Dominion A Stranded Risk Assessment* was inadequate in addressing the Company's liability risk.

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  - seek to portray natural gas as a green, climate-friendly fuel, while internally acknowledging that there is significant scientific evidence that the lifecycle emissions from gas are as bad as coal and are incompatible with scientific emissions reduction targets;...
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Resolved:

Shareholders request that Dominion issue a report by June 1, 2026 at reasonable cost and omitting proprietary information describing how it is responding to the liability risks associated with expanding natural gas based infrastructure and suppressing clean energy progress as the courts respond to cases holding gas companies responsible for extreme weather catastrophes.

From: Karen Doggett (Services - 6)
Sent: Monday, December 2, 2024 6:05 PM
To: Freeda Cathcart
Cc: Amanda B Tornabene (Services - 6); Noopur N Garg (Services - 6); Andrew R Klimek (Services - 6)
Subject: RE: [EXTERNAL] Resolution for 2025 annual meeting

Dear Freeda,

We are in receipt of your shareholder proposal and would like to schedule a call to discuss it. Based on the dates you provided, we are available for call on Thursday, December 5 at 10:30 a.m. ET. Could you confirm that works for you? If so, we will follow up with a calendar invitation with the Microsoft Teams conferencing information.

Sincerely,

Karen

Karen W. Doggett
Assistant Corporate Secretary and Director-Governance
Dominion Energy Services, Inc.
600 East Canal Street, Richmond, VA 23219
[redacted]

From: Freeda Cathcart [redacted]
Sent: Friday, November 22, 2024 3:46 PM
To: Karen Doggett (Services - 6) [redacted]
Cc: Amanda B Tornabene (Services - 6) [redacted]
Subject: [EXTERNAL] Resolution for 2025 annual meeting

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All the best,
Freeda Cathcart
Dominion Energy shareholder
(she/her)
--

[redacted]

From: Freeda Cathcart [redacted]
Sent: Tuesday, December 3, 2024 3:37 PM
To: Karen Doggett (Services - 6)
Cc: Amanda B Tornabene (Services - 6); Noopur N Garg (Services - 6); Andrew R Klimek (Services - 6)
Subject: [EXTERNAL] Re: Resolution for 2025 annual meeting

CAUTION! This message was NOT SENT from DOMINION ENERGY
Are you expecting this message to your DE email? Suspicious? Use PhishAlarm to report the message. Open a browser and type in the name of the trusted website instead of clicking on links. DO NOT click links or open attachments until you verify with the sender using a known-good phone number. Never provide your DE password.

This Thursday at 10:30 works for me.

All the best,
Freeda Cathcart
(she/her)
--
[redacted]

On Mon, Dec 2, 2024 at 6:05 PM [redacted]> wrote:

> Dear Freeda,
>
> We are in receipt of your shareholder proposal and would like to schedule a call to discuss it. Based on the dates you provided, we are available for call on Thursday, December 5 at 10:30 a.m. ET. Could you confirm that works for you? If so, we will follow up with a calendar invitation with the Microsoft Teams conferencing information.
>
> Sincerely,
>
> Karen
>
> Karen W. Doggett
> Assistant Corporate Secretary and Director-Governance
> Dominion Energy Services, Inc.
> 600 East Canal Street, Richmond, VA 23219
> [redacted]

From: Freeda Cathcart [redacted]
Sent: Friday, November 22, 2024 3:46 PM
To: Karen Doggett (Services - 6) [redacted]
Cc: Amanda B Tornabene (Services - 6) [redacted]
Subject: [EXTERNAL] Resolution for 2025 annual meeting

Dear Corporate Secretary,

Attached is a resolution to be presented at the 2025 Dominion Energy annual shareholder meeting. Also attached is the required shareholder letter of intent to continue to hold the required shares through the 2025 annual meeting.

I have a very flexible schedule and will work with the Company's representatives to find a time to meet with them according to the SEC rules. The first week in December I have the most flexibility. I'm **not** available the morning of December 3, December 5 from 1:00-2:30 and December 6 from 12:00-2:00. I prefer to communicate via email.

All the best,

Freeda Cathcart

Dominion Energy shareholder

(she/her)

--

[redacted]

Andrew R Klimek (Services - 6)

Subject: Dominion Energy - Freeda Cathcart Call
Location: Microsoft Teams Meeting; [redacted] Restricted

Start: Thu 12/5/2024 10:30 AM
End: Thu 12/5/2024 11:00 AM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Karen Doggett (Services - 6)
Required Attendees Amanda B Tornabene (Services - 6); Noopur N Garg (Services - 6); Molly A Parker (Services - 6); Freeda Cathcart
Optional Attendees: Andrew R Klimek (Services - 6)

Microsoft Teams [Need help?]

