STATE OF SOUTH CAROLINA

(Caption of Case)

In re:

Application of South Carolina Electric & Gas Company to Establish a Distributed Energy Resource Program

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

COVER SHEET

DOCKET NUMBER: 2015 - 5 - E

(Please type or print)

Submitted by: Bonnie Loomis

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DOCKETING INFORMATION (Check all that apply)

☐ **Emergency Relief demanded in petition**

☒ **Request for item to be placed on Commission's Agenda expeditiously**

☐ **Other:**

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
☐ Electric	☐ Affidavit	☐ Letter	☐ Request
☐ Electric/Gas	☐ Agreement	☐ Memorandum	☐ Request for Certification
☐ Electric/Telecommunications	☐ Answer	☐ Motion	☐ Request for Investigation
☐ Electric/Water	☐ Appellate Review	☐ Objection	☐ Resale Agreement
☐ Electric/Water/Telecom.	☐ Application	☐ Petition	☐ Resale Amendment
☐ Electric/Water/Sewer	☐ Brief	☐ Petition for Reconsideration	☐ Reservation Letter
☐ Gas	☐ Certificate	☐ Petition for Rulemaking	☐ Response
☐ Railroad	☐ Comments	☐ Petition for Rule to Show Cause	☐ Response to Discovery
☐ Sewer	☐ Complaint	☒ Petition to Intervene	☐ Return to Petition
☐ Telecommunications	☐ Consent Order	☐ Petition to Intervene Out of Time	☐ Stipulation
☐ Transportation	☐ Discovery	☐ Prefiled Testimony	☐ Subpoena
☐ Water	☐ Exhibit	☐ Promotion	☐ Tariff
☐ Water/Sewer	☐ Expedited Consideration	☐ Proposed Order	☐ Other:
☐ Administrative Matter	☐ Interconnection Agreement	☐ Protest	
☐ Other:	☐ Interconnection Amendment	☐ Publisher's Affidavit	
	☐ Late-Filed Exhibit	☐ Report	

Print Form Reset Form

BEFORE
THE PUBIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2015-54-E

In re:	)	
	)	
	)	**PETITION TO INTERVENE**
Application of South Carolina Electric & Gas	)	**OF THE**
Company to Establish a Distributed Energy	)	**S.C. SOLAR BUSINSS ALLIANCE**
Resource Program	)	
	)	

Pursuant to Public Service Commission Regulation 103-825 and other applicable provisions of the South Carolina Public Service Commission's ("Honorable Commission" and "Commission") Rules of Practice and Procedure, the South Carolina Solar Business Alliance, LLC ("SCSBA" or "Petitioner") hereby timely files this Petition to Intervene in the above-captioned proceeding. In support of this Petition, SCSBA respectfully shows unto this Honorable Commission the following:

1) SCSBA is a limited liability corporation ("LLC") organized October 21, 2009, pursuant to Chapter 44 of Title 33 of the South Carolina Code of Laws and, since that date, remaining in good standing with the South Carolina Secretary of State.

2) SCSBA's principal place of business is currently co-located with that of Sustainable Energy Solutions, LLC at 804 Meeting Street, Charleston, South Carolina, 29403 and mailing address is currently co-located with that of the Hannah Solar Government Services, LLC at 3297 Pacific Street, North Charleston, South Carolina, 29418.

3) Petitioner is represented in this proceeding by:

Bonnie Loomis
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4) SCSBA is organized for the purpose of promoting and advocating public policy positions supportive of solar power generation in South Carolina.

5) SCSBA is a manager-managed LLC whose current managers are the following individuals, all of whom conduct solar energy related business in South Carolina under the company names indicated:

A) Paul Fleury (Sustainable Energy Solutions, LLC)
B) Grant Reeves (TIG Sun Energy I and II, LLC),
C) Andrew Streit (SolBright Renewable Energy, LLC),
D) Don Zimmerman (Alder Energy Systems, LLC),
E) Bruce Wood (Sunstore Solar, LLC), and
F) Dave McNeil (Hannah Solar Government Services, LLC).

6) SCSBA's more than thirty (30) Trade Members include solar energy companies and professional service firms engaged in the business of solar energy generation in this state and across the nation. The majority of SCSBA's Trade Members are based in South Carolina. All of the SCSBA Managers' companies are based in South Carolina.

