STATE OF SOUTH CAROLINA	)	
	)	**BEFORE THE**
	)	**PUBLIC SERVICE COMMISSION**
Azilee Yeadon,	)	**OF SOUTH CAROLINA**
	)	
Complainant/Petitioner,	)	**COVER SHEET**
	)	
v.	)	
	)	**DOCKET**
South Carolina Electric & Gas Company,	)	**NUMBER: 2012 - 81 - E**
	)	
Defendant/Respondent.	)	
	)	

(Please type or print)

Submitted by: Matthew W. Gissendanner
Address: SCANA Corp.
220 Operation Way, MC-C222
Cayce, SC 29033-3701

SC Bar Number: 76027
Telephone: 803-217-5359
Fax: 803-217-7931
Other:
Email: matthew.gissendanner@scana.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

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 Certificatio
☐ Electric/Telecommunications	☒ Answer	☒ Motion	☐ Request for Investigatior
☐ 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	

Matthew W. Gissendanner
Senior Counsel

matthew.gissendanner@scana.com

March 1, 2012

VIA ELECTRONIC FILING

F. David Butler, Esquire
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

RE: Azilee Yeadon v. South Carolina Electric & Gas Company
Answer and Motion to Dismiss of South Carolina Electric & Gas Company, Docket No. 2012-81-E

Dear Mr. Butler:

On or about February 14, 2012, Azilee Yeadon ("Ms. Yeadon") commenced the instant action by filing a complaint with the Public Service Commission of South Carolina ("Commission"). By way of this letter, South Carolina Electric & Gas Company ("SCE&G") hereby responds to the complaint and respectfully requests that the Commission dismiss Ms. Yeadon's complaint on the grounds that she has failed to state a claim upon which relief can be granted. While the Commission is considering SCE&G's request, the Company also requests that the Commission toll the deadline for filing direct testimony in the above-referenced docket.

On January 27, 2012, SCE&G sent Ms. Yeadon a bill for electric service provided to her residence at 167 Carribell Road, in Eutawville, South Carolina, from December 22, 2011 to January 25, 2012 (the "January 2012 Bill"). That bill totaled $506.42. Ms. Yeadon's January 2012 Bill for electric service is attached hereto as Exhibit A with confidential customer account information redacted. In her complaint, Ms. Yeadon complains that the January 2012 Bill "do[es]n't make any sense because the weather was to[o] warm for this bill" and requests an "adjustment on this bill because [she] know[s] this bill is wrong."

Based on its reading of Ms. Yeadon's complaint, SCE&G understands Ms. Yeadon to complain about SCE&G's electric weather normalization adjustment ("eWNA"). This understanding is supported by the fact that, according to Company records, Ms. Yeadon has not called SCE&G to complain about her January 2012 Bill; rather she called the South Carolina Office of Regulatory Staff ("ORS") and requested that her objection to the eWNA program be noted on her account.

(Continued . . .)

SCE&G understands that the ORS discussed the eWNA program with Ms. Yeadon and closed the inquiry.

Under the eWNA, SCE&G calculates a rate adjustment for each eWNA customer group under rate schedules 1, 6, 8, and 9 for each revenue month and meter reading cycle. After the meters are read for a particular cycle, the Company accumulates the weather for that cycle and calculates the deviation of the weather from normal. Based on this data, a factor is determined to adjust the impact of above or below average weather on the margin component of the customer's bill. In short, the eWNA is designed to adjust the rate that customers are charged for electricity consumed to account for abnormal weather; in no circumstance is a customer charged for electricity that was not consumed.[1]

The eWNA was approved by the Commission in Order No. 2010-471. Accordingly, Ms. Yeadon's complaint fails to allege that SCE&G violated any applicable statute, rule, regulation, or order administered or issued by the Commission.

Moreover, to confirm that Ms. Yeadon's meter was functioning properly and that the electricity consumption on her January 2012 Bill reflected actual usage, SCE&G conducted an in-field electric meter test of Ms. Yeadon's meter on February 24, 2012. Consistent with SCE&G's standard practice, two separate tests were conducted on Ms. Yeadon's meter. The tests were conducted in accordance with applicable Commission regulations, and Ms. Yeadon was at home during both tests. A copy of the results from the in-field electric meter tests for Ms. Yeadon's meter is attached hereto as Exhibit B with confidential customer account information redacted. These results demonstrate that Ms. Yeadon's meter was within calibration and functioning properly.

Based upon the foregoing, SCE&G respectfully requests that Ms. Yeadon's complaint be dismissed. Moreover, SCE&G requests that while the Commission is considering the Company's request, the Commission toll the deadline for filing direct testimony in this docket.

Any statement or allegation not specifically admitted herein is denied. By copy of this letter, we are serving this answer and motion to dismiss and the affidavit of Marsha H. Klatt upon Ms. Yeadon as well as counsel for the ORS and enclose a certificate of service to that effect.

---

[1] The eWNA resulted in an upward adjustment of $59.51 on Ms. Yeadon's January 2012 Bill. However, as of January 27, 2012, and including the upward adjustment on the January 2012 Bill, Ms. Yeadon has received total net downward adjustments to her electric bills of $129.32 since the inception of the eWNA in August 2010.

