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1401 Main Street, Suite 900
Columbia, SC 29201

Phone: (803) 737-0800
www.regulatorystaff.sc.gov

shudson@regstaff.sc.gov

Shannon Bowyer Hudson
Counsel for ORS

February 7, 2018

VIA U.S. MAIL

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

Re: Continuing Audit Information Request ("AIR") for Consolidated Docket Nos.:
2017-207-E (2nd Continuing AIR)
2017-305-E (1st Continuing AIR)
2017-370-E (1st Continuing AIR)

Dear Ms. Boyd:

Please find enclosed the South Carolina Office of Regulatory Staff's Continuing Audit Information Request ("AIR") for the consolidated dockets referenced above along with its cover letter which was served on South Carolina Electric & Gas Company and Dominion Energy, Inc. today.

Sincerely,

Shannon B. Hudson

Shannon B. Hudson

Enclosure

cc: Joseph Melchers, Esquire (via U.S. 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 except William T. Dowdey (via e-mail)
William T. Dowdey (via U.S. mail)

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C. DUKES SCOTT
EXECUTIVE DIRECTOR

1401 Main Street, Suite 900
Columbia, SC 29201

NANETTE S. EDWARDS
DEPUTY EXECUTIVE DIRECTOR

Phone: (803) 737-0800
www.regulatorystaff.sc.gov

shudson@regstaff.sc.gov

Shannon Bowyer Hudson
Counsel for ORS

February 7, 2018

VIA ELECTRONIC MAIL

K. Chad Burgess, Esquire
South Carolina Electric & Gas Company
220 Operation Way-MC C222
Cayce, South Carolina 20033-3701

Lisa S. Booth, Esquire
Dominion Energy Services, Inc.
120 Tredegar Street
P.O. Box 26532
Richmond, Virginia 23261-6532

Re: Continuing Audit Information Request ("AIR") for Consolidated Docket Nos.:
2017-207-E (2nd Continuing AIR) [1]
2017-305-E (1st Continuing AIR) [1]
2017-370-E (1st Continuing AIR)

Dear Mr. Burgess and Ms. Booth:

Please find enclosed and served on you South Carolina Office of Regulatory Staff's ("ORS") Continuing Audit Information Request as referenced above. Please note that pursuant to S.C. Code § 58-4-55(A), ORS requests that the responses be provided under oath. ORS also asks that individual responses be provided early if they are completed prior to the due date. Lastly, and for clarity, Dominion Energy, Inc. was not served the 1st Continuing AIR in Docket No. 2017-207-E.

(Continued...)

[1] A First Continuing Audit Information Request for Records and Information Pursuant to Commission Order Nos. 2017-769 and 2017-770 were sent and have been responded to. Commission Order Nos. 2017-769 and 2017-770 were issued in Docket Nos. 2017-305-E and 2017-207-E. The First Continuing Audit Information Request for Records and Information Pursuant to Commission Order Nos. 2017-769 and 2017-770 is being treated as a chronology separate and apart from the AIRS referenced above.

Sincerely,

Shannon B. Hudson

Shannon B. Hudson

Enclosure

cc: Matthew W. Gissendanner, Esquire (via e-mail)
Byron Hinson (via e-mail)

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BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E

IN RE:	Friends of the Earth and Sierra Club, Complainant/Petitioner v. South Carolina Electric & Gas Company, Defendant/Respondent	)	**SOUTH CAROLINA OFFICE OF REGULATORY STAFF'S SECOND AND CONTINUING AUDIT INFORMATION REQUEST FOR RECORDS AND INFORMATION**
IN RE:	Request of the South Carolina Office of Regulatory Staff for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920	)	**SOUTH CAROLINA OFFICE OF REGULATORY STAFF'S FIRST AND CONTINUING AUDIT INFORMATION REQUEST FOR RECORDS AND INFORMATION**
IN RE:	Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Incorporated for Review and Approval of a Proposed Business Combination between SCANA Corporation and Dominion Energy, Incorporated, as May Be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans	)	**SOUTH CAROLINA OFFICE OF REGULATORY STAFF'S FIRST AND CONTINUING AUDIT INFORMATION REQUEST FOR RECORDS AND INFORMATION**

TO: K. CHAD BURGESS, ESQ., MATTHEW W. GISSENDANNER, ESQ., MITCHELL WILLOUGHBY, ESQ., AND BELTON T. ZEIGLER, ESQ., REPRESENTATIVES FOR SOUTH CAROLINA ELECTRIC & GAS COMPANY AND ROBERT A. MUCKENFUSS, ESQ., LISA S. BOOTH, ESQ., JOSEPH K. REID, III, ESQ., AND ELAINE S. RYAN, ESQ., REPRESENTATIVES FOR DOMINION ENERGY, INC.:

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I. INSTRUCTIONS

The South Carolina Office of Regulatory Staff ("ORS") hereby requests, pursuant to S.C. Code Ann. §§ 58-4-50(A)(2), 58-4-55(A), 58-27-160, 58-27-1570, 58-27-1580, and 58-33-277 that South Carolina Electric & Gas Company ("SCE&G" or "Company") and Dominion Energy, Inc. ("Dominion") (collectively the "Parties") provide responses in writing and under oath and serve the undersigned on or before March 1, 2018 to ORS at 1401 Main Street, Suite 900, Columbia, South Carolina, 29201. If you are unable to respond to any of the requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these audit requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. As used in these audit requests, "address" means mailing address and business address. When asked to identify or provide a document, "identify" and "provide" mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, a copy of the document may be attached with the identity of the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this audit request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

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IT IS THEREFORE REQUESTED:

