



VIRGINIA POLITICAL INTELLIGENCE PORTAL

VIRGINIA'S GREEN-ENERGY ARCHITECTURE, 2020-2026

*How a 2020 statutory framework became a larger, more complicated energy system***Independent VPIP analysis | Virginia Code, LIS, SCC, JLARC and EIA****THE STORY IN ONE SENTENCE**

Virginia did not enact one green-energy law and move on. In 2020 it created a statutory architecture - renewable mandates, generation retirements, offshore wind, storage and carbon-market policy - and the years since have repeatedly modified, financed, challenged, accelerated and expanded pieces of that architecture.

2020

VCEA enacted

2045

Phase II RPS reaches 100%

\$608.7MApproved Rider RPS revenue
requirement**50.1M MWh**

2023 net interstate receipts

Executive Assessment

The central fact is continuity. Virginia's current clean-energy system is best understood as an architecture whose statutory spine was written in 2020, not as a sequence of unrelated annual bills. The Virginia Clean Economy Act established mandatory renewable portfolio requirements, generation-retirement deadlines, storage and renewable-development requirements, offshore-wind policy, energy-efficiency provisions and related cost-recovery mechanisms. Separate 2020 legislation established the statutory framework for participation in the Regional Greenhouse Gas Initiative (RGGI).

The second fact is expansion and adaptation. The architecture did not remain frozen. Offshore-wind deadlines were accelerated in 2023; small-modular-reactor development-cost recovery was authorized in 2024; and by 2026 the Code reflected larger storage requirements and new clean-energy procurement rules. The 2026 General Assembly also restored a statutory direction to maintain a RGGI-consistent carbon trading program.

The third fact is that cost and reliability cannot be reduced to one number. The SCC has approved specific rate-adjustment-clause revenue requirements tied to portions of the architecture, including \$608.7 million for Rider RPS and \$485.9 million for a Rider OSW rate year. But those are separate recoveries, not a single 'cost of VCEA.' Likewise, Dominion's 2020 projection of a \$52.40-\$55.02 monthly bill impact by 2030 was a planning projection reported by the SCC, not an approved 2026 residential rate.

The pressure point changed after 2020. JLARC's 2024 data-center study found that Virginia electricity demand had been essentially flat from 2006 to 2020 but is now forecast to rise sharply, with data centers the main driver. That does not make data centers the cause of VCEA. It does mean a policy framework designed in an era of comparatively flat demand is now operating against a very different load-growth environment.

What This Report Does Differently

VPIP ANALYTICAL RULE

This report separates four things that political arguments often collapse: (1) what the General Assembly required, (2) what regulators approved for recovery, (3) what utilities projected, and (4) what later load growth changed. A vote, a rider, a forecast and an electric bill are not interchangeable evidence.

1. The 2020 Architecture

HB1526 and SB851 became Chapters 1193 and 1194 on April 11, 2020. The legislation itself states that it is to be referred to as the Virginia Clean Economy Act. The framework created mandatory RPS requirements, carbon-emitting generation retirement deadlines, annual renewable-development planning, energy storage requirements, offshore-wind provisions and other utility programs.

Source: [Virginia Law - 2020 Chapter 1193](#)

For a Phase II utility such as Dominion, the current Code shows the RPS requirement rising from 14% in 2021 to 29% in 2026 and ultimately 100% in 2045 and thereafter. The same section requires retirement of most remaining in-state carbon-emitting generation by the end of 2045, subject to a reliability/security relief process before the SCC.

Source: [Virginia Code § 56-585.5 \(2026 update\)](#)

