THE OFFICE OF REGULATORY STAFF

REBUTTAL TESTIMONY

OF

MICHAEL L. SEAMAN–HUYNH

OCTOBER 24, 2018

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

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
REBUTTAL TESTIMONY OF
MICHAEL L. SEAMAN-HUYNH
ON BEHALF OF
THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF
DOCKET NOS. 2017-207-E; 2017-305-E AND 2017-370-E
IN RE: 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

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND OCCUPATION.
A. My name is Michael Seaman-Huynh. My business address is 1401 Main Street,
Suite 900, Columbia, South Carolina 29201. I am employed by the State of South Carolina
as a Senior Regulatory Manager in the Utility Rates and Services Division of the Office of
Regulatory Staff (“ORS”).

Q. DID YOU PREVIOUSLY SUBMIT DIRECT TESTIMONY AND EXHIBITS IN
DOCKET NO. 2017-370-E?
A. Yes. I submitted direct testimony and exhibits in Docket No. 2017-370-E which
has been consolidated for hearing purposes with Docket No. 2017-305-E. My direct
testimony and exhibits filed in Docket No. 2017-370-E address issues raised by South
Carolina Electric & Gas Company (“SCE&G”) witnesses.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY FILED IN DOCKET NO. 2017-
370-E?
A. The purpose of my direct testimony is to address certain areas of the ORS’s
examination of the joint application and petition of SCE&G and Dominion Energy,
Incorporated ("Dominion") (together the “Applicants”) in Docket No. 2017-370-E ("Application"). My testimony will address several topics including:

- An overview of SCE&G’s natural gas operations in South Carolina;
- ORS’s recommendations regarding natural gas operations should the merger be approved;
- ORS’s review of the Application regarding rates and riders;
- ORS’s recommendations regarding its base rate reduction, capital cost recovery rider, tax savings rider, and merger savings rider under the ORS Optimal Rate Payer Benefits Plan;
- ORS’s recommendation regarding the Applicants’ proposed rate credit to customers; and,
- A comparison of the three (3) plans proposed by SCE&G and Dominion to the Optimal Plan proposed by ORS and the impacts of each proposal on customers.

Q. **DO YOU HAVE ANY CHANGES TO YOUR DIRECT TESTIMONY PRE-FILED IN DOCKET NO. 2017-370-E AFTER REVIEW OF THE DIRECT TESTIMONY FILED BY SCE&G IN DOCKET NO. 2017-305-E?**

A. No. After my review of the direct testimony filed by SCE&G witnesses, the conclusions and recommendations remain unchanged as presented in my pre-filed direct testimony in Docket No. 2017-370-E and are also applicable in Docket No. 2017-305-E. I am hereby adopting by reference in Docket No. 2017-305-E the testimony and exhibits which I have previously pre-filed in Docket No. 2017-370-E.

Q. **WILL YOU UPDATE YOUR TESTIMONY BASED ON INFORMATION THAT BECOMES AVAILABLE?**
A. Yes. ORS fully reserves the right to revise its recommendation via supplemental testimony should new information become available to ORS not previously provided by the Applicants, or from pending state and federal investigations and lawsuits.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes, it does.