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BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E

IN RE:

Friends of the Earth and Sierra Club,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

IN RE:

Request of the Office of Regulatory Staff for Rate Relief to South Carolina Electric & Gas Company's Rates Pursuant to S.C. Code Ann. § 58-27-920.

IN RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., as may be required, and for a prudency determination regarding the abandonment of the V.C. Summer Units 2 & 3 Project and associated customer benefits and cost recovery plan.

SOUTH CAROLINA ELECTRIC AND GAS COMPANY'S FIRST SET OF REQUESTS FOR ADMISSION, SECOND SET OF INTERROGATORIES, AND SECOND SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS (AMENDED)

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TO: COUNSEL FOR THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF

South Carolina Electric & Gas Company ("SCE&G") by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, 34, and 36, hereby requests that the South Carolina Office of Regulatory Staff ("ORS") answer fully and separately, in writing and under oath, the following requests for admissions, interrogatories, and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before August 21, 2018.

INSTRUCTIONS

ORS's responses to SCE&G's First Set of Requests for Admission, Second Set of Interrogatories, and Second Set of Requests for Production of Documents (amended) (collectively, the "Requests") should include not only all information and documents available to ORS, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery**. If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit Joint Applicants to assess the basis of any such claim.

2. **Continuing Nature**. These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter

until the conclusion of this matter. If you should subsequently acquire any further responsive information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections**. If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language**. The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word "all" means any and all. The word "including" means "including without limitation."

5. **Time Period**. Unless otherwise indicated, these Requests cover the time period from January 1, 2015, until the present.

DEFINITIONS

1. "**2015 Bechtel Report**." The term "2015 Bechtel Report" is used herein to refer to the draft "Project Assessment Report" regarding the V.C. Summer Nuclear Generating Station Units 2 & 3, which was written by Bechtel and dated November 9, 2015.

2. "**2016 Bechtel Report**." The term "2016 Bechtel Report" is used herein to refer to the "Project Assessment Report" regarding the V.C. Summer Nuclear Generating Station Units 2 & 3, which was written by Bechtel and dated February 5, 2016.

3. "**2016 NND Update Docket**." The term "2016 NND Update Docket" is used herein to refer to the proceeding before the Public Service Commission of South Carolina ("Commission") pursuant to Docket No. 2016-223-E, which was initiated on May 26, 2016, by SCE&G's filing of its "Petition of South Carolina Electric & Gas Company for Updates and

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Revisions to Schedules Related to the Construction of a Nuclear Base Load Generation Facility at Jenkinsville, South Carolina."

4. **"Act 258"** The term "Act 258" is used to refer to Act 258 of 2018 and Act 285 of the General Assembly of the State of South Carolina as well as the predecessor bills considered in arriving those acts, including without limitation. H. 4375 and S. 954.

5. "**Bechtel**." The term "Bechtel" is used herein to refer to the Bechtel Power Corporation, as well as all of its predecessors, subsidiaries, related entities, agents, directors, employees, officers, and representatives.

6. "**BLRA**." The term "BLRA" is used herein to refer to the Base Load Review Act

7. "**CB&I**." The term "CB&I" is used herein to refer to Chicago Bridge & Iron Company, as well as all of its predecessors, subsidiaries, related entities, agents, directors, employees, officers, and representatives.

8. "**Central Electric**." The term "Central Electric" is used herein to refer to Central Electric Cooperative, Inc. as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

9. "**Clean Power Plan**." The term "Clean Power Plan is used herein to refer to the EPA's Clean Power Plan rule, 80 Fed. Reg. 64,662, and the plan developed by DHEC for South Carolina pursuant to that rule.

10. "**Communication**." The word "communication" is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including, without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

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11. "**Consortium**." The term "Consortium" is used herein to refer to the association of companies, led by partners Westinghouse and CB&I, that undertook construction responsibilities with respect to the NND Project.

12. "**Describe**," "**Description**," "**Summarize**," or "**Summary**." The words "describe," "description," "summarize," and "summary," when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

13. "**DHEC**." The term "DHEC" is used herein to refer to the South Carolina Department of Health and Environmental Control, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

14. "**Document**" or "**Documents**." The words "document" and "documents" are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored in formation and data compilations. The terms "document" and "documents" also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of example and not limitation, the terms "document" and "documents" include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail

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recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

15. "**ECSC**" and "**Electric Cooperatives**." The terms "ECSC" and "Electric Cooperatives" are used herein to refer to the Electric Cooperatives of South Carolina, Inc. as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

16. "**Energy Advisory Council**." The term "Energy Advisory Council" is used herein to refer to the Energy Advisory Council in the South Carolina General Assembly, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

17. "**EPC Contract**." The term "EPC Contract" is used herein to refer to that Engineering, Procurement, and Construction Agreement entered into by and between SCE&G, Santee Cooper, and the Consortium on or about May 23, 2008 in connection with the NND Project, as well as all subsequent amendments and alterations made thereto.

18. "**EPA**." The term "EPA" is used herein to refer to the United States Environmental Protection Agency, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

19. "**Friends of the Earth**." The term "Friends of the Earth" is used herein to refer to that organization commonly referred to as Friends of the Earth, which filed a complaint with the Commission against SCE&G on June 22, 2017, thereby initiating Docket No. 2017-207-E, as

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well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

20. "**Identify**." The word "identify," when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word "identify" shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word "identify" shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

21. "**LCI Committee**." The term "LCI Committee" is used herein to refer to the Labor, Commerce & Industry Committee in the South Carolina General Assembly, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

22. "**Merger Approval Case**." The term "Merger Approval Case" is used herein to refer to the proceedings before the Commission in Docket No. 2017-370-E, which were initiated on January 12, 2018, by SCE&G's and Dominion Energy's filing of their "Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc."