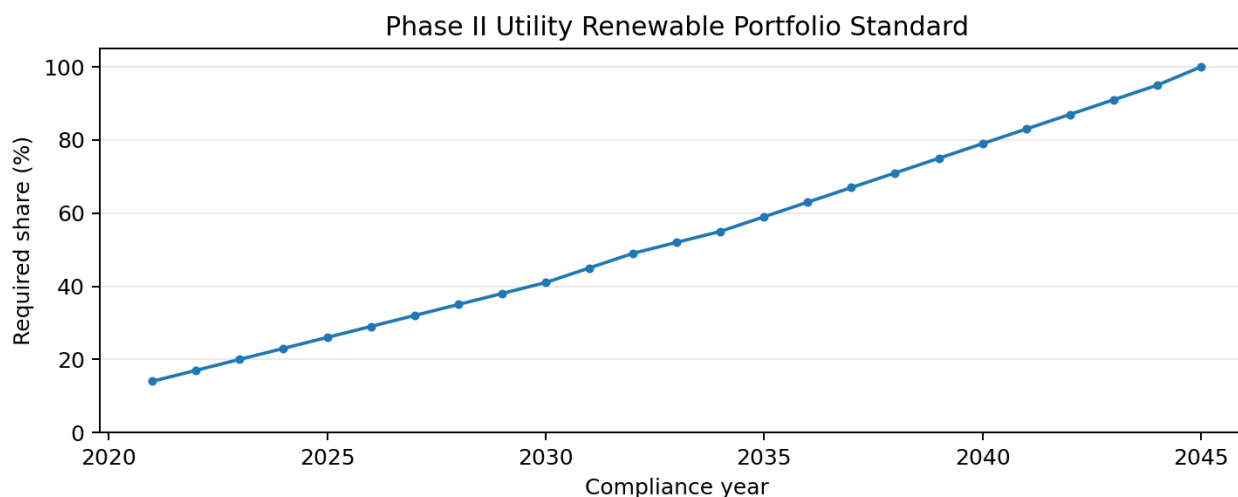


Figure 1. The statutory RPS path for a Phase II utility. This is a compliance requirement, not a forecast of actual generation mix or customer bills.

2. Carbon Policy: Regulation, Statute, Withdrawal, Re-entry

Virginia's carbon-market story has two distinct starting points. A regulatory CO₂ trading program existed in 2019. In 2020, HB981 and SB1027 wrote the Clean Energy and Community Flood Preparedness Act into statute and directed a market-based program consistent with RGGI, with auction proceeds allocated principally to flood resilience and low-income energy efficiency.

Source: [Virginia Code - Clean Energy and Community Flood Preparedness Act](#)

Governor Glenn Youngkin's administration later withdrew Virginia from RGGI through executive/regulatory action. In 2026, HB397 and SB802 amended the Code to direct the Air Board to establish and maintain a RGGI-consistent trading regulation. HB397 became Chapter 920, effective July 1, 2026.

Source: [2026 HB397 - LIS](#)

WHY THIS MATTERS

The political fight over RGGI was not simply 'join versus leave.' It became a separation-of-powers and durability fight: what can be changed administratively, and what becomes harder to unwind once the General Assembly places the direction explicitly in statute?

3. Offshore Wind: From 2020 Mandate to 2023 Acceleration

The VCEA declared up to 5,200 MW of offshore wind to be in the public interest. In 2023, Chapters 808 and 809 moved the relevant construct-or-purchase deadline from 2034 to 2032. The change was not purely partisan: the House bill was sponsored by Republican Robert S. Bloxom Jr., a fact that complicates any claim that every expansion of the architecture was a Democratic-only action.

Source: [Virginia Code § 56-585.1:11](#)

The SCC's 2024 annual report records an approved Rider OSW revenue requirement of \$485,932,045 for the September 2024-August 2025 rate year. That figure is real and substantial, but it is a defined regulatory recovery for a defined period - not the lifetime project cost and not the entire cost of Virginia clean-energy policy.

Source: [State Corporation Commission 2024 Annual Report](#)

4. Nuclear Was Not Removed From the Story

A clean-versus-fossil framing can obscure another part of Virginia's policy evolution: nuclear. In 2024 the General Assembly authorized pathways for utilities to seek recovery of development costs associated with small modular nuclear technology. These laws authorize development-cost recovery and petitions; they do not establish that an SMR has been built.

For Phase I utilities, the Code permits recovery of approved project-development costs subject to statutory caps. Separate legislation created a Dominion-related SMR development-cost mechanism with a residential-bill-impact cap. The accurate description is therefore neither 'Virginia abandoned nuclear' nor 'Virginia built new nuclear.' It created regulatory financing pathways for possible future projects.

Source: [Virginia Code Title 56 - SMR development-cost provisions](#)

5. 2026: The Architecture Gets Heavier

The strongest evidence that 2026 is consequential is not a slogan about a 'green agenda.' It is the current Code. Section 56-585.5 now contains materially larger storage obligations, including a Phase II requirement to petition for 16,000 MW of short-duration storage by 2045 and 4,000 MW of long-duration storage, with interim requirements and geographic conditions. The same Code section continues the RPS escalator and annual renewable-development planning.

Source: [Virginia Code § 56-585.5 \(2026 update\)](#)

The Grok working paper's frozen census identified 42 enacted in-scope 2026 Regular Session vehicles, 20 failed and four continued/open, while cautioning that companions were counted separately and the failed group included both attempted rollbacks and attempted expansions. VPIP treats that census as useful source material, but not as a substitute for the legal effect of each enacted chapter.