- Pursuant to S.C. Code Ann. § 58-4-55(A) that responses be submitted under oath.
- That SCANA/SCE&G respond only unless Dominion is included in the request.
- All information shall be provided to ORS in the format requested.
- All responses to the requests below must be labeled using the same numbers as the requests.
- Unless otherwise agreed, the requested information shall be bound in 3-ring binders with numbered tabs between each question. The question should be reproduced at the beginning of each tab for the responses included. All exhibits shall be reduced or expanded to 8 ½" x 11" formats, where practical.
- If information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place a copy of the requested information in the appropriate numerical sequence.
- Any inquiries or communications requesting clarification of the information requested should be directed to Dawn Hipp [803.737.0814], Anthony James [203.737.2090], Jay Jashinsky [803.737.1984], Jeffrey M. Nelson, Esquire [803.737.0823], or Shannon Bowyer Hudson, Esquire [803.737.0889] of ORS.
- This entire list of questions shall be reproduced and included in front of each set of responses.
- Unless otherwise set forth below, the Parties shall provide four (4) flash drives with each containing a set of the responses, and seven (7) paper copies/binders of responses to ORS. In addition it is requested that the Parties provide working copies of all spreadsheets (not in Adobe) with all formulas and calculations intact to ORS.
- If the response to any request is that the information requested is not currently available, please state when the information requested will be provided to ORS. This statement is not a waiver of the deadline for all other responses.
- In addition to the signature and verification at the close of the Parties' responses, the Parties' witness(es), employee(s), contractor(s) or agent(s) responsible for the information contained in each response shall be indicated at the bottom of each response.
- This request shall be deemed to be continuing so as to require SCE&G to supplement or amend its responses as any additional information becomes available.

- Each answer shall incorporate the requested information for South Carolina Generating Company, Inc. ("GENCO"), where applicable.

- For responses regarding the V.C. Summer Units 2 & 3 Project (the "NND Project"), please provide all responses to reflect SCE&G's 55% participation where possible. Where this request is not possible, please clearly identify whether the responses reflect 100% or 55% dollars.

- The following Attachments are to be completed as requested below:

    - Attachment A - Cash Working Capital Allowance for Twelve Months Ending September 30, 2017
    - Attachment B - Cash Working Capital Allowance Net Income for Return and Rate Base
    - Attachment C - Net Income Per 1,000 kWh Sold for The Years Ending December 31, Last Five Years and Twelve Months Ending September 30, 2017
    - Attachment D - Bill Comparison

II. REQUESTS

1-1 Please provide a list of the witness names the Parties intend to call and the subject matter for which each witness intends to testify at the hearing in this matter.

1-2 For the Parties, please provide copies of any correspondence, discovery requests, and discovery responses from or to any other party in this Docket. If a party requests a copy of the discovery issued by ORS, those responses do not need to be replicated.

1-3 Please provide **THREE** (3) copies of the latest SCANA and Dominion Prospectus and Proxy statement. Please provide **THREE** (3) copies of the 2017 SCANA and Dominion Prospectus, Proxy statement, and Securities and Exchange Commission 10-K annual report when available.

1-4 Please provide the following data on an annual basis for the past five (5) years:

a. The ratio of AFUDC as a percent of income before interest charges (total company);
b. The actual dollar amount of AFUDC (total company and retail) charged during the twelve-months ending September 30, 2017;
c. The dollar amount of electric operation expenses for total power production, transmission, distribution and administration;
d. The dollar amount of electric maintenance expenses for total power production, transmission, distribution and administration;
e. The historical cost and accumulated depreciation of total electric plant in service; and
f. The dollar amount of capital obtained by SCANA from sources outside the United States.

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1-5 Please provide:

a. A list of individual electric generation plants as of the end of the twelve-months ending September 30, 2017. This list should include the capacity, actual total cost, type of fuel utilized and cost per kilowatt ("kW") of installed capacity; and

b. Any expenditures incurred for new generation by unit and the accounts charged during the twelve-months ending September 30, 2017.

1-6 Please provide a table each for approved and Joint Application proposed rates, showing rates of return by classes of service for total SCE&G Electric Operations, South Carolina Retail Electric Operations, and Wholesale Electric Operations utilizing the twelve-months ending September 30, 2017.

1-7 Separating to the extent possible for South Carolina Retail Total System Operations, please provide in a separate and tabbed binder an explanation and working papers for all Pro-forma and Accounting Adjustments using Cost of Service Study methodologies.

1-8 Where allocation is not directly assignable, please provide the basis and development of each allocation factor and reasons for utilization of specific allocation factors (such as revenue, Peak Demand, etc.) for all components (Rate Base and Total Income for Return) and Pro Forma and Accounting Adjustments using Cost of Service Study methodologies.

1-9 Please provide a Per Book Jurisdictional Cost Study reflecting twelve-months ending September 30, 2017 operations and include a fully distributed cost analysis for the South Carolina Retail jurisdiction.

1-10 Please provide a fully distributed Pro Forma Cost of Service Study with the present rates annualized for the South Carolina Retail jurisdiction's operations for the twelve-months ending September 30, 2017.

1-11 Please provide a fully distributed Pro Forma Cost of Service Study with the proposed rates annualized for the South Carolina Retail jurisdiction's twelve-months ending September 30, 2017 operations.

1-12 Please provide data and back-up calculations to determine average fuel costs per kilowatt-hour ("kWh") sold for the twelve-months ending September 30, 2017.

1-13 Please provide the present revenue from each rate schedule and the additional revenue to be derived by incorporating the changes proposed in the Joint Application for the twelve-months ending September 30, 2017 incorporating the approved fuel clause rate at the end of the twelve-months ending September 30, 2017.

1-14 For the twelve-months ending September 30, 2017, please provide a copy of the bill frequency and hours-of-use analyses by months and totals and by rate schedules.

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1-15 Please provide the billing determinants for each rate schedule for the twelve-months ending September 30, 2017 (i.e.: Res kWh<=1000; kWh>1000; # of bills).

1-16 Please provide a calculation of the return on common equity for present and proposed rates for SCE&G Total and South Carolina Retail for the twelve-months ending September 30, 2017.

1-17 Utilizing the approved rate schedules for the twelve-months ending September 30, 2017, please furnish a schedule showing separately, the customer, demand and energy components of rate base and expense, including the totals for each, as well as Net Operating Income for Return, by classes of service based on pro forma Retail Operations Cost Study.