[redacted]
Meeting ID: [redacted]
Passcode: [redacted]

Dial in by phone

[redacted] United States, Richmond

[Find a local number]

Phone conference ID: [redacted] #

Join on a video conferencing device

Tenant key: [redacted]
Video ID: [redacted]

[More info]

For organizers: [redacted]

EXHIBIT B

(Copy of the 2022 Proposal and Supporting Statement)

Report on risk and impacts of natural gas use

Whereas:

The Intergovernmental Panel on Climate Change **released a report** finding that "rapid, far-reaching" changes are necessary in the next 10 years to avoid disastrous levels of global warming.

The energy sector has a critical role to play in mitigating climate risks. Already, the sector is undergoing a rapid transition by moving away from coal, but growing reliance on natural gas creates ongoing risk. Natural gas is a major contributor to climate change due to methane leaks and routine combustion emissions. In 2018, natural gas contributed to an **increase in power sector emissions**, thereby jeopardizing chances of achieving reductions in line with the Paris Agreement's goal of keeping global warming below 1.5 degrees Celsius.

Investing in **new gas infrastructure** may be uneconomic and result in costly stranded assets comparable to early retirements now occurring for coal. While **some low-carbon scenarios** show gas use continuing, they rely on carbon removal technologies -- a risky assumption given that the technology has yet to prove economic at scale.

Existing alternatives to natural gas -- such as **renewables plus storage**, demand response, electrification, and energy efficiency -- are all increasingly cost-effective means of serving energy needs while reducing fossil fuel use and climate impacts. City governments, recognizing gas' harmful climate impacts, are setting policies prohibiting **gas hookups for new buildings** in favor of safer, healthier electric buildings. Furthermore, states, cities, and **large consumers are setting ambitious renewable energy targets**, which utilities will need to supply or risk losing business.

While Dominion (the Company) is to be commended for taking **climate conscious steps**, including setting a long term greenhouse gas target and actions to decrease methane leakage, investors lack sufficient information to understand if or how the Company can reconcile its growing reliance on natural gas with aligning with the Glasgow COP26 goals.

Even though the Company canceled the Atlantic Coast Pipeline, the Company signed onto a contract for capacity from the Mountain Valley Pipeline (an expensive new natural gas infrastructure project still under construction). This is incongruent with the recent pledge that over 100 countries, including the U.S. and China, made to reduce methane emissions by 30% by 2030 compared to 2020. This indicates that the Company may not be sufficiently addressing commitments for new natural gas infrastructure projects to be reconciled with climate stability goals or the existence of increasingly low cost, clean energy pathways.

Peer utilities, including **Xcel**, have demonstrated alternatives to investing in new gas infrastructure by replacing coal assets with renewables and storage, creating win-win solutions. Shareholders are concerned that the Company is **lagging behind** on such opportunities and increasing its exposure to climate-related risks by investing in significant gas holdings that may become stranded.

Resolved:

Shareholders request that Dominion issue a report at reasonable cost and omitting proprietary information describing how it is responding to the risk of stranded assets of planned natural gas based infrastructure and assets as the global response to climate change intensifies.

