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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,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

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.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., 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 plan.

SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO WAL-MART STORES EAST, LP AND SAM'S EAST, INCORPORATED

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TO: COUNSEL FOR WAL-MART STORES EAST, LP AND SAM'S EAST, INCORPORATED

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that Wal-Mart Stores East, LP and Sam's East, Incorporated answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

Wal-Mart Stores East, LP and Sam's East, Incorporated's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to Wal-Mart Stores East, LP and Sam's East, Incorporated, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery**. If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

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2. **Continuing Nature.** These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections.** If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language.** The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period.** Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **"Combined Regulatory Proceedings."** The term "Combined Regulatory Proceedings" is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the "Commission") and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club"; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920"; and (c) Docket No. 2017-370-E, which was initiated by

SCE&G's and Dominion Energy, Inc.'s filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

2. **"Communication."** The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **"Describe," "Description," "Summarize,"** or **"Summary."** The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **"Document"** or **"Documents."** The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail

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recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **"Identify."** The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **"ORS."** The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **"People" and "Person."** The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state

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governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

8. **"Relate," "Relating," "Relating to,"** and **"Related to."** The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **"You"** and **"Your."** The words "you" and "your" refer to Wal-Mart Stores East, LP and Sam's East, Incorporated, the party to which these Requests are directed, as well as its executive officers (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on Wal-Mart Stores East, LP and Sam's East, Incorporated's behalf.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to

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submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:

Responsible Person:

Interrogatory 1-4

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:

Responsible Person:

Request for Production 1-2

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Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

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Responsible Person:

Respectfully submitted,

Belton T. Zeigler
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Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 24, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO WAL-MART STORES EAST, LP AND SAM'S EAST, INCORPORATED via electronic mail and U.S. Mail, postage prepaid, upon the following:

Derrick Price Williamson
Spilman Thomas & Battle PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050

Lara Brandfass
Spilman Thomas & Battle PLLC
300 Kanawha Blvd.
East Charleston, SC 53501

Stephanie U. Eaton
Spilman Thomas & Battle PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103

Belton T. Zeigler

August 24, 2018

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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,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

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.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., 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 plan.

SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO CENTRAL ELECTRIC POWER COOPERATIVE, INC.

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TO: COUNSEL FOR CENTRAL ELECTRIC POWER COOPERATIVE, INC.

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that Central Electric Power Cooperative, Inc. answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

Central Electric Power Cooperative, Inc.'s responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to Central Electric Power Cooperative, Inc., but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery.** If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

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information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections.** If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language.** The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period.** Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **"Combined Regulatory Proceedings."** The term "Combined Regulatory Proceedings" is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the "Commission") and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club"; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920"; and (c) Docket No. 2017-370-E, which was initiated by SCE&G's and Dominion Energy, Inc.'s filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

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2. **"Communication."** The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **"Describe," "Description," "Summarize,"** or **"Summary."** The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **"Document"** or **"Documents."** The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **"Identify."** The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **"ORS."** The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **"People"** and **"Person."** The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

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8. **"Relate," "Relating," "Relating to,"** and **"Related to."** The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **"You"** and **"Your."** The words "you" and "your" refer to Central Electric Power Cooperative, Inc., the party to which these Requests are directed, as well as its President and CEO (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on Central Electric Power Cooperative, Inc.'s behalf.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:

Responsible Person:

Interrogatory 1-4

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:

Responsible Person:

Request for Production 1-2

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

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Responsible Person:

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

Responsible Person:

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Respectfully submitted,

Belton T. Zeigler
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Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 24, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO CENTRAL ELECTRIC POWER COOPERATIVE, INC. via electronic mail and U.S. Mail, postage prepaid, upon the following:

Christopher R. Koon
The Electric Cooperatives of South Carolina
800 Knox Abbott Drive
Cayce, SC 29033-3311

Christopher S. McDonald
The Tiencken Law Firm, LLC
234 Seven Farms Drive, Sutie 113
Daniel Island, SC 29492

Frank Ellerbe III, John H. Tiencken, Jr.
Kevin K. Bell
Robinson Gray Stepp I& Laffitte, LLC
PO Box 11449
Columbia, SC 29211

Belton T. Zeigler

August 24, 2018

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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,

Complainants/Petitioners,

v.