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23. "**NND Project**" and "**Project**." The terms "NND Project" and "Project" are used herein to refer to the new nuclear development project, jointly undertaken by SCE&G and Santee Cooper to construct two new nuclear power generation units (the "Units") at the V.C. Summer Nuclear Plant, near Jenkinsville, South Carolina.

24. "**ORS**." The term "ORS" is used herein to refer to the South Carolina Office of Regulatory Staff, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, and representatives.

25. "**People**" and "**Person**." The words "people" and "person" shall include natural persons, proprietorships, corporations, public corporations, municipal corporations, state governments, local governments, governmental agencies, political subdivisions, partnerships, groups, associations, and other businesses and public organizations.

26. "**Prudency Determination Case**." The term "Prudency Determination Case" is used herein to refer to the proceedings before the Commission in Docket No. 2017-205-E, which were initiated on or about June 22, 2017, by Friends of the Earth's and Sierra Club's filing of their "Complaint of Friends of the Earth and Sierra Club."

27. "**Prudency of Abandonment Case**." The term "Prudency of Abandonment Case" is used herein to refer to the proceedings before the Commission in Docket No. 2017-244-E, which were initiated on or about August 1, 2017, by SCE&G's petition for a prudency determination regarding abandonment, amendments to the construction schedule, capital cost schedule, and other terms of the BLRA orders for V.C. Summer Units 2 & 3 and related matters.

28. "**PURC**." The term "PURC" is used herein to refer to the State Regulation of Public Utilities Review Committee in the South Carolina General Assembly, as well as all of its

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predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

29. "**Rate Relief Case**." The term "Rate Relief Case" is used herein to refer to the proceedings before the Commission in Docket No. 2017-305-E, which were initiated on September 26, 2017, by ORS's filing of its "Request for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. §58-27-920."

30. "**Relate**," "**Relating**," "**Relating to**," and "**Related to**." The terms "relate," "relating," "relating to," and "related to" mean recording, summarizing, embodying, constituting, reflecting, digesting, referring to, commenting upon, describing, reporting, listing, analyzing, studying, or otherwise discussing in any way a subject matter identified in the Request, and is defined so as to reach all matters within the scope of discovery pursuant to the Commission's Regulations and the South Carolina Rules of Civil Procedure, including all information which, though inadmissible at trial, is reasonably calculated to lead to the discovery of admissible evidence.

31. "**Santee Cooper**" and "**SCPSA**." The terms "Santee Cooper" and "SCPSA" are used herein to refer to Santee Cooper, which is also known as the South Carolina Public Service Authority, as well as all of its predecessors, subsidiaries, related entities, agents, directors, employees, officers, and representatives.

32. "**SCEUC**." The term "SCEUC" is used herein to refer to The South Carolina Energy Users Committee, as well as all of its predecessors, subsidiaries, related entities, agents, members, directors, employees, officers, and representatives.

33. "**Sierra Club**." The term "Sierra Club" is used herein to refer to that organization commonly referred to as the Sierra Club, which filed a complaint with the Commission against

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SCE&G on June 22, 2017, thereby initiating Docket No. 2017-207-E, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

34. "**Westinghouse**." The term "Westinghouse is used herein to refer to Westinghouse Electric Company, LLC, as well as all of its predecessors, subsidiaries, related entities, agents, directors, employees, officers, and representatives.

35. "**You**" and "**Your**." The words "you" and "your" refer to ORS, the party to which these Requests are directed, as well as its executive director (past and present), agents, employees (past and present), representatives, successors, or any other person or persons acting for or purportedly acting on ORS's behalf, including but not limited to Gary Jones.

REQUESTS FOR ADMISSION

Request for Admission 1-1:

Admit that during August 2015, you were aware that Bechtel was conducting an assessment of the NND Project.

Response to Request for Admission 1-1:

Responsible Person:

Request for Admission 1-2:

Admit that during September 2015, you were aware that Bechtel was conducting an assessment of the NND Project.

Response to Request for Admission 1-2:

Responsible Person:

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Request for Admission 1-3:

Admit that you knew about the existence of the 2015 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-3:

Responsible Person:

Request for Admission 1-4:

Admit that you had been informed of some or all of the findings set forth in the 2015 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-4:

Responsible Person:

Request for Admission 1-5:

Admit that you knew about the existence of the 2016 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-5:

Responsible Person:

Request for Admission 1-6:

Admit that you knew about some or all of the findings set forth in 2016 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-6:

Responsible Person:

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Request for Admission 1-7:

Admit that you were aware of each of the challenges to the NND Project that are set forth in the 2016 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-7:

Responsible Person:

Request for Admission 1-8:

Admit that Santee Cooper informed you about the existence of the 2015 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-8:

Responsible Person:

Request for Admission 1-9:

Admit that Santee Cooper informed you of the findings set forth in the 2015 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-9:

Responsible Person:

Request for Admission 1-10:

Admit that Santee Cooper informed you about the existence of the 2016 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-10:

Responsible Person:

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Request for Admission 1-11:

Admit that Santee Cooper informed you of the findings set forth in the 2016 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-11:

Responsible Person:

Request for Admission 1-12:

Admit that ECSC informed you about the existence of the 2015 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-12:

Responsible Person:

Request for Admission 1-13:

Admit that ECSC informed you of the findings set forth in the 2015 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-13:

Responsible Person:

Request for Admission 1-14:

Admit that ECSC informed you about the existence of the 2016 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-14:

Responsible Person:

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Request for Admission 1-15:

Admit that ECSC informed you of the findings set forth in the 2016 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-15:

Responsible Person:

Request for Admission 1-16:

Admit that Central Electric informed you about the existence of the 2015 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-16:

Responsible Person:

Request for Admission 1-17:

Admit that Central Electric informed you of the findings set forth in the 2015 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-17:

Responsible Person:

Request for Admission 1-18:

Admit that Central Electric informed you about the existence of the 2016 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-18:

Responsible Person:

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Request for Admission 1-19:

Admit that Central Electric informed you of the findings set forth in the 2016 Bechtel Report prior to the hearing held in the 2016 NND Update Docket.

Response to Request for Admission 1-19:

Responsible Person:

Request for Admission 1-20:

Admit that that at SCE&G's request, you were reviewed and proposed changes to a draft of the BLRA before it was introduced before the General Assembly of the State of South Carolina.

Response to Request for Admission 1-20:

Responsible Person:

Request for Admission 1-21:

Admit that that you were actively involved in the drafting and review of the BLRA while it was being proposed and considered by the General Assembly of the State of South Carolina.

Response to Request for Admission 1-21:

Responsible Person:

Request for Admission 1-22:

Admit that that you proposed a number of provision and amendments to the draft of the BLRA which were incorporated into the final draft of the BLRA.

Response to Request for Admission 1-22:

Responsible Person:

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Request for Admission 1-23:

Admit that that key leaders of the General Assembly indicated that the BLRA would not advance through committee and subcommittee without your approval as to its terms.

Response to Request for Admission 1-23:

Responsible Person:

Request for Admission 1-24:

Admit that that the changes you proposed to the draft of the BLRA which were incorporated into the final draft of the BLRA included additional protections for customers, additional resources for your oversight of projects, and provisions imposing clear burdens of proof on the utility.

Response to Request for Admission 1-24:

Responsible Person:

Request for Admission 1-25:

Admit that that you publically spoke in favor of the adoption of the BLRA before committees and subcommittees of the General Assembly of the State of South Carolina.

Response to Request for Admission 1-25:

Responsible Person:

Request for Admission 1-26:

Admit that that you never raised any concerns about the constitutionality of the BLRA while it was being considered by the General Assembly of the State of South Carolina.

Response to Request for Admission 1-26:

Responsible Person:

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Request for Admission 1-27:

Admit that that you never raised any concerns about the constitutionality of the BLRA prior to March 28, 2017.

Response to Request for Admission 1-27:

Responsible Person:

INTERROGATORIES

Interrogatory 1-1

State with specificity the date on which you first learned that Bechtel was conducting a review of the NND Project.

Response to Interrogatory 1-1:

Responsible Person:

Interrogatory 1-2

Identify the person(s) from whom you first learned about the existence of Bechtel's review of the NND Project.

Response to Interrogatory 1-2:

Responsible Person:

Interrogatory 1-3

State with specificity the date on which you first learned about the existence of the 2015 Bechtel Report. For purposes of this Interrogatory and the interrogatories that follow it, the 2015 Bechtel Report refers specifically to "Project Assessment Report" written by Bechtel and dated November 9, 2015, not the fact that Bechtel was conducting a review of the NND Project.

Response to Interrogatory 1-3:

Responsible Person:

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Interrogatory 1-4

Identify the person(s) from whom you first learned about the existence of the 2015 Bechtel Report.

Response to Interrogatory 1-4:

Responsible Person:

Interrogatory 1-5

Identify the manner in which you learned about the existence of the 2015 Bechtel Report (*e.g.*, phone call, e-mail, in-person meeting).

Response to Interrogatory 1-5:

Responsible Person:

Interrogatory 1-6

State with specificity the date on which you first learned about the existence of the 2016 Bechtel Report. For purposes of this Interrogatory and the interrogatories that follow it, the 2016 Bechtel Report refers specifically to "Project Assessment Report" written by Bechtel and dated February 5, 2016, not the fact that Bechtel was conducting a review of the NND Project.

Response to Interrogatory 1-6:

Responsible Person:

Interrogatory 1-7

Identify the person(s) from whom you first learned about the existence of the 2016 Bechtel Report.

Response to Interrogatory 1-7:

Responsible Person:

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Interrogatory 1-8

Identify the manner in which you learned about the existence of the 2016 Bechtel Report (*e.g.*, phone call, e-mail, in-person meeting).

Response to Interrogatory 1-8:

Responsible Person:

Interrogatory 1-9

State with specificity the date on which you were first informed of any of the findings set forth in 2015 Bechtel Report.

Response to Interrogatory 1-9:

Responsible Person:

Interrogatory 1-10

Identify the person(s) from whom you first learned about any of the findings set forth in the 2015 Bechtel Report.

Response to Interrogatory 1-10:

Responsible Person:

Interrogatory 1-11

Identify the manner in which you learned about any of the findings set forth in the 2015 Bechtel Report (*e.g.*, phone call, e-mail, in-person meeting).

