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OF COUNSEL:
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March 7, 2017

VIA, ELECTRONIC FILING
The Honorable Jocelyn Boyd
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re:
- **Docket Number 2017-1-E**
- **Petition to Intervene**

Dear Ms. Boyd:

Enclosed for filing is Petitioner Adger Solar, LLC's Petition to Intervene, Cover Sheet and Certificate of Service.

All parties of record have been served. Please notify the undersigned if you there is anything else you may need.

Respectfully Submitted,

/S/_____
Richard L. Whitt

RLW/cas

BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2017-1-E

IN RE: Annual Review of Base Rates for Fuel Costs of Duke Energy Progress, LLC	))))))	**PETITION TO INTERVENE**

INTRODUCTION

This Commission established Commission Docket 2017-1-E, on October 12, 2016, for this Commission's annual review of base rates for fuel costs of Duke Energy Progress, LLC, ("DEP"), pursuant to S.C. Code Ann. Section 58-27-865, *et. seq.*, (Supp. 2016) and **coincident** with this proceeding and pursuant to S.C. Code Ann. § 58-39-140, (Supp. 2016), the Commission will also determine whether an increase or decrease should be granted in the fuel cost component designed to recover the incremental or avoided costs incurred by DEP, to implement the Distributed Energy Resource program previously approved by this Commission.

Petitioner herein is Adger Solar, 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. This Petition to Intervene is also consistent with S.C. Code Ann. Section 58-27-865, *et. seq.*, (Supp. 2016), which allows participation by, "...all interested parties...." Petitioner 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

Adger Solar, LLC.

1. Adger Solar, LLC is a utility-scale solar development firm based in Bluffton, South Carolina, ("Adger Solar"). Adger Solar has been active in South Carolina since 2014 and currently has over 500 MW of solar farms under development in South Carolina. The Adger Solar management team and its investors have led the development of over 9,000 MW of operating utility-scale wind and solar projects in the United States.

2. Adger Solar is a clean energy development company focused on creating lower-cost, utility-scale solar-electric generating facilities, with developments underway in six different South Carolina Counties. Adger Solar is a joint venture with one of the nation's oldest private energy investors, which has participated in the financing and development of more than 10,000 megawatts of wind and solar projects now in operation around the country.

3. Additionally, Adger Solar is in the process of developing a two hundred million dollar project in Clarendon County, South Carolina, consisting of two separate solar farm projects. Together, these two proposed projects in Clarendon County, South Carolina, will generate enough electricity to supply approximately 25,000 homes on an average annual basis.

4. The proposed solar farm projects are located in DEP's assigned territory.

Request for Intervenor Status.

5. Adger Solar is financially impacted by this Commission's Review, as is outlined in more detail herein.

6. Specifically, Petitioner plans to conduct business with DEP, including sales to DEP's Consumers in DEP's assigned territory, and Petitioner Adger Solar has a material interest in this Commission's Review.

This Commission's Review.

7. This Commission is conducting a Review of DEP's fuel purchasing practices and policies pursuant to S.C. Code Ann. § 58-27-865, (Supp. 2016).

8. Coincident with this proceeding and pursuant to S.C. Code Ann. § 58-39-140, (Supp. 2016), the Commission will also determine whether an increase or decrease should be granted in the fuel cost component designed to recover the incremental or avoided costs incurred by DEP, to implement the Distributed Energy Resource program previously approved by this Commission.

9. This Commission's annual Review of DEP's fuel purchasing practices and policies will determine if any adjustment in the fuel cost recovery mechanism is necessary and reasonable.

10. As outlined herein, Petitioner, Adger Solar has substantial business interests with DEP and DEP's Consumers in DEP's assigned territory in South Carolina.

11. Petitioner's position is that Adger Solar has a direct and substantial interest in the Review to be made by this Commission in this Docket and Petitioner's interests cannot be adequately addressed by any other party. Petitioner's further position is that Petitioner Adger Solar will be impacted by this Commission's decision upon its Review, outlined hereinabove. Therefore, the decision of this Commission is important to the Petitioner from a financial standpoint. Petitioner's further position is that Intervention is contemplated by S.C. Code Ann. Section 58-27-865, *et. seq.* (Supp. 2016), and Petitioner's Intervention will aid this Commission by assisting in the development of a full and fair record to address the important Review to be conducted in this Docket. As shown above, Petitioner has a direct and material interest in this Commission's Review and Petitioner's interests are not adequately represented by the current parties in this Docket.

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

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

14. 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

15. The granting of Adger Solar, LLC's Petition to Intervene is (**i**) contemplated by S.C. Code Ann. Section 58-27-865, *et. seq.* (Supp. 2016), (**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.

16. Adger Solar, 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,
AUSTIN & ROGERS, P.A.
508 Hampton Street, Suite 300
Columbia South Carolina, 29201
803-251-7442
Counsel for Petitioner, Adger Solar, LLC.

March 7, 2017
Columbia, South Carolina

BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2017-1-E

IN RE: Annual Review of Base Rates for Fuel Costs of Duke Energy Progress, LLC	))))))	**CERTIFICATE OF SERVICE**

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I have served copies of the Cover Sheet, Petitioner, Adger Solar LLC's Petition to Intervene and this Certificate of Service, as indicated below, via electronic mail on March 7, 2017.

Andrew M. Bateman,
Email: abateman@regstaff.sc.gov

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Rebecca J. Dulin,
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/S/_____
Carrie A. Schurg

March 7, 2017
Columbia, South Carolina