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SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO UNITED STATES DEPARTMENT OF DEFENSE AND ALL OTHER FEDERAL EXECUTIVE AGENCIES

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TO: COUNSEL FOR UNITED STATES DEPARTMENT OF DEFENSE AND ALL OTHER FEDERAL EXECUTIVE AGENCIES

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that the United States Department of Defense and All Other Federal Executive Agencies answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

The United States Department of Defense and All Other Federal Executive Agencies' responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to the United States Department of Defense and All Other Federal Executive Agencies, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery.** If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

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2. **Continuing Nature**. These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections**. If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language**. The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period**. Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **"Combined Regulatory Proceedings."** The term "Combined Regulatory Proceedings" is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the "Commission") and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club"; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920"; and (c) Docket No. 2017-370-E, which was initiated by

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SCE&G's and Dominion Energy, Inc.'s filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

2. **"Communication."** The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **"Describe," "Description," "Summarize,"** or **"Summary."** The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **"Document"** or **"Documents."** The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail

recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **"Identify."** The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **"ORS."** The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **"People"** and **"Person."** The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state

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governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

8. **"Relate," "Relating," "Relating to,"** and **"Related to."** The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **"You"** and **"Your."** The words "you" and "your" refer to the United States Department of Defense and All Other Federal Executive Agencies, the party to which these Requests are directed, as well as their Secretaries and Directors (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on behalf of the United States Department of Defense and All Other Federal Executive Agencies.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

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If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:

Responsible Person:

Interrogatory 1-4

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:

Responsible Person:

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Request for Production 1-2

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

Responsible Person:

Respectfully submitted,

Belton T. Zeigler
Womble Bond Dickinson (US) LLP
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Columbia, SC 29201
(803) 454-7720
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K. Chad Burgess, Esquire
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mwilloughby@willoughbyhoefer.com

Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 24, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO UNITED STATES DEPARTMENT OF DEFENSE AND ALL OTHER FEDERAL EXECUTIVE AGENCIES via electronic mail and U.S. Mail, postage prepaid, upon the following:

Emily W. Medlyn
US Army Legal Services Agency-Regulatory Law
9275 Gunston Road
Fort Belvoir, VA 22060

Belton T. Zeigler

August 24, 2018

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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,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

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.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., 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 plan.

SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SPEAKER JAMES H. "JAY" LUCAS AND THE SOUTH CAROLINA HOUSE OF REPRESENTATIVES

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TO: COUNSEL FOR SPEAKER JAMES H. "JAY" LUCAS AND THE SOUTH CAROLINA HOUSE OF REPRESENTATIVES

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that Speaker James H. "Jay" Lucas and the South Carolina House of Representatives answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

Speaker James H. "Jay" Lucas and the South Carolina House of Representatives' responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to Speaker James H. "Jay" Lucas and the South Carolina House of Representatives, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery.** If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

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2. **Continuing Nature.** These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections.** If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language.** The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period.** Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **"Combined Regulatory Proceedings."** The term "Combined Regulatory Proceedings" is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the "Commission") and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club"; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920"; and (c) Docket No. 2017-370-E, which was initiated by

SCE&G's and Dominion Energy, Inc.'s filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

2. **"Communication."** The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **"Describe," "Description," "Summarize,"** or **"Summary."** The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **"Document"** or **"Documents."** The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail

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recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **"Identify."** The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **"ORS."** The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **"People"** and **"Person."** The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state

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governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

8. **"Relate," "Relating," "Relating to," and "Related to."** The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **"You" and "Your."** The words "you" and "your" refer to Speaker James H. "Jay" Lucas and the South Carolina House of Representatives, the party to which these Requests are directed, as well as its Representatives (past and present), agents, employees (past and present), or any other person or persons acting for or purportedly acting on behalf of Speaker James H. "Jay" Lucas and the South Carolina House of Representatives.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to

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submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:

Responsible Person:

Interrogatory 1-4

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:

Responsible Person:

Request for Production 1-2

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Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

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Responsible Person:

Respectfully submitted,

Belton T. Zeigler
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(803) 454-7720
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Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 24, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SPEAKER JAMES H. "JAY" LUCAS AND THE SOUTH CAROLINA HOUSE OF REPRESENTATIVES via electronic mail and U.S. Mail, postage prepaid, upon the following:

Michael J. Anzelmo
PO Box 11867
Columbia, SC 29211

Belton T. Zeigler

August 24, 2018

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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,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

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.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., 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 plan.

SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SOUTH CAROLINA SOLAR BUSINESS ALLIANCE, LLC

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TO: COUNSEL FOR SOUTH CAROLINA SOLAR BUSINESS ALLIANCE, LLC

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that the South Carolina Solar Business Alliance, LLC answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

The South Carolina Solar Business Alliance, LLC's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to the South Carolina Solar Business Alliance, LLC, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery.** If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature.** These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter

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until the conclusion of this matter. If you should subsequently acquire any further responsive information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections**. If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language**. The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period**. Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **"Combined Regulatory Proceedings."** The term "Combined Regulatory Proceedings" is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the "Commission") and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club"; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920"; and (c) Docket No. 2017-370-E, which was initiated by SCE&G's and Dominion Energy, Inc.'s filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

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2. **"Communication."** The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **"Describe," "Description," "Summarize,"** or **"Summary."** The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **"Document"** or **"Documents."** The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **"Identify."** The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **"ORS."** The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **"People"** and **"Person."** The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

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8. **"Relate," "Relating," "Relating to,"** and **"Related to."** The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **"You"** and **"Your."** The words "you" and "your" refer to the South Carolina Solar Business Alliance, LLC, the party to which these Requests are directed, as well as its board (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on behalf of the South Carolina Solar Business Alliance, LLC.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

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Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:

Responsible Person:

Interrogatory 1-4

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:

Responsible Person:

Request for Production 1-2

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

Responsible Person:

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Respectfully submitted,

Belton T. Zeigler
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belton.zeigler@wbd-us.com

K. Chad Burgess, Esquire
Matthew Gissendanner, Esquire
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Cayce, SC 29033-3701
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Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 24, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SOUTH CAROLINA SOLAR BUSINESS ALLIANCE, LLC via electronic mail and U.S. Mail, postage prepaid, upon the following:

Richard L. Whitt
Austin &I Rogers, PA
508 Hampton St., Suite 300
Columbia, SC 29201

Belton T. Zeigler

August 24, 2018

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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,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

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.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., 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 plan.

SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SOUTH CAROLINA PUBLIC SERVICE AUTHORITY

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TO: COUNSEL FOR SOUTH CAROLINA PUBLIC SERVICE AUTHORITY

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that the South Carolina Public Service Authority answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

The South Carolina Public Service Authority's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to the South Carolina Public Service Authority, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery**. If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature**. These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive

information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections**. If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language**. The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period**. Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **"Combined Regulatory Proceedings."** The term "Combined Regulatory Proceedings" is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the "Commission") and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club"; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920"; and (c) Docket No. 2017-370-E, which was initiated by SCE&G's and Dominion Energy, Inc.'s filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

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2. **"Communication."** The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **"Describe," "Description," "Summarize,"** or **"Summary."** The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **"Document"** or **"Documents."** The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **"Identify."** The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **"ORS."** The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **"People" and "Person."** The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

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8. **"Relate," "Relating," "Relating to,"** and **"Related to."** The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **"You"** and **"Your."** The words "you" and "your" refer to the South Carolina Public Service Authority, the party to which these Requests are directed, as well as its President and Chief Executive Officer, board of directors (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on behalf of the South Carolina Public Service Authority.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

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Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:

Responsible Person:

Interrogatory 1-4

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:

Responsible Person:

Request for Production 1-2

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

Responsible Person:

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Respectfully submitted,

Belton T. Zeigler
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Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 24, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SOUTH CAROLINA PUBLIC SERVICE AUTHORITY via electronic mail and U.S. Mail, postage prepaid, upon the following:

Weston Adams III, William Hubbard
Rush Smith, Matt Bogan
Nelson Mullins
PO Box 11070
Columbia, SC 29211

Belton T. Zeigler

August 24, 2018

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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,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

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.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., 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 plan.

SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SOUTH CAROLINA ENERGY USERS COMMITTEE

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TO: COUNSEL FOR SOUTH CAROLINA ENERGY USERS COMMITTEE

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that the South Carolina Energy Users Committee answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

The South Carolina Energy Users Committee's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to the South Carolina Energy Users Committee, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery**. If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature**. These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive

information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections.** If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language.** The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period.** Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **"Combined Regulatory Proceedings."** The term "Combined Regulatory Proceedings" is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the "Commission") and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club"; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920"; and (c) Docket No. 2017-370-E, which was initiated by SCE&G's and Dominion Energy, Inc.'s filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

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2. **"Communication."** The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **"Describe," "Description," "Summarize,"** or **"Summary."** The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **"Document"** or **"Documents."** The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **"Identify."** The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **"ORS."** The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **"People" and "Person."** The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

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8. **"Relate," "Relating," "Relating to,"** and **"Related to."** The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **"You"** and **"Your."** The words "you" and "your" refer to the South Carolina Energy Users Committee, the party to which these Requests are directed, as well as its members (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on behalf of the South Carolina Energy Users Committee.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

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Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:

Responsible Person:

Interrogatory 1-4

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:

Responsible Person:

Request for Production 1-2

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

Responsible Person:

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Respectfully submitted,

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belton.zeigler@wbd-us.com

K. Chad Burgess, Esquire
Matthew Gissendanner, Esquire
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Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 24, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SOUTH CAROLINA ENERGY USERS COMMITTEE via electronic mail and U.S. Mail, postage prepaid, upon the following:

Scott Elliott
Elliot & Elliot, PA
1508 Lady St.
Columbia, SC 29201

Belton T. Zeigler

August 24, 2018

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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,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

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.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., 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 plan.

SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO FRANK KNAPP JR.

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TO: COUNSEL FOR FRANK KNAPP JR.

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that Frank Knapp Jr. answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

Frank Knapp Jr.'s responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to Frank Knapp Jr., but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery**. If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature**. These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive

information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections**. If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language**. The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period**. Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **"Combined Regulatory Proceedings."** The term "Combined Regulatory Proceedings" is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the "Commission") and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club"; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920"; and (c) Docket No. 2017-370-E, which was initiated by SCE&G's and Dominion Energy, Inc.'s filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

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2. **"Communication."** The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **"Describe," "Description," "Summarize,"** or **"Summary."** The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **"Document"** or **"Documents."** The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **"Identify."** The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **"ORS."** The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **"People" and "Person."** The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

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8. **"Relate," "Relating," "Relating to,"** and **"Related to."** The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **"You"** and **"Your."** The words "you" and "your" refer to Frank Knapp Jr., the party to which these Requests are directed, as well as any agents, attorneys, representatives, or any other person or persons acting for or purportedly acting on his behalf.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:

Responsible Person:

Interrogatory 1-4

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:

Responsible Person:

Request for Production 1-2

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:

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Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

Responsible Person:

Respectfully submitted,

Belton T. Zeigler
Womble Bond Dickinson (US) LLP
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Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 24, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO FRANK KNAPP JR. via electronic mail and U.S. Mail, postage prepaid, upon the following:

Frank Knapp, Jr.

118 East Selwood Lane

Columbia, SC 29212

Belton T. Zeigler

August 24, 2018

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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,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

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.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., 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 plan.

SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO CMC STEEL SOUTH CAROLINA

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TO: COUNSEL FOR CMC STEEL SOUTH CAROLINA

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that CMC Steel South Carolina answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

CMC Steel South Carolina's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to CMC Steel South Carolina, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery**. If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature**. These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive

information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections**. If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language**. The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period**. Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **"Combined Regulatory Proceedings."** The term "Combined Regulatory Proceedings" is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the "Commission") and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club"; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920"; and (c) Docket No. 2017-370-E, which was initiated by SCE&G's and Dominion Energy, Inc.'s filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

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2. **"Communication."** The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **"Describe," "Description," "Summarize,"** or **"Summary."** The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **"Document"** or **"Documents."** The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. "**Identify**." The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. "**ORS**." The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. "**People**" and "**Person**." The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

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8. **"Relate," "Relating," "Relating to,"** and **"Related to."** The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **"You"** and **"Your."** The words "you" and "your" refer to CMC Steel South Carolina, the party to which these Requests are directed, as well as its President and CEO (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on behalf of CMC Steel South Carolina.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

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Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:

Responsible Person:

Interrogatory 1-4

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:

Responsible Person:

Request for Production 1-2

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:

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Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

Responsible Person:

Respectfully submitted,

Belton T. Zeigler
Womble Bond Dickinson (US) LLP
1221 Main Street
Suite 1600
Columbia, SC 29201
(803) 454-7720
belton.zeigler@wbd-us.com

K. Chad Burgess, Esquire
Matthew Gissendanner, Esquire
Mail Code C222
220 Operation Way
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Mitchell Willoughby
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Post Office Box 8416
Columbia, SC 29202
(803) 252-3300
mwilloughby@willoughbyhoefer.com

Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 24, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO CMC STEEL OF SOUTH CAROLINA via electronic mail and U.S. Mail, postage prepaid, upon the following:

Alexander G. Shissias
Shissias Law Firm, LLC
1727 Hampton Street
Columbia, SC 29201

Belton T. Zeigler

August 24, 2018

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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,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

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.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., 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 plan.

SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SIERRA CLUB

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TO: COUNSEL FOR SIERRA CLUB

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that the Sierra Club answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

The Sierra Club's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to the Sierra Club, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery**. If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature**. These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive

information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections**. If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language**. The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period**. Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **"Combined Regulatory Proceedings."** The term "Combined Regulatory Proceedings" is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the "Commission") and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club"; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920"; and (c) Docket No. 2017-370-E, which was initiated by SCE&G's and Dominion Energy, Inc.'s filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

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2. **"Communication."** The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **"Describe," "Description," "Summarize,"** or **"Summary."** The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **"Document"** or **"Documents."** The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **"Identify."** The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **"ORS."** The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **"People"** and **"Person."** The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

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8. **"Relate," "Relating," "Relating to,"** and **"Related to."** The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **"You"** and **"Your."** The words "you" and "your" refer to the Sierra Club, the party to which these Requests are directed, as well as its officers (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on behalf of the Sierra Club.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

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Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:

Responsible Person:

Interrogatory 1-4

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:

Responsible Person:

Request for Production 1-2

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:

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Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

Responsible Person:

Respectfully submitted,

Belton T. Zeigler
Womble Bond Dickinson (US) LLP
1221 Main Street
Suite 1600
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(803) 454-7720
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Mitchell Willoughby
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Post Office Box 8416
Columbia, SC 29202
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mwilloughby@willoughbyhoefer.com

Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 24, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO SIERRA CLUB via electronic mail and U.S. Mail, postage prepaid, upon the following:

Robert Guild Attorney at Law
314 Pall Mall Street
Columbia, SC 29201

Belton T. Zeigler

August 24, 2018

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womblebonddickinson.com

WOMBLE
BOND
DICKINSON

Belton T. Zeigler
Direct Dial: 803-454-7720
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E-mail: Belton.Zeigler@wbd-us.com

Womble Bond Dickinson (US) LLP

1221 Main Street
Suite 1600
Columbia, SC 29201

t: 803.454.6504

August 24, 2018

Lynn Teague
3728 Wilmot Avenue
Columbia, SC 29205

Re: Docket No. 2017 – 207 – E; Docket No. 2017 – 305 – E;
and Docket No. 2017 – 370 – E

Dear Ms. Teague:

Enclosed and served upon you please find South Carolina Electric & Gas Company's First Set of Interrogatories and First Set of Requests for Production of Documents. I understand that you are not represented by counsel in this matter. If you are not intending to offer a witness at the hearing, an email or letter to me stating that fact will be a sufficient response to these requests. If you are intending to offer a witness at the hearing in these matters, please do respond and let me know the details concerning that witness as requested in the attached discovery document.

Sincerely,

Belton T. Zeigler

Womble Bond Dickinson (US) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the world. Each Womble Bond Dickinson entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Womble Bond Dickinson entity. Womble Bond Dickinson (International) Limited does not practice law. Please see www.womblebonddickinson.com/legal notices for further details.

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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,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

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.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., 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 plan.

SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO LYNN TEAGUE

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TO: COUNSEL FOR LYNN TEAGUE

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that Lynn Teage answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

Lynn Teague's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to Lynn Teague, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery**. If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature**. These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive

information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections.** If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language.** The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period.** Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **"Combined Regulatory Proceedings."** The term "Combined Regulatory Proceedings" is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the "Commission") and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club"; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920"; and (c) Docket No. 2017-370-E, which was initiated by SCE&G's and Dominion Energy, Inc.'s filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

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2. **"Communication."** The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **"Describe," "Description," "Summarize,"** or **"Summary."** The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **"Document"** or **"Documents."** The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. "**Identify**." The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. "**ORS**." The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. "**People**" and "**Person**." The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

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8. **"Relate," "Relating," "Relating to,"** and **"Related to."** The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **"You"** and **"Your."** The words "you" and "your" refer to Lynn Teague, the party to which these Requests are directed, as well as any agents, attorneys, representatives, or any other person or persons acting for or purportedly acting on her behalf.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:

