

**STATE OF SOUTH CAROLINA**

(Caption of Case)

IN RE:

Joint Application of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and South Carolina Electric & Gas Company for Approval of the Revised South Carolina Interconnection Standard

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**COVER SHEET**

**DOCKET  
NUMBER: 2015 - 362 - E**

(Please type or print)

**Submitted by:** Bonnie Loomis

**SC Bar Number:** 15928

**Address:** 1201 Main Street

**Telephone:** 803-719-6202

Suite 1100

**Fax:** \_\_\_\_\_

Columbia, SC 29201

**Other:** \_\_\_\_\_

**Email:** bonnie@thepalladiangroup.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

**DOCKETING INFORMATION** (Check all that apply)

**Emergency Relief demanded in petition**

**Request for item to be placed on Commission's Agenda expeditiously**

**Other:** \_\_\_\_\_

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	_____	
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

Print Form

Reset Form

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2015-362-E**

IN RE: Joint Application of Duke Energy )  
Carolinas, LLC, Duke Energy ) **PETITION TO INTERVENE OF**  
Progress, LLC and South Carolina ) **THE SC SOLAR BUSINESS ALIANCE**  
Electric & Gas Company for Approval )  
of the Revised South Carolina )  
Interconnection Standard. )

Pursuant to Public Service Commission Regulation 103-825 and other applicable provisions of the South Carolina Public Service Commission's ("Commission") Rules of Practice and Procedure, the South Carolina Solar Business Alliance, LLC ("SCSBA" or "Petitioner") hereby timely files this Petition to Intervene in the above-captioned proceeding. In support of this Petition, SCSBA respectfully shows unto this Honorable Commission the following:

1) SCSBA is a limited liability corporation ("LLC") organized October 21, 2009, pursuant to Chapter 44 of Title 33 of the South Carolina Code of Laws and, since that date, remaining in good standing with the South Carolina Secretary of State.

2) SCSBA's principal place of business is currently co-located with that of Sustainable Energy Solutions, LLC at 804 Meeting Street, Charleston, South Carolina, 29403 and mailing address is currently co-located with that of the Hannah Solar Government Services, LLC at 3297 Pacific Street, North Charleston, South Carolina, 29418.

3) Petitioner is represented in this proceeding by:

Bonnie Loomis

1201 Main Street, Suite 1100, Columbia, South Carolina 29201

Telephone: 803-719-6202

Email: [bonnie@thepalladiangroup.com](mailto:bonnie@thepalladiangroup.com)

4) SCSBA is organized for the purpose of promoting and advocating public policy positions supportive of solar power generation in South Carolina.

5) SCSBA is a manager-managed LLC whose current managers are the following individuals, all of whom conduct solar energy related business in South Carolina under the company names indicated:

- A) Paul Fleury (Sustainable Energy Solutions, LLC)
- B) Grant Reeves (TIG Sun Energy I and II, LLC),
- C) Don Zimmerman (Alder Energy Systems, LLC),
- D) Dave McNeil (Hannah Solar Government Services, LLC),
- E) Bret Sowers (Narenco),
- F) Bryan Pittman (SolBright Renewable Energy, LLC),
- G) Jarrett Branham (SolBright Renewable Energy, LLC), and
- H) Bruce Wood (Sunstore Solar, LLC).

6) SCSBA's more than forty (40) Trade Members include solar energy companies and professional service firms engaged in the business of solar energy generation in this state and across the nation. The majority of SCSBA's Trade Members are based in South Carolina.

7) On behalf of these Trade Members' business interests and upon request of the South Carolina Office of Regulatory Staff ("ORS"), SCSBA past Board Chair Grant Reeves appeared before this Honorable Commission on April 16, 2014, for an Allowable Ex Parte Briefing to Discuss Solar Power Potential in South Carolina, including the impact on solar of, then, Senate Bill, 1189 and, now, Act 236 of 2014 ("Act" or "the Act"). (See SCPSC Docket 2014-12-E)

8) The General Assembly explicitly stated in the Act that "all interested parties shall be allowed to participate" and "propose methodologies" for setting net metering rates and credits in the generic proceeding. (See S.C. Code Section 58-40-20(F)(4))

10) SCSBA has previously petitioned this Honorable Commission to participate in Commission Dockets 2014-246-E, 2015-53-E, 2015-54-E, 2015-55-E, 2015-203-E, 2015-204-E, and 2015-205-E all stemming from Act 236 of 2014, alleging that:

- A) SCSBA had standing to intervene as an "interested party" pursuant to Section 58-40-20(F)(4),

B) SCSBA Trade Members had direct and material interests in the issues to be addressed and resolved by this Honorable Commission, and

C) SCSBA's interests could not be represented adequately by any other party.