1-18 Please provide the following information for the different billing classes of customers for the twelve-months ending September 30, 2017.

a. Beginning, average and ending number of customers for all active rate schedules;
b. Energy sales per month and yearly total by rate schedule; and
c. System coincidental peak demand of each class of customers by month.

1-19 Please provide a bill comparison for Residential, Small General, Medium General and Large General rates. This comparison should conform to the outline in Attachment D.

1-20 For the Joint Application, please provide a list of changes and reasons for changes on any and all rates, tariffs, and terms and conditions in this filing. For rates and tariff changes, provide the actual monetary change.

1-21 Please provide **THREE** (3) copies of SCE&G's Chart of Accounts.

1-22 Please provide a copy of the SCANA Minutes of the Board of Directors Meetings for each meeting held from January 1, 2015 through December 31, 2017.

1-23 Please provide **THREE** (3) copies of the internal auditor's Report Summaries for the twelve-months ending September 30, 2017.

1-24 Please provide **THREE** (3) copies of SCE&G's General Ledger and Trial Balance with reconciliations to amounts presented in the Per Books column in Exhibits 14, 15, 16, and 17 of the Joint Application for the twelve-months ending September 30, 2017.

1-25 Please provide details of any and all revenues, expenditures and rate base items included in the Joint Application which represent allocations from any parent, subsidiary or affiliate to SCE&G's regulated electric operations. Details should include, but not be limited to, amounts allocated, account charged, allocation percentage and justification for the allocation percentage.

1-26 Please provide audited financial statements for the calendar years ending 2014, 2015, and 2016.

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1-27 Please provide an update of SCE&G's participation in the energy insurance pool, Nuclear Electric Insurance Limited ("NEIL"), as of September 30, 2017. Did the Company receive NEIL distributions from October 1, 2016 through September 31, 2017? If so, provide the amount of distributions received and the general ledger accounts to which these amounts were posted.

1-28 Please furnish a wage schedule showing regular time, overtime, and total amounts charged to expense accounts or capitalized for 2014, 2015, 2016, and the twelve-months ending September 31, 2017.

1-29 Please provide the proposed construction and acquisition budget by major function (generation, transmission, etc.) for the electric operations of SCE&G for the next ten (10) years. Please include:

a. Dollar amount by year;
b. Total generating capacity by year;
c. Summer Peak Load;
d. Summer Reserve Margin;
e. Winter Peak Load; and
f. Winter Reserve Margin.

1-30 Please submit the following information to include the original purchase price cost as of the twelve-months ending September 30, 2017.

a. Total amount of land owned by SCE&G included in its electric Plant-in-Service accounts; and
b. Complete breakdown of land maintained on SCE&G's books as plant held for future use by Part or Parcel, date purchased, intended purpose, location, and date that it is expected to be placed in service.

1-31 Please provide:

a. In comparative form for each account (include sub-accounts) in the Annual Report (FERC Form No. 1, pages 320-323), the total SCE&G electric operating expense account balance for 2014, 2015, and 2016; and
b. In comparative form, the percentage increase over prior year for each account in (a) above.

1-32 Please provide the historical cost of environmental capital investment (Plant-in-Service) as of September 30, 2017 and the accumulated depreciation balance for the investments. (Identify by FERC account)

1-33 Please provide dollars of environmental capital investment in Construction Work-in-Process ("CWIP") at the end of September 30, 2017.

1-34 Please provide the variable environmental expenses (qualifying under the current fuel statute) by FERC account charged. Identify by name (i.e. lime, limestone, ammonia, etc.)

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1-35 Please provide **THREE** (3) copies of SCANA's and/or SCE&G's State and Federal Income Tax Return for the most recent tax year available.

1-36 With respect to those who have as a part of their function or duties to contact legislators and other government agents, whether it be on the local, state or national level, please provide:

a. A statement describing SCANA's, SCE&G's, and Dominion's national and South Carolina lobbying activities;
b. A schedule showing the name of the individual providing the activities the state in which the activities took place, monies paid, reimbursed expenses, and allowances; and,
c. The accounts charged by SCANA, SCE&G, and Dominion, respectively.

1-37 Please provide:

a. Completed Attachment A for Cash Working Capital Allowance (Include on line 28 of Attachment B); and
b. A copy of the Company's latest lead-lag study.

1-38 Please provide beginning balances, additions and retirements, cost of removal, and ending balances to Plant in Service for the twelve-months ending September 30, 2017 (total SCE&G) by FERC account and sub-account.

1-39 Please provide:

a. Ending monthly balances on Customer Deposits and interest paid during the twelve-months ending September 30, 2017. (Include on lines 26 and 14, respectively, of Attachment B); and
b. Completed Attachment B.

1-40 Please provide quantities of fuel (gallons of oil, tons of coal, etc.), cost, and number of days' supply on hand at the end of each month for the twelve-months ending September 30, 2017.

1-41 Please provide a detailed listing, by vendor and amount, of expenditures included in the following accounts for the test period:

a. Account 9090000 – Information and Instruction Advertising Expenses;
b. Account 9120000 – Demonstrating and Selling Expenses;
c. Account 9130000 – Advertising Expenses;
d. Account 9160000 – Miscellaneous Sales Expense;
e. Account 9210000 – Office Supplies and Expenses;
f. Account 9302000 – Miscellaneous General Expenses;
g. Account 9350000 – Maintenance – General Plant;
h. Account 1430117 – Employee Rec Club Dues; and

i. Account 1430119 – Employee Club Dues.

1-42 Please identify and detail all industry association dues, specifically including Edison Electric Institute ("EEI") dues and breakdown of their uses within the association. Please quantify any benefit to the ratepayer from such associations.

1-43 Please provide a list and a description of each employee benefit (salary overheads) contained in the employee benefits account, including the cost and account charged for 2014, 2015, 2016, and the twelve-months ending September 30, 2017.