Response to Interrogatory 1-11:

Responsible Person:

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Interrogatory 1-12

State with specificity the date on which you were first informed of any of the findings set forth in 2016 Bechtel Report.

Response to Interrogatory 1-12:

Responsible Person:

Interrogatory 1-13

Identify the person(s) from whom you first learned about any of the findings set forth in the 2016 Bechtel Report.

Response to Interrogatory 1-13:

Responsible Person:

Interrogatory 1-14

Identify the manner in which you learned about any of the findings set forth in the 2016 Bechtel Report (*e.g.*, phone call, e-mail, in-person meeting).

Response to Interrogatory 1-14:

Responsible Person:

Interrogatory 1-15

State with specificity the date on which you first reviewed any portion of the 2015 Bechtel Report.

Response to Interrogatory 1-15:

Responsible Person:

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Interrogatory 1-16

State with specificity the date on which you first reviewed any portion of the 2016 Bechtel Report.

Response to Interrogatory 1-16:

Responsible Person:

Interrogatory 1-17

Describe with particularity the source of information and the manner in which you obtained the information which lead you to include as part of your "SCE&G VC Summer Units 2 & 3 October 27 & 28, 2015 Site Visit" the following: "Discuss the Status of the Bechtel Assessment and the top ten issues noted thus far."

Response to Interrogatory 1-17:

Responsible Person:

Interrogatory 1-18

Describe with particularity why the following entry, "Discuss the Status of the Bechtel Assessment and the top ten issues noted thus far" was removed from the ORS/SCE&G monthly agenda for the monthly oversight meeting between SCE&G and ORS that followed the October 27 & 28, 2015 Site Visit monthly meeting.

Response to Interrogatory 1-18:

Responsible Person:

Interrogatory 1-19

Describe with particularity why you did not pursue the further inquiry concerning "the Status of the Bechtel Assessment" after it was removed from the ORS/SCE&G monthly agenda.

Response to Interrogatory 1-19:

Responsible Person:

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Interrogatory 1-20

Did anyone who was present in the October 27 & 28, 2015 Site Visit monthly oversight meeting between ORS and SCE&G ever raise the issue of the Bechtel Assessment with C. Dukes Scott? If so, when? Describe with particularity his response.

Response to Interrogatory 1-20:

Responsible Person:

Interrogatory 1-21

Did anyone who was present in the October 27 & 28, 2015 Site Visit monthly oversight meeting between ORS and SCE&G ever raise the issue of the Bechtel Assessment with Nanette S. Edwards? If so, when? Describe with particularity his response.

Response to Interrogatory 1-21:

Responsible Person:

Interrogatory 1-22

To the extent that you deny Request for Admission 1-5, please set forth with particularity each and every challenge faced by the NND Project, as set forth in the 2016 Bechtel Report, that was not known to you prior to the hearing held in the 2016 NND Update Docket.

Response to Interrogatory 1-22:

Responsible Person:

Interrogatory 1-23

State with specificity the dates on which you met with Santee Cooper between January 1, 2015, and December 31, 2016.

Response to Interrogatory 1-23:

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Responsible Person:

Interrogatory 1-24

Please identify the persons who attended each of your meetings with Santee Cooper between January 1, 2015, and December 31, 2016.

Response to Interrogatory 1-24:

Responsible Person:

Interrogatory 1-25

State with specificity the dates on which you met with ECSC between January 1, 2015, and December 31, 2016.

Response to Interrogatory 1-25:

Responsible Person:

Interrogatory 1-26

Please identify the persons who attended each of your meetings with ECSC in 2015 between January 1, 2015, and December 31, 2016.

Response to Interrogatory 1-26:

Responsible Person:

Interrogatory 1-27

State with specificity the date on which you met with Central Electric between January 1, 2015, and December 31, 2016.

Response to Interrogatory 1-27:

Responsible Person:

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Interrogatory 1-28

Please identify the persons who attended each of your meetings with Central Electric between January 1, 2015, and December 31, 2016.

Response to Interrogatory 1-28:

Responsible Person:

Interrogatory 1-29

State with specificity the date on which Santee Cooper first informed you of the findings set forth in the 2015 Bechtel Report.

Response to Interrogatory 1-29:

Responsible Person:

Interrogatory 1-30

State with specificity the date on which Santee Cooper first informed you of the findings set forth in the 2016 Bechtel Report.

Response to Interrogatory 1-30:

Responsible Person:

Interrogatory 1-31

State with specificity the date on which ECSC first informed you of the findings set forth in the 2015 Bechtel Report.

Response to Interrogatory 1-31:

Responsible Person:

Interrogatory 1-32

State with specificity the date on which ECSC first informed you of the findings set forth in the 2016 Bechtel Report.

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Response to Interrogatory 1-32:

Responsible Person:

Interrogatory 1-33

State with specificity the date on which Central Electric first informed you of the findings set forth in the 2015 Bechtel Report.

Response to Interrogatory 1-33:

Responsible Person:

Interrogatory 1-34

State with specificity the date on which Central Electric first informed you of the findings set forth in the 2016 Bechtel Report.

Response to Interrogatory 1-34:

Responsible Person:

Interrogatory 1-35

Identify every party with whom you contend you have, or have had, a joint defense agreement or a common interest agreement with respect to any of the following actions:

1. The Prudency of Abandonment Case
2. The Prudency Determination Case
3. The Rate Relief Case
4. The Merger Approval Case

Response to Interrogatory 1-35:

Responsible Person:

Interrogatory 1-36

State with specificity the date on which you contend each joint defense agreement or common interest agreement identified in response to Interrogatory 1-29 was entered into.

