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March 9, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk / Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Public Service Commission Review of South Carolina Code of Regulations Chapter 103 Pursuant to S.C. Code Ann. Section 1-23-120(J)

Docket No. 2020-247-A

LETTER FROM BLUE GRANITE WATER COMPANY REGARDING WATER AND SEWER REGULATION REVIEW

Dear Ms. Boyd:

I am filing this letter on behalf of Blue Granite Water Company (the "Company") pursuant to the Notice of Review filed in the above-referenced docket as related to Articles 5 and 7 of the Commission's regulations. The Company appreciates this opportunity to provide input in this process and intends to participate in the workshop scheduled for March 19, 2021.

103-552 and 103-750(B)(1) – Minimum Pipe Size and Water Mains

The engineering specifications for water and sewer systems incorporate a variety of standards and requirements focused on flow rates, pressures, water quality, material type, accessibility, and many environmental considerations. Water and sewer utilities must conform to all applicable standards while also identifying the most cost and operationally effective method of providing service. Primarily, such engineering standards and approvals for water and sewer infrastructure are under the jurisdiction of the South Carolina Department of Health and Environmental Control ("DHEC"). Indeed, 103-750 (as well as 103-751) largely defers to DHEC's jurisdiction in the setting of requirements for engineering practices. However, 103-552 and 103-750(B)(1) include specific requirements for engineering of water and sewer infrastructure that may not conform to DHEC requirements, may conflict with such requirements on certain case-by-case bases, or otherwise may unnecessarily add to costs or operational risk in certain cases. Additionally, certain infrastructure existing at the time of the implementation of these rules would either need to be considered as "grandfathered," or else deemed a priority to replace even if proper

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service is still occurring. The limitations of the jurisdiction of the Commission appear to defer inspection and approval of engineering specifications to DHEC, with review by ORS per 103-556 and 103-756 applicable to identify any concerns within the Commission's purview. The Company also notes that while Articles 3 and 4 include sections similar to 103-550, 103-750(A), 103-751, and 103-753, there are no sections in the electric or gas Articles comparable to 103-552, 103-750(B)(1), 103-556, or 103-756.

The Company would therefore propose that 103-552 be subsumed within the applicability of 103-550, 103-551 and 103-553, and therefore would propose to strike 103-552. Likewise, the Company would propose that 103-750(B)(1) be subsumed within the applicability of 103-750(A), 103-751, and 103-752, and therefore propose to strike 103-750(B)(1).

Thank you for your consideration of these comments. A copy of this filing is also being provided to the parties of record.

Kind regards,

Sam Wellborn

SJW:tch

cc: Parties of Record (via email)
Donald Denton, President (via email)
Phil Drennan, Regional Director of FP&A (via email)