STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of: Request of the Office of Regulatory Staff for Rate Relief to South Carolina Electric & Gas Company’s Rates Pursuant to S.C. Code Ann. § 58-27-920

DOCKET NO. 2017-305-E

PETITION TO INTERVENE AS AN SCE&G RATEPAYER AND ON BEHALF OF SIMILARLY SITUATED SCE&G RATEPAYERS RESIDING IN LEXINGTON COUNTY

I respectfully submit this petition to intervene as a ratepayer of SCE&G and as a Party in the above-captioned matter. In support of this petition and the Request for Rate Relief submitted by Ms. Shannon B. Hudson of the Office of Regulatory Staff, I note the following:


• SCE&G ratepayers have paid more than $1.7 billion due to increased utility rates demanded by SCE&G to pay for the now abandoned V.C. Summer nuclear project.

• The Office of Regulatory Staff has rightly requested that SCE&G suspend all revised rate collections from its customers and cease and desist from collecting such revised rates, from ratepayers such as myself and similarly situated ratepayers across Lexington County;

• The Office of Regulatory Staff has also requested that credits or refunds be issued to SCE&G ratepayers such as myself and similarly situated ratepayers across Lexington County:
• The S.C. General Assembly may amend or revoke the Base Load Review Act, a law which unjustly passed the financial risk of the V.C. Summer nuclear project to ratepayers, rather than be carried by SCE&G;

• The Public Service Commission is empowered by state law to disallow rate increases and additional capital costs where a "material and adverse deviation" from approved construction schedules occurs "to the extent that the failure by the utility to anticipate or avoid the deviation, or to minimize the resulting expense, was imprudent considering the information available at the time that the utility could have acted to avoid the deviation or minimize its effect." (S.C. Code Ann. § 58-33-275(E); see S.C. Code. Ann § 58-33-275(E)(1) and S.C. Code Ann. § 58-33-225(F)).

• Mr. Stephen A. Byrne, the Chief Operating Officer and President of SCE&G's Generation and Transmission, stated according to 2013 local media reports "that project costs currently are coming in about half a billion dollars below budget. . . ." but SCE&G noted that the cost of the project just two years later in 2015 were projected to be more than $500 million over budget;

• That pursuant to state law "The Office of Regulatory Staff shall conduct on-going monitoring of the construction of the plant and expenditure of capital through review and audit of the quarterly reports under this article, and shall have the right to inspect the books and records regarding the plant and the physical progress of construction upon reasonable notice to the utility." (S.C. Code. Ann § 58-33-277(B));

• That the secretive Bechtel report revealed recently to the public was not provided to The Office of Regulatory Staff in a timely fashion in order for the staff and commission to make an informed decision on proposed rate increases demanded by SCE&G; and
That The Office of Regulatory Staff’s request is timely, fair, and reasonable and in the public’s best interests.

WHEREFORE, I respectfully request on behalf of myself and similar situated ratepayers across Lexington County the full relief requested by The Office of Regulatory Staff in its Request for Rate Relief and an opportunity to speak on this matter before the commission at the December 12 hearing or before.

Respectfully submitted,

Dino Teppara, Esquire
Dino.Teppara@gmail.com

cc: The Honorable Swain E. Whitfield
    The Honorable Comer H. “Randy” Randall
    The Honorable John E. “Butch” Howard
    The Honorable Elliott F. Elam, Jr.
    The Honorable Elizabeth B. “Lib” Fleming
    The Honorable Nikiya “Nikki” Hall
    The Honorable G. O’Neal Hamilton
    Mr. Chad Burgess, Esquire