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Response to Interrogatory 1-36:

Responsible Person:

Interrogatory 1-37

Identify and describe every presentation that you made to the SCEUC at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Interrogatory 1-37:

Responsible Person:

Interrogatory 1-38

Identify and describe every presentation that you made to the PURC at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Interrogatory 1-38:

Responsible Person:

Interrogatory 1-39

Identify and describe every presentation that you made to the Energy Advisory Council at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Interrogatory 1-39:

Responsible Person:

Interrogatory 1-40

Identify and describe every presentation that you made to the LCI Committee or any of its subcommittees at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

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Response to Interrogatory 1-40:

Responsible Person

Interrogatory 1-41

Identify and describe every report, letter, briefing paper, or other communication that you made or sent to the PURC at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Interrogatory 1-41:

Responsible Person:

Interrogatory 1-42

Identify and describe every report, letter, briefing paper, or other communication that you made or sent to the Energy Advisory Council at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Interrogatory 1-42:

Responsible Person:

Interrogatory 1-43

Identify and describe every report, letter, briefing paper, or other communication that you made or sent to the LCI Committee or any of its subcommittees at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Interrogatory 1-43:

Responsible Person

Interrogatory 1-44

Identify and describe every report, letter, briefing paper, or other communication that you made or sent to the Governor's Office or the Governor of the State of South Carolina at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

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Response to Interrogatory 1-44:

Responsible Person

Interrogatory 1-45

Identify and describe every communication that you have had with any of the following regarding the Prudency of Abandonment Case:

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly
4. The SCEUC
5. DHEC
6. EPA
7. PURC
8. The Energy Advisory Council
9. The LCI Committee

Response to Interrogatory 1-45:

Responsible Person:

Interrogatory 1-46

Identify and describe every communication that you have had with any of the following regarding the Prudency Determination Case:

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly
4. The SCEUC
5. DHEC
6. EPA
7. PURC
8. The Energy Advisory Council
9. The LCI Committee

Response to Interrogatory 1-46:

Responsible Person:

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Interrogatory 1-47

Identify and describe every communication that you have had with any of the following regarding the Rate Relief Case:

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly
4. The SCEUC
5. DHEC
6. EPA
7. PURC
8. The Energy Advisory Council
9. The LCI Committee

Response to Interrogatory 1-47:

Responsible Person:

Interrogatory 1-48

Identify and describe every communication that you have had with any of the following regarding the Merger Approval Case:

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly
4. The SCEUC
5. DHEC
6. EPA
7. PURC
8. The Energy Advisory Council
9. The LCI Committee

Response to Interrogatory 1-48:

Responsible Person:

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Interrogatory 1-49

Identify and describe every communication that you have had with any of the following regarding the NND Project:

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly
4. The SCEUC
5. DHEC
6. EPA
7. PURC
8. The Energy Advisory Council
9. The LCI Committee

Response to Interrogatory 1-49:

Responsible Person:

Interrogatory 1-50

Identify and describe every communication that you have had with any of the following regarding the Act No. 285 and the bills:

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly
4. The SCEUC
5. DHEC
6. EPA
7. PURC
8. The Energy Advisory Council
9. The LCI Committee

Response to Interrogatory 1-50:

Responsible Person:

Interrogatory 1-51

Identify and describe each and every presentation that you made to each of the following between March 30, 2009, and the present, in which the NND Project was discussed.

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly

Response to Interrogatory 1-51:

Responsible Person:

Interrogatory 1-52

Identify and describe each and every presentation that you made to each of the following between January 1, 2008, and the present, in which the BLRA was discussed.

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly

Response to Interrogatory 1-52:

Responsible Person:

Interrogatory 1-53

Identify and describe each and every presentation that you made to each of the following between January 1, 2015, and the present, in which the Clean Power Plan was discussed.

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly
4. The SCEUC
5. DHEC
6. EPA
7. PURC
8. The Energy Advisory Council
9. The LCI Committee

Response to Interrogatory 1-53:

Responsible Person:

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Interrogatory 1-54

Identify and describe every communication in which you raised any concerns about the constitutionality of the BLRA prior to March 28, 2017.

Response to Interrogatory 1-54:

Responsible Person:

Interrogatory 1-55

Identify and describe every communication in which you stated that completion of the Project would not be in customers' best interest prior to March 28, 2017.

Response to Interrogatory 1-55:

Responsible Person:

Interrogatory 1-56

Identify and describe every communication in which you stated that completion of the Project would be in customers' best interest before or after March 28, 2017.

Response to Interrogatory 1-56:

Responsible Person:

Interrogatory 1-57

Identify and describe every communication in which you identify or describe the benefits of the Project for SCE&G's customers or the State of South Carolina.

Response to Interrogatory 1-57:

Responsible Person:

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Interrogatory 1-58

Identify and describe every communication in which you identify or describe the benefits of the BLRA for electric customers or the State of South Carolina.

Response to Interrogatory 1-58:

Responsible Person:

REQUESTS FOR PRODUCTION

Request for Production 1-1

Produce copies of every joint defense agreement or common interest agreement that you entered into with at least one of the following:

1. Friends of the Earth
2. Sierra Club
3. Central Electric
4. ECSC

for the period between January 1, 2015, and the present, related to the Prudency of Abandonment Case, the Prudency Determination Case, the Rate Relief Case, or the Merger Approval Case.

