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March 23, 2018

VIA, ELECTRONIC FILING
The Honorable Jocelyn Boyd
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re:
- **Docket Number 2018-1-E**
- **Petition to Intervene**

Dear Ms. Boyd:

Enclosed for filing, please find the South Carolina Solar Business Alliance, Inc.'s Petition to Intervene, Docket Cover Sheet and Certificate of Service.

All parties of record have been served. Please notify the undersigned if you there is anything else you may need.

Respectfully Submitted,

/s/_____
Richard L. Whitt,
Timothy F. Rogers.

RLW/cas

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BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2018-1-E

IN RE: Annual Review of Base Rates for Fuel Costs of Duke Energy Progress, LLC	))))))	**PETITION TO INTERVENE**

This Commission established Commission Docket 2018-1-E, on October 4, 2017, for this Commission's annual review of base rates for fuel costs of Duke Energy Progress, LLC, ("DEP", or "Company"), pursuant to S.C. Code Ann. Section 58-27-865, *et. seq.*, (Supp. 2016) and coincident with this proceeding and pursuant to S.C. Code Ann. § 58-39-140, (Supp. 2016), this Commission will also determine whether an increase or decrease should be granted in the fuel cost component designed to recover the incremental or avoided costs incurred by the Company to implement the Distributed Energy Resource program previously approved by this Commission.

Petitioner herein is South Carolina Solar Business Alliance, Inc., ("SCSBA" or "Petitioner"). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission's Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

1. SCSBA is a Public Benefit Non-Profit Corporation, by a conversion filing on May 17, 2017, with the South Carolina Secretary of State's office, originally organized on 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 Southern Current LLC at 1519 King Street Extension, Charleston, SC 29405 and SCSBA's mailing address is currently co-located with that of the Hannah Solar Government Services, LLC at 1090 Jack Primus Road, Charleston, South Carolina, 29492.

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

4. SCSBA is a Public Benefit Non-Profit Corporation, whose Board Members are the following individuals, all of whom conduct solar energy-related business in South Carolina under the company names indicated:

a. Bret Sowers (Southern Current LLC);
b. Jarrett Branham (Alder Energy Systems, LLC);
c. Dave McNeil (Hannah Solar Government Services, LLC);
d. Andy Israelson (E.ON Climate and Renewables);
e. Steffanie Dohn (Southern Current LLC);
f. Mark Walter (Tradewind Energy) and
g. Tyler Norris (Cypress Creek Renewables).

5. SCSBA's more than sixty (60) Trade Members includes solar energy developers, engineering procurement and construction (EPC) contractors, professional service firms, equipment distributors and equipment manufacturers engaged in the business of solar energy generation in South Carolina and across the nation. All of SCSBA's Board Members' companies maintain offices in South Carolina.

6. Therefore, SCSBA is financially impacted by this Commission's Review of DEP's filing, as is outlined in more detail hereinbelow.

7. Specifically, Petitioner, SCSBA's Trade Members conduct business with DEP and Petitioner, SCSBA has material interest in the subject matter of this Docket.

8. This Commission is conducting a review of DEP's fuel purchasing practices and policies pursuant to S.C. Code Ann. § 58-27-865, (Supp. 2016).

9. Coincident with this proceeding and pursuant to S.C. Code Ann. § 58-39-140, (Supp. 2016), this Commission will also determine whether an increase or decrease should be granted in the fuel cost component designed to recover the incremental or avoided costs incurred by the Company to implement the Distributed Energy Resource program previously approved by this Commission.

10. This Commission's annual review of DEP's fuel purchasing practices and policies will determine if any adjustment in the fuel cost recovery mechanism is necessary and reasonable.

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11. As outlined hereinabove, Petitioner, SCSBA has substantial business interests in DEP's assigned territory in South Carolina.

12. Petitioner's position is that Petitioner, SCSBA and its Trade Members have a direct and substantial interest in the review to be made by this Commission in this Docket and Petitioner's interests cannot be adequately addressed by any other party. Petitioner's further position is that Petitioner, SCSBA will be impacted by this Commission's decision upon its Review, outlined hereinabove. Therefore, the decision of this Commission is important to the Petitioner and its Trade Members from a financial standpoint. Petitioner's further position is that Intervention is contemplated by S.C. Code Ann. Section 58-27-865, *et. seq.* (Supp. 2016), and Petitioner's Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important Review to be conducted in this Docket. As shown above, Petitioner has a direct and material interest in this Commission's Review and Petitioner's interests are not adequately represented by the current parties in this Docket.

13. Petitioner should be allowed to intervene in this Docket, with full rights of cross-examination, discovery and participation in any Hearing to be scheduled in this Docket.

14. The granting of SCSBA's Petition to Intervene is (**i**) contemplated by S.C. Code Ann. Section 58-27-865, *et. seq.* (Supp. 2016), (**ii**) in the public interest and (**iii**) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

15. This Petition to Intervene is timely filed with this Commission.

16. Petitioner, SCSBA has previously received approval for intervention from this Commission on numerous occasions, including in recent Commission Docket No. 2015-362-E, Docket No. 2015-8-E, Docket No. 2016-2-E, Docket No. 2016-1-E, Docket 2016-3-E, Docket 2016-9-E, Docket 2016-8-E, Docket 2016-10-E, Docket 2017-2-E, Docket 2017-1-E, Docket 2017-3-E, Docket 2017-305-E and Docket 2018-2-E.

17. Furthermore, Petitioner's Intervention is consistent with this Commission's long standing policy, "…in encouraging maximum public participation in issues before this Commission, and [Intervention] should be allowed so that a full and complete record… can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).

18. SCSBA is represented by counsel in this proceeding:

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Timothy F. Rogers,
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WHEREFORE, Petitioner prays for the following relief:

(**a**) That this Petition to Intervene be accepted and that Petitioner be made a party of record;

(**b**) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and

(**c**) For such other and further relief as is just and proper.

Respectfully Submitted,
/s/

Richard L. Whitt,
Timothy F. Rogers,
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508 Hampton Street, Suite 300
Columbia South Carolina, 29201
(803) 256-4000
Counsel for Petitioner, SCSBA

March 23, 2018
Columbia, South Carolina

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BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-1-E

IN RE: Annual Review of Base Rates for Fuel Costs for Duke Energy Progress, LLC	))))	**CERTIFICATE OF SERVICE**

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I have served copies of the South Carolina Solar Business Alliance, Inc.'s Petition to Intervene, Docket Cover Sheet and this Certificate of Service, as indicated below, via electronic mail on March 23, 2018.

Andrew M. Bateman,
Email: abateman@regstaff.sc.gov

Frank R. Ellerbe, III,
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Heather Shirley Smith,
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/s/_____
Carrie A. Schurg

March 23, 2018
Columbia, South Carolina

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