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January 25, 2021

Clerk of the State Corporation Commission
c/o Document Control Center
P.O. Box 2118
Richmond, Virginia 23218-2118

RE: Case No. PUR-2020-00197

Dear Clerk:

The Utilities Technology Council (UTC) is excited to extend its strong support of Dominion Energy Virginia's proposal to facilitate broadband deployment in unserved and underserved parts of Virginia. In a time when millions of Americans are working and learning from home due to the coronavirus pandemic, Dominion Energy Virginia's pilot program is precisely the kind of effort our nation needs to connect more Americans to the Internet. UTC has worked closely with Dominion Energy Virginia to learn more about this effort and we urge this Commission to approval Dominion's proposal.

UTC is the national trade association for the broadband, telecom and information and communications technology interests of electric, water, and natural gas utilities of all ownership types. Based in Arlington, Virginia, UTC's mission is to shape the future of utility mission-critical technologies by driving innovation, fostering collaboration, and influencing public policy.

Dominion Energy Virginia is proposing to provide middle-mile broadband services in parts of Virginia that are currently unserved by traditional telecommunications providers. Policymakers in Washington and throughout the country have recognized that electric utilities of all kinds are key players in bringing broadband services to unserved and underserved areas.

In fact, Virginia was one of the first states to recognize the important role utilities could play when the General Assembly passed laws in 2018 and 2019 requiring utilities like Dominion Energy Virginia to consider whether and how their infrastructure could be used to support middle-mile broadband deployment. As utilities such as Dominion Energy Virginia invest in new grid-modernization technologies, these investments can also be used to bring robust, reliable and affordable broadband services to unserved and underserved areas.¹ Indeed, this Commission has already approved a similar program proposed by American Electric Power.²

¹ https://utc.org/wp-content/uploads/2021/01/BB_utilities_historical_piece_FINAL.pdf

² <https://www.appalachianpower.com/info/news/viewRelease.aspx?releaseID=5556#:~:text=5%2F14%2F2020-Virginia%20SCC%20approves%20Appalachian%20Power's%20broadband%20pilot%20program,the%20Virginia%20State%20Corporation%20Commission.>

UTC has held dozens of workshops and conferences on the importance of utility broadband efforts³. In addition, UTC several years ago established a Utilities Broadband Committee to share information and discuss business, regulatory, and legal issues that could promote utility broadband efforts. There is a growing recognition within the industry that utilities can play key roles in facilitating broadband deployment, either through directly providing broadband to their customers or through middle-mile projects such as the one being proposed here by Dominion Energy Virginia.

Moreover, utility investments in broadband will also assist in bringing new and innovative energy technologies to market, such as renewable and distributed energy resources. Utilities are investing in highly resilient communications systems that enable the greater use of cleaner energy generation sources.⁴ These are the same networks that can be used to facilitate broadband deployment as well.

Like electricity in the 1900s, access to broadband is the currency for the 2020s. No Virginia customers should be left behind simply because of where they live. UTC is proud to support Dominion Energy Virginia's proposal and urges this Commission to approve it.

Sincerely,

Sheryl Osiene-Riggs
President and CEO
Utilities Technology Council

³ <https://utc.org/utility-broadband-deployment/>

⁴ <https://www.utilitydive.com/news/utilities-communications-needs-are-diverse-and-growing-utc-survey-finds/553286/>