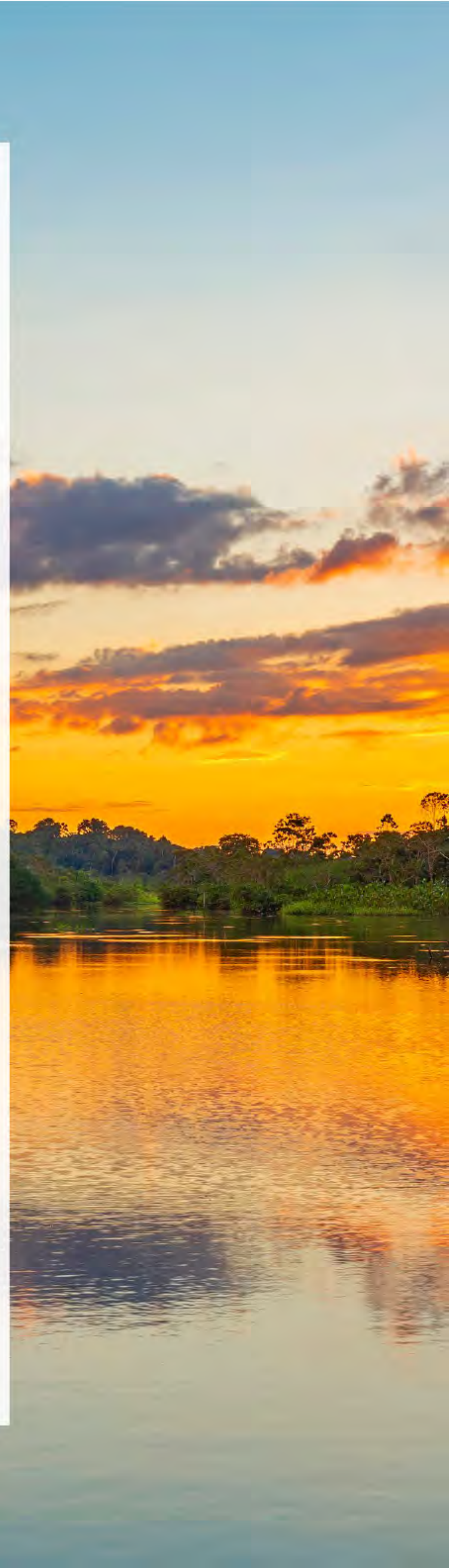
EXHIBIT C

(Copy of the Risk Assessment Report)

Dominion Energy

Dominion Energy's Natural Gas Assets:

A Stranded Risk Assessment



Contents

Forward-Looking Statements

This report contains certain forward-looking statements that are subject to various risks and uncertainties. Such forward-looking statements include, among other things, projections related to emission reductions and targets, changes in technology, statements about future business plans and forecasts for planned capital needs. We have identified and will in the future identify in our SEC (Securities and Exchange Commission) Reports on Forms 10-K and 10-Q several factors that could cause actual results to differ from those in the forward-looking statements. We refer you to those discussions for further information. Any forward-looking statement speaks only as of the date on which it is made, and we undertake no obligation to update any forward-looking statement to reflect events or circumstances after the date on which it is made.

Robert M. Blue
Chair, President, and CEO

Letter from the CEO

Dear Shareholders:

Dominion Energy is committed to delivering safe, reliable, affordable and increasingly clean energy. As a result, we have taken meaningful steps toward a sustainable clean-energy future. In 2020, we announced a commitment to Net Zero carbon and methane emissions across our electric and gas lines of business by 2050.[1] In 2022 we meaningfully expanded our Net Zero commitment to include Scope 2 emissions and material categories of Scope 3 emissions, including upstream fossil fuel and power suppliers and downstream end-use natural gas customers.[2]

We are taking action to achieve these industry-leading commitments. For example, we have developed one of the largest solar power generation portfolios among utility holding companies in the United States. We built and operate the only offshore wind turbines located in federal waters and we are in advanced stages of building, owning, and operating the largest offshore wind project in the United States currently under development. We are extending the operating lives of our zero-carbon nuclear power stations and, relatedly, are the only U.S. company to currently possess governmental authorization to operate a nuclear unit beyond 60 years. We have a national-leading agriculture-based renewable natural gas (RNG) presence capturing millions of cubic feet of methane from livestock operations every year (and growing) and processing it into carbon-beneficial natural gas. We are also testing innovative uses of hydrogen across a variety of energy applications.

Even as we optimally position the company to pursue an industry-leading regulated decarbonization investment opportunity to the benefit of customers and shareholders alike, some things have not and will not change—your company remains steadfast in both our public service obligations and fiduciary duty as we undertake this generational transformation. We recognize that the clean-energy transition must be attentive to costs borne by our customers and risks borne by shareholders.

[1] https://news.dominionenergy.com/2020-02-11-Dominion-Energy-Sets-New-Goal-of-Net-Zero-Emissions-by-2050.

[2] https://news.dominionenergy.com/2022-02-11-Dominion-Energy-Broadens-Net-Zero-Commitments.

We recognize that the clean-energy transition must be attentive to costs borne by our customers and risks borne by shareholders.

At the company's 2022 Annual Meeting of Shareholders, a majority voted in favor of a proposal regarding a report on the theoretic potential that during this transition, natural gas assets become "stranded" (i.e., no longer able to usefully serve our customers). In response to the proposal, we collated and report herein relevant information from your company's various public disclosures, including the recently released 2022 Climate Report.[3]

This information demonstrates that Dominion Energy is pursuing multiple initiatives to enhance and ensure the sustainability of our natural gas investments as part of our broader business strategy to achieve Net Zero and align with global climate objectives. These efforts involve prudent, timely investments in modernizing our natural gas distribution infrastructure and preparing for the critical role we expect natural gas, RNG, and hydrogen will play in the future. Roughly half our customers receive natural gas from Dominion Energy, and natural gas service and infrastructure will continue to play an important role in the clean energy transition. Put simply, your company is responding to stranded asset risk by working to keep our natural gas infrastructure portfolio modern, reliable, affordable, and sustainable.