Response to Request for Production 1-1:

Responsible Person:

Request for Production 1-2

Produce all documents and communications, including e-mails, that you contend evidence the existence of a joint defense agreement or a common interest agreement between you and at least one of the following:

1. Friends of the Earth
2. Sierra Club
3. Central Electric
4. ECSC

for the period between January 1, 2015, and the present, related to the Prudency of Abandonment Case, the Prudency Determination Case, the Rate Relief Case, or the Merger Approval Case.

Response to Request for Production 1-2:

Responsible Person:

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Request for Production 1-3

Produce copies of every joint defense agreement or common interest agreement that you entered into with any party related to at least one of the following:

1. The Prudency of Abandonment Case
2. The Prudency Determination Case
3. The Rate Relief Case
4. The Merger Approval Case

for the period between January 1, 2015, and the present.

Response to Request for Production 1-3:

Responsible Person:

Request for Production 1-4

Produce all documents and communications, including e-mails, that you contend evidence the existence of a joint defense agreement or a common interest agreement between you and any other party related to at least one of the following:

1. The Prudency of Abandonment Case
2. The Prudency Determination Case
3. The Rate Relief Case
4. The Merger Approval Case

for the period between January 1, 2015, and the present.

Response to Request for Production 1-4:

Responsible Person:

Request for Production 1-5

Produce copies of all documents related to any communications between you and Friends of the Earth that relate to any of the following issues:

1. SCE&G
2. The NND Project
3. The BLRA
4. The Abandonment Decision
5. The 2015 Bechtel Report
6. The 2016 Bechtel Report

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7. The Prudency of Abandonment Case
8. The Prudency Determination Case
9. The Rate Relief Case
10. The Merger Approval Case
11. Act No. 285

for the period between January 1, 2015, and the present.

Response to Request for Production 1-5:

Responsible Person:

Request for Production 1-6

Produce copies of all documents related to any communications between you and Sierra Club that relate to any of the following issues:

1. SCE&G
2. The NND Project
3. The BLRA
4. The Abandonment Decision
5. The 2015 Bechtel Report
6. The 2016 Bechtel Report
7. The Prudency of Abandonment Case
8. The Prudency Determination Case
9. The Rate Relief Case
10. The Merger Approval Case
11. Act No. 285

for the period between January 1, 2015, and the present.

Response to Request for Production 1-6:

Responsible Person:

Request for Production 1-7

Produce copies of all documents related to any communications between you and ECSC that relate to any of the following issues:

1. SCE&G
2. The NND Project
3. The BLRA
4. The Abandonment Decision

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5. The 2015 Bechtel Report
6. The 2016 Bechtel Report
7. The Prudency of Abandonment Case
8. The Prudency Determination Case
9. The Rate Relief Case
10. The Merger Approval Case
11. Act No. 285

for the period between January 1, 2015, and the present.

Response to Request for Production 1-7:

Responsible Person:

Request for Production 1-8

Produce copies of all documents related to any communications between you and Central Electric that relate to any of the following issues:

1. SCE&G
2. The NND Project
3. The BLRA
4. The Abandonment Decision
5. The 2015 Bechtel Report
6. The 2016 Bechtel Report
7. The Prudency of Abandonment Case
8. The Prudency Determination Case
9. The Rate Relief Case
10. The Merger Approval Case
11. Act No. 285

for the period between January 1, 2015, and the present.

Response to Request for Production 1-8:

Responsible Person:

Request for Production 1-9

Produce copies of all documents related to any communications between you and PURC or any of its members that relate to any of the following issues:

1. SCE&G
2. The NND Project

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3. The BLRA
4. The Abandonment Decision
5. The 2015 Bechtel Report
6. The 2016 Bechtel Report
7. The Prudency of Abandonment Case
8. The Prudency Determination Case
9. The Rate Relief Case
10. The Merger Approval Case
11. Act No. 285

for the period between January 1, 2015, and the present.

Response to Request for Production 1-9:

Responsible Person:

Request for Production 1-10

Produce copies of all documents related to any communications between you and Santee Cooper that relate to any of the following issues:

1. SCE&G
2. The NND Project
3. The BLRA
4. The Abandonment Decision
5. The 2015 Bechtel Report
6. The 2016 Bechtel Report
7. The Prudency of Abandonment Case
8. The Prudency Determination Case
9. The Rate Relief Case
10. The Merger Approval Case
11. Act No. 285

for the period between January 1, 2015, and the present.

Response to Request for Production 1-10:

Responsible Person:

Request for Production 1-11

Produce copies of all documents related to any communications between you and any member of the South Carolina General Assembly that relate to any of the following issues:

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1. SCE&G
2. The NND Project
3. The BLRA
4. The Abandonment Decision
5. The 2015 Bechtel Report
6. The 2016 Bechtel Report
7. The Prudency of Abandonment Case
8. The Prudency Determination Case
9. The Rate Relief Case
10. The Merger Approval Case
11. Act No. 285

for the period between August 1, 2017, and the present.

Response to Request for Production 1-11:

Responsible Person:

Request for Production 1-12

Produce copies of all documents related to any communications between you and anyone employed by the South Carolina General Assembly that relate to any of the following issues:

1. SCE&G
2. The NND Project
3. The BLRA
4. The Abandonment Decision
5. The 2015 Bechtel Report
6. The 2016 Bechtel Report
7. The Prudency of Abandonment Case
8. The Prudency Determination Case
9. The Rate Relief Case
10. The Merger Approval Case
11. Act No. 285

for the period between August 1, 2017, and the present.

