

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2015-8-E

In the Matter of:)	
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)	
Duke Energy Progress, LLC's)	PETITION TO INTERVENE
Integrated Resource Plan (IRP))	
)	

The South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) (collectively “Petitioners”) through counsel, hereby petition the Public Service Commission of South Carolina (“Commission”), pursuant to R. 103-825 of the Commission’s rules, to intervene in the above-captioned docket. In support of this petition, Petitioners state as follows:

1. Duke Energy Progress, LLC (“DEP”) is an investor-owned utility that is regulated by the Commission. S.C. Code Ann. § 58-3-140 (2010). The Commission regulates and supervises DEP as to, among other things, its rates, services, facilities, and practices. Id.; see also R. 103-810 of S.C. Code of Regs. (citing S.C. Code Ann., §§ 58-27-10 et seq.). DEP’s rates, services, facilities, and practices are relevant to, and in part a function of, the development of its resource plan.

2. DEP must prepare Integrated Resource Plans (“IRPs”), submit them to the State Energy Office every three years and update them on an annual basis, and file the plans with the Commission pursuant to the requirements established by the Commission. See S.C. Code Ann. §§ 58-37-10 and 58-37-40 (2010) and Commission Order Nos. 1998-502 and 2010-124.

3. IRPs filed with the Commission must contain a 15-year demand and energy forecast; the utility's program for meeting its forecast requirements in an economic and reliable manner, including both demand-side and supply-side options; a brief description and summary of cost-benefit analysis, if available, of each option considered, including those not selected; and the supplier's or producer's assumptions and conclusions with respect to the plan's effect on the cost and reliability of energy service, and a description of the external, environmental and economic consequences of the plan to the extent practicable. Commission Order No. 1998-502; see also S.C. Code Ann. § 58-37-10 (2010).

4. In Order No. 2012-26, the Commission declared that "the Commission's integrated resource planning process [constitutes] a proceeding under Section 103-804(Q) of our regulations, into which intervention is permitted." In rendering this decision, the Commission noted that "[t]he IRP process is an important planning tool for the Companies and the Commission," and that "a transparent and open process in this regard allows for increased sharing of information and ideas, which is valuable to all interested parties." Commission Order No. 2012-26. The Commission indicated that in future IRP dockets, intervention requests would be considered by the Commission.

5. On October 30, 2015, DEP filed its 2015 IRP, which was entered in the above-captioned docket.

6. Petitioners seek to intervene in this docket to advocate for integrated resource planning that evaluates resource alternatives and results in a low-cost, reliable portfolio of supply- and demand-side resources with minimal harmful environmental impacts and costs to ratepayers.

7. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402. As an advocate for conservation and energy efficiency, CCL supports development of energy policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from DEP and who would be subject to the impacts of DEP's integrated resource planning, which influences decision-making about supply- and demand-side resources utilized and impacts the cost of electricity.

8. SACE is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina. SACE and its members have an interest in promoting greater reliance on clean, low-cost energy, and have an interest in DEP's IRP. SACE has members in South Carolina who receive electricity service from DEP and who would be subject to the impacts of DEP's integrated resource planning, including resource selection and the cost of electricity.

9. The provision of reliable and economical electricity, and all decisions related thereto, impacts Petitioners and their members. DEP's IRP, and the resource mix contained therein, impacts the cost of electricity to customers. Moreover, the manner in which DEP conducts its integrated resource planning, and whether it does so in a fiscally and environmentally responsible manner, is directly relevant to the purpose of

Petitioners' organizations. Accordingly, Petitioners and their members have a direct interest in this proceeding.

10. Petitioners are in the process of developing their position in this docket. Petitioners propose to provide their position on the IRP through written comments and may also request an ex parte briefing before the Commission.

11. Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 30th day of November, 2015.

s/ J. Blanding Holman, IV
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Attorney for Petitioners

STATE OF SOUTH CAROLINA
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Duke Energy Progress, LLC's) CERTIFICATE OF SERVICE
Integrated Resource Plan (IRP))
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)

I certify that the following persons have been served with one (1) copy of Petition to Intervene by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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This the 30th day of November, 2015.

s/ Rachel Pruzin