1-44 Please provide a comparative analysis of annual compensation of each officer charged to SCE&G for 2014, 2015, 2016, and the twelve-months ending September 30, 2017, including the Officer's name, title, salary (including bonuses, incentive, fringe benefits, etc., separately) and annual percent (%) increase in total compensation received by the officer. Please include total amounts and amounts (including percentage) allocated to SC Retail.

1-45 Please provide the annual compensation for the twelve-months ending September 30, 2017 for each officer charged to SCE&G. Please include actual and, where necessary, budgeted amounts and specify total amounts and amounts (including percentage) allocated to SC Retail. Please include the Officer's name, title and salary (including bonuses, incentive, fringe benefits, etc., separately).

1-46 Please provide the following related to employee incentive compensation programs:

a. A description of each program applicable to SCE&G officers in the twelve-months ending September 30, 2017. (List the name of officers who qualified for each of these programs, if any.) Please describe changes that were made to the programs in 2017 and 2018, and those expected to take place in 2018;
b. Provide a description of each program available in the twelve-months ending September 30, 2017 for employees not eligible for officer programs. Please describe changes that were made in 2017 and 2018, and those expected to take place in 2018; and,
c. For each program in (a) and (b):
   i. Provide the categories of the bonuses/incentive programs and the details of the payout goals for each category that must be attained to trigger partial or complete payouts under each category. (e.g. Earnings per Share, O&M savings);
   ii. Typical payout dates (i.e. annually in February);
   iii. Quantify (dollars savings) the benefit(s) for each program to the rate payers;
   iv. Provide criteria for bonus/incentive calculation under each program.

1-47 Provide, separately, the dollar amount and account charged for each incentive compensation program payment made during the twelve-months ending September 30, 2017. Please include total amounts and amounts (including percentage) allocated to SC Retail.

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1-48 Please provide a comparative analysis of electric employee salary expenses for each calendar year for 2014, 2015, 2016, and for the twelve-months ending September 30, 2017 by FERC account charged.

1-49 Please provide the following related to SCE&G and SCANA employees:

a. Number of electric only employees at the end of 2014, 2015, 2016, 2017, and twelve-months ending September 30, 2017. Number of electric only employees anticipated in 2018; and

b. Number of employees who allocated part of their time to electric operation at the end of 2014, 2015, 2016, 2017, and twelve-months ending September 30, 2017. Number of employees who are expected to allocate part of their time to electric operation in 2018.

1-50 Please provide a copy of the SCANA and/or SCE&G policy and guidelines regarding reimbursement for expenses incurred while travelling for business. If there is no official publication, please provide an explanation of such policies and guidelines. Please describe any changes that have/will be made to these guidelines subsequent to the end of the twelve-months ending September 30, 2017.

1-51 With regard to initiation fees and dues for country clubs, to what account(s) have these expenses been charged? What action has been taken to ensure that the expenses incurred at all clubs and restaurants charged to operating accounts are in fact related to business?

1-52 With regard to initiation fees and dues for private clubs, provide the amount charged to electric operations, name of club, number of employee memberships and account charged for Total SCE&G - Electric and S.C. Retail during the twelve-months ending September 30, 2017.

1-53 Please provide a listing by account number and dollar amount of SCE&G expenditures for the twelve-months ending September 30, 2017 for the following items to the extent that any of these expenditures have been charged to electric operations:

a. Contributions to charitable, civic, educational, etc., organizations;
b. Employee newsletter costs;
c. Memberships in Social and Athletic Clubs (including but not limited to Chamber of Commerce, Rotary, Lions, etc.);
d. Employee incentive awards;
e. Other employee awards, gifts, clubs, etc.;
f. Sponsorship of sports teams and/or other events;
g. Novelty or company-image building items such as combs, t-shirts, calendars, coffee mugs, etc.;
h. Benefits, which are recreational in nature (fitness, golf, etc.);
i. Flowers;
j. Candy;
k. Luncheons and banquets;
l. Penalties and fines;

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m. Late payment charges;
n. Employee clubs; and
o. Liquor/Beer/Wine.

1-54 Please provide a schedule of pension expenses by FERC account for 2014, 2015, 2016, and the twelve-months ending September 30, 2017 for officers and non-officers, separately.

1-55 Please provide a copy of the latest available actuarial study supporting pension expense calculations.

1-56 Please provide a detailed calculation of SCE&G's Pension Expense for 2014, 2015, 2016, and the twelve-months ending September 30, 2017.

1-57 For the twelve-months ending September 30, 2017, please provide details of expenses and/or rate base items associated with SCANA or SCE&G owned or leased aircraft.

1-58 For the twelve-months ending September 30, 2017, please provide details of expenses and/or rate base items associated with recreational vehicles.

1-59 Please provide a breakdown of the proposed revenue change dollars indicating the amount attributable to such categories as:

a. CWIP;
b. Return on Common Equity;
c. Inflation (Specify Rate);
d. Changes in Capital Structure; and
e. Other (Specify).

1-60 Please provide an analysis of all Deferred Debit Accounts and Deferred Credit Accounts at the end of the twelve-months ending September 30, 2017. Include description, account number and dollar amount.

1-61 Please provide the following for all regulatory deferrals (i.e. Deferred Capacity, Fukishima Compliance, etc.):

a. Description;
b. Current amount deferred and amount at the end of the twelve-months ending September 30, 2017; and
c. Utility purpose.

1-62 Please provide a listing of uncollectables by customer class for 2014, 2015, 2016, and the twelve-months ending September 30, 2017 and a copy of SCE&G's write-off policy for uncollectables.

1-63 Please provide the total amount of uncollectables booked during the twelve-months ending September 30, 2017, the total revenue, and the percent of uncollectables as compared to total revenue.

