239138

STATE OF SOUTH CAROLINA

(Caption of Case)
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

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

COVER SHEET

S. C. PUBLIC SERVICE COMMISSION RECEIVED SEP 12 2012 RECEIVED

DOCKET NUMBER: 2012 - 203 - E

(Please type or print)

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DOCKETING INFORMATION (Check all that apply)

☐ **Emergency Relief demanded in petition** ☐ **Request for item to be placed on Commission's Agenda expeditiously**

☒ **Other: Interrogatories; 2 questions not answered from 1st set of questions**

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
☒ Electric	☐ Affidavit	☒ Letter	☒ Request
☐ Electric/Gas	☐ Agreement	☐ Memorandum	☐ Request for Certificati
☐ Electric/Telecommunications	☐ Answer	☐ Motion	☐ Request for Investigatio
☐ 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	

September 7, 2012

Dear Honorable Jocelyn Boyd,

Please ask SCE&G to answer the questions below about Docket 2012-203-E on Costs and schedule changes before the hearing date of October 2 my Interrogatories for Discovery not answered satisfactorily from my first set by SCE&G

S. C. PUBLIC SERVICE COMMISSION
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Sincerely,
Pamela Greenlaw, Intervenor

Introduction: In my first set of Interrogatories dated August 9, 2012, which SCE&G answered on August 29, 2012, were a number of questions two* of which SCE&G did not answer adequately, either because perhaps the question was not clear or the Company was not willing to answer.

These along with additional clarifying language are as follows:

Q. #4. What remains in the discovery phase of construction as of July 2012? *To* clarify, Mr. Byrne's statement in his testimony on p. 3, lines 13-14, "I believe we are now largely out of the discovery phase for the project" indicates 2 things: 1. his "belief" –he may need to check with someone who has thorough knowledge so the belief is replaced with actuality; and 2. "largely" does not mean completely. *(The original response from SCE&G was simply to repeat an explanation of what constitutes the discovery phase. The question was not answered.)*

*Q. #18. What are the time lines, costs, materials, and locations of fabrications and assembly for the construction of hardened, above-ground dry cask storage units? What is/are the company(ies) contracted to do this work? *The company refused to answer this question. It is well within the limits of the issues already discussed in writing by the witnesses for this docket and is related to the Engineering piece of the EPC contracting. Waste containment construction is included in the BLRA revised Milestones, specifically, the spent fuel rack listed under tracking ID # 126. On top of all this, the original question does go to the heart of the discussion about unanticipated future costs of unanticipated difficulties and requirements. We begin to see cracks as time goes by in the insistence by the Company that nuclear energy is the least costly alternative source (Marsh's d.t., p. 6.). A lack of solutions to nuclear waste containment has caused the NRC to cease issuing any further COL's. This question should be answered.*

***Q.** #47, (background question 46 necessary to understand #47. "46. Concerning Shaw Modular Solutions module fabrication in Louisiana, SCE&G has had to closely monitor with a resident inspector on site due to a seeming lack of a culture of nuclear safety at SMS...")
Question #47: Concerning fabrication at other plants in the US and in other countries, to where else has the Company had to deploy in residence a monitor or monitoring team?
*Although the Company technically answered this question, they may have missed the spirit of the question because the question was most likely not well-crafted. So, the clarifying, next step question is "How does SCE&G physically provide oversight at the places of fabrication whether in the US or in other countries, and at what costs . . . flying, ov*ernight accommodations, etc.?"

I understand that because I did not actually complete this particular question for the Company to answer, I do not expect the PSC to compel the Company to answer it before the day of the hearing.

Second Set of Interrogatories for SCE&G for Docket #2012-203-E September 7, 2012
by Pamela Greenlaw, Intervenor

2nd set, (1.) Noted South Carolina economist Dr. Ron Wilder advised SCE&G that the proposed schedule for constructing the 2 new AP 1000's was overly ambitious and did not take into account the learning curve. To what degree did SCE&G incorporate Dr. Wilder's advice about the learning curve in revising the construction schedule?

2nd set, (2.) What guidelines did SCE&G use to devise their ambitious schedule?

2nd set, (3.)a. What was the original time line for building Unit 1 of the current nuclear plant in Jenkinsville and how does that compare time-line-wise to Unit 2?

b. Unit 3?

c. How many months longer than the original time line did it take to build and put on line Unit 1?

2nd set, (4.) What lessons have been learned from the time line of the AP1000 construction in China, and what has caused delays there?

2nd set, (5) On page 26 of his direct testimony, Mr. Marsh referred to SCE&G's commitments concerning its receptivity to alternative generation as a supplemental source of electricity. Mr. Byrne elucidates about cost competitiveness of alternatives.

a. Please describe SCE&G's alternative energy division or team.

b. Is there a division or team responsible for studying residential and commercial deployment of solar technology?

2nd set, (6) Is the sole source of the solar costs in Mr. Byrne's Rebuttal the thin film installation at Boeing? Also

a. How many houses could operate on a 2.6 MW facility back stood by gas in a distributed rather than centralized system?

b. Why is price of real estate included in the conversation about costs given that solar can be installed on rooftops, over existing parking lots, and other already-owned, available space?

2nd set, (7) Please list the training webinars, seminars, forums, teleconferences, physical conferences, and other such opportunities, for e.g. IREC Solar Conference in September 2012, to learn about devising and deploying solar energy in which SCE&G has participated since the BLRA proceeding in 2008. Please name the organizer organizations, the dates of the training, and what SCE&G learned and is incorporating into its IRP plan. (Topic is relevant given Mr. Cooper's Direct Testimony and Mr. Byrne's Rebuttal.

