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BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2017-245-E

IN THE MATTER OF:	)	
	)	
Application of Duke Energy Progress, LLC	)	**MOTION FOR ADMISSION**
for Approval of Rider 9, Demand-Side	)	***Pro Hac Vice***
Management and Energy Efficiency	)	
	)	

Nucor Steel-South Carolina, a Division of Nucor Corporation, hereby moves the Public Service Commission of South Carolina ("Commission") to permit Michael K. Lavanga to practice *pro hac vice* before the Commission in the above-captioned matter.

Pursuant to SCACR 404, Mr. Lavanga, together with counsel of record, has filed a *Verified Application for Admission Pro Hac Vice* with the South Carolina Supreme Court. Attached hereto is a stamped copy of the Verified Application as filed with the Supreme Court.

WHEREFORE, as the provisions set forth in SCACR 404 have been satisfied, Nucor requests this motion be granted.

Respectfully submitted,
MOORE & VAN ALLEN, PLLC

Robert R. Smith, II

Robert R. Smith, II

100 North Tryon Street
Suite 4700
Charlotte, NC 28202
(704) 331-1000
(704) 339-5870 Fax
robsmith@mvalaw.com

Counsel for Nucor Steel-South Carolina

Dated: September 15, 2017

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BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2017-245-E

IN THE MATTER OF:	)	
	)	
Application of Duke Energy Progress, LLC	)	**MOTION FOR ADMISSION**
for Approval of Rider 9, Demand-Side	)	***Pro Hac Vice***
Management and Energy Efficiency	)	
	)	

This is to certify that the foregoing document was served upon the following parties at the addresses set forth by first-class mail or electronic mail on this the 15 day of September, 2017:

Rebecca J. Dulin, Esq.
Duke Energy Progress, LLC
1201 Main Street, Suite 1180
Columbia, SC 29201
Rebecca.Dulin@duke-energy.com

Frank R. Ellerbe, III, Esq.
Sowell Gray Robinson Stepp Laffitte, LLC
Post Office Box 11449
Columbia, SC 29211
fellerbe@sowellgray.com

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Robert R. Smith, II

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RECEIVED
SEP 15 2017
S.C. SUPREME COURT

VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*
IN THE STATE OF SOUTH CAROLINA

IN THE MATTER OF:

Application of Duke Energy Progress, LLC for Approval of Rider 9, Demand-Side Management and Energy Efficiency

Docket No. 2017-245-E

Public Service Commission of South Carolina

Mailing Address:
101 Executive Center Dr.
Suite 100
Columbia, SC 29210

Comes now Michael K. Lavanga, applicant herein, and respectfully represents the following:

1. Applicant resides at [redacted]

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Stone Mattheis Xenopoulos & Brew, PC (formerly Brickfield, Burchette, Ritts & Stone, PC), with offices at 1025 Thomas Jefferson Street, NW, 8th Floor West, Washington, DC 20007; telephone 202-342-0800; cell phone number 202-701-9743; fax number 202-342-0807; email address mkl@smxblaw.com.

3. Applicant has been retained personally or as a member of the above-named law firm by Nucor Steel-South Carolina to provide legal representation in connection with the above case now pending before the above-named regulatory agency of the State of South Carolina.

4. Since August of 2001, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia where applicant regularly practices law. Attached is a certificate of good standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State where applicant regularly practices law.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
Virginia	2000

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

Not applicable.

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

Applicant affirms the above statement to be true and correct.

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

Not applicable.

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

Not applicable.

9. Local counsel of record associated with applicant in this case is Robert R. Smith II, of the Moore & Van Allen, PLLC law firm, which has offices at: 100 North Tryon Street, Suite 4700, Charlotte, Mecklenburg County, NC 28202; telephone 704-331-1100; cell phone number 864-444-4470; fax number 704-331-1159; email address robsmith@mvalaw.com; South Carolina Bar Number 69592.