Robert M. Blue
Chair, President, and CEO
February 10, 2023

[3] Dominion Energy Climate Report 2022, available at https://www.dominionenergy.com/-/media/pdfs/global/company/esg/2022-climate-report.pdf.

Risk Assessment and Management

Enterprise risk management processes guide Dominion Energy's strategic decisions. These processes are embedded in management practices and corporate governance. At least annually, management assists in identifying and evaluating the major risks faced by the holding company and at each of the company's business segments. Members of management regularly report their findings and recommendations to the Board of Directors and its committees. The Board exercises oversight of the company's long-term strategy and any associated risks, consistent with its belief that risk management advances the company's interests.[4]

In support of effective climate governance, Dominion Energy operates an executive-level Climate Council supported by working groups and strategy teams in developing and overseeing climate-related strategy, initiatives, commitments, and performance. To evaluate the alignment of our capital investments with our business strategy, including our decarbonization strategy, we have an Investment Review Committee (IRC) that ensures all significant proposed investments receive appropriate analysis and review of Environmental, Social, and Governance (ESG) and Environmental Justice considerations, among other factors.

The transition-related and physical/climatic risks we have identified in the utility industry's response to climate change are disclosed and discussed in the 2022 Climate Report.[5] We consider stranded asset risk as principally transition-related and recognize the attendant potential for financial implications. The risk of natural gas infrastructure becoming stranded is assessed in its proper context, alongside the other risks implicated in the clean-energy transition.

We are especially mindful of the imperative to meet our customers' energy needs reliably and affordably; any lapse in our public service commitments would entail its own regulatory, financial, and reputational risks. Given today's technological outlook, retention of and reinvestment in natural gas assets is a strategic planning decision intended to mitigate those risks. Efficient and low-emission natural gas resources are necessary to ensure reliability and security of electric service—at least until advances in zero-carbon energy and battery storage allow those resources to meet our customers' around-the-clock energy needs. Therefore, natural gas will remain a part of our portfolio for the foreseeable future.

We also take notice of 2020 survey results which showed that 74 percent of our natural gas utility customers in Utah, Ohio, and South Carolina, including a majority of those who identify as environmentalists, prefer the ability to choose natural gas service over the implementation of bans on new natural gas connections or mandated electrification of home appliances.[6] We acknowledge the risks associated with natural gas bans in certain jurisdictions, and the company is working with policymakers to maintain customers' access to natural gas in accordance with their preferences and expectations. Legislation preserving customer choice has already been passed in many of the states in which our gas business operates.

Although preservation of and investment in natural gas infrastructure may raise concerns about stranded asset risk, the company is confident that the strategies discussed in subsequent sections of this report substantially mitigate that risk. We firmly believe these assets will remain used and useful even as the global response to climate change intensifies. In fact, they will be instrumental in achieving near-term progress toward our Net Zero commitment and in implementing innovative carbon-reducing measures in the future.

[4] Dominion Energy Climate Report 2022, pg. 46.
[5] Dominion Energy Climate Report 2022, pgs. 46-53.
[6] Dominion Energy Climate Report 2021, pg. 34.

Promoting Natural Gas Sustainability

From 2010 through 2021, Dominion Energy reduced direct methane emissions from our natural gas business by 38%. Furthermore, the company's efforts prevented 138,000 metric tons of methane emissions from entering the atmosphere in that timeframe—the carbon equivalent of removing 744,000 non-electric cars from the road for a year or planting 57 million new trees.[7]

Our strategy has hinged on modernizing and replacing less efficient natural gas infrastructure, expanding our leak detection programs, improving processes, procedures and systems, pursuing a wide range of voluntary initiatives, investing in innovation, and striving towards best-in-class technical excellence. By taking these proactive measures, we help ensure existing and planned natural gas infrastructure aligns with our customers' needs as well as both our Net Zero commitment and the objectives of the Paris Agreement. This supports ongoing use of that infrastructure and mitigates stranded asset risk.

Direct Emissions Reductions

Carbon and methane emissions from our natural gas operations make up only about 6% of Dominion Energy's Scope 1 emissions.[8] The company established targets for Scope 1 methane emissions reductions of 65% by 2030 and 80% by 2040, relative to a 2010 baseline. The primary sources of methane emissions from Dominion Energy's natural gas system are:

- Bare and unprotected steel mains and services;
- Pneumatic devices;
- Residential and commercial meter sets; and
- Third-party pipeline damages.