11) In those Petitions, SCSBA further alleged standing to intervene pursuant to the long-standing practice of this Honorable Commission to grant such Petitions when "it is in the public interest to grant the relief requested in the Petition so that the Commission may consider all of the relevant information in the instant proceeding" (See SCPSC Docket 84-10-C, Order No. 84-498, Page 2) and intervention of the Petitioning party will "aid us in developing a full record in this case . . ." (See SCPSC Docket No. 95-835-C, Order No. 1999-20, Page 2) SCSBA additionally asserted that involvement of South Carolina's only solar trade alliance would unquestionably serve to promote the public interest, better allow this Honorable Commission to consider all of the relevant information and ensure the development of a full record in that Docket.

12) SCSBA's Petitions in those prior dockets were not objected to by any Party or Intervenor (most of whom are the same as those involved in these three dockets), and this Honorable Commission granted Intervenor status to SCSBA.

13) SCSBA subsequently actively participated the multi-party negotiations that resulted the settlements proposed to, and later approved by and made Orders of, this Honorable Commission, in those prior dockets.

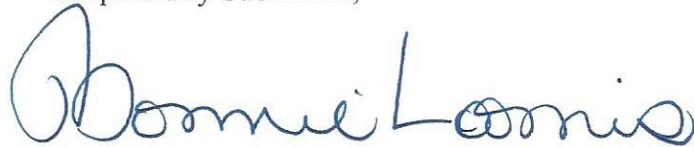
14) SCSBA remains situated today as it was when this Honorable Commission granted Intervenor status in all prior Act dockets and respectfully invokes this Honorable Commission's prior reasoning as the Commission gives consideration to SCSBA's Petition to Intervene herein.

15) SCSBA's participation in this docket is (i) consistent with the Settlement Agreement reached concerning the Act (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) This Petition is timely filed.

**WHEREFORE**, Petitioner prays that this Honorable Commission grant SCSBA's Petition to Intervene in this docket and all related proceedings, including, but not limited to, the ability to appear as a party, engage in discovery, and participate in all hearings by offering testimony and exhibits and cross-examining the testimony and exhibits of other parties. Petitioner requests receipt of all notices, documents, exhibits and data submitted by all parties and the Commission's staff. Petitioner also prays for such other and further relief as is just and proper.

Respectfully Submitted,



---

Bonnie D. Loomis

1201 Main Street, Suite 1100, Columbia, SC 29201

Telephone: 803-719-6202

Email: [bonnie@thepalladiangroup.com](mailto:bonnie@thepalladiangroup.com)

November 23, 2015

Columbia, South Carolina

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2015-362-E**

IN RE: Joint Application of Duke Energy )  
Carolinas, LLC, Duke Energy )  
Progress, LLC and South Carolina )  
Electric & Gas Company for Approval )  
of the Revised South Carolina )  
Interconnection Standard. )

**CERTIFICATE OF SERVICE**

This is to certify that I, Bonnie Loomis, have this date served one (1) copy of the PETITION TO INTERVENE OF THE SC SOLAR BUSINESS ALLIANCE in the above-referenced matters to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown:

Shannon Bowyer Hudson  
Andrew M. Bateman  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201

K. Chad Burgess  
Matthew W. Gissendanner  
South Carolina Electric & Gas Company  
220 Operation Way – MC C222  
Cayce, SC 29033-3701

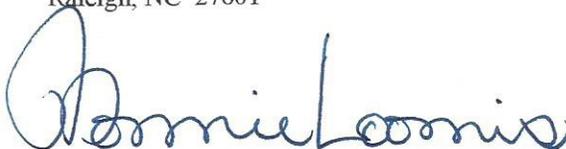
Charles A. Castle  
Duke Energy  
550 South Tryon Street/DEC 45 A  
Charlotte, NC 28202

J. Blanding Holman, IV  
Southern Environmental Law Center  
463 King Street – Suite B  
Charleston, SC 29403

Lauren Bowen  
Southern Environmental Law Center  
601 West Rosemary Street, Suite 220  
Chapel Hill, NC 27516

Frank R. Ellerbe  
Robinson, McFadden & Moore, PC  
PO Box 944  
Columbia, SC 29202

E. Brett Breitschwerdt  
McGuireWoods LLP  
434 Fayetteville Street  
Suite 2600  
Raleigh, NC 27601



Bonnie Loomis  
1201 Main Street, Suite 1100  
Columbia, SC 29201  
Telephone: 803-719-6202  
Email: [bonnie@thepalladiangroup.com](mailto:bonnie@thepalladiangroup.com)

November 23, 2015  
Columbia, SC