

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2015-362-E

IN RE: Joint Application of Duke Energy)	
Carolinas, LLC, Duke Energy)	
Progress, LLC and South Carolina)	
Electric & Gas Company for Approval)	PETITION
of the Revised South Carolina)	TO
Interconnection Standard.)	INTERVENE

INTRODUCTION

A Commission Docket was opened in this matter on October 12, 2015, by Duke Energy Carolinas, LLC, (“DEC”), Duke Energy Progress, LLC (“DEP”) and South Carolina Electric & Gas Company, (“SCE&G”) , and assigned the above-referenced Docket number. Petitioner herein is SC Solar Development, LLC. This Petition to Intervene is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation. This Petition to Intervene follows:

PETITIONER

SC Solar Development, LLC.

1. SC Solar Development, LLC, (“SC Solar Development”) is a South Carolina Limited Liability Corporation, duly organized and authorized to conduct business in the State of South Carolina, with its registered agent located in Greenville, South Carolina. SC Solar Development, LLC is a wholly owned subsidiary of National Renewable Energy Corporation (“NARENCO”).

2. SC Solar Development, as a wholly owned subsidiary, operates under the business model of NARENCO. NARENCO is a vertically integrated Solar Company with in house design, engineering, procurement, construction developer, financier, and Operations and Maintenance provider. NARENCO, through its subsidiaries, including SC Solar Development, controls a pipeline of approximately 500 MW in South Carolina, has built nearly 100 MW of solar to this date, and has approximately 800 MW pipeline across the southeast.

Request for Intervenor Status.

3. Representatives of NARENCO and/or SC Solar Development have previously participated in multiple discussions with the staff of the South Carolina Office of Regulatory Staff (“ORS”), as to the Distributed Energy Resource Program Act, Act No. 236 of 2014 in Docket 2014-246-E (hereinafter as the, “Act”), and other Solar issues, including the new Interconnection Standard for South Carolina.

4. Representatives of NARENCO and/or SC Solar Development have shown their interest in Solar issues and the Act, by participation with the South Carolina Solar Business Alliance (“SCSBA”). Mr. Bret J. Sowers, Sr. Business Developer with NARENCO, is also a Board Member of the SCSBA.

5. Petitioner plans to conduct, business in DEC’s, DEP’s and SCE&G’s territories, including sales to the stated Utilities’ Consumers.

6. Additionally, Mr. Bret Sowers will be attending and participating in a meeting on December 2, 2015, at ORS concerning a new Interconnection Standard for South Carolina.

DEC’S, DEP’S and SCE&G’s Application.

7. Section 6 of the Act, directed this Commission to promulgate standards for interconnection of renewable energy facilities and other nonutility-owned generation with an electrical utility’s distribution system.

8. All three Applicants have jointly proposed a new Interconnection Standard for South Carolina and attached the same to their Joint Application, as Exhibit “1”, thereto.

9. The proposed new Interconnection Standard for South Carolina is outlined and supported in the Joint Application, and the Petitioner herein, appreciates the efforts of the companies and the Office of Regulatory Staff, to include stake holders in discussions leading up to the proposed new Interconnection Standard by the Applicants.

10. Petitioner's position is that they have a direct and substantial interest in the decision to be made by this Commission in this Docket, concerning this Commission's approval of the Applicants proposed new Interconnection Standard for South Carolina and Petitioner's interests cannot be adequately addressed by any other party. Petitioner's further position is that although this Commission must approve a new Interconnection Standard, the specifics thereof, are important to the Petitioner, from a financial standpoint. Petitioner's further position is that Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important issue raised in this Docket. As shown above, Petitioner has a direct and material interest in the issue to be addressed and resolved by this Commission in this Docket and Petitioner's interests are not adequately represented by the current parties in this Docket.

11. This Petition to Intervene is timely filed with this Commission.

12. Petitioner's Intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before this Commission, and [Intervention] should be allowed so that a full and complete record... can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).

13. Petitioner should be allowed to intervene in this Docket, with full rights of cross examination, discovery and participation in any Hearing to be scheduled in this Docket.

PETITION TO INTERVENE

14. The granting of SC Solar Development's Petition to Intervene is (i) consistent with the Settlement Agreement, reached concerning the Act (ii) in the public interest and (iii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

15. SC Solar Development, LLC is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as is just and proper.

Respectfully Submitted,

/S/

Richard L. Whitt

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803-251-7442

Counsel for Petitioner, SC Solar Development, LLC

November 23, 2015

Columbia, South Carolina

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OF SOUTH CAROLINA
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IN RE: Joint Application of Duke Energy)
Carolinas, LLC, Duke Energy)
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CERTIFICATE OF SERVICE

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I have served copies of the Coversheet, Petitioner, SC Solar Development, LLC's Petition to Intervene and this Certificate of Service, as indicated below, via electronic mail on November 23, 2015.

- (1) Charles Alex Castle**
Email: alex.castle@duke-energy.com
- (2) Andrew M. Bateman**
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/s/ _____
Carrie A. Schurg

November 23, 2015
Columbia, South Carolina