Considerable progress has been made to date through implementation of Best Management Practices (BMPs) including replacement of vintage

[7] Dominion Energy Methane Report 2021, pg. 2.
[8] Dominion Energy Climate Report 2022, pg. 29.

pipe and pneumatic devices; voluntary expansion of our Leak Detection and Repair (LDAR) activities; damage prevention programs and annual public awareness campaigns which have considerably reduced releases caused by excavation damage to pipelines; and minimizing methane emissions from maintenance activities through procedural changes and investments in innovation such as Zero Emission Vacuum and Compressor (ZEVAC) technology. A full list of BMPs can be found in our 2021 Methane Report.

These efforts will continue, and we are evaluating additional reduction opportunities to reach our targets, including leak detection and repair activities for customer meter sets and refinement of emissions calculation methodologies (use of company specific measurements versus emissions factors).

This multi-pronged approach has enhanced the company's environmental performance. Of course, we recognize that the company's Net Zero ambitions call for even deeper emissions reductions, and we are confident that future technological innovations will enable further operational emissions reductions.

Upstream and Downstream Emissions Reductions

As Dominion Energy holds itself to an ever-higher standard of sustainability for its natural gas operations, we are also asking the same of our upstream gas suppliers. We advocate for gas suppliers to adopt their own net zero goals, promote disclosure of their emissions and development of sustainability plans, and encourage them to bring responsibly sourced gas—that is, gas certified as produced at a lower emissions intensity—to market.[9] At the other end of the value chain, Dominion Energy is working to support our natural gas customers' desire to lower their emissions profile.

Although Scope 3 emissions are not under the direct control of the company, Dominion Energy employs a variety of approaches to help reduce gas supplier and customer emissions:

- We provide carbon calculators to customers to help them better understand and manage their emissions.

- We offer energy efficiency programs to our customers and are expanding them in many states.
- We offer customer programs in Utah, Idaho, and North Carolina providing access to RNG and carbon offsets.
- We are surveying our gas suppliers to better understand their methane intensities, methane reduction goals, net zero initiatives, and responsibly sourced gas (RSG) certifications.
- We are piloting hydrogen blending in Utah, Ohio, and North Carolina.
- We created the largest agriculture based RNG profile in the country.
- We are performing RNG feasibility assessments in our operating areas and working with developers.

Ongoing Asset Utilization

There are multiple applications of Dominion Energy's natural gas distribution infrastructure that support ongoing utilization and align with emissions reduction strategies. Our efforts involve prudent, timely investments in modernizing our natural gas distribution infrastructure and preparing for the critical role we expect natural gas, RNG, and hydrogen to play in the future.

We envision a growing role for carbon-beneficial RNG throughout our electric and natural gas lines of business to capitalize on its emissions reduction benefits.

[9] Dominion Energy Climate Report 2022, pgs. 28, 30.

By capturing methane created through agricultural operations that would otherwise escape into the atmosphere, RNG facilities are able to convert it into RNG which can then be used interchangeably within the same infrastructure built for conventional natural gas. Methane is a more potent greenhouse gas compared to carbon dioxide, so capturing it removes significantly more emissions than are created when agriculture-based RNG is used to heat homes, power businesses, or fuel transportation fleets.

The Align and Vanguard Renewables RNG programs capture methane created through farming operations and convert it into RNG that can be used interchangeably with conventional natural gas. Our first swine-based RNG project (in Milford, Utah) entered service in 2020. During 2022, we continued to develop and construct RNG swine and dairy projects, with three projects in commissioning, 11 projects in active construction and five more approved to start construction by the end of the year. In 2023, we expect to complete our first swine-based RNG project in North Carolina, enough RNG from a network of 19 family farms to heat 4,500 homes. Additional projects are underway in Georgia, Colorado, Nevada, Utah, Arizona, and elsewhere.

Our RNG business will continue to grow and develop. Taken together, these industry-leading initiatives are expected to reduce agricultural emissions by over 5.5 million metric tons a year—the carbon equivalent of removing more than 1.2 million non-electric cars off the road for a year or planting 90 million new trees.[10]

Hydrogen is an emerging clean energy source that could reduce the environmental impact of generating electricity and heating homes and buildings; power manufacturing; and fuel transportation — all with few or zero emissions. Dominion Energy is exploring how hydrogen can help us achieve Net Zero emissions and help decarbonize other industries like transportation and manufacturing. One substantial advantage of hydrogen is that it can be blended into the existing natural gas network, preserving the beneficial use of natural gas infrastructure. Another advantage is that hydrogen, like natural gas, is an efficient heating source (particularly in colder climates).