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1-64 Please provide the following income tax data for SCANA/SCE&G separated by Total Company, S.C. Retail, Total Electric Operations and FERC Wholesale Electric Operations for the twelve-months ending September 30, 2017:

a. Federal Income Taxes:
   i. Operating Federal Income Taxes Deferred accelerated tax;
   ii. Depreciation;
   iii. Federal Income Taxes – Operating;
   iv. Income Credits resulting from prior deferrals of Federal Income Taxes;
   v. Investment Credit Net:
      1. Investment credit realized;
      2. Investment credit amortized-Pre-revenue Act of 1971;
      3. Investment credit amortized-Revenue Act of 1971;

b. Reconciliation of book to taxable income and a calculation of the Federal Income Tax expense for the twelve months ending September 30, 2017; and

c. Provide SCANA/SCE&G's calculation of State Income Tax expense for the twelve-months ending September 30, 2017.

1-65 Complete Attachment C, providing a schedule of SCE&G Total Company net income per 1,000 kWh sold per company books for the last five (5) years and twelve-months ending September 30, 2017.

1-66 Please provide a detailed calculation of all expense and rate base items under FASB Statement #106 ("FASB 106") for the twelve-months ending September 30, 2017.

1-67 Please provide the account numbers and dollar amounts where FASB 106 expenses and rate base items are booked.

1-68 Please provide a description of the benefits included in SCE&G's Other Post Retirement Benefit ("OPEB") expenses.

1-69 Please provide SCE&G's Accumulated Post Retirement Benefit Obligation ("APBO") at the end of the most recent calendar year.

1-70 Please provide the method and amortization period, if any, used for amortizing:

a. Any transition asset or obligation;
b. Unrecognized prior service cost; and
c. Unrecognized gains or losses.

1-71 Please provide details of SCE&G's plans to fund or not to fund the OPEB liability.

1-72 Please provide the account number and dollar amount of any unfunded OPEB liability contained on SCE&G's books.

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1-73 Please detail economic development expenditures by total amounts spent and charged to cost of service for the twelve-months ending September 30, 2017.

1-74 Please provide a cost/benefit analysis of any economic development program or funding and a description of how the program directly benefits SCE&G's ratepayers.

1-75 Please detail separately, SCANA, SCE&G, and Dominion federal and South Carolina litigation expenditures, excluding rate case expenditures, for 2014, 2015, 2016, and the twelve-months ending September 30, 2017. For Dominion, please also list rate case expenses by state in which the rate case expenditures were incurred or allocated to.

1-76 Please detail a thirteen-month (13) average for the balance in prepayments as used in the working capital computation. Please use the same thirteen (13) month period as used for average tax accruals.

1-77 Please provide a schedule showing advertising expense by year for 2014, 2015, and 2016, and the twelve-months ending September 30, 2017, by type; e.g., informational, institutional, etc., and the percentage increase (decrease) of each from the preceding year. For the twelve-months ending September 30, 2017, please indicate whether the expense was charged above the line or below the line.

1-78 Please provide detail of all legal and/or consulting fees charged to electric operations for the twelve-months ending September 30, 2017 including:

a. Person or firm paid; and
b. The amount charged by FERC account number(s).

1-79 Please provide an analysis of all construction projects by major function compromising CWIP at the end of the twelve-months ending September 30, 2017. Include the location, cost, brief description of construction, starting date, and expected completion date. Include project or estimate number.

1-80 Please provide the percentage of capitalized wages and expensed wages for the twelve-months ending September 30, 2017.

1-81 Please provide the amount of unclaimed funds as of the end of the twelve-months ending September 30, 2017.

1-82 Please identify any Accounting Codification Standards ("ACS") that were implemented during the twelve-months ending September 30, 2017. For each ACS identified please quantify the effect on test period revenues, expenses and rate base items.

1-83 Please provide a detailed schedule of Accumulated Deferred Income Taxes ("ADIT") for the twelve-months ending September 30, 2017.

1-84 Please provide a schedule of depreciation expense for the twelve-months ending September 30, 2017 including depreciable plant categories and depreciation rates.

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1-85 Please provide, ***electronically and one copy only***, the latest SCE&G depreciation study performed.

1-86 Please provide:

a. SCE&G's latest Decommissioning study for the V.C. Summer Unit 1, ***electronically only***; and

b. The calculation of SCE&G's Nuclear Decommissioning and depreciation expense based on the latest study and relicensing of the V.C. Summer Unit 1 by the Nuclear Regulatory Commission.

1-87 Please provide a schedule of advanced billings and pre-payments as of the end of the twelve-months ending September 30, 2017.

1-88 Please provide a schedule of each capital and operating lease for the twelve-months ending September 30, 2017. Include description, account number, and dollar amount.

1-89 Please provide a schedule of any abandoned projects for the twelve-months ending September 30, 2017 and indicate the accounting treatment utilized.

1-90 Please provide a schedule of injuries and any monies paid related to the injuries for 2014, 2015, 2016, and the twelve-months ending September 30, 2017 and indicate the accounting method used.

1-91 Please provide a schedule of Other Taxes (taxes other than income taxes) for the twelve-months ending September 30, 2017.

1-92 Please provide by year for 2014, 2015, 2016, and the twelve-months ending September 30, 2017 a detailed schedule of balances in the Materials and Supplies Account.

1-93 Please provide the number of complaints received and processed from SCE&G's South Carolina retail class for 2014, 2015, 2016, and the twelve-months ending September 30, 2017 with complaints shown separately for billing, service, rate, and other.

1-94 Please provide a copy of the latest Sarbanes-Oxley 404 Report.

1-95 Please provide the amount included in the twelve-months ending September 30, 2017 for SCE&G's current energy efficiency programs.

1-96 Please provide expenses associated with employee medical/health insurance benefits for 2014, 2015, 2016, and the twelve-months ending September 30, 2017 charged to electric operations.

1-97 Please provide copies of any settlement agreements executed within the last five (5) years by SCANA, SCE&G, Dominion, or any affiliate which affected or could affect SCE&G's retail electric operations.

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1-98 Please provide copies of any orders issued to SCANA, SCE&G, Dominion, or any affiliate within the last five (5) years by a court of law or by any regulatory agency which affected or could affect SCE&G's retail electric operations (excluding the South Carolina Public Service Commission ("Commission") and ORS).

