March 8, 2018

VIA E-FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210


Dear Ms. Boyd:

The South Carolina Office of Regulatory Staff ("ORS") provides the following response to the schedule proposed by South Carolina Electric & Gas Company ("SCE&G") for the above dockets on February 26, 2018.

SCE&G’s proposed schedule has SCE&G’s and Dominion’s direct testimony for the 2017-370-E docket due August 15, 2018 and the other parties’ responsive testimony due September 17, 2018.\(^1\) The Joint Application and Petition is almost 700 pages\(^2\), and it is expected the direct testimony of SCE&G and Dominion will be voluminous. ORS respectfully submits that more time should be allowed between the time periods for the direct testimony due dates such that each party may thoroughly review testimony, issue discovery, receive discovery responses, and review discovery responses prior to the direct testimony due date.

Next, ORS respectfully requests that no party’s testimony be due on a Monday. The schedule proposed by SCE&G has the responsive party direct testimony due on Monday, September 17, 2018. No other proposed due dates are on a Monday.

Last, Senate Bill 954 is a joint resolution that would require a Commission decision on the abandonment by December 21, 2018. Were the Commission to refrain from action on the ORS

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\(^1\) For the 2017-305-E docket, SCE&G proposes that ORS’s direct testimony be filed August 15, 2018 with SCE&G’s responsive testimony due September 17, 2018. For the 2017-207-E docket, SCE&G proposes that the Sierra Club and Friends of the Earth testimony be filed August 15, 2018 with SCE&G’s responsive testimony due September 17, 2018.

\(^2\) On January 12, 2018, SCE&G and Dominion filed a Joint Application and Petition in Commission Docket No. 2017-370-E.
request in Docket No. 2017-305-E, as proposed by SCE&G, the revised rates SCE&G currently charges pursuant to the Base Load Review Act are expected to be replaced by the rates derived from the Commission’s abandonment decision depriving SCE&G’s ratepayers of earlier rate relief. Given the time between now and December 21, 2018, the ratepayer relief sought by ORS in Docket No. 2017-305-E diminishes each month a decision is delayed and may become moot. This is particularly so since SCE&G has stated in an affidavit that it will utilize S.C. Code Ann. § 58-27-930 if the Commission grants ORS’s request in the 2017-305-E docket.

In conclusion, ORS asks that the Commission not accept the proposed schedule put forth by SCE&G and accept the schedule proposed by ORS which provides ORS, intervenors and ratepayers sufficient opportunity to understand and address the issues in the Joint Application and Petition. However, ORS offers a date where the Other Party and ORS Direct Testimony is filed earlier to allow SCE&G additional time for rebuttal. The resulting dates for consideration are:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Dates Sent to the Commission by ORS on February 22, 2018</th>
<th>Alternate Dates to Allow SCE&amp;G More Time for Rebuttal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joint Applicant Direct Testimony Due</td>
<td>Tuesday, May 15, 2018</td>
<td></td>
</tr>
<tr>
<td>Other Party and ORS Direct Testimony Due</td>
<td>Tuesday, September 25, 2018</td>
<td>Tuesday, September 11</td>
</tr>
<tr>
<td>Joint Applicant Rebuttal Testimony Due</td>
<td>Tuesday, October 9, 2018</td>
<td>Wednesday, October 10</td>
</tr>
<tr>
<td>Other Party and ORS Surrebuttal Testimony Due</td>
<td>Tuesday, October 23, 2018</td>
<td>Wednesday, October 24</td>
</tr>
<tr>
<td>Hearing Start Date</td>
<td>Monday, November 5, 2018</td>
<td></td>
</tr>
<tr>
<td>Proposed Orders Due</td>
<td>Friday, November 30, 2018</td>
<td></td>
</tr>
<tr>
<td>Order Due</td>
<td>Friday, December 21, 2018</td>
<td></td>
</tr>
</tbody>
</table>

Sincerely,

Shannon B. Hudson

CC: Joseph M. Melchers, Esquire (via e-mail)
    F. David Butler, Esquire (via e-mail)
    All Parties of Record in Docket No. 2017-305-E (via e-mail)
    All Parties of Record in Docket No. 2017-207-E (via e-mail)
    All Parties of Record in Docket No. 2017-370-E (via e-mail)