BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2016-1-E

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

This Commission established Commission Docket 2016-1-E, on October 1, 2015, for this Commission's annual review of base rates for fuel costs for Duke Energy Progress, LLC, ("DEP"), pursuant to S.C. Code Ann. Section 58-27-865, *et. seq.*, (Supp. 2015) and coincident with this proceeding and pursuant to S.C. Code Ann. § 58-39-140, (Supp. 2015), the 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 the Commission.

Petitioner herein is South Carolina Solar Business Alliance, LLC ("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 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 Southern Current LLC at 1634 Ashley River Road, Charleston, South Carolina, 29407 and SCSBA's 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. 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 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 (Southern Current LLC)
b. Grant Reeves (TIG Sun Energy I and II, LLC),
c. Don Zimmerman (Alder Energy Systems, LLC),
d. Dave McNeil (Hannah Solar Government Services, LLC),
e. Bret Sowers (Southern Current LLC),
f. Bryan Pittman (SolBright Renewable Energy, LLC),
g. Jarrett Branham (SolBright Renewable Energy, LLC), and
h. Bruce Wood (Sunstore Solar, LLC).

5. SCSBA's more than fifty (50) 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 the SCSBA's Board Members' eight 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's Trade Members plan to conduct business with DEP and Petitioner SCSBA has a material interest in DEP's filing.

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. 2015).

9. Coincident with this proceeding and pursuant to S.C. Code Ann. § 58-39-140, (Supp. 2015), the 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 the 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.

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

12. Petitioner's position is that 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. 2015), 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. 2015), (**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 and Docket No. 2016-2-E.

17. SCSBA is represented by counsel in this proceeding:

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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/

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March 22, 2016
Columbia, South Carolina