1-99 Identify and provide a detailed description of any lawsuits in which SCANA, SCE&G, Dominion, or any affiliate were a party within the last five (5) years which affected SCE&G's retail electric operations.

1-100 Has SCANA, SCE&G, Dominion, or any affiliate been assessed any fines or penalties by any regulatory agency within the last five (5) years which affected SCE&G's retail electric operations? If the response is affirmative, please provide all supporting documents related to those assessments.

1-101 Does the booking of rate reductions or other benefits to SCE&G customers under the proposed merger indicate the decision to forgo the recovery of the total reductions in later rate cases or other proceedings before the Commission?

1-102 After the merger, what would be the anticipated annual dividend payments from SCE&G to SCANA? Would a tax gross-up be included in these anticipated amounts?

1-103 After the merger, what would be the anticipated annual dividend payments from SCANA to Dominion? Would a tax gross-up be included in these anticipated amounts?

1-104 Will tax benefits from abandonment of the NND Project provide for additional rate relief for ratepayers over and above other reductions proposed, if those benefits are realized?

1-105 Please explain in detail the uses of the Toshiba Corporation Guarantee Settlement Payment, including, but not limited to, paydown of Short-Term Debt and rate relief for ratepayers through the Capital Cost Component Rider.

1-106 The footnote to Section 57.a. of the Joint Application states that, "A portion of the one-time rate credit will be funded through issuance of debt and defeasement of the regulatory liability associated with the Toshiba Corporation Guarantee Settlement Payment." What would be the issuing entity if debt were issued? Would it be Senior Debt?

1-107 Does Toshiba Corporation retain any liability under the Parent Guaranty within the Engineering, Procurement and Construction Agreement? If so, please provide the total exact dollar amount of the Toshiba Corporation Parent Guarantee due to SCE&G in accordance with the Engineering, Procurement and Construction Agreement.

1-108 Is the $1.3 billion one-time credit pursuant to the merger intended to take the place of the Toshiba Corporation Guarantee Settlement Payments since it was asserted the Toshiba Corporation Guarantee Settlement Payments would be used to the benefit of ratepayers? If not, please provide and explain the difference between the $1.3 billion one-time rate credit and the Toshiba Corporation Guarantee Settlement Payment.

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1-109 Please provide a complete breakdown of the $1.3 billion one-time rate credit. Please identify the origin of all funds that make-up the $1.3 billion. Please provide all documents and calculations in working Excel spreadsheets with all formulas intact. Additionally, please detail (amount and origin) the portion of the dollars funded through the issuance of debt and defeasement of the regulatory liability associated with the Toshiba Corporation Guarantee Settlement Payment.

1-110 Please explain why the Parties propose to apportion the one-time rate credit based on each class's contribution to 2016 peak demand instead of 2017 peak demand.

1-111 In working Excel documents with all formulas intact, please provide the impacts of the one-time rate credit for:

a. A typical Residential customer (Rate 8, 1,000 kWh per month);
b. A typical Commercial customer (Rate 20, 150,000 kWh and 500 kVa per month); and,
c. A typical Industrial customer (Rate 23, 10,000 kW and 90% load factor per month).

1-112 Please provide a complete breakdown of the approximately $3.3 billion that will be recorded as a regulatory asset. Please identify the origins of write-down by listing all accounts to which the write-down would apply. Please provide all documents and calculations in working Excel spreadsheets with all formulas intact.

1-113 Please provide a complete breakdown of the approximately $1.4 billion write down related to SCE&G's investment in the NND Project. Please identify the origin of all funds, which includes $1.2 billion in assets that have not previously been subject to consideration in setting revised rates and $200 million that have been so considered. Please identify the origins of write-down by listing all accounts to which the write-down would apply. Please provide all documents and calculations in working Excel spreadsheets with all formulas intact.

1-114 Please explain why there should be carrying costs, post-abandonment. Include, but do not limit this explanation to, an explanation as to why receiving carrying costs does not conflict with the intent to abandon that SCANA is demonstrating to the Internal Revenue Service.

1-115 Please explain, in the case of the NND Project, why a revenue stream calculated to recover the Weighted Average Cost of Capital is sufficient to prevent a write-down of assets if bondholders have no other value in the assets against which to recover in the event of a bankruptcy. Does the NND Project have any value apart from the revenue stream?

1-116 Please provide a complete breakdown of the approximately $575 million that Dominion will underwrite and recognize as a regulatory liability. Please identify how, and by what company, the $575 million will be funded.

1-117 Please provide a complete breakdown of the "certain amounts" discussed in Section 57.d. of the Joint Application previously collected under the NND project. Please identify the

origin of all funds that make-up the "certain amounts" previously collected under the NND Project.

1-118 Please provide documentation supporting the calculation of the 3.5% bill reduction for the eight (8) year period as stated. Please show the calculations on how the regulatory liability of $575 million contributes to the 3.5% retail rate reduction.

1-119 As noted in Section 122 of the Joint Application, SCE&G will provide a bill credit of approximately 1.5% in recognition of tax expense reductions under the Tax Cut and Jobs Act of 2017. Please show the calculation of how the 1.5% was derived in working Excel documents with all formulas intact.

1-120 Please provide a breakdown of the revenue per year currently being recovered in revised rates revenues for the Transmission Project costs associated with the NND Project.

1-121 Given SCE&G's decision to abandon the NND Project, please explain why all the transmission assets are necessary additions to SCE&G's transmission system. Please provide support for each transmission line, switchyard, substation, and switching station in detail.

1-122 What is the total investment in the construction of the Transmission assets associated with the NND Project? Please provide a breakdown by transmission line, switchyard, substation, and switching station.

1-123 What percentage of the Transmission Investment under the Base Load Review Act ("BLRA") is used and useful?

1-124 In regards to the Transmission project regulatory asset, what return is being sought for future recovery, as noted in Section 57.g. of the Joint Application?