[10] RNG Partnerships | Dominion Energy

In Utah, we tested blending hydrogen with natural gas on a small scale on natural gas pipelines and appliances at our training center with significant positive results. Our pilot project confirmed extensive industry research that at modest blending levels, hydrogen can deliver safe, reliable, and sustainable energy without impairing appliance or system performance. We are expanding our pilot to a Utah community to field-test blending on a broader scale. We are conducting similar pilots at our North Carolina and Ohio training centers, and the company is engaging with regional coalitions in support of establishing multiple regional hydrogen hubs.

Strategy Summary

Our Net Zero commitment and the Paris Agreement impel us to find ways to reduce the emissions intensity of our business, including our natural gas operations. Those assets may indeed be at risk of becoming stranded if the company does nothing to adapt them to meet modern-day climate challenges. On the contrary, Dominion Energy foresees continued beneficial use of our natural gas infrastructure, and we are acting accordingly.

The company is taking steps to reduce not only Scope 1 emissions from our natural gas operations, but also Scope 3 emissions from upstream and downstream sources. And we are positioning our natural gas distribution and electric generation infrastructure to leverage clean-energy innovations like RNG and hydrogen. This includes meeting with state commissions, project developers, regulators, and legislators in our operating states to discuss the company's natural gas sustainability strategy and work collaboratively to develop tariffs and incentives for RNG. Through 2035, Dominion Energy foresees up to $8 billion in gas distribution modernization and RNG investment.[11]

Dominion Energy is at the forefront of efforts to reduce methane emissions, but it is not a unilateral effort. We are a founding member or leading participant in the EPA's Natural Gas STAR Program, the EPA's Methane Challenge Program, the Natural Gas Sustainability Initiative, and the ONE Future Coalition. Moreover, we are supporting certification and procurement of responsibly sourced natural gas through the NextGenGas Coalition.[12] Dominion Energy is also an anchor sponsor of the Low Carbon Resources Initiative, a research and development effort focused on emerging clean-energy technologies, including hydrogen.

[11] Dominion Energy Fall 2022 ESG Update Materials, slide 31.

[12] Dominion Energy 2020 Sustainability and Corporate Responsibility Report, pgs. 88, 99.

Consistency with Scenario Modeling

Climate Reports

In addition to its discussion of climate-related risks and opportunities, the 2022 Climate Report assessed decarbonization pathways for Dominion Energy's electric and gas operations.

To better understand the contours of these potential pathways, we engaged a third-party consultant to model different scenarios under which Net Zero could be achieved. Those pathways were modeled using two national market scenarios reflecting different increases in average global temperatures — one reflecting a 2.1°C scenario and the other reflecting a 1.5°C scenario consistent with the Paris Agreement. Combined, the results of the scenario modeling and related analysis provide comparative pathways to meet our enterprise-wide carbon and methane Net Zero goal. Notably, the electric generation and natural gas scenario modeling demonstrates the need for gas infrastructure to support reliable integration of intermittent renewable generation resources, hydrogen, and RNG on our system.

In particular, the natural gas scenario analysis focused on reducing Scope 3 customer emissions as a critical component of our Net Zero commitment. Our approach evaluated a mix of potential strategies by modeling the following two scenarios:

- Energy Efficiency Scenario: This scenario results in customer demand reductions by focusing on increasing levels of energy efficiency.
- Hybrid Heating Scenario: This scenario results in customer demand reductions by assuming higher rates of hybrid (electric and gas) heating.

While the two gas customer scenarios assume the same level of demand reduction, they take different approaches to achieving it. Both leverage higher levels of decarbonized gases and some offsets to reach Net Zero emissions by 2050. The results of this scenario modeling illustrate that even with the assumed widespread energy efficiency and adoption of other demand reduction approaches like hybrid heating, gas infrastructure will still be needed to meet customer demand on peak cold days across our service territory. In addition, the modeling results contemplate further development of RNG and hydrogen supply technologies and markets. Given the increasing levels of RNG called for in the scenario modeling, the analysis included an assessment of potential feedstocks and RNG supply within Dominion Energy's natural gas service territories.

RNG and hydrogen production are not currently demonstrated at the requisite long-term scale but are assumed to become widely available within the planning horizon. To achieve such widespread adoption of these fuels, multiple conditions including technological advancement and cost reductions, sufficient infrastructure, manufacturing capability for key equipment, incentives to stimulate private sector investment, and a supportive regulatory framework at the federal and state levels are implicitly assumed within the modeled scenarios. Some of these conditions are already in various states of formation, such as new federal legislative tax benefits for RNG that enhance the economic viability of new RNG projects.

The 2022 Climate Report scenario modeling supports natural gas as part of our long-term vision, consistent with our Net Zero commitment. Natural gas plays a key role in delivering clean energy by providing fuel to power the electric grid as intermittent renewable energy sources are brought online. We are committed to efforts that reduce upstream and downstream emissions and continued investment in our gas infrastructure to support integration of RNG and hydrogen on our system.