2nd set, (8.) Please list the training webinars, seminars, forums, teleconferences, physical conferences, and other such opportunities in which SCE&G has participated since the BLRA Proceeding in 2008 about devising and deploying ChP (combined heat and power.) Please name the organizer organizations, the dates of the training, and what SCE&G learned and is incorporating into its IRP plan.

2nd set (9.) How many MWHs or Kwhs per year are generated by the 150 customers in the PaCE program? How much money has this program saved or created for the Company? For the 150 participating customers? What are the goals and plans for this program going forward?

2nd set (10.) Concerning DSM (Demand Side Management) referred to on pp. 6 - 8 in Mr. Byrne's rebuttal testimony , Mr. David Pickles's testimony from Docket 2009-261-E is quoted in which he stated that SCE&G's

successful implementation of the selected programs over 3 years was would result in savings of over 62 MW & 333,363 Mwh annually.

a. This was his prediction, was it not?

b. How well are the programs succeeding thus far according to the review by ORS & the DSM advisory group?

c. What are the planned improvements and revisions to program design &/or implementation to ensure success? Are these included in the Integrated Resource Plan (IRP?)

2nd set, (11.) Which of the 9 chosen efficiency programs will be replaced or eliminated? Which expanded?

2nd set (12.) Please give the results of the Home Report Program in terms of kwh's and costs saved by consumers who participated.

a. Please reveal the results of the telephone survey.

b. Please indicate what the participants saved in Kwhs.

c. What were the costs of this program to SCE&G?

d. Will this program be revised, continued or is it complete?

2nd set (13.) Considering that weatherization has been a highly successful energy efficiency program under Santee Cooper and the corresponding electric coops, what are SCE&G's plans for incorporating and initiating employment of the same successful strategies that will make weatherization work for its customers? (Please do not include the past year's program unless revisions initiated will be a substantial improvement.)

2nd set (14.) On pp. 13-15 of his d.t. Mr. Marsh discusses conditions of the unanticipated 9 month delay of approval of the COL by the NRC. The following questions deal with his points:

a. When Unit I of V.C. Summer was built, what were the causes of delay in receiving its license approval for construction?

b. What were the construction causes of delay for completion of Unit I?

c. How did both those delays change the operating costs of Unit I? What was the original cost projection and the final cost of Unit I?

d. How did these lessons learned about Unit I play a part of the development of time lines (milestones) and cost projections for Units 2 and 3?

2nd set (15.) Why did SCE&G submit its application prematurely, i.e., before" the NRC completed its reference plant COL application that provided the vehicle for NRC licensing of the standard AP 1000 configuration?" (Mr. Marsh's d.t., p. 13, line 8-10 and p. 14, lines 8-11)

2nd set (16.)Why did SCE&G submit its COL application to NRC prematurely, i.e., before the environmental report and wetlands permit applications were complete? Mr. Marsh's d.t., p. 13, lines 13-17 and p. 14, lines 8-11)

2nd set (17.) Referencing "delays," what is meant by the Company's having met its obligation to have the initial licensing and permitting issues resolved within the 18 month schedule contingency? For which of the permits and/or licenses does this mean actual acquisition of said permits and/or licenses? For which of these licenses are there other issues and how was each issue resolved?
Mr. Marsh's d.t., p. 16, lines 6 -10,

(2nd set, (18.) In the petition on p.8, #28, did SCE&G request a change proposal for the waste water piping for gravity drainage to the discharge system in the COL at the time of the BLRA hearing or at the time the COL application was made to the NRC? Was there an anticipated calculation made in advance of the actual estimation from Westinghouse/Toshiba/Shaw?

2nd set, (19.) In Mr. Marsh's d.t. he explained the cost schedule adjustments in the petition as well as updates that are evolving even now. In particular, on p. 8, lines 19-21 Mr. Marsh refers to new standards emerging in response to the recent Fukushima events.

How does the revised BLRA milestone time line make room for operational and anticipated changes aka, evolving requirements by NRC,(Byrne's rebuttal p. 9, line 5,) specifically

a. the development, fabrication, and installation of hardened above-ground storage casks (a.k.a., HOS) for cooled spent fuel rods for long-term, on-site storage;

b. the increase of armed security (from 5 to 10 minimum with required face-to-face attack and repel tactical practices and corresponding payroll, benefits, etc.);

c. other?

2nd set, (20.) In Mr. Byrne's rebuttal testimony on pp. 5-6, he compares nuclear construction costs and solar construction costs for a comparable KW output extrapolating from EIA estimates of nuclear construction costs based on 2010 dollars.

a. Were SCE&G inclusions in its cost calculations for construction the same as what is included in EIA's estimates? If not, how do they differ?

b. Did SCE&G use data from EIA on solar cost construction estimation? What do these data show in terms of construction cost calculations?

. c. Has SCE&G sought data on operational costs of nuclear and compared them with *operating* costs of solar installations/facilities? If so, what are the sources of the data and what do the generators of that data include and conclude?

2nd set, (21.) What sorts of support would be needed by SCE&G, be it from the General Assembly, ORS, the public, the DOE, and NRC to deploy sufficient solar to provide heating water in amounts to relieve the grid?

2nd set, (22.) What were the projected and final costs of Unit 1?