1-125 Does Exhibit 13 of the Joint Application contain Transmissions Investment costs that were proposed to be closed to rate base and removed from NND Project costs? If so, please a breakdown of these costs.

1-126 As a part of the No Merger Benefits Plan, please detail the amount of capital costs for the NND Project to be recovered in rates.

1-127 Please provide documentation of the liens paid as referenced in Exhibit 10, number 1.e. through the Toshiba Corporation Guarantee Settlement Payment proceeds. Have all the liens been settled? If not, what are the number of estimated outstanding liens and the total amount?

1-128 Explain how the one-time write off of $490 million, discussed in Exhibit 10, number 1.f., is calculated.

1-129 What are the total revenue proceeds under the provisions of the No Merger Benefits Plan using the fifty (50) year amortization period?

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1-130 Please clarify the provisions of the No Merger Benefits Plan as outlined in Section 98 of the Joint Application versus Exhibit 10 of the same.

1-131 When would SCE&G expect to seek further revised rates and file a general rate case as mentioned in Exhibit 10, Section 1.a.?

1-132 Is Dominion's Long-Term Debt equal to approximately 65% of its Total (Long-Term Debt + Common Equity) Capital? If so, what is the timetable for reducing this proportion to 55%?

1-133 Since Virginia Electric Power is now receiving 9.2% Return on Equity under Rate Adjustment Clauses, why should SCE&G receive a higher rate if the Parties are merged?

1-134 Please provide documentation and work papers to support the Deferred Tax Considerations outlined in the Customer Benefits Plan.

1-135 Please provide a schedule showing rate payer total cost from the $3.3 billion collected over the twenty (20) year period utilizing the rate structure as outlined at Section 59.b. of the Joint Application.

1-136 Please provide the impacts for each year over twenty (20) years on the average monthly bill utilizing the rate reductions and credits proposed by the merger, a twenty (20) year amortization of the $3.3 billion at the proposed ROE, and holding all other rate components (ex. fuel, DSM/EE, etc.) unchanged, for:

a. A typical Residential customer (Rate 8, 1,000 kWh);
b. A typical Commercial customer (Rate 20, 150,000 kWh and 500 kVa); and,
c. A typical Industrial customer (Rate 23, 10,000 kW and 90% load factor).

1-137 Please provide a breakdown of the $320 million in regulatory assets that SCE&G does not plan to seek recovery of by type, as outlined in Section 57.c. of the Joint Application.

1-138 What proportion of the $320 million in regulatory assets that SCE&G states it will not seek to recover is "due to interest rate swap losses related to the debt that was not issued for the NND Project" and what is the dollar amount? Are some of the interest rate swap losses embedded in the Weighted Average Cost of Debt of 5.85%? If not, are these losses in addition to the over $300 million in interest-rate swap losses already embedded?

1-139 Section 60.j. of the Joint Application states, "Dominion Energy intends to maintain credit metrics that are supportive of strong investment-grade credit ratings for SCE&G." Please explain by which of the following means and in what proportions this will be accomplished. Please also state all credit metrics that will be used in accomplishing this stated goal and the targets for each one.

a. Infusion of capital from Dominion to SCANA and SCE&G;
b. Increased general rates for ratepayers;

c. Trackers or other mechanisms for faster recovery of capital;
d. Reduction of expenses; and/or,
e. Other – provide a full explanation.

1-140 Please provide the total return in both nominal and current (discounted) dollars of the "Amortization Charge" over the proposed sixty (60) year period. Please provide the same information for amortization over twenty (20) years. Please provide the net present value assumptions and a spreadsheet with working formulas showing the charges by year, with running cumulative totals.

1-141 Please provide a list of benefits available to SCE&G with access to the Dominion Energy Services, Inc. ("DES") Model. Does DES have a money pool or other means of accessing low interest borrowing?

1-142 Please identify if SCANA has considered the suspension, or reduction of dividends to improve the SCANA's cash position. If not, why not?

1-143 Please prepare a Pro Forma balance sheet and income statement reflecting the closure of the acquisition of SCANA/SCE&G by Dominion.

1-144 Please explain if there has been any discussion or action taken to "claw back" bonuses paid to former senior executives as a result of the failure to complete the NND Project. If so, what amounts have been recovered? If not, why not?

1-145 Please provide a complete breakdown of the salary and benefits costs associated with the employees who are no longer employed with SCE&G/SCANA since September 30, 2017.

1-146 Please provide all documentation related to any items, components, or parts sold from the NND Project. Has the sale of these items been credited against the total balance of CWIP? If so, please provide supporting documentation that demonstrates the sale/disposition.

1-147 Please provide all documents and calculations, in working Excel spreadsheets with all formulas intact, supporting all rates and charges in Exhibit 12 to the Joint Application. These supporting documents should be in the same format provided to ORS in previous Revised Rates Proceedings and should include, but not be limited to:

a. Application Revenue Proof;
b. Test Year Proofs;
c. Rate Class Summary; and,
d. Revenue Ratios.

1-148 Please provide, in working Excel spreadsheets with all formulas intact, Exhibit 14 to the Joint Application. Please include all supporting documentation and calculations.

1-149 Please provide, in working Excel spreadsheets with all formulas intact, Exhibit 15 to the Joint Application. Please include all supporting documentation and calculations.

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1-150 Please provide, in working Excel spreadsheets with all formulas intact, Exhibit 16 to the Joint Application. Please include all supporting documentation and calculations.

1-151 Please provide, in working Excel spreadsheets with all formulas intact, Exhibit 17 to the Joint Application. Please include all supporting documentation and calculations.

1-152 Regarding the purchase of the 540 megawatt (MW) rated combined cycle gas-fired generation facility and equipment located near Gaston, South Carolina (the "Facility") from Columbia Energy LLC ("Columbia Energy"), please explain in detail how SCE&G will exclude the Facility from rate base as described in Section 57.f. of the Joint Application. Please also state when the impairment/write-off will be recorded and explain the impact to the balance sheet and income statement.