Response to Request for Production 1-12:

Responsible Person:

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Request for Production 1-13

Produce copies of all documents related to any communications between you and the South Carolina Governor that relate to any of the following issues:

1. SCE&G
2. The NND Project
3. The BLRA
4. The Abandonment Decision
5. The 2015 Bechtel Report
6. The 2016 Bechtel Report
7. The Prudency of Abandonment Case
8. The Prudency Determination Case
9. The Rate Relief Case
10. The Merger Approval Case
11. Act No. 285

for the period between August 1, 2017, and the present.

Response to Request for Production 1-13:

Responsible Person:

Request for Production 1-14

Produce copies of all documents related to any communications between you and Scott Elliott that relate to any of the following issues:

1. SCE&G
2. The NND Project
3. The BLRA
4. The Abandonment Decision
5. The 2015 Bechtel Report
6. The 2016 Bechtel Report
7. The Prudency of Abandonment Case
8. The Prudency Determination Case
9. The Rate Relief Case
10. The Merger Approval Case
11. Act No. 285

for the period between January 1, 2015, and the present.

Response to Request for Production 1-14:

Responsible Person:

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Request for Production 1-15

Produce copies of all documents related to any communications between you and Gary Jones that relate to any of the following issues:

1. SCE&G
2. The NND Project
3. The BLRA
4. The Abandonment Decision
5. The 2015 Bechtel Report
6. The 2016 Bechtel Report
7. The Prudency of Abandonment Case
8. The Prudency Determination Case
9. The Rate Relief Case
10. The Merger Approval Case
11. Act No. 285

for the period between January 1, 2015, and the present.

Response to Request for Production 1-15:

Responsible Person:

Request for Production 1-16

Produce copies of all documents related to any communications between you and Bechtel that relate to any of the following issues:

1. SCE&G
2. The NND Project
3. The BLRA
4. The Abandonment Decision
5. The 2015 Bechtel Report
6. The 2016 Bechtel Report
7. The Prudency of Abandonment Case
8. The Prudency Determination Case
9. The Rate Relief Case
10. The Merger Approval Case
11. Act No. 285

for the period between January 1, 2015, and the present.

Response to Request for Production 1-16:

Responsible Person:

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Request for Production 1-17

Produce copies of all documents and communications related to Bechtel's involvement with, and analysis of, issues regarding the NND Project.

Response to Request for Production 1-17:

Responsible Person:

Request for Production 1-18

Produce all documents and communications related to any draft versions of the 2015 Bechtel Report that were created before November 9, 2015.

Response to Request for Production 1-18:

Responsible Person:

Request for Production 1-19

Produce all documents and communications related to any draft versions of the 2016 Bechtel Report that were created before February 5, 2016.

Response to Request for Production 1-19:

Responsible Person:

Request for Production 1-20

Produce all documents and communications concerning the Consortium's management, or purported mismanagement, of the NND Project.

Response to Request for Production 1-20:

Responsible Person:

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Request for Production 1-21

Produce all documents and communications concerning disputes in and among the members of the Consortium regarding issues related to the NND Project.

Response to Request for Production 1-21:

Responsible Person:

Request for Production 1-22

Produce all documents and communications concerning disputes about the NND Project by and between any of the following parties:

1. The Consortium
2. Westinghouse
3. CB&I
4. SCE&G
5. Santee Cooper

for the period between January 1, 2015, and the present.

Response to Request for Production 1-22:

Responsible Person:

Request for Production 1-23

Produce all documents and communications concerning any of the following issues at the NND Project site:

1. Productivity
2. Construction productivity
3. Designs
4. Constructability of designs
5. Finalizing engineering designs
6. Work packages
7. SCE&G's oversight
8. Santee Cooper's oversight
9. Westinghouse's oversight
10. CB&I's oversight
11. The Consortium's oversight

for the period between January 1, 2015, and the present.

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Response to Request for Production 1-23:

Responsible Person:

Request for Production 1-24

Produce all documents and communications concerning any of the following issues with respect to the NND Project:

1. Pricing
2. Engineering plans
3. Procurement
4. Construction plans
5. Construction schedules
6. Modular fabrication
7. Forecasts for schedule durations
8. Forecasts for productivity
9. Forecasted manpower peaks
10. Percent completed
11. Delays in schedules
12. Discrepancies between construction need dates and procurement delivery dates
13. Disconnects between construction need dates and procurement delivery dates
14. Testing
15. Start-up
16. Inspections, Tests, Analyses, and Acceptance Criteria ("ITAAC")

for the period between January 1, 2015, and the present.

Response to Request for Production 1-24:

Responsible Person:

Request for Production 1-25

Produce all documents and communications related to issues concerning the fixed price option for the NND Project.

Response to Request for Production 1-25:

Responsible Person:

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Request for Production 1-26

Produce all documents and communications concerning ORS's review of SCE&G's attorneys' billing records from between January 1, 2015, and the present.

Response to Request for Production 1-26:

Responsible Person:

Request for Production 1-27

Produce all documents and communications related to each and every presentation that you made to each of the following between March 30, 2009, and the present, in which the NND Project was discussed.