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

Applicant filed an application to appear in the following proceeding before the South Carolina Public Service Commission:

Name:	Case No. 2017-1-E Annual Review of Base Rates for Fuel Costs of Duke Energy Progress, LLC
Status:	Settlement Approved by Commission
Application:	March 23, 2017 Granted April 5, 2017 by Commission Order
Local Counsel:	Robert R. Smith, II

Name:	Case No. 2016-8-E Duke Energy Progress, LLC's Integrated Resource Plan (IRP)
Status:	On-going
Application:	November 30, 2016 Granted December 15, 2016 by Commission Order
Local Counsel:	Robert R. Smith, II

Name:	Case No. 2016-289-E Application of Duke Energy Progress, LLC for Approval of Rider 8, Demand-Side and Energy Management Efficiency for 2017
Status:	Granted
Application:	September 14, 2016 Granted September 28, 2016 by Commission Order
Local Counsel:	Robert R. Smith, II

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Name:	Case No. 2016-227-E Application of Duke Energy Progress, LLC for Authority to Adjust and Increase Its Electric Rates and Charges
Status:	Settlement Approved by Commission
Application:	July 27, 2016 Granted August 10, 2016 by Commission Order
Local Counsel:	Robert R. Smith, II

Name:	Case No. 2016-1-E Annual Review of Base Rates for Fuel Costs of Duke Energy Progress, LLC
Status:	Settlement Approved by Commission
Application:	March 4, 2016 Granted March 23, 2016 by Commission Order
Local Counsel:	Robert R. Smith, II

Name:	Case No. 2015-8-E Duke Energy Progress, LLC's Integrated Resource Plan (IRP)
Status:	On-going
Application:	November 25, 2015 Granted November 5, 2015 by Commission Order
Local Counsel:	Robert R. Smith, II

Name:	Case No. 2015-323-E Application of Duke Energy Progress, LLC for Approval of Rider DSM/EE-7
Status:	Granted
Application:	Filed October 7, 2015 Granted December 16, 2015 by Commission Order
Local Counsel:	Robert R. Smith, II

Name:	Case No. 2015-163-E Application of Duke Energy Progress, LLC to Establish a New Cost Recovery and Incentive Mechanism for Demand-Side Management and Energy Efficiency Programs
Status:	Granted
Application:	Filed June 26, 2015 Granted July 22, 2015 by Commission Order
Local Counsel:	Robert R. Smith, II

Name:	Case No. 2015-53-E Application of Duke Energy Progress, Incorporated to Establish a Distributed Energy Resource Program
Status:	Settlement Approved by Commission
Application:	Filed March 16, 2015 Granted April 1, 2015 by Commission Order
Local Counsel:	Robert R. Smith, II

Name:	Case No. 2015-1-E Annual Review of Base Rates for Fuel Costs of Duke Energy Progress, LLC
Status:	Settlement Approved by Commission
Application:	Filed January 30, 2015 Granted February 25, 2015 by Commission Order
Local Counsel:	Robert R. Smith, II

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Name:	Case No. 2014-8-E Duke Progress Energy, Inc.'s Integrated Resource Plan (IRP)
Status:	On-going
Application:	Filed November 24, 2014 Granted December 17, 2014 by Commission Order
Local Counsel:	Robert R. Smith, II
Name:	Case No. 2014-246-E Petition of the Office of Regulatory Staff to Establish Generic Proceeding Pursuant to the Distributed Energy Resource Program Act, Act No. 236 of 2014, Ratification No. 241, Senate Bill No. 1189
Status:	Settlement Approved by Commission
Application:	Filed July 22, 2014 Granted July 30, 2014 by Commission Order
Local Counsel:	Robert R. Smith, II
Name:	Case No. 2014-1-E Annual Review of Base Rates for Fuel Costs of Duke Energy Progress, Inc.
Status:	Settlement Approved by Commission
Application:	Filed February 18, 2014 Granted March 12, 2014 by Commission Order
Local Counsel:	Robert R. Smith, II
Name:	Case No. 2013-8-E Duke Energy Progress, Inc.'s Integrated Resource Plan (IRP)
Status:	On-going
Application:	Filed November 27, 2013 Granted December 18, 2013 by Commission Order
Local Counsel:	Robert R. Smith, II
Name:	Case No. 2013-1-E Annual Review of Base Rates for Fuel Costs of Duke Energy Progress, Inc.
Status:	Settlement Approved by Commission
Application:	Filed March 19, 2013 Granted March 27, 2013 by Commission Order
Local Counsel:	Robert R. Smith, II
Name:	Case No. 2012-8-E Progress Energy Carolinas, Inc.'s Integrated Resource Plan (IRP)
Status:	On-going
Application:	Filed December 19, 2012 Granted January 9, 2013 by Commission Order
Local Counsel:	Robert R. Smith, II
Name:	Case No. 2012-1-E Carolina Power & Light Company d/b/a Progress Energy Carolinas, Inc., Annual Review of Base Rates for Fuel Costs
Status:	Settlement Approved by Commission

