



January 6, 2026

Dear PJM Load Analysis Team:

Dominion Energy (“the Company”) submitted a data center large load adjustment for the 2026 PJM load forecast. Below is a summary of this adjustment as required by PJM’s Manual 19 Attachment B.

Data Center Large Load Adjustment

Year	Demand MW
2026	4,433
2027	4,933
2028	5,448
2029	5,980
2030	6,526
2031	7,086
2032	7,661
2033	8,247
2034	8,846
2035	9,456
2036	10,076
2037	10,705
2038	11,342
2039	11,987
2040	12,639
2041	13,297
2042	13,959
2043	14,625
2044	15,294
2045	15,965
2046	16,636

The Company requested the coincident peak values shown in the table to the left for its data center industry. As background, the Company currently serves the largest data center market in the world with a 2025 coincident peak of 4 GW. To put this in perspective, the Virginia data center market is greater than the sum of the next five largest U.S. markets combined¹.

The Company has collected detailed metering information on its data center customers since 2013. This information provides consistent growth patterns and behaviors of both individual customers and the industry as a whole. The Company expects the industry to continue to grow at an increasing rate as it has since 2013.

The Company has publicly shared its forecasts in earnings calls and other external communications specifically highlighting the size and growth of its data center industry. The Company uses the data center forecast as one of the inputs into its financial plans. Additionally, it uses the forecast as an input into its Integrated Resource Plans. It should be noted that the data center forecast is shown separately in the Integrated Resource Plan process. In summary, the forecast provided to PJM is used in both the Company’s financial and regulatory plans.

Forecasting Process

In developing the data center forecast, the Company uses its metered data going back to 2013 to statistically model its seven largest or fastest growing customers and combines all remaining customers (approximately 45) into an eighth segment. Three different statistical models are run for each of these eight customer segments, a total of twenty-four statistical models. Each customer segment is assigned the statistical model that best represents its past behavior as well as future expectations based on contracts-in-hand and both public and confidential customer information. The Company adds the

¹ See Batson, A., North America Data Center Report Mid-Year 2025: Another Record Performance Despite Some Uncertainty.

selected models together to develop its “High” scenario. The Company then runs four different statistical models on the industry in aggregate. One of these four models is selected and deemed the “Low” scenario. The average of the “High” and “Low” scenarios yields the Company’s submission to PJM. The final step in the process is to validate the forecast against executed contracts. Below is a summary of each of these contracts.

Contract Structure

The Company uses a three-contract structure when conducting business with the data center industry.

Engineering Letter of Authorization (“ELOA”)

Once a customer meets certain prerequisites, such as securing site control and submitting an engineered site plan, the customer may request and execute an ELOA along with a \$250,000 deposit to cover engineering costs. This contractual agreement places the project into the Company’s engineering queue and authorizes the Company to dedicate time and resources to conduct a detailed engineering study. The engineering phase typically takes 9 to 12 months and evaluates the infrastructure required to serve the proposed site. This study provides the customer with three deliverables: the infrastructure needed, an estimated energization date, and projected costs for the infrastructure. In short, the ELOA provides the customer with the critical information needed to make an investment decision on the project. The customer is not obligated to proceed with the project once the ELOA results are completed. ELOAs are not considered firm load. The sum of the capacity values of all ELOAs is considered as potential long-term growth.

Construction Letter of Authorization (“CLOA”)

Upon completion of the ELOA, the customer has 90 days to request a CLOA and another 90 days to execute it. If the CLOA is not executed within the 90-day window, the project is canceled. Executing the CLOA commits the customer to three key obligations:

- (1) **Cost Responsibility:** If the project is canceled before energization, the customer must reimburse the Company for any investments made on its behalf.
- (2) **ESA Execution:** The customer is required to execute an ESA for the installed capacity once the infrastructure is completed and prior to energization. Once the CLOA is executed, the Company reserves capacity for it.
- (3) **Long Leadtime Deposits:** The customer is required to place deposits for long-lead time equipment, prior to the Company ordering the equipment. These deposits are refunded at energization, typically 3 years after the point of order.

Once the CLOA is signed, the Company reserves capacity for it. CLOAs are considered firm load. The sum of the capacity values of all CLOAs is considered as mid-term growth potential that supports the forecast.