Responsible Person:

Interrogatory 1-4

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:

Responsible Person:

Request for Production 1-2

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:

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Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

Responsible Person:

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Respectfully submitted,

Belton T. Zeigler
Womble Bond Dickinson (US) LLP
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belton.zeigler@wbd-us.com

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Matthew Gissendanner, Esquire
Mail Code C222
220 Operation Way
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Mitchell Willoughby
Willoughby & Hoefer, P.A.
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(803) 252-3300
mwilloughby@willoughbyhoefer.com

Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 24, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO LYNN TEAGUE via electronic mail and U.S. Mail, postage prepaid, upon the following:

Lynn Teague
3728 Wilmot Avenue
Columbia, SC 29205

Belton T. Zeigler

Belton T. Zeigler

August 24, 2018

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womblebonddickinson.com

WOMBLE
BOND
DICKINSON

Womble Bond Dickinson (US) LLP

1221 Main Street
Suite 1600
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t. 803.454.6504

Belton T. Zeigler
Direct Dial: 803-454-7720
Direct Fax: 803-381-9120
E-mail: Belton.Zeigler@wbd-us.com

August 24, 2018

Dino Teppara
104 Egret Court
Lexington, SC 29072

Re: Docket No. 2017 – 207 – E; Docket No. 2017 – 305 – E;
and Docket No. 2017 – 370 – E

Dear Mr. Teppara:

Enclosed and served upon you please find South Carolina Electric & Gas Company's First Set of Interrogatories and First Set of Requests for Production of Documents. I understand that you are not represented by counsel in this matter. If you are not intending to offer a witness at the hearing, an email or letter to me stating that fact will be a sufficient response to these requests. If you are intending to offer a witness at the hearing in these matters, please do respond and let me know the details concerning that witness as requested in the attached discovery document.

Sincerely,

Belton T. Zeigler

Womble Bond Dickinson (US) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the world. Each Womble Bond Dickinson entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Womble Bond Dickinson entity. Womble Bond Dickinson (International) Limited does not practice law. Please see www.womblebonddickinson.com/legal notices for further details.

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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,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

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.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., 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 plan.

SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO DINO TEPPARA

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TO: COUNSEL FOR DINO TEPPARA

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that Dino Teppara answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

Dino Teppara's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to Dino Teppara, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery.** If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature.** These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive

information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections**. If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language**. The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period**. Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **"Combined Regulatory Proceedings."** The term "Combined Regulatory Proceedings" is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the "Commission") and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club"; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920"; and (c) Docket No. 2017-370-E, which was initiated by SCE&G's and Dominion Energy, Inc.'s filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

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2. **"Communication."** The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **"Describe," "Description," "Summarize,"** or **"Summary."** The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **"Document"** or **"Documents."** The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **"Identify."** The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **"ORS."** The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **"People" and "Person."** The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

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8. **"Relate," "Relating," "Relating to,"** and **"Related to."** The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **"You"** and **"Your."** The words "you" and "your" refer to Dino Teppara, the party to which these Requests are directed.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

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Response to Interrogatory 1-3:

Responsible Person:

Interrogatory 1-4

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:

Responsible Person:

Request for Production 1-2

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:

Request for Production 1-3

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Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

Responsible Person:

ACCEPTED FOR PROCESSING - 2018 August 24 12:49 PM - SCPSC - 2017-370-E - Page 120 of 133

Respectfully submitted,

Belton T. Zeigler
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(803) 454-7720
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K. Chad Burgess, Esquire
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(803) 252-3300
mwilloughby@willoughbyhoefer.com

Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 24, 2018

ACCEPTED FOR PROCESSING - 2018 August 24 12:49 PM - SCPSC - 2017-370-E - Page 121 of 133

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO DINO TEPPARA via electronic mail and U.S. Mail, postage prepaid, upon the following:

Dino Teppara
104 Egret Court
Lexington, SC 29072

Belton T. Zeigler

August 24, 2018

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Womble Bond Dickinson (US) LLP

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t: 803.454.6504

Belton T. Zeigler
Direct Dial: 803-454-7720
Direct Fax: 803-381-9120
E-mail: Belton.Zeigler@wbd-us.com

August 24, 2018

William T. Dowdey
811 Jefferson Street
West Columbia, SC 29169

Re: Docket No. 2017 – 207 – E; Docket No. 2017 – 305 – E;
and Docket No. 2017 – 370 – E

Dear Mr. Dowdey:

Enclosed and served upon you please find South Carolina Electric & Gas Company's First Set of Interrogatories and First Set of Requests for Production of Documents. I understand that you are not represented by counsel in this matter. If you are not intending to offer a witness at the hearing, an email or letter to me stating that fact will be a sufficient response to these requests. If you are intending to offer a witness at the hearing in these matters, please do respond and let me know the details concerning that witness as requested in the attached discovery document.

