STATE OF SOUTH CAROLINA

(Caption of Case)

Combined Application of SCE & G for a Certificate of Environmental Compatibility & Public Necessity, Convenience for a Base Load Review Order for the Construction of Operation of a Nuclear Facility in Jenkinsville, SC

(Please type or print)

Submitted by: Pamela Green law
Address: 1001 Water Rd.
Columbia, SC 29229

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

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition  ☑ Request for item to be placed on Commission's Agenda expeditiously

☐ Other:

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

RECEIVED
AUG 14 2008
PSC SC
DOCKETING DEPT.
Re: Request to Intervene in All Proceedings on Docket # 2008-196-E,
The Combined Application of South Carolina Electric and Gas Company
for a Certificate of Environmental Compatibility and Public Convenience and
Necessity for a Base Load Review Order for the Construction and Operation of
a Nuclear Facility in Jenkinsville, South Carolina

Dear Mr. Terreni,

As a customer of SCE&G I petition the Public Service Commission to grant my request to be an intervenor for the above established Docket # 2008-196-E in any and all hearings and proceedings before the Public Service Commission. In particular I wish to be admitted or approved as an intervenor as immediately as possible so that I may participate in the upcoming hearing on September 10 about SCE&G’s petition for the PSC to prematurely authorize land clearing far in advance of approval of actual construction. I wish also to participate as an intervenor in the hearing in October concerning SCE&G’s proposed nuclear power facilities.

Please find enclosed three (3) additional letters with separate requests.

I am serving all other parties of record with a copy of this enclosed request, the additional letter, and a copy of the certificate of service.

Sincerely,

Pamela Greenlaw

Cc: Nanette Edwards, Counsel
    Shannon Bowyer Hudson, Counsel
    K. Chad Burgess, Senior Counsel
    Belton T Zeigler, Counsel
    Mitchell Willoughby, Counsel
    Scott Elliott, Counsel
    E.Wade Mullins, III, Counsel
    Damon E. Xenopoulos, Esquire

Leslie Minernd
Mildred McKinley
Joseph Wojcicki
Maxine Warshauer
The Honorable Charles Terreni  
Chief Clerk/Administrator  
South Carolina Public Service Commission  
101 Executive Drive  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Request to Reduce Time for Responses of SCE&G to Interrogatories or Requests for Discovery concerning Docket #2008-196-E, The Combined Application of South Carolina Electric and Gas Company for a Certificate of Environmental Compatibility and Public Convenience and Necessity for a Base Load Review Order for the Construction and Operation of a Nuclear Facility in Jenkinsville, South Carolina

Dear Mr. Terreni,

Because the time for preparation for the hearing on actual site clearing has been very much shortened, I request that, on behalf of myself and other parties of record, that SCE&G be required by the PSC to respond to interrogatories and discovery requests about site clearing in six (6) days from the September 3 deadline rather than the regulatory 20 days. If SCE&G were to take the full twenty days to respond, the site clearing hearing on September 10 will have been concluded before the information is shared.

Sincerely,

Pamela Greenlaw

Cc: Parties of Record
The Honorable Charles Terreni
Chief Clerk/Administration
South Carolina Public Service Commission
101 Executive Drive
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Petition or Request for a Site Visit to All Areas scheduled for Rail Line and Road Installation As Well As All Areas Where the Actual Nuclear Power Plants and All Buildings of the Nuclear Facility Pertaining to Docket # 2008-196-E, The Combined Application of South Carolina Electric and Gas Company for a Certificate of Environmental Compatibility and Public Convenience and Necessity for a Base Load Review Order for the Construction and Operation of a Nuclear Facility in Jenkinsville, South Carolina

Dear Mr. Terreni,

As a customer of SCE&G I petition the Public Service Commission to grant my request to direct SCE&G to provide a site visit for all Intervenors, Protestants, Representatives, and Other Litigant and Parties established for Docket # 2008-196-E.

All the parties involved need an opportunity to understand the exact parameters as well as perimeters in question. Being knowledgeable about the site designation boundaries within which the Utility wishes permission to clear accomplish two things. First, the court time will be reduced, as all the parties will be on the same page as far as the defined geographical area intended by SCE&G's land clearing request is concerned. Second, the exact areas being known by all will ensure accountability on behalf of the Utility when actual clearing occurs.

I am serving all other parties of record with a copy of this enclosed request.

Sincerely,

Pamela Greenlaw