For more information on Dominion Energy's scenario modeling, see the 2022 Climate Report.

Integrated Resource Plans

Our Integrated Resource Plans filed with state-level regulatory agencies also provide insight into the contours of potential pathways Dominion Energy could pursue to meet future customer needs reliably, affordably, and sustainably. Due to specific regulatory requirements, Integrated Resource Plans filed may use some modeling assumptions that differ from the Climate Report scenario modeling. Nevertheless, recent results from these filings lend support to ongoing utilization of our natural gas assets.

For instance, Dominion Energy Virginia's 2022 Update to its 2020 Integrated Resource Plan (filed September 1, 2022) notes that preservation of natural gas generation can act as a hedge against

future system reliability, stability, and energy independence issues even on a trajectory toward dramatic emissions reductions. By contrast, pathways that assume complete retirement of all company-owned natural gas generation in Virginia would demand significant incremental resource development and capacity purchases. Even then, it remains to be seen whether the utility could maintain a reliable system under such an approach.[13]

Meanwhile, the preferred resource plan in Dominion Energy South Carolina's Integrated Resource Plan 2021 Update is aptly described as a plan to replace coal with natural gas and renewables.[14] It is the most cost-effective means of meeting the utility's projected energy and capacity needs over the 15-year planning horizon and is the most consistent with a Net Zero future. That is, the preferred plan reflects the greatest carbon emissions reduction among the multitude of alternative plans, despite its contemplated addition of new natural gas-fired combined cycle and combustion turbine facilities as coal resources retire.

In short, these Integrated Resource Plans affirm that long-term electric system plans which include natural gas resources are among the most successful in balancing reliability, fuel diversity, and cost to customers in tandem with emissions reductions. Integrated Resource Plans do not purport to be a definitive statement of how Dominion Energy will ultimately meet customers'

[13] Dominion Energy Virginia's 2022 Update to the 2020 Integrated Resource Plan, pg 24.
[14] Dominion Energy South Carolina's Integrated Resource Plan 2021 Update, pgs. 35-36.

energy needs. Rather, they represent a snapshot in time based on present market, technological, and legal conditions. But it is telling that, to date, these highly elaborate modeling exercises present a compelling use case for natural gas infrastructure.

Regulatory Framework

For our state-regulated businesses, the impact of significant losses from stranded assets is also mitigated by our regulatory framework. For new investments, we do not invest in projects that are uneconomic to customers and shareholders. Through regulatory proceedings such as rate cases, state regulators review investments made by the company for prudency. To date, they have consistently found our investments prudent.

For our current gas assets, we are required to continuously assess their useful life. When a regulated asset's useful life changes significantly before its previously determined useful life, an assessment of recoverability of the remaining unrecovered value from the customer would need to be determined. Given these assets are currently being recovered in rates, there is not significant risk they would be disallowed in future rates if decisions to retire are considered prudent. If such a risk were to become more than remote and potentially significant to investors, such information would be disclosed. None of our current gas assets are probable of being retired significantly before the end of their useful life.

The Broader Clean-Energy Context

Investment in natural gas infrastructure is not mutually exclusive with an increasingly sustainable generation portfolio on the electric side of our business. We note that use of natural gas in electric generation has presided over a dramatic reduction in the company's reliance on coal over the past 16 years—our owned electricity generation from coal fell from 47% in 2005 to 12% in 2021.[15] And, by 2035, we expect that coal generation will only represent approximately 1% of our owned generation output.[16] Dominion Energy South Carolina has proposed to retire coal-only stations by the end of 2030. Dominion Energy Virginia maintains coal capacity beyond 2030 for reliability and resiliency, with a 100% Renewable Portfolio Standard by 2045.[17]

The company's Net Zero commitment for our power generation business includes an interim target—a 55% carbon emissions reduction by 2030 (compared to 2005 levels). We are well on our way. For example, we expanded our fleet of zero-carbon solar resources from zero megawatts to ~2,200 megawatts in less than a decade, creating one of the largest portfolios in our industry.[18] The company also boasts the first utility-owned offshore wind turbines in federal waters, and our Coastal Virginia Offshore Wind project, the largest of its kind in the nation, has received key state-level regulatory approvals.