Moreover, by copy of this letter, we are also informing Ms. Yeadon that, pursuant to Commission Regulation 103-829, her response to this motion is due within ten (10) days after service of the motion. According to our calculations, Ms. Yeadon's response is due on or before March 12, 2012.

If you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,

Matthew W. Gissendanner

MWG/mcs

cc: Azilee Yeadon
John W. Flitter
Jeffrey M. Nelson, Esquire
(all via U.S. First Class Mail w/enclosure)

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2012-81-E

IN RE:	)	
	)	
Azilee Yeadon,	)	
	)	
Complainant/Petitioner,	)	
	)	**AFFIDAVIT**
v.	)	
	)	
South Carolina Electric & Gas Company,	)	
	)	
Defendant/Respondent.	)	
	)	

Personally appeared before me Marsha H. Klatt who, having first been duly sworn, deposes and states as follows:

1. My name is Marsha H. Klatt and I am a Senior Analyst for South Carolina Electric & Gas Company ("SCE&G" or "Company"). Among other things, I am responsible for the investigation of customer complaints received through the South Carolina Office of Regulatory Staff as well as customer complaints filed with the Public Service Commission of South Carolina ("Commission") requesting a hearing before the Commission. I am competent to make this affidavit.

2. This affidavit is based upon my personal knowledge and review of documents received and maintained in the ordinary course of business by SCE&G. I am familiar with the records of SCE&G that pertain to Ms. Azilee Yeadon and have personally worked on the documents and records concerning Ms. Yeadon.

3. I assisted SCE&G's attorney in preparing the Company's Answer and Motion to Dismiss dated March 1, 2012. The Company's Answer and Motion to Dismiss was filed in response to the Complaint of Ms. Yeadon, which was filed with the Public Service Commission of South Carolina on February 14, 2012. I have read the Answer and Motion to Dismiss and verify that the information contained within the Answer and Motion to Dismiss is true and accurate to best of my knowledge, information and belief.

FURTHER AFFIANT SAYETH NOT.

Marsha H Klatt

Marsha H. Klatt

Sworn to and subscribed before me
this 1st day of March, 2012

Notary Public for South Carolina
My Commission Expires: 5/30/2017

SCE&G
A SCANA COMPANY

www. sceg.com

SERVICE FOR
AZILEE YEADON
167 CARRIBELL RD
EUTAWVILLE SC 29048-9134

ACCOUNT NUMBER
[redacted]

DATE DUE
Feb 16 2012

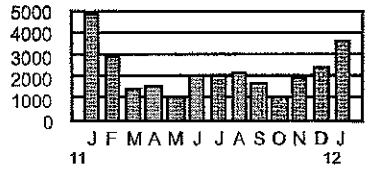
AMOUNT DUE
$506.42

CUSTOMER SERVICE - 24 HOURS A DAY
1-800-251-7234, toll-free

EMERGENCY SERVICE - 24 HOURS A DAY
Gas leaks, downed lines or power outages
1-888-333-4465, toll-free

STATEMENT DATE
Jan 27 2012

Electric Usage History *- kWh*



	Jan 11	Jan 12
kWh used	4952	3640
Avg regional temp	43	53
Days in billing period	33	34
Cost	$486.81	$495.81

For a complete set of tools to analyze your usage, log on to sceg.com.

ACCOUNT SUMMARY

Previous Bill Amount		$349.97
Payment Received	01/25/12 THANK YOU	-349.97
Current Charges		506.42
	Amount Due on 2/16/12	**$506.42**

A late payment charge of 1.5% may be added to any balance remaining 25 days after billing. Any remaining balance after 5:00 PM on 2/27/12 is subject to late payment charges.

SUMMARY OF CURRENT CHARGES

Electric Charges	$506.42
Total Current Charges	***$506.42***

View your Past Bills and Usage History Online! *- In addition to giving you the convenience of viewing and paying your current bill online, SCE&G's account services also allow you to view and compare your past bills, usage history and rates for the last two years. It's one more way SCE&G is working to provide you with the highest level of flexibility and convenience available.*

To register, simply visit sceg.com and enter Account Number: [redacted] *and activation code:* [redacted]

To view your account online, go to sceg.com and enter the following activation code: [redacted]

PLEASE KEEP THIS PORTION FOR YOUR RECORDS.

PLEASE RETURN THIS PORTION WITH YOUR PAYMENT, MAKING SURE THE RETURN ADDRESS SHOWS IN THE ENVELOPE WINDOW.

SCE&G
A SCANA COMPANY

0000000000327 16 RG 027400531

ACCOUNT NUMBER
[redacted]

DATE DUE
Feb 16 2012

AMOUNT DUE
$506.42

Please enter amount enclosed.
$

Write account number on check and make payable to SCE&G.