1-153 For the next eight (8) years, please provide a schedule of power purchases planned or needed by supplier including:

a. Total energy purchase (MWh) projected;
b. Total energy price projected;
c. Fuel energy price projected;
d. Capacity purchase (MW) projected;
e. Capacity price & cost projected;
f. Whether such purchase projections are on-peak or off-peak daily, weekly or monthly block purchase;
g. Whether energy purchase is take or pay;
h. Whether energy purchase projections are for firm or interruptible; and
i. Use of power (e.g. native load; off system sale, etc.).

1-154 Please provide a statement describing SCANA's, SCE&G's, and Dominion's national and South Carolina advertising activities related to the Joint Application. Please provide a detailed schedule or schedules for advertising including but not limited to, print, web/internet, television and radio:

a. The name of the company (i.e. SCANA, SCE&G, or Dominion) that purchased the advertising;
b. The amount paid for design, development and implementation of the advertising and the name of the company or individual it was paid to; and
c. The account charged for personnel, independent contractors or agents who have as a part of their function implementing advertising for subjects contained in the Joint Application, whether it be on the local, state or national level.

1-155 Please provide the Dominion and SCE&G JD Power scores for customer satisfaction for the most recent five (5) years.

1-156 Please explain how the rate freeze of base rates until 2021 discussed in Section 57.h. of the Join Application would impact investment in capital and operational improvements.

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1-157 Please provide a forecast of the rates and increases customers will experience after the rate freeze ends in 2021. Please provide a detailed breakdown by the following rate schedules:

a. A typical Residential customer (Rate 8; 1,000 kWh per month);
b. A typical Commercial customer (Rate 20, 150,000 kWh and 500 kVa per month); and,
c. A typical Industrial customer (Rate 23, 10,000 kW and 90% load factor per month).

1-158 Please identify if any proposed mergers and/or acquisitions by Dominion have been denied/rejected by federal or state regulators. If so, please identify the jurisdiction, provide the case/docket number, and state the reason(s) for denial/rejection.

1-159 Please identify and explain any ring-fencing provisions contained in the Merger Agreement.

1-160 Please provide the most recent five (5) year SAIDI and SAIFI data statistics for Dominion and SCE&G.

1-161 Please explain why the table on page 4 of the Joint Application does not sum to $1.3 billion.

1-162 Please explain how the proposed rate credit will impact the following:

a. Customers who have recently moved out of the SCE&G service territory;
b. Customers who have recently moved into the SCE&G service territory;
c. Customers who net meter with SCE&G; and
d. Customers with an outstanding balance due to SCE&G.

1-163 Please explain the purpose of the Sedona Corp. in relation to the Joint Application. Will Sedona Corp. exist after the merger is complete?

1-164 Please provide a draft electric bill for a Rate 8 customer using 1,000 kWh/month demonstrating the Cost of Capital Rider and the Tax Rider.

1-165 Please provide a listing of the accounts to be impacted by the Cost of Capital Rider and/or the Tax Rider.

1-166 Please provide a breakdown of charitable contributions made to charities by SCANA for the most recent five (5) year period.

1-167 Please identify and describe how charitable giving will increase by $1 million per year should the merger be approved. Please list what charities would benefit from the increase in charitable contributions.

1-168 Please identify and explain all other offers of merger and/or acquisition received by SCANA and/or SCE&G for any or all of its regulated utility business entities.

1-169 Please identify if SCANA, SCE&G and/or Dominion has considered securitization for the debt associated with the NND Project. If so, why was securitization not pursued?

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1-170 Please explain why SCE&G is not requesting rate relief related to its retail electric operations.

1-171 Please provide a detailed breakdown of all travel expense(s) for Dominion employees, consultants or subcontractors related to the Joint Application including but not limited to meetings with regulators, legislators, media, and special interest groups. Please provide the breakdown to include the following:

a. Air travel expense amounts;
b. Air travel expenses using owned or leased aircraft;
c. Hotel and meal expenses;
d. Miscellaneous expenses (i.e. parking, rental car, luggage);
e. Name of person traveling;
f. Total dollar amount spent; and
g. Purpose of travel.

1-172 Please provide a detailed breakdown of all travel expense for SCANA and/or SCE&G employees, consultants or subcontractors related to the Joint Application including but not limited to meetings with regulators, legislators, media, and special interest groups. Please provide the breakdown to include the following:

a. Air travel expense amounts;
b. Air travel expenses using owned or leased aircraft;
c. Hotel and meal expenses;
d. Miscellaneous expenses (i.e. parking, rental car, luggage);
e. Name of person traveling;
f. Total dollar amount spent; and,
g. Purpose of travel.

1-173 Please list all lawsuits, regulatory proceedings, and investigations arising out of or related to the abandoned NND Project. Please list the case caption, docket number, forum, a short description of the case (ex. shareholder lawsuit), and for investigations, the name of each investigative body.

1-174 In the merger benefit, the tax law reduction is estimated at 1.5%. Has the 1.5% estimate changed and if so, explain.

1-175 For Dominion, please list all prior mergers for the past ten (10) years, the number of employees of the target company at or around the date the merger was announced and the number employees of the target company three (3) years after the merger.

1-176 Please provide by calendar year for 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016 and, 2017, a detailed schedule of the amounts billed to and collected from customers for revised rates under the BLRA. Please include the following information in the schedule:

a. Commission Docket Number authorizing the billing and collection;
b. Approved revised rates revenue per;

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c. Amount of the PSC approved revised rates increase per year;
d. Total amount billed to customers per year; and
e. Total amount collected from customers per year.

Jeffrey M. Nelson, Esquire
Shannon B. Hudson, Esquire
Jenny R. Pittman, Esquire
South Carolina Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, South Carolina 29201
Telephone: (803) 737-0823
(803) 737-0889
(803) 737-0794
Fax: (803) 737-0895
Email: jnelson@regstaff.sc.gov
shudson@regstaff.sc.gov
jpittman@regstaff.sc.gov

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