December 14, 2018

The Honorable Jocelyn G. Boyd
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29211

Re: Docket Nos. 2017-207-E; 2017-305-E; 2017-370-E

Dear Ms. Boyd:

The Joint Applicants, South Carolina Electric & Gas Company and Dominion Energy, Inc., object to inclusion of the late-filed Exhibit No. 180 (the “Exhibit”) filed yesterday by counsel for South Carolina Coastal Conservation League (“CCL”) and the Southern Alliance for Clean Energy (“SACE”) in the evidentiary record of these dockets. The record in this proceeding is closed. The Exhibit should not be entered into the record, and it should not be considered by the Commission.

CCL and SACE are mistaken when they suggest that the Exhibit is subject to leave granted during the hearing for them to file a late-filed exhibit concerning model securitization legislation. The late-filed exhibit was received into evidence as Hearing Exhibit 94 before the record in these dockets closed. The Commission did not authorize, nor did CCL and SACE request, authority to make any additional or supplemental filings related to securitization legislation. The evidentiary record as to these matters closed when that Hearing Exhibit 94 was filed.

In the addition, the hearing in this matter concluded over two weeks ago, and the matter has been extensively brief on that record, and is now before the Commission for its decision. There has been no evidentiary support placed in the record for this Exhibit and no opportunity for parties to respond to it either factually or in briefing before the Commission. The filing is therefore untimely, improper and should not be accepted as part of the evidentiary record in these dockets.

Please let us know if we can provide anything further.

Sincerely,

/s/Belton T. Zeigler
Belton T. Zeigler

cc: All parties of record (via email)