AZILEE YEADON
167 CARRIBELL RD
EUTAWVILLE SC 29048-9134

PO Box 100255
Columbia, SC 29202-3255

[redacted]

SCE&G
A SCANA COMPANY

www. sceg.com

CUSTOMER SERVICE	ACCOUNT NUMBER	
1-800-251-7234	[redacted]	
STATEMENT DATE	DATE DUE	AMOUNT DUE
Jan 27 2012	Feb 16 2012	$506.42

Payment Options

By Mail: Pay by check or money order in the enclosed envelope.

Online: Visit sceg.com to pay directly from your bank account or credit card.

By Phone: Call 1-800-450-9160, toll-free, 24 hours a day to pay using your credit card, debit card or directly from your bank account. There is a fee of $3.50 per transaction that BillMatrix receives for providing this service. Additional limitations may apply.

Business Office: Visit an SCE&G business office located near you to pay in person. This is a free service.

HOLLY HILL OFFICE, 1085 GILWAY AVE, HOLLY HILL SC 29059

Unauthorized Payment Agencies: Additional payment centers may exist in your area that are not SCE&G authorized payment locations. While these unauthorized locations may accept your SCE&G payment, they will charge a fee for doing so, and your payment will be delayed in reaching SCE&G.

CURRENT CHARGES

Electric Charges

RATE PLAN
008 - Residential Service

METER READING
Electric Meter read on 01/25/12 at 12:25 pm
(Next scheduled read date 2/23/12)

METER NO.	BILLING PERIOD	DAYS	CURRENT		PREVIOUS		CONSTANT		KWH
001760042	12/22/11 - 1/25/12	34	75582	-	71942	X	1	=	3,640

Basic Facilities Charge	8.50
First 800 kWh X ($ 0.121310 + $ 0.016350 WNA)	110.13
Next 2840 kWh X ($ 0.116460 + $ 0.016350 WNA)	377.18
Overhead Pvt St Lights	10.61
Total Electric Charges	**$506.42**

Electronic check conversion. When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

Third Party Notification Program is a safety net that allows others to be aware of a situation that may affect your energy service, especially during extreme weather conditions. This program gives you the option of naming another person (such as a friend, relative, neighbor, clergy or social agency) to receive a copy of any disconnection notice sent to you. ***The third party is not responsible for paying the bill.*** Call 1-800-251-7234 to enroll.

SCE&G
A SCANA COMPANY

SCE&G CERTIFICATE OF IN-FIELD ELECTRIC METER TEST

Meter Number: 176042 **Test Date:** 2/24/12
Customer: Azilee Yeadon **Tested By:** Coons
Premise Address: 167 Cornbell Rd **Account No:** [redacted]
City: Eutawville **Zip Code:** 29048

Full Load % Registration:	100.17	100.18
Light Load % Registration:	100.08	100.06
Weighted Average % Registration:	100.16	100.15
Meter Within Calibration?	yes	Yes

Remarks: 77909 Index Voltage 243
Customer was present for test

Follow Up (if necessary):

Explanation of High Bill Test

In order to determine the accuracy of a meter, the meter is tested at two test points, one representing normal (full) load conditions and another representing light load conditions. The result of the normal load condition test is noted as *Full Load % Registration* above. The result of the light load condition test is noted as *Light Load % Registration*. The overall accuracy of the meter is indicated by *Weighted Average % Registration*.

Weighted Average % Registration is calculated as below:
Weighted Average % Registration = [(4 X *Full Load % Registration*) + *Light Load %Registration*] / 5

The *Weighted Average % Registration* is the value that is used to determine if billing adjustments are necessary and warranted. S.C. Public Service Commission regulation 103-340 requires adjustment of customer's bill for errors in percent registration greater or less than 2%. Any *Weighted Average % Registration* between 98.01 and 101.99 is considered within calibration and no bill adjustments will be made.

This also certifies that the above listed meter was tested in-field by an SCE&G Energy Services Representative. All equipment used in this test has been calibrated with instruments whose accuracy can be traced to the National Institute of Standards and Testing (NIST). The limits of accuracy for watthour meters are governed by the South Carolina Public Service Commission.

Should you have any further questions, please call the Energy Information Services Department line at 1.866.660.3704.

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2012 - 81 - E

IN RE:

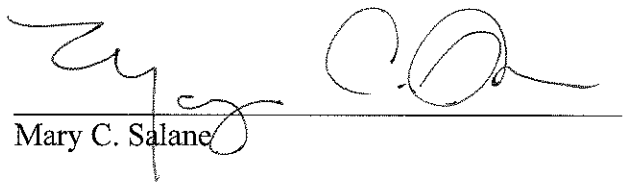
Azilee Yeadon, Complainant/Petitioner, v. South Carolina Electric & Gas Company, Defendant/Respondent.	)	**CERTIFICATE OF SERVICE**

This is to certify that I have caused to be served this day one (1) copy of South Carolina Electric & Gas Company's **Answer and Motion to Dismiss and Affidavit of Marsha H. Klatt,** via First Class U.S. Mail to the persons named below at the addresses set forth:

John W. Flitter
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Jeffrey Nelson, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Azilee Yeadon
167 Carribell Road
Eutawville, SC 29048



Mary C. Salane

Columbia, South Carolina
This 1st day of March, 2012