June 3, 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: 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

Dear Ms. Boyd:

Enclosed for filing please find a Petition to Intervene on behalf of The Electric Cooperatives of South Carolina, Inc. and Central Electric Power Cooperative, Inc. in the referenced docket. By copy of this letter we are serving same on the parties of record. Please contact me if you have any questions.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

FRANK R. ELLERBE, III

FRE/tch
Enclosures
cc w/enc: K. Chad Burgess, Esquire
Matthew W. Gissendanner, Esquire
Belton T. Zeigler, Esquire
Jeffrey M. Nelson, Esquire
Shannon B. Hudson, Esquire
Michael N. Couick, Esquire
Christopher R. Koon, Esquire
John H. Tiencken, Jr., Esquire
Paul J. Conway, Esquire
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

PETITION TO INTERVENE OF THE ELECTRIC COOPERATIVES OF SOUTH CAROLINA, INC. AND CENTRAL ELECTRIC POWER COOPERATIVE, INC.

Pursuant to Public Service Commission Regulation 103-825, and other applicable provisions of the Commission’s Rules of Practice and Procedure, The Electric Cooperatives of South Carolina, Inc. ("ECSC") and Central Electric Power Cooperative, Inc. ("Central") (jointly referred to as the “Petitioners”) hereby file this Petition to Intervene in the above-captioned proceeding. In support of this Petition, ECSC and Central state as follows:

1. ECSC consists of member electric cooperatives organized in the State of South Carolina. ECSC serves as a legal and regulatory representative of its member electric cooperatives. ECSC is the state-wide service and trade association for electric cooperatives in the state. ECSC’s members are twenty consumer-owned electric cooperatives, one wholesale power supply cooperative (Central) and one materials supply cooperative. Together, ECSC’s members operate the largest electric distribution system in the state. More than 1.5 million South Carolinians in all 46 counties use electricity from electric cooperatives. ECSC’s principal place of business and mailing address is 808 Knox Abbot Drive, Cayce, South Carolina 29033.
2. Central is a generation and transmission electric cooperative formed under SC Code Section 33-49-10, *et seq.* Central’s principal place of business is 20 Cooperative Way, Columbia, South Carolina 29210. Central’s mailing address is P.O. Box 1455, Columbia, South Carolina 29202. Central is engaged in the purchase, transmission and sale of electric power to twenty (20) distribution electric cooperatives throughout the State of South Carolina. Central’s distribution cooperative members provide electric power to over 700,000 homes, businesses, and industrial members throughout all 46 South Carolina counties and a small portion of North Carolina.

3. ECSC and Central have a substantial interest in the issues to be considered in this proceeding. The nuclear generating units under construction at Jenkinsville are a joint project of SCE&G and the Public Service Authority of South Carolina (“Santee Cooper”). Under a contract between Central and Santee Cooper, Central and the members of ECSC are responsible for seventy percent of Santee Cooper’s capital costs. Thus Santee Cooper’s share of the cost of the new nuclear units will be borne largely by ECSC members and Central, giving ECSC and Central a direct and significant interest in this proceeding in which the Commission will consider a request to approve changes in the estimated costs of the project. The position of ECSC and Central in this proceeding is that the changes in cost estimates must be examined closely to ensure that those costs are prudent and necessary.
4. Pursuant to Rule R. 103-804(S) of the Commission’s Rules of Practice and Procedure, Petitioners are represented by counsel in this proceeding:

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WHEREFORE, Petitioners request that they be allowed to intervene in this docket, with full rights to participate as a party of record, including, but not limited to, the ability to engage in discovery and participate in all hearings by offering testimony and exhibits and cross-examining witnesses. Petition requests the receipt of all notices, documents, exhibits and data submitted by all parties and the Commission’s staff.

Respectfully submitted,

Michael N. Couick  
Christopher R. Koon  
The Electric Cooperatives of SC, Inc.  
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Charleston, SC 2949

/s/ Frank R. Ellerbe, III  
Frank R. Ellerbe, III  
ROBINSON, MCFADDEN & MOORE, P.C.  
Post Office Box 944

June 3, 2016  
Columbia, SC 29202
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, Toni C. Hawkins, 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 Petition to Intervene in the foregoing matter 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 3rd day of June, 2016.

Toni C. Hawkins