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Gardner, Bist, Bowden, Bush,
Dee, LaVia & Wright, P.A.
Attorneys at Law

Michael P. Bist
Garvin B. Bowden*
Benjamin B. Bush**
David S. Dee
Erin W. Duncan
Charles R. Gardner
John T. LaVia, III
Robert Scheffel "Schef" Wright

1300 Thomaswood Drive
Tallahassee, Florida 32308

www.gbwlegal.com

Telephone 850.385.0070
Facsimile 850.385.5416

*Board Certified Real Estate Lawyer
**Also Licensed to Practice in Georgia

August 15, 2019

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PSC SC
MAIL / DMS

Jocelyn Boyd, Chief Clerk/Executive Director
Public Service Commission of South Carolina
101 Executive Center Dr, Suite 100
Columbia, South Carolina 29210

Re: South Carolina Public Service Commission Proceedings Pursuant to the South Carolina Energy Freedom Act (H.3659), Docket No. 2019-184-E (Dominion Energy South Carolina, Inc.), Docket No. 2019-185-E (Duke Energy Carolinas, LLC), and Docket No. 2019-186-E (Duke Energy Progress, LLC),

Conflict Response of Gardner, Bist, Bowden, Bush, Dee, LaVia & Wright, P.A. and Robert Scheffel ("Schef") Wright

Dear Ms. Boyd:

This is to confirm that this firm has performed a conflict check as to the investor owned public utilities in South Carolina, identified above and that it does not have a professional relationship with, and has not represented, any of the entities referenced above.

To further address any "conflict" concerns, please know that none of our firm's attorneys, employees, associates, contractors, counsel, or shareholders have ever been retained to represent any investor owned public utilities in South Carolina. (Further, neither Mr. Wright nor any other member or attorney of our firm is licensed to practice law in South Carolina.) In addition, we are not aware of any reason that our firm, or any of our counsel or employees, should not serve as an independent expert as to any issues in any dockets or proceedings before the Public Service Commission of South Carolina concerning the above entities.

With respect to other parties and intervenors in the above-styled proceedings, we advise you as follows:

1. Our firm, and specifically Mr. Wright, represents Ecoplexus, Inc. in connection with its development efforts for solar power projects in Florida. Ecoplexus is listed as a member of the South Carolina Solar Business Alliance and has recently petitioned to intervene as a separate party in the above-styled dockets. Mr. Wright has not represented or advised Ecoplexus in connection with any matters in South Carolina or in any jurisdiction other than Florida.

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2. Noting that Walmart, Inc. is listed as a party in these dockets, we advise you that our firm, and specifically Mr. Wright, have represented affiliates of Walmart, Inc., in certain proceedings before the Florida Public Service Commission ("PSC"). The affiliates are Wal-Mart Stores East, LP, and Sam's East, Inc. The proceedings before the Florida PSC in which Mr. Wright represented these entities were two general rate cases filed by Gulf Power Company, Florida PSC Docket No. 20130140-EI and Docket No. 20160186-EI, and also proceedings in several consolidated Florida PSC dockets relating to energy conservation goals and energy conservation cost recovery charges by Florida utilities (Docket Nos. 20130199-EI through 20130203-EI, and Docket No. 20140002-EG). Mr. Wright has not represented any Walmart entities or affiliates in connection with any matters or proceedings in South Carolina or in any jurisdiction other than Florida.

Further, the firm and Mr. Wright are willing to commit, in writing, that if we are engaged by the Public Service Commission of South Carolina, we will not represent Ecoplexus or any Walmart affiliate in any matters in South Carolina or North Carolina for at least five (5) years following the conclusion of the dockets referenced above.

Finally, our firm is not associated with any matters pending before the Public Service Commission of South Carolina now, nor has it been in the past.

Sincerely,

Michael P. Bist
President

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