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December 22, 2015

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 2015-8-E**
● **Joint Petition to Intervene**

Dear Ms. Boyd:

Enclosed for filing is Joint Petitioners, Solbridge Energy LLC and Sustainable Energy Solutions, LLC's Joint Petition to Intervene, Coversheet 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

RLW/cas

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2015-8-E**

IN RE: Duke Energy Progress, Incorporated's)	
Integrated Resource Plan (IRP))	JOINT PETITION
)	TO
)	INTERVENE
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INTRODUCTION

A filing was made in Commission Docket 2015-8-E, on October 30, 2015, by Duke Energy Progress, LLC (“DEP”), formerly known as, “Duke Energy Progress, Incorporated”. Joint Petitioners’ herein, are (i) Solbridge Energy LLC and (ii) Sustainable Energy Solutions, LLC. This Joint 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 seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation. This Joint Petition to Intervene follows:

JOINT PETITIONERS

Solbridge Energy LLC.

1. Solbridge Energy LLC (hereinafter, “Solbridge Energy”), is a Delaware Corporation, domesticated to conduct business in the State of South Carolina, with its principal place of business in Charleston, South Carolina.
2. Solbridge Energy is a Solar Development Company. Their business model is to (i) identify financially viable opportunities to build solar power plants (ii) package each solar power plant as a distinct project and investment opportunity, and (iii) manage the installation and ongoing operations of each project. Solbridge Energy focuses on projects ranging in size between one to 80 megawatts, located primarily along the Eastern Seaboard. Solbridge Energy, along with its development partner, controls a portfolio of approximately 500 MW.

Sustainable Energy Solutions, LLC.

3. Sustainable Energy Solutions, LLC (hereinafter, "Sustainable Energy"), is a Limited Liability Corporation, organized under the Laws of the State of South Carolina with its principal place of business in Charleston, South Carolina.

4. Sustainable Energy is a renewable energy solutions provider, with a focus on solar photovoltaic energy systems. Sustainable Energy has installed over 300 Solar Energy Systems in six different States. Their services include planning, consulting, design, system installation and maintenance and project development.

5. As a developer, Sustainable Energy controls a pipeline of 500 MW of utility scale projects focused mainly in the Southeastern States, including Maryland, North Carolina, South Carolina, Arkansas, Alabama, Mississippi and Florida. Sustainable Energy's projects range in size from 1 to 80 MW.

Request for Joint Intervenors Status.

6. Although Solbridge Energy and Sustainable Energy are separate legal entities, they share: common business interest, financing sources and are joint development partners.

7. This Commission has previously allowed joint intervention by Solbridge Energy and Sustainable Energy. Because of their closely interrelated interests in this Docket, Solbridge Energy and Sustainable Energy are filing this, "Joint Petition to Intervene".

8. Joint Petitioners are financially impacted by DEP's filing, as is outlined in more detail hereinbelow.

9. Specifically, Joint Petitioners plan to conduct, business in DEP's assigned territory, including sales to DEP's Consumers and Joint Petitioners have a material interest in DEP's filing.

10. This Commission has also granted Joint Petitioners' Intervenors status in Dockets, 2015-53-E, 2015-55-E, 2015-203-E, 2015-204-E, 2015-205-E and 2015-362-E.

DEP'S Filing.

11. DEP's filing was made pursuant to § 58-37-40, S.C. Code Ann., (1976, as amended). DEP's filing is DEP's annual update to its Integrated Resource Plan, ("IRP").

12. DEP's annual IRP filing outlines potential infrastructure which will be needed to match DEP's forecasted electricity requirements.

13. As outlined hereinabove, Joint Petitioners have substantial business interests in DEP's assigned territory in South Carolina.

14. Joint Petitioner's position is that Joint Petitioners have a direct and substantial interest in the decision to be made by this Commission in this Docket, concerning this Commission's review of DEP's filing in South Carolina and Joint Petitioner's interests cannot be adequately addressed by any other party. Joint Petitioner's further position is that Joint Petitioners will be impacted by DEP's IRP planning, which necessarily influences DEP's decision making, concerning demand-side and supply-side resources and those decisions impact the cost of electricity for South Carolina consumers. Therefore, the specifics of DEP's IRP are important to Joint Petitioners from a financial standpoint. Joint Petitioner's further position is that Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important issue raised in this Docket. As shown above, Joint Petitioner have a direct and material interest in DEP's filing, and this Commission's review and Joint Petitioner's interests are not adequately represented by the current parties in this Docket.

15. This Commission contemplated intervention in IRP filings, as stated in this Commission's Order No. 2012-95. This Joint Petition to Intervene is timely filed with this Commission.

16. Furthermore, Joint 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).

17. Joint Petitioners 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.

JOINT PETITION TO INTERVENE

18. The granting of Joint Petitioners' Petition to Intervene is (i) in the public interest and (ii) 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.

19. Joint Petitioners are represented by counsel in this proceeding:

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WHEREFORE, Joint Petitioners pray for the following relief:

- (a) That this Joint Petition to Intervene be accepted and that Joint Petitioners be made a party of record;
- (b) That Joint Petitioners be allowed to participate fully in this proceeding and take such positions as they deem advisable; and
- (c) For such other and further relief as is just and proper.

Respectfully Submitted,

/S/

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803-251-7442
Counsel for Solbridge Energy LLC and
Sustainable Energy Solutions, LLC

December 22, 2015
Columbia, South Carolina

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THE PUBLIC SERVICE COMMISSION
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DOCKET NO. 2015-8-E

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CERTIFICATE OF SERVICE

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I have served copies of the Coversheet, Joint Petitioners, Solbridge Energy LLC and Sustainable Energy Solutions, LLC's Joint Petition to Intervene and this Certificate of Service, as indicated below, via electronic mail on December 22, 2015.

- (1) Heather S. Smith**
Email: Heather.smith@duke-energy.com
- (2) J. Blanding Holman, IV**
Email: Bholman@selcsc.org.com
- (3) Michael K. Lavanga**
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/S/ _____
Carrie A. Schurg

December 22, 2015
Columbia, South Carolina