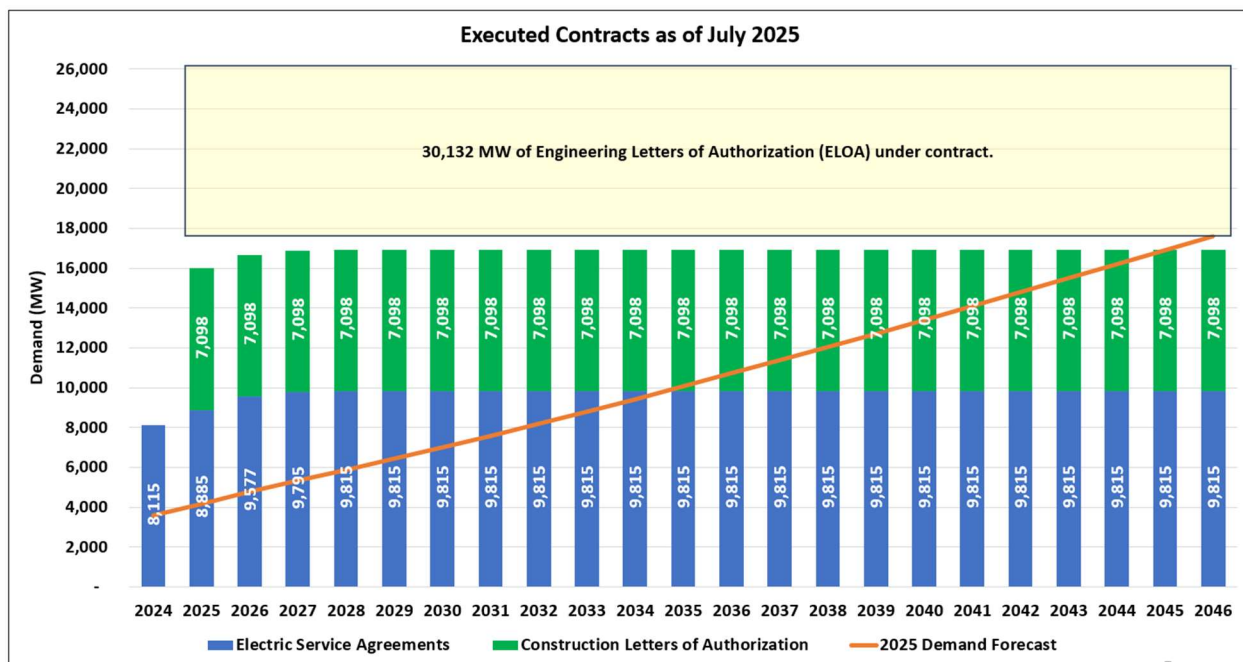
Electric Service Agreement (“ESA”)

An ESA is required in order to set a meter and provide electric service. The ESA is the legal document that details the contracted capacity, assigns collateral, and ties the customer to the appropriate tariff and the Company’s filed Terms and Conditions. If the customer does not execute an ESA, the project is

cancelled, and the customer must reimburse the Company for all investments made. The sum of the capacity values of all ESAs is considered as near-term growth potential that supports the forecast.

Forecast Validation

As mentioned above, the final step in the forecasting process is to validate the forecast against executed contracts. See the graph below for this comparison.



It is important to note that the sum of the capacity contracts already connected (ESAs) to the system plus the capacity contracts under construction (CLOAs) support the Company’s forecast through 2045. The yellow block represents executed contracts for engineering studies (ELOAs) and represents potential future load. As mentioned above, the Company shares on its earnings calls the capacity amounts of its executed contracts. From this chart and consistent with the Company’s earnings call, as of July 2025, the capacity value of these contracts is 47 GW (9.8 ESA + 7.1 CLOA + 30.1 ELOA). The Company is forecasting 16.6 GW of demand by 2046, not the 47 GW of capacity. This difference highlights the difference between capacity and demand.

Summary

In summary, the Company uses over 10 years of metered data to develop its forecast. The forecast is then compared to executed contracts to validate its reasonableness. The Company is unique in its forecasting approach given its extensive experience with the industry and the significant amount of metered data available for forecasting.

Sincerely,

Stanley L Blackwell