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August 5, 2019

Via Electronic Filing

Chairman Comer H. "Randy" Randall
The Public Service Commission of South Carolina
101 Executive Drive, Suite 100
Columbia, SC 29210

Re: Pegasus-Global Holdings, Incorporated
Dockets 2019-184-E, 2019-185-E, and 2019-186-E

Dear Chairman Randall:

Consistent with the concerns outlined by Johnson Development Associates, Incorporated ("JDA") in its letter to this Commission dated August 5, 2019 regarding Pegasus-Global Holdings, Incorporated ("Pegasus") and Dockets 2019-184-E, 2019-185-E, and 2019-186-E, the SC Solar Business Alliance, Inc. respectfully submits this letter supporting JDA's request: 1) that the Commission should find that Pegasus does not meet the statutory requirement of a "qualified independent third party expert" under SC Code Ann. § 58-41-20(I) of the South Carolina Energy Freedom Act ("Act"); 2) that the Commission should immediately disqualify Pegasus from acting as the Commission's independent third party expert in the above proceedings; and 3) that the Commission should expeditiously retain a qualified independent third party as required by the Act, in light of the statutorily constrained timelines under which the Commission is operating within these proceedings.

According to a recent article in Charleston's Post & Courier[1], this Commission was not aware of previous contractual work by Pegasus for Duke Energy, specifically testimony submitted by Pegasus on behalf of Duke Energy related to the controversial Edwardsport coal gasification project in Indiana. To ensure that the Commission has all

[1] https://www.postandcourier.com/business/sc-utility-regulators-hire-firm-with-ties-to-power-companies/article_836757a4-b528-11e9-8742-174e1b620875.html

the relevant information on Pegasus, we herein provide the Commission with information from Pegasus' website, in which Pegasus: 1) describes itself as a company that "specializes in consulting services for the largest, most complex megaprojects in the energy and infrastructure sectors"[2], 2) lists Duke Energy as a client on its "About" page[3], and 3) lists Duke Energy's Edwardsport plant on its "Global Projects" page.[4]

In a similar vein, Pegasus also has a close and recent connection to Dominion Energy South Carolina ("DESC") predecessor SCANA. The current Pegasus Board of Directors Chair was a member of the Board of Directors for SCANA Corporations ("SCANA") until January 1, 2019, according to a DESC email notification to the Commission on August 2, 2019.[5] The Pegasus Board Chair holds a 51% interest in Pegasus, according to Pegasus' website. [6]

Finally, Pegasus is also an Associate Member of the Edison Electric Institute ("EEI"), and the Pegasus President and Chief Executive Officer serves on EEI's Legal Committee.[7] According to EEI's website, EEI is an "association that represents all U.S. investor-owned electric companies."[8]

All of the above information establishes Pegasus' close relationship to both Duke Energy and DESC, and suggests that they are not the appropriate entity to serve as the Commission's "qualified independent third party expert" under SC Code Ann. § 58-41-20(I). The above information also calls into question whether Pegasus has been properly vetted for other potential conflicts of interest in the above proceedings.

Very best regards,

s/Weston Adams, III

Weston Adams, III

cc: All Parties of Record (via email and electronic filing)
Hon. Jocelyn Boyd (via email)
Chairman Thomas C. Alexander, Public Utilities Review Committee (via email)
Vice-Chairman William E. Sandifer, Public Utilities Review Committee (via email)
Members and Committee Counsel, Public Utilities Review Committee (via email)

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[2] https://www.pegasus-global.com/
[3] https://www.pegasus-global.com/our-firm/
[4] https://www.pegasus-global.com/global-projects/
[5] August 2, 2019 email of DESC's K. Chad Burgess to Commission.
[6] https://www.pegasus-global.com/our-firm/
[7] https://www.pegasus-global.com/wp-content/uploads/2019/07/RigginsW_PGHI-2019-07-23.pdf
[8] https://www.eei.org/about/Pages/default.aspx

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