June 26, 2008

Mr. Charles Terreni
Chief Clerk and Administrator
Public Service Commission of South Carolina
Docketing Department
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Docket No. 2008-196-E.

Dear Mr. Terreni:

Southern Alliance for Clean Energy (SACE) is a regional non-profit organization with members in South Carolina and across the Southeast that are concerned about the impacts energy choices have on our health, economy and environment. We object to SCEG’s request to get early approval from the South Carolina Public Service Commission (PSC) to conduct initial clearing, excavation, and construction work for two new reactors at the existing V.C. Summer nuclear plant near Jenkinsville, South Carolina.

According to the notice to comment on these activities, the petition was filed simultaneously with the Company’s Combined Application and the notice states,

"...one of the reasons that SCEG seeks to commence site and construction work is that the Commission’s order in the Combined Application proceeding is due to be issued in February 2009. The Petition reveals that Westinghouse Electric Co., LLC (Westinghouse) and Stone & Webster, Inc. (Stone & Webster) have contracted with SCEG to construct the facilities. Westinghouse and Stone & Webster may not be able to meet their completion deadlines for VCSNS Unit 2 unless site work and initial construction is underway before then."

First, approval to build two more reactors at V.C. Summer has not yet been granted by the PSC so it is premature to move forward with initial activities to expand the existing plant. It is also irresponsible to have ratepayers in South Carolina on the hook for these activities before an official approval process has been conducted. The PSC will issue a decision on SCEG’s Combined Application in February of 2009. That process will allow for public involvement through public hearings, whereas no hearings are being conducted on this matter.

Additionally, it is not the ratepayers fault that the contractors may not be able to meet their completion deadlines for expanding the V.C. Summer plant. In fact, it is highly presumptive of SCEG and the contractors to think that they would get approval from the SC PSC before the Combined Application review process was even completed. Last, it is highly unlikely that the construction of new reactors will stay on schedule. The federal review process with the U.S. Nuclear Regulatory Commission is not even underway.
We respectfully ask the PSC to reject SCE&G's request to begin site and construction work to expand the V.C. Summer nuclear plant. Further, if the PSC does not reject their request then the PSC should at least require public hearings on the issue before making a final decision.

Sincerely,

Sara Barczak, High Risk Energy Director
Southern Alliance for Clean Energy

cc: Office of Regulatory Staff
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