THE BETTER 2026 NARRATIVE

2026 was not a brand-new green program. It was a year in which lawmakers restored the carbon-market direction in statute while continuing to add capacity, financing, storage, shared-resource and compliance mechanisms around the 2020 framework.

6. The Cost Story: Real Dollars, Different Buckets

Energy-policy arguments become unreliable when every dollar is added into one political total. The record supports several large numbers, but they answer different questions.

Evidence	Amount	What it actually means
Dominion 2020 IRP projection	\$52.40-\$55.02/month by 2030	Dominion's projected typical residential bill impact of VCEA plus additional 2020 legislation, as reported by SCC; not an approved 2026 rate.
Rider RPS	\$608.7 million	SCC-approved total revenue requirement for the relevant Rider RPS rate year.
Rider OSW	\$485,932,045	SCC-approved Rider OSW revenue requirement for Sept. 2024-Aug. 2025.
JLARC residential estimate	\$14-\$37/month by 2040	Estimated generation/transmission cost increase associated with data-center-driven demand growth; not a VCEA rider.

Source: [SCC 2021 Annual Report - VCEA planning projection](#)

Source: [SCC Rider RPS order](#)

7. The Load Shock: Data Centers Change the Operating Environment

This is where the story changes most sharply from 2020. JLARC found that Virginia electricity demand was essentially flat from 2006 to 2020, but its independent forecast shows unconstrained demand doubling within roughly a decade, with data centers the main driver. JLARC also found that meeting even half of unconstrained demand would be difficult.

In JLARC's unconstrained-demand modeling for 2025-2040, both the VCEA and no-VCEA scenarios require enormous new infrastructure. With VCEA requirements, the model shows about 30.8 GW of renewables, 15.3 GW of carbon resources, 2.7 GW of nuclear, 7.5 GW of storage/demand response and 3.5 GW of interzonal transmission additions. Without VCEA, the model still requires 28.7 GW of renewables and 19.0 GW of carbon resources.

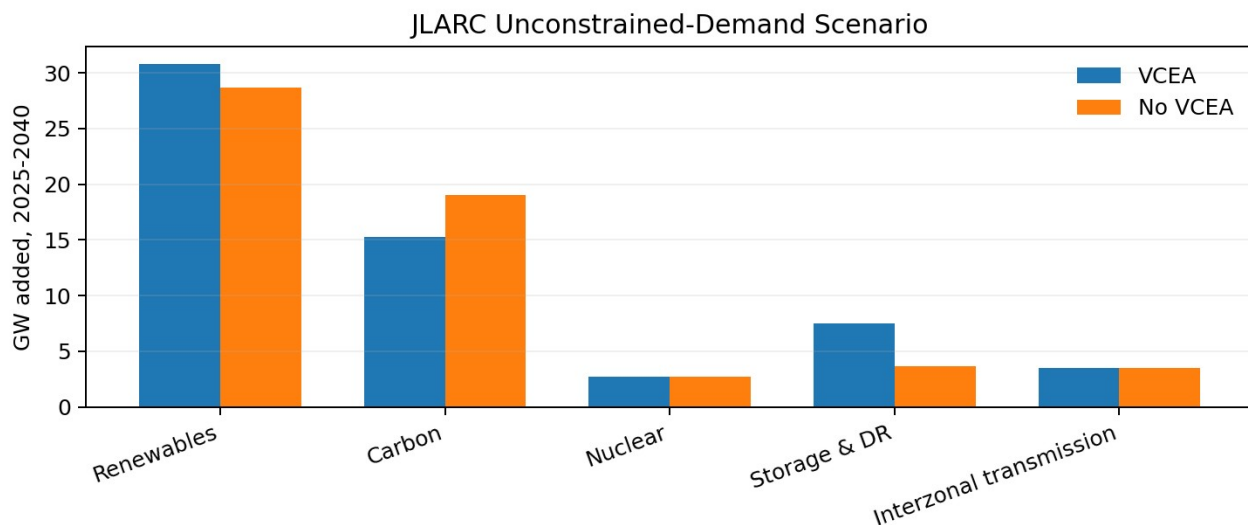


Figure 2. JLARC/E3 modeled capacity additions under unconstrained demand. The central point is not that one scenario is easy; JLARC labels both very difficult to achieve.