To support these new renewable energy resources, we also continue to grow our investments in energy storage. Meanwhile, we have sought to secure a vital source of zero-carbon baseload power for years to come by extending the operating lives of our

[15] Dominion Energy 2021 Sustainability and Corporate Responsibility Report, pg. 26.
[16] Dominion Energy Fall 2022 ESG Update Materials, slide 25.
[17] Dominion Energy Fall 2022 ESG Update Materials, slide 28.
[18] Dominion Energy 2021 Sustainability and Corporate Responsibility Report, pg. 28.

nuclear units and by exploring advanced nuclear technologies such as small modular reactors. Dominion Energy has also retired more than 3,500 megawatts of fossil fuel-fired capacity through 2021.[19] In addition, consistent with the company's strategic positioning to focus on pure-play state regulated utility operations with a strong sustainability ethic, we have also divested about 7,200 megawatts of fossil fuel-fired capacity.[20]

We have reduced carbon emissions from our electric operations by 46% through 2021, using 2005 as the baseline.[21] In order to meet our Net Zero commitment and prepare for the possibility of more stringent emissions regulations, we have identified up to $50 billion in zero-carbon generation and energy storage investment through 2035.[22]

Such a shift in generation mix demands a concerted focus on grid transformation to better accommodate renewable resources without impairing system reliability and security. This is a worthwhile endeavor, but power delivery modernization alone cannot assure electric service reliability in view of the intermittent generation profile of our forecasted investment in solar and wind assets. As the company has long recognized, preserving some natural gas generation will be necessary to complement renewables by serving as a reliability backstop throughout the clean-energy transition.

For this reason, we expect high efficiency natural gas generation will remain a crucial part of our electric system until RNG, hydrogen, advanced nuclear, and carbon capture and storage technologies are deployable affordably at commercial scale. Dominion Energy projects that even as zero-carbon resources emerge as the largest contributors to our generation mix through 2035, natural gas will still comprise about 29% of the company's owned generation dispatch.[23] It would be imprudent not to prepare our natural gas infrastructure accordingly.

Dominion Energy believes that our robust response to climate change and our natural gas sustainability strategy are complementary rather than competing. Carbon and methane emissions have fallen substantially and will continue trending downward. Renewable energy resources' share of our total investment base is expected to grow from 9% in 2021 to 25% in 2026.[24] Zero-carbon generation and energy storage will come to dominate the company's portfolio as our medium-term investments through 2035 come to fruition. Beyond that horizon, we expect new technologies and public policies to support fulfillment of our Net Zero commitment.

At each stage of this decades-long undertaking, Dominion Energy will invest in natural gas infrastructure where and when it makes sense for our customers and shareholders.

[19] Dominion Energy Fall 2022 ESG Update Materials, slide 21.
[20] Dominion Energy Fall 2022 ESG Update Materials, slide 21.
[21] Dominion Energy Fall 2022 ESG Update Materials, slide 21.
[22] Dominion Energy Fall 2022 ESG Update Materials, slide 25.
[23] Dominion Energy Fall 2022 ESG Update Materials, slide 25.
[24] Dominion Energy Fall 2022 ESG Update Materials, slide 29.

Conclusion

This report demonstrates Dominion Energy's ongoing commitment to transparently disclose our plans for responding to the global imperative of emissions reductions, along with the accompanying risks and opportunities. Shareholders can be assured that the risk of natural gas infrastructure becoming stranded is duly considered as part of the company's robust risk management protocols.

We believe the many voluntary methane reduction strategies Dominion Energy is employing across its natural gas distribution system, in conjunction with the promising future of RNG and hydrogen, substantially mitigate that risk. So too does the vital role that natural gas-fired generation will continue to play in any credible decarbonization pathway for the company's electric business.

Of course, no single report should be construed as Dominion Energy's final word on the matter. We are charged with navigating a path toward a sustainable clean-energy future—one which respects both our public service obligations and our responsibility to shareholders—in a rapidly evolving technological and policy landscape. Our analysis and strategy will necessarily adjust as greater clarity and understanding about the future reveals itself over time.

Any shift in our strategy for achieving Net Zero, including the company's thinking relative to existing and planned natural gas infrastructure, will be made apparent through a variety of recurring disclosures. Future iterations of our strategy will be discussed in the Sustainability & Corporate Responsibility Report, Climate Report, and Summary Annual Report. State-level Integrated Resource Plans filed with state regulators by our electric utilities will also be instructive.

For now, we are pleased to have had this opportunity to review how Dominion Energy is thoughtfully positioning our natural gas infrastructure for a sustainable, reliable, affordable, and productive future.

References

2020 Annual Report:
https://s2.q4cdn.com/510812146/files/doc_financials/2020/ar/Dominion_Energy_2020_Summary_Annual_Report.pdf

2021 Annual Report:
https://s2.q4cdn.com/510812146/files/doc_financials/2021/ar/2021-Summary-Annual-Report-(ADA).pdf

Climate Report 2021:
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