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Application:	Filed March 21, 2012 Granted April 11, 2012 by Commission Order
Local Counsel:	Robert R. Smith, II
Name:	Case No. 2011-158-E Application Regarding the Acquisition of Progress Energy Incorporated by Duke Energy Corporation and Merger of Progress Energy Carolinas, Incorporated and Duke Energy Corporation, LLC
Status:	On-going
Application:	Filed June 22, 2011 Granted July 13, 2011 by Commission Order
Local Counsel:	Robert R. Smith, II
Name:	Case No. 2011-1-E Carolina Power & Light Company d/b/a Progress Energy Carolinas, Inc., Annual Review of Base Rates for Fuel Costs
Status:	Settlement Approved by Commission
Application:	Filed March 21, 2011 Granted March 30, 2011 by Commission Order
Local Counsel:	Robert R. Smith, II
Name:	Case No. 2010-1-E Carolina Power & Light Company d/b/a Progress Energy Carolinas, Inc., Annual Review of Base Rates for Fuel Costs
Status:	Settlement Approved by Commission
Application:	Filed March 24, 2010 Granted April 14, 2010 by Commission Order
Local Counsel:	Thomas S. Mullikin and Robert R. Smith, II
Name:	Case No. 2008-447-EG Petition of the Office of Regulatory Staff to Establish Docket to Consider Implementing the Requirements of Section 1307 (State Consideration of Smart Grid) and Section 532 (Energy Efficiency Programs) of the Energy Independence and Security Act of 2007
Status:	Stipulation Adopted
Application:	Filed April 30, 2009 Granted May 13, 2009 by Commission Order
Local Counsel:	Thomas S. Mullikin and Robert R. Smith, II
Name:	Case No. 2009-1-E Carolina Power & Light Company d/b/a Progress Energy Carolinas, Inc., Annual Review of Base Rates for Fuel Costs
Status:	Settlement Approved by Commission
Application:	Filed March 12, 2009 Granted March 25, 2008 by Commission Order
Local Counsel:	Thomas S. Mullikin and Robert R. Smith, II
Name:	Case No. 2008-251-E Application of Carolina Power and Light Company d/b/a Progress Energy Carolinas, Incorporated for the Establishment of Procedures for DSM/EE Programs
Status:	Settlement Approved by Commission

Application:	Filed July 22, 2008 Granted August 14, 2008 by Commission Order
Local Counsel:	Thomas S. Mullikin and Robert R. Smith, II
Name:	Case No. 2008-1-E Carolina Power & Light Company d/b/a Progress Energy Carolinas, Inc., Annual Review of Base Rates for Fuel Costs
Status:	Settlement Approved by Commission
Application:	Filed March 26, 2008 Granted April 15, 2008 by Commission Order
Local Counsel:	Thomas S. Mullikin and Robert R. Smith, II
Name:	Case No. 2007-1-E Carolina Power & Light Company d/b/a Progress Energy Carolinas, Inc., Annual Review of Base Rates for Fuel Costs
Status:	Settlement Approved by Commission
Application:	Filed February 8, 2007 Granted March 2, 2007 by Commission Order
Local Counsel:	Thomas S. Mullikin and Robert R. Smith, II

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named regulatory agency for this case only.

DATED this 14 day of September, 2017.

APPLICANT

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VERIFICATION

DISTRICT OF COLUMBIA)

I, Michael K. Lavanga, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the regulatory agency has ruled on the motion for admission *pro hac vice*. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear *pro hac vice* in the action or proceeding. Any updated information shall be provided to both the regulatory agency that granted the motion and to the regulatory agency in which the action or proceeding may then be pending.

APPLICANT/AFFIANT

Subscribed and sworn to before me this 14th day of September, 2017.

Notary Public for the District of Columbia

My Commission Expires: April 14, 2022

PAMELA G. GROSS
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires April 14, 2022

LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 15 day of September, 2017.

LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by a payment of the $250 filing fee payable to the South Carolina Supreme Court on this 15 day of September, 2017.

Robert R. Smith II

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District of Columbia Court of Appeals
Committee on Admissions
430 E Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

MICHAEL K. LAVANGA

was on **AUGUST 6, 2001** *duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.*

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on ***September 14, 2017****.*

JULIO A. CASTILLO
Clerk of the Court

By: Nonette Lane
Deputy Clerk

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