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January 22, 2016

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 2016-2-E**
- **Petition to Intervene**

Dear Ms. Boyd:

Enclosed for filing is Petitioner's SC Solar Development, 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. 2016-2-E

IN RE: Annual Review of Base Rates for Fuel Costs for South Carolina Electric & Gas Company	))))))	**PETITION TO INTERVENE**

INTRODUCTION

This Commission established Commission Docket 2016-2-E, on October 1, 2015, for this Commission's annual Review of base rates for fuel costs for South Carolina Electric & Gas Company, ("SCE&G"), pursuant to S.C. Code Ann. §58-27-865, *et. seq.*, (Supp. 2015) and coincident with this proceeding and pursuant to S.C. Code Ann. §58-39-140, (Supp. 2015), 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 the Company to implement the Distributed Energy Resource program previously approved by the Commission.

Petitioner herein is SC Solar Development, 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. §58-27-865, *et. seq.*, (Supp. 2015), 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

SC Solar Development, LLC.

1. SC Solar Development, LLC, ("SC Solar Development") is a South Carolina Limited Liability Corporation, duly organized and authorized to conduct business in the State of South Carolina, with its registered agent located in Greenville, South Carolina. SC Solar Development, LLC is a wholly owned subsidiary of National Renewable Energy Corporation ("NARENCO").

2. SC Solar Development, as a wholly owned subsidiary, operates under the business model of NARENCO. NARENCO is a vertically integrated Solar Company with in house development, design, engineering, procurement, construction, operations and maintenance and asset management. NARENCO, through its subsidiaries, including SC Solar Development, controls a pipeline of approximately 500 MW in South Carolina, has built nearly 100 MW of solar to this date, and has an approximately 850 MW pipeline across the southeast.

Request for Intervenor Status.

3. Petitioner, SC Solar Development has previously received approval for intervention from this Commission, in Commission Docket No. 2015-362-E, and Docket No. 2015-8-E.

4. SC Solar Development is financially impacted by this Commission's Review, as is outlined in more detail hereinbelow.

5. Specifically, Petitioner plans to conduct business with SCE&G, including sales to SCE&G's Consumers in SCE&G's assigned territory and Petitioner SC Solar Development has a material interest in this Commission's Review.

This Commission's Review.

6. This Commission is conducting a Review of SCE&G's fuel purchasing practices and policies pursuant to S.C. Code Ann. §58-27-865, (Supp. 2015).

7. Coincident with this proceeding and pursuant to S.C. Code Ann. §58-39-140, (Supp. 2015), 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 the Company to implement the Distributed Energy Resource program previously approved by the Commission.

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

9. As outlined hereinabove, Petitioner, SC Solar Development has substantial business interests with SCE&G and SCE&G's Consumers in SCE&G's assigned territory in South Carolina.

10. Petitioner's position is that SC Solar Development 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 SC Solar Development 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. §58-27-865, *et. seq.* (Supp. 2015), 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.

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

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

13. 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

14. The granting of SC Solar Development's Petition to Intervene is (**i**) contemplated by S.C. Code Ann. §58-27-865, *et. seq.* (Supp. 2015), (**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.

15. SC Solar Development, 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
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508 Hampton Street, Suite 300
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803-251-7442
Counsel for Petitioner, SC Solar Development, LLC

January 22, 2016
Columbia, South Carolina

BEFORE

THE PUBLIC SERVICE COMMISSION

OF SOUTH CAROLINA

DOCKET NO. 2016-2-E

IN RE: Annual Review of Base Rates for Fuel Costs for South Carolina Electric & Gas Company	))))))	**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, SC Solar Development, LLC's Petition to Intervene and this Certificate of Service, as indicated below, via electronic mail on January 22, 2016.

(1) Jeffrey M. Nelson, Esq.
Email: jnelson@regstaff.sc.gov

(2) K. Chad Burgess, Esq.
Email: chad.burgess@scana.com

/S/_____
Carrie A. Schurg

January 22, 2016
Columbia, South Carolina