7) On behalf of these Trade Members' business interests and upon request of the South Carolina Office of Regulatory Staff ("ORS"), SCSBA past Board Chair Grant Reeves appeared before this Honorable Commission on April 16, 2014, for an Allowable Ex Parte Briefing to Discuss Solar Power Potential in South Carolina, including the impact on solar of, then, Senate Bill 1189 and, now, Act 236 of 2014 ("Act" or "the Act"). (See SCPSC Docket 2014-12-E)

8) On June 5, 2014, this Honorable Commission was petitioned by the ORS pursuant to Section 58-40-20(F)(4) of the Act to open a docket in compliance with the Act's requirement of a generic Commission proceeding "for the purposes of implementing the requirements of Chapter 40, Net Metering, with respect to the net energy metering rates,

tariffs, charges and credits of electrical utilities, and specifically to establish the methodology to set any necessary charges and credits." (See SCPSC Docket 2014-246-E)

9) Recognizing the broad implications of that proceeding, the General Assembly explicitly stated in the Act that "all interested parties shall be allowed to participate" and "propose methodologies" for setting net metering rates and credits in the generic proceeding. (See S.C. Code Section 58-40-20(F)(4))

10) On July 25, 2014, SCSBA petitioned this Honorable Commission to participate in Commission Docket 2014-246-E alleging that:

A) SCSBA had standing to intervene as an "interested party" pursuant to Section 58-40-20(F)(4),

B) SCSBA Trade Members had direct and material interests in the issues to be addressed and resolved by this Honorable Commission, and

C) SCSBA's interests could not be represented adequately by any other party.

11) In that Petition, SCSBA further alleged standing to intervene pursuant to the long-standing practice of this Honorable Commission to grant such Petitions when "it is in the public interest to grant the relief requested in the Petition so that the Commission may consider all of the relevant information in the instant proceeding" (See SCPSC Docket 84-10-C, Order No. 84-498, Page 2) and intervention of the Petitioning party will "aid us in developing a full record in this case . . .." (See SCPSC Docket No. 95-835-C, Order No. 1999-20, Page 2) SCSBA additionally asserted that involvement of South Carolina's <u>only</u> solar trade alliance would unquestionably serve to promote the public interest, better allow this Honorable Commission to consider all of the relevant information and ensure the development of a full record in that Docket.

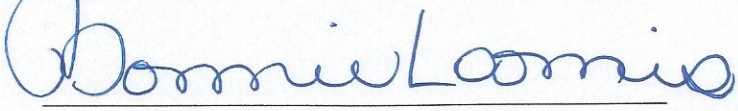
12) SCSBA's Petition in Docket 2014-246-E was not objected to by any Party or Intervenor (many of whom are the same as those involved in this proceeding, Docket 2015-54-E) and, on August 20, 2014, this Honorable Commission granted Intervenor status to SCSBA by approving the Petition.

13) SCSBA subsequently actively participated in the multi-party negotiations that resulted in the settlement proposed to, and later approved by and made an Order of, this Honorable Commission, in Docket 2014-246-E.

14) The SCSBA remains situated today as it was when this Honorable Commission favorably viewed the standing allegations made in Docket 2014-246-E, which are recited in Paragraphs 10 and 11 above. SCSBA, herein, re-states those standing allegations, specifically those in Paragraphs 10B, 10C and 11, and respectfully invokes this Honorable Commission's prior reasoning as the Commission gives consideration to this Petition to Intervene in Docket 2015-54-E.

WHEREFORE, Petitioner prays that this Honorable Commission grant SCSBA's Petition to Intervene in this docket and all related proceedings, including, but not limited to, the ability to appear as a party, engage in discovery, and participate in all hearings by offering testimony and exhibits and cross-examining the testimony and exhibits of other parties. Petitioners request the receipt of all notices, documents, exhibits and data submitted by all parties and the Commission's staff.

Respectfully submitted this 29th day of April, 2015,



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BEFORE
THE PUBIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2015-54-E

In re:	)	
	)	**CERTIFICATE OF SERVICE**
Application of South Carolina Electric & Gas Company to Establish a Distributed Energy Resource Program	)	

The undersigned certifies that she has, this 29th day of April, 2015, served a copy of the PETITION TO INTERVENE OF SC SOLAR BUSINESS ALLIANCE in the above-captioned matter on the Representatives of all Parties and all Intervenors in this Docket listed in the attached two (2) page "Service List for Docket 2015-54-E" accessed this date and printed from the South Carolina Public Service Commission online Docket Management System.

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Service List For Docket 2015-54-E

Summary: **Petition of South Carolina Electric & Gas Company for Approval to Participate in a Distributed Energy Resource Program**
Industry: Electric
Opened: 2/10/15

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