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OF COUNSEL:
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February 9, 2017

***VIA, ELECTRONIC FILING***
The Honorable Jocelyn Boyd
Chief Clerk and Administrator
The Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re:
- Docket Number 2017-2-E
- **South Carolina Solar Business Alliance, LLC's Second Requests for Production**

Dear Ms. Boyd:

Enclosed for filing please find Intervenor, South Carolina Solar Business Alliance, LLC's Second Requests for Production, Cover Sheet and Certificate of Service.

All parties of record have been served. Please notify the undersigned if you there is anything else you may need.

Respectfully Submitted,

/S/_____
Timothy F. Rogers

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**BEFORE**

**THE PUBLIC SERVICE COMMISSION**

**OF SOUTH CAROLINA**

**DOCKET NO. 2017-2-E**

| | | |
|---|---|---|
| IN RE: Annual Review of Base Rates for Fuel Costs for South Carolina Electric & Gas Company | ) ) ) ) ) ) | **INTERVENOR, SOUTH CAROLINA SOLAR BUSINESS ALLIANCE, LLC'S SECOND REQUESTS FOR PRODUCTION.** |

**TO: K. CHAD BURGESS, ESQUIRE, ATTORNEY OF RECORD FOR SOUTH CAROLINA ELECTRIC & GAS COMPANY:**

Intervenor, South Carolina Solar Business Alliance, LLC, (hereinafter as, "SCSBA", pursuant to Reg. 103-835, hereby serves, **South Carolina Electric & Gas Company**, (hereinafter as, "SCE&G") with SCSBA's First Requests for Production, to be answered separately within twenty (20) days from the date of service hereof. Please set forth your answers separately, after restating the question.

This Request for Production shall be deemed continuing, and if complete production to any of them is not presently available, and the information becomes available before trial, supplemental production is required at such time as this information becomes available to Plaintiff.

IF YOU CONTEND THAT ANY OF THE REQUESTED MATERIAL NEED NOT BE PRODUCED, IDENTIFY SUCH MATERIAL AND SET FORTH THE BASIS FOR YOUR CONTENTION IN ACCORDANCE WITH RULE 26(b)(5) OF THE SOUTH CAROLINA RULES OF CIVIL PROCEDURE.

## INSTRUCTIONS

**IT IS HEREIN REQUESTED:**

1. That all information shall be provided to the undersigned in the format as requested.

2. That all responses to the below Requests for Production shall be labeled using the same numbers as used herein.

3. That if the requested information is found in other places or in other exhibits, reference not be made to those, but, instead, that the information be reproduced and placed in the responses to these Requests for Production in the appropriate sequence.

4. That any inquiries or communication relating to questions concerning clarifications of the data requested below be directed to the undersigned.

5. That all exhibits be reduced to an 8 1/2" x 11" format.

6. That each Request be reproduced at the beginning of the response thereto.

7. That SCE&G provides the undersigned with responses to these Requests for Production as soon as possible but **not later than twenty (20) days from the date of service hereof.**

8. If the response to any Requests for Production is that the information requested is not currently available, state when the information requested will become available.

9. These Requests for Production shall be deemed continuing so as to require SCE&G to supplement or amend its responses as any additional information becomes available up to and through the date of trial.

10. If a privilege not to answer a Request is claimed, identify each matter as to which the privilege is claimed, the nature of the privilege, and the legal and factual basis for each such claim.

11. If a refusal to respond to a Request is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

12. Answer each Request on the basis of the entire knowledge of SCE&G, including information in the possession of SCE&G or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

13. If any Request cannot be answered in full, respond to the extent possible and specify the reasons for SCE&G's inability to produce.

**14. Please provide a copy of the information responsive to this request in electronic working spreadsheet (Microsoft Excel) format with all data and formulas intact, to the extent feasible.**

## DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. **"You" or "your" shall refer to**, SCE&G.

2. **The conjunctions "and" and "or" shall be interpreted** in each and every instance as meaning "and/or" and shall in neither instance be interpreted disjunctively to exclude any document or information otherwise within the scope of any description or request made herein.

3. **"Document" shall mean** all originals of any nature whatsoever, identical copies and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in your possession, custody or control, or other tangible objects regardless of where located; including, without limiting the generality of foregoing, punch cards, print-out sheets, movie film, slides, photographs, records, work papers, source documents, microfilm, notes, letters, memoranda, ledgers, worksheets, books, magazines, notebooks, diaries, calendars, appointment book registers, charts, cable, papers, agreements, contracts, purchase orders, acknowledgements, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meeting of any kind, correspondence, telegrams, drafts, data processing disks or tapes, or computer-produced interpretations thereof, instructions, announcements, schedules, and price list. Media includes data on computers, laptop computers, netbook computers, cell phones, telephones, PDA's, Blackberry's or Blackberry type devices, smart phones, external hard drives and flash drives or storage devices of any type, of SCE&G and specifically includes the computer and or laptop computers utilized by Representatives of SCE&G. Media means media, as broadly as the term "media" may be defined, that contains electronic data, as to the Interaction between SCSBA and SCE&G.

4. **"Identify" or "identity"** used with reference to an individual means to state his or her full name, present or last known address, present or last known position and business affiliation, and employer, title, and position at the same time in question.

5. **"Identify" or "identity"** used with reference to a writing means to state the date, author, type of document (e.g. letter, memorandum, telegram, chart, note, application, etc.) or other means of identification, and its present location or custodian. If any such document is no longer in your possession or subject to their control, state what disposition was made of the document(s).

6. All references to the singular contained herein shall be deemed to include the appropriate plural number and all references to the plural shall be deemed to include the singular. All references to the masculine gender contained herein shall be deemed to include the appropriate feminine and neuter genders.

## SECOND REQUESTS FOR PRODUCTION

2-1. Produce copies of all work papers and source documents, utilized or relied upon in formulating SCE&G's existing, approved PR-2 Rate.

/S/

Timothy F. Rogers,
Richard L. Whitt,
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Columbia South Carolina, 29201
(803) 256-4000
Counsel for SCSBA.

February 9, 2017
Columbia, South Carolina

**BEFORE**

**THE PUBLIC SERVICE COMMISSION**

**OF SOUTH CAROLINA**

**DOCKET NO. 2017-2-E**

| | | |
|---|---|---|
| IN RE: Annual Review of Base Rates for Fuel Costs for South Carolina Electric & Gas Company | ) ) ) ) ) ) | **CERTIFICATE OF SERVICE** |

I, Carrie A. Schurg, an employee of Austin & Rogers, P.A., certify that I have served copies of Intervenor, South Carolina Solar Business Alliance, LLC's Second Requests for Production, Cover Sheet and this Certificate of Service, via electronic mail on February 9, 2017.

**Andrew M. Bateman**
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/S/_____
Carrie A. Schurg

February 9, 2017
Columbia, South Carolina