Sincerely,

Belton T. Zeigler

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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,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

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.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., 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 plan.

SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO WILLIAM T. DOWDEY

ACCEPTED FOR PROCESSING - 2018 August 24 12:49 PM - SCPSC - 2017-370-E - Page 125 of 133

TO: COUNSEL FOR WILLIAM T. DOWDEY

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, and 34, hereby requests that William T. Dowdey answer fully and separately, in writing and under oath, the following interrogatories and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure, and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before September 13, 2018.

INSTRUCTIONS

William T. Dowdey's responses to SCE&G's First Set of Interrogatories and First Requests for Production of Documents (collectively, the "Requests") should include not only all information and documents available to William T. Dowdey, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery**. If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit SCE&G to assess the basis of any such claim.

2. **Continuing Nature**. These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive

information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections**. If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language**. The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period**. Unless otherwise indicated, these Requests cover the time period from November 1, 2015, until the present.

DEFINITIONS

1. **"Combined Regulatory Proceedings."** The term "Combined Regulatory Proceedings" is used herein to collectively refer to the following dockets that are currently pending before the Public Services Commission of South Carolina (the "Commission") and which have been consolidated for proceedings before the Commission: (a) Docket No. 2017-207-E, which was initiated by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club"; (b) Docket No. 2017-305-E, which was initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920"; and (c) Docket No. 2017-370-E, which was initiated by SCE&G's and Dominion Energy, Inc.'s filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

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2. **"Communication."** The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

3. **"Describe," "Description," "Summarize,"** or **"Summary."** The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

4. **"Document"** or **"Documents."** The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing

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files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

5. **"Identify."** The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

6. **"ORS."** The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

7. **"People" and "Person."** The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

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8. **"Relate," "Relating," "Relating to,"** and **"Related to."** The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

9. **"You"** and **"Your."** The words "you" and "your" refer to William T. Dowdey, the party to which these Requests are directed, as well as any agents, attorneys, representatives, or any other person or persons acting for or purportedly acting on his behalf.

INTERROGATORIES

Interrogatory 1-1

Please state whether you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

If you intend to submit any pre-filed witness testimony in connection with the Combined Regulatory Proceedings, please identify each and every person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

ACCEPTED FOR PROCESSING - 2018 August 24 12:49 PM - SCPSC - 2017-370-E - Page 129 of 133

Please state whether you intend to present any witness or testimony at the hearing in Combined Regulatory Proceedings for whom pre-filed testimony is not envisioned.

Response to Interrogatory 1-3:

Responsible Person:

Interrogatory 1-4

If you intend to present any witness testimony at the hearing in the Combined Regulatory Proceedings other than those disclosed in response to Interrogatory 1-2, please identify each and every such person whose testimony you intend to submit. Your identification should include each person's: (a) name; (b) last-known residential address; (c) telephone number; and (d) e-mail address.

Response to Interrogatory 1-4:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact to support the testimony that you intend to present for any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-1:

Responsible Person:

Request for Production 1-2

Produce copies of all documents related to your communications with any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-2:

Responsible Person:

ACCEPTED FOR PROCESSING - 2018 August 24 12:49 PM - SCPSC - 2017-370-E - Page 130 of 133

Request for Production 1-3

Produce copies of all documents that you supplied to any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce copies of all documents and communications that form the basis for the testimony of any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents and communications relied upon to support the testimony any person identified in response to Interrogatory 1-2 or Interrogatory 1-4, above.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and ORS regarding the Combined Regulatory Proceedings.

Response to Request for Production 1-6:

Responsible Person:

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Respectfully submitted,

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Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 24, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO WILLIAM T. DOWDEY. via electronic mail and U.S. Mail, postage prepaid, upon the following:

William T. Dowdey
811 Jefferson Street
West Columbia, SC 29169

Belton T. Zeigler

August 24, 2018

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