Sandra Wright
313 N. Stonehedge Dr
Columbia, SC 29210
843-893-8309

Ms Jocelyn D Boyd
Chief Clerk
Public Service Commission of South Carolina
PO Drawer 11649
Columbia, SC 29211

December 10, 2016

Dear Ms. Boyd:

Please find enclosed a Petition for Rehearing of Reconsideration of Sandra Wright.

With kind regards,

Sincerely,

Sandra Wright
BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2016-223-E

In Re: Petition of South Carolina Electric & Gas Company for Updates and Revisions to Schedules Related to the Construction of a Nuclear Base Load Generation Facility at Jenkinsville, South Carolina

As an intervenor in the above-referenced proceeding, I, Sandra Wright, hereby petition the Commission pursuant to SC Code Ann. Section 58-27-2150 (1976) and Rule 103-854 of the Commission's Rules, for rehearing or reconsideration of Order No. 2016-794, dated November 28, 2016, approving the Petition of South Carolina Electric & Gas Company for updates and Revisions to Schedules Related to the Construction of a Nuclear Base Load Generation Facility at Jenkinsville, South Carolina and the Settlement Agreement proposed by the settling parties, excluding Sandra Wright and others. I urge the Commission to reconsider said Order, to correct the errors therein as set forth below, and to reject said Petition and Settlement Agreement.

In support of this petition for rehearing or reconsideration of Order No. 2016-794, I would respectfully show that:

1. The Commission has erred in approving the $831.3 million in additional capital costs claimed by the Company to complete the proposed new nuclear regenerating units, under the terms of the Base Load Review Act. These costs are not specifically known and are referred to by the Company in immeasurable terms. These costs are presented in an Amendment that was created to mitigate disputed claims, claims WEC was and is unwilling to pay. The Company is unwilling to accept their own decision to not litigate these costs. Passing these on to the ratepayer is unconscionable as these costs are not new capital costs. The company used terms such as “rework” and “reschedule” in their application so as not to use the actual terms for these costs of “repair” and “delay schedules”.

2. I was not included in discussions about a Settlement Agreement and it was known I was a intervenor in this matter. I was not the only party excluded from these discussions. The Commission erred in accepting the Settlement Agreement when not all parties were involved in it’s creation.

3. The Commission has erred in approving the $831.3 million in additional capital costs claimed by the Company in accordance to the Base Load
Review Act. Under Article 4 of the BLRA section 58-33-220 (4) " 'Base load review order' means an order issued by the commission pursuant to Section 58-33-270 establishing that if a plant is constructed in accordance with an approved construction schedule, approved capital costs estimates, and approved projections of in-service expenses, as defined herein, that the plant is considered to be used and useful for utility purposes such that its capital costs are prudent utility costs and are properly included in rates." These capital costs are not prudent as they are NOT within the approved construction schedule, approved capital costs estimates, nor approved projections.

4. The Commission erred in its acceptance of witnesses from the parent company. SCANA is NOT a utility, merely the parent company of SCE&G. SCE&G representatives should be the only parties providing evidence in matters involving the utility and its compliance with the BLRA. Mr. Marsh declared under oath that he was not employed by SCE&G, only by SCANA.

5. The Commission erred in approving the $831.3 million in additional capital costs claimed by the Company instead of the company using the 2008 Bush-Obama Nuclear Renaissance stimulus funds which are available to SCE&G. There are about $50 Billion available. The Vogtle, GA build has received $8.3 Billion from the US DOE for their build.

6. The Commission has erred in approving the increase in rates requested by SCE&G by not considering the public and the amount that is already being taken from them, as well as this new addition to the rates. These increases continue to multiply against the public that the commission's mission is to protect.

7. The Commission has erred in refusing to consider the motions I proposed as individual motions. In offering a flat statement of "Because these motions largely deal with matters already litigated before this Commission, I move that we deny Ms. Wright's motions.", the Commission erred in refusing to take an opportunity to clarify each one of my motions.
   a. The Commission erred in accepting the Settlement Agreement without causing the removal of the signature of the ORS. The signing of the Settlement Agreement by the ORS is not legal for the fact that the ORS is to be an unbiased party representing the public and the utility. In signing this Agreement, the ORS has agreed to accept SCE&G's terms.
   b. The Commission has erred in not conducting an investigation into the validity of the BLRA with the Jenkinsville nuclear reactors, based on the 2008 proposal brought before the Commission, not with any
changes that may have been made to the site in order to comply with the BLRA from 2008 after the fact.

c. The Commission has erred in increasing the rates on ratepayers until after the aforementioned investigation is completed.
d. The Commission erred in not at least considering placing a "cap" on rate increases related to the Jenkinsville nuclear reactor build until after the above mentioned investigation is completed.

8. The Commission erred in not waiting until after an investigation, not an audit, is completed before making any judgments regarding the nuclear reactor build in Jenkinsville.

Wherefore: for the above reasons, I hereby urge the Commission to reconsider said Order, to correct any and all errors mentioned above, and to reject said Petition and Settlement Agreement.

Sandra Wright
313 N. Stonehedge Drive
Columbia, SC 29210
843-893-8309