December 12, 2016

VIA ELECTRONIC FILING

Jocelyn Boyd, Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Re: SCE&G Petition for Updates and Revisions to Schedules Related to the Construction of a Nuclear Base Load Generation Facility at Jenkinsville, South Carolina - Docket No. 2016-223-E

Dear Ms. Boyd:

On behalf of the South Carolina Office of Regulatory Staff, the South Carolina Energy Users Committee, Electric Cooperatives of South Carolina, Inc., and Central Electric Power Cooperative, Inc., enclosed is a Return to the Petitions for Rehearing or Reconsideration by Sierra Club and South Carolina Coastal Conservation League.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

Frank R. Ellerbe, III

Enclosure

cc w/enc: Parties of Record (via email and US Mail)
BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re: 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

Docket No. 2016-223-E

RETURN TO THE PETITIONS FOR REHEARING OR RECONSIDERATION BY SIERRA CLUB AND SOUTH CAROLINA COASTAL CONSERVATION LEAGUE ON BEHALF OF THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF, THE ELECTRIC COOPERATIVES OF SOUTH CAROLINA, INC., CENTRAL ELECTRIC POWER COOPERATIVE, INC., AND THE SOUTH CAROLINA ENERGY USERS COMMITTEE

The South Carolina Office of Regulatory Staff, The Electric Cooperatives of South Carolina, Inc., Central Electric Power Cooperative, Inc. and the South Carolina Energy Users Committee (collectively “Respondents”) submit this Return to the Petitions of the Sierra Club and the South Carolina Coastal Conservation League for Rehearing or Reconsideration of Order No. 2016-794 of the Public Service Commission of South Carolina (“Commission”) in the above-captioned proceeding. Respondents request that the Commission deny both petitions for reconsideration on the grounds that Order No. 2016-794 properly disposed of the issues presented in this proceeding and that its findings of fact and conclusions of law were supported by substantial evidence. See Duke Power Co. v. Public Service Commission of S.C., 343 S.C. 554, 541 S.E.2d 250 (2001). The petitions for reconsideration fail to make the showing required under S.C. Code Ann. §1-23-380(A)(6) to establish a basis for a reversal or modification of Order No. 2016-794. Accordingly, the petitions should be denied.
Respondents request an opportunity to submit a proposed order that will be consistent with the Commission’s directive ruling on the petitions for reconsideration following the issuance of the directive.

Respectfully submitted,

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__________________________
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December 12, 2016

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BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2016-223-E

In Re:

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

CERTIFICATE OF SERVICE

This is to certify that I, Kristy S. Egan, a Paralegal with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the Return to Petitions to Reconsideration by Sierra Club and South Carolina Coastal Conservation League in the foregoing matter by electronic mail and by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

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Dated at Columbia, South Carolina this 12th day of December, 2016.

s/Kristy S. Egan
Kristy S. Egan