4. The Governor of South Carolina
5. The Office of the Attorney General of South Carolina
6. Any member or staff member of the South Carolina General Assembly
7. The SCEUC
8. DHEC
9. EPA
10. PURC
11. The Energy Advisory Council
12. The LCI Committee

Response to Request for Production 1-27:

Responsible Person:

Request for Production 1-28

Produce all documents and communications related to each and every presentation that you made to each of the following between January 1, 2008, and the present, in which the BLRA was discussed.

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly
4. The SCEUC
5. DHEC
6. EPA
7. PURC
8. The Energy Advisory Council
9. The LCI Committee

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Response to Request for Production 1-28:

Responsible Person:

Request for Production 1-29

Produce all documents and communications related to each and every presentation that you made to each of the following between January 1, 2015, and the present, in which the Clean Power Plan was discussed.

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly
4. The SCEUC
5. DHEC
6. EPA
7. PURC
8. The Energy Advisory Council
9. The LCI Committee

Response to Request for Production 1-29:

Responsible Person:

Request for Production 1-30

Produce all reports, memoranda, and correspondence provided to each of the following regarding the NND Project.

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly
4. The SCEUC
5. DHEC
6. EPA
7. PURC
8. The Energy Advisory Council
9. The LCI Committee

Response to Request for Production 1-30:

Responsible Person:

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Request for Production 1-31

Produce all reports, memoranda, and correspondence provided to each of the following regarding the Clean Power Plan.

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly
4. The SCEUC
5. DHEC
6. EPA
7. PURC
8. The Energy Advisory Council
9. The LCI Committee

Response to Request for Production 1-31:

Responsible Person:

Request for Production 1-32

Produce all reports, memoranda, and correspondence provided to each of the following regarding the Abandonment Decision.

1. The Governor of South Carolina
2. The Office of the Attorney General of South Carolina
3. Any member or staff member of the South Carolina General Assembly
4. The SCEUC
5. DHEC
6. EPA
7. PURC
8. The Energy Advisory Council
9. The LCI Committee

Response to Request for Production 1-32:

Responsible Person:

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Request for Production 1-33

Produce copies of every presentation that you made to the SCEUC at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Request for Production 1-33:

Responsible Person:

Request for Production 1-34

Produce copies of every presentation that you made to the PURC at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Request for Production 1-34:

Responsible Person:

Request for Production 1-35

Produce copies of every presentation that you made to the Energy Advisory Council at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Request for Production 1-35:

Responsible Person:

Request for Production 1-36

Produce copies of every presentation that you made to the LCI Committee or any of its subcommittees at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Request for Production 1-36:

Responsible Person:

Request for Production 1-37

Produce copies of every report, letter, briefing paper, or other communication that you made or sent to the PURC at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Request for Production 1-37:

Responsible Person:

Request for Production 1-38

Produce copies of every report, letter, briefing paper, or other communication that you made or sent to the Energy Advisory Council at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Request for Production 1-38:

Responsible Person:

Request for Production 1-39

Produce copies of every report, letter, briefing paper, or other communication that you made or sent to the LCI Committee or any of its subcommittees at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Request for Production 1-39:

Responsible Person:

Request for Production 1-40

Produce copies of every report, letter, briefing paper, or other communication that you made or sent to the Governor's Office or the Governor of the State of South Carolina at any time between January 1, 2005, and the present that in any way concerned the BLRA or the NND Project.

Response to Request for Production 1-40:

Responsible Person:

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Request for Production 1-41

Produce copies of every document indicating that you raised concerns about the constitutionality of the BLRA while it was being considered by the General Assembly or thereafter.

Response to Request for Production 1-41:

Responsible Person:

Request for Production 1-42

Produce copies of every document in which you stated that completion of the Project would not be in customers' best interest.

Response to Request for Production 1-42:

Responsible Person:

Request for Production 1-43

Produce copies of every document in which you stated that completion of the Project would be in customers' best interest.

Response to Request for Production 1-43:

Responsible Person:

Request for Production 1-44

Produce copies of every document in which you identify or describe the benefits of the Project for SCE&G's customers or the State of South Carolina.

Response to Request for Production 1-44:

Responsible Person:

Request for Production 1-45

Produce copies of every document every communication in which you identify or describe the benefits of the BLRA for electric customers or the State of South Carolina.

Response to Request for Production 1-45:

Responsible Person:

Respectfully submitted,

Belton T. Zeigler
Womble Bond Dickinson (US) LLP
1221 Main Street
Suite 1600
Columbia, SC 29201
(803) 454-7720
belton.zeigler@wbd-us.com

K. Chad Burgess, Esquire
Matthew Gissendanner, Esquire
Mail Code C222
220 Operation Way
Cayce, SC 29033-3701
Telephone: 803-217-8141
Facsimile: 803-217-7931
chad.burgess@scanna.com
matthew.gissendanner@scana.com

Mitchell Willoughby
Willoughby & Hoefer, P.A.
Post Office Box 8416
Columbia, SC 29202
(803) 252-3300
mwilloughby@willoughbyhoefer.com

Attorneys for South Carolina Electric & Gas Company

Cayce, South Carolina
August 2, 2018

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of SCE&G's First Set of Requests for Admission, Second Set of Interrogatories, and Second Set of Requests for Production of Documents (amended) via electronic mail and U.S. Mail, postage prepaid, upon the following:

Shannon Bowyer Hudson, Nanette S. Edward
Jenny R. Pittman, Jeffrey M. Nelson
Andrew M. Bateman
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Edwin Mathis

August 2, 2018

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