Source: [JLARC - Data Centers in Virginia](#)

8. Virginia Was Already an Import State - But the Scale Grew

EIA reported that Virginia was the nation's largest net recipient of interstate electricity in 2023: 50.1 million MWh, equal to about 36% of the state's electricity supply. EIA also reported that Virginia utilities' interstate receipts increased 61% between 2019 and 2023, alongside growing commercial demand including data centers.

Source: [U.S. EIA - Virginia interstate electricity receipts](#)

IMPORTANT DISTINCTION

Electricity imports are not the same thing as renewable-energy certificates. PJM power flows, REC compliance, generation ownership and retail cost recovery are separate systems. A credible analysis has to keep them separate.

9. The Competing Narratives - and What Survives

Narrative	What is supported	What overreaches
"The 2020 law caused today's entire energy problem."	The 2020 laws created binding clean-energy mandates and cost-recovery pathways that remain central.	Today's load-growth challenge is also driven heavily by data centers and regional system conditions that are not the 2020 statute.
"The green program has no meaningful customer cost."	Some individual riders have fallen or changed over time.	SCC-approved RPS and offshore-wind revenue requirements are substantial, and the SCC reported Dominion's significant 2030 planning projection.
"Virginia simply chose renewables instead of reliability."	The Code contains mandatory renewable and retirement requirements.	The Code also contains reliability-relief language, storage mandates, and Virginia has authorized nuclear-development cost recovery; JLARC modeling still requires carbon resources during the transition.
"This is entirely a Democratic project."	Democratic majorities wrote the 2020 statutory spine and the 2026 RGGI re-entry passed on divided votes.	Some later expansions had Republican sponsorship or broad bipartisan votes, including the 2023 offshore-wind deadline change.

10. Accountability Chain

The most useful political and policy analysis is not 'green good' or 'green bad.' It is an accountability chain:

1. Legislature: What requirement or authority did the General Assembly actually enact?
2. Regulator: What project, rider, cost recovery or compliance mechanism did the SCC actually approve?
3. Utility: What did Dominion or Appalachian Power project, build, procure or petition to recover?
4. Load: What new demand appeared after the policy architecture was written?
5. Customer: Which costs are actually assigned to which customer classes, and on what timetable?

This is also where Accountability Laundering can occur. When the legislature creates the mandate, the regulator approves the recovery, the utility files the rider and the bill arrives years later, responsibility becomes fragmented across institutions. Each actor can accurately point to another step in the chain. VIP's job is to reconstruct the chain without pretending that one vote directly equals one later bill charge.

11. What the Record Does Not Support

- There was a 2019 Virginia Clean Economy Act. The statutory VCEA chapters are 2020.
- Virginia's 2020 law itself created today's data-center load boom.
- Every dollar in Rider RPS, Rider OSW, RGGI, fuel and transmission can be added together as one clean-energy 'tax.'
- Virginia eliminated nuclear from its policy mix.
- Every post-2020 expansion was party-line or Democratic-only.
- Virginia's 50.1 million MWh of 2023 net interstate receipts are equivalent to imported renewable-energy certificates.
- Dominion's 2020 2030 bill projection is an approved 2026 residential rate.

12. VPIP Conclusion

The most defensible story is not that Virginia passed one green bill and everything that followed was inevitable. It is that Virginia created a binding clean-energy architecture in 2020, preserved and modified that architecture across multiple sessions, accelerated major components, built regulatory cost-recovery pathways around it, and in 2026 reinforced key parts of the framework at the same time the Commonwealth was confronting a radically larger electricity-demand problem.

That collision - a mandate-driven transition meeting extraordinary load growth - is the real policy question going into the next phase. The relevant debate is no longer whether Virginia has a green-energy program. It does. The debate is whether the architecture can deliver enough power, on time, at an acceptable cost, while maintaining reliability - and who is accountable when those objectives conflict.

Sources & Method

This report used the attached GrokBot chronology as a research lead and formatting reference, then independently checked core propositions against current Virginia Code/LIS materials, State Corporation Commission orders and annual reports, JLARC's Data Centers in Virginia study, and U.S. Energy Information Administration data. Where the source document supplied a frozen 2026 census that was not independently reconstructed bill-by-bill here, that fact is labeled as source-derived rather than independently reproduced.

[Virginia Clean Economy Act, Chapter 1193](#)

[Virginia Code § 56-585.5](#)

[Clean Energy and Community Flood Preparedness Act](#)

[2026 HB397 / Chapter 920](#)

[Offshore wind Code § 56-585.1:11](#)

[SCC 2024 Annual Report](#)

[SCC Rider RPS Order](#)

[JLARC Data Centers in Virginia](#)

[EIA Virginia interstate electricity receipts](#)