(Caption of Case)

Application of South Carolina Electric & Gas Company for Approval of Rider to Retail Rates – Net Metering for Renewable Facilities

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET NUMBER: 2015 - 205 - E

(Please type or print)

Submitted by: Bonnie Loomis

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

Print Form Reset Form

BEFORE

THE PUBIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NOS. 2015-203-E, 2015-204-E, & 2015-205-E

In re: Application of Duke Energy Carolinas, LLC for Approval of Rider RNM, Renewable Net Metering Application of Duke Energy Progress, Incorporated for Approval of Renewable Net Metering Rider, RNM-1 Application of South Carolina Electric & Gas Company for Approval of Rider to Retail Rates- Net Metering for Renewable Facilities	)	PETITION TO INTERVENE OF THE S.C. SOLAR BUSINSS ALLIANCE

Pursuant to Public Service Commission Regulation 103-825 and other applicable provisions of the South Carolina Public Service Commission's ("Commission") Rules of Practice and Procedure, the South Carolina Solar Business Alliance, LLC ("SCSBA" or "Petitioner") hereby timely files this Petition to Intervene in the above-captioned proceedings. In support of this Petition, SCSBA respectfully shows unto this Honorable Commission the following:

1) SCSBA is a limited liability corporation ("LLC") organized October 21, 2009, pursuant to Chapter 44 of Title 33 of the South Carolina Code of Laws and, since that date, remaining in good standing with the South Carolina Secretary of State.

2) SCSBA's principal place of business is currently co-located with that of Sustainable Energy Solutions, LLC at 804 Meeting Street, Charleston, South Carolina, 29403 and mailing address is currently co-located with that of the Hannah Solar Government Services, LLC at 3297 Pacific Street, North Charleston, South Carolina, 29418.

3) Petitioner is represented in this proceeding by:

Bonnie Loomis
1201 Main Street, Suite 1100, Columbia, South Carolina 29201
Telephone: 803-719-6202
Email: bonnie@thepalladiangroup.com

4) SCSBA is organized for the purpose of promoting and advocating public policy positions supportive of solar power generation in South Carolina.

5) SCSBA is a manager-managed LLC whose current managers are the following individuals, all of whom conduct solar energy related business in South Carolina under the company names indicated:

A) Paul Fleury (Sustainable Energy Solutions, LLC)
B) Grant Reeves (TIG Sun Energy I and II, LLC),
C) Andrew Streit (SolBright Renewable Energy, LLC),
D) Don Zimmerman (Alder Energy Systems, LLC),
E) Bruce Wood (Sunstore Solar, LLC), and
F) Dave McNeil (Hannah Solar Government Services, LLC).

6) SCSBA's forty three (43) Trade Members include solar energy companies and professional service firms engaged in the business of solar energy generation in this state and across the nation. The majority of SCSBA's Trade Members are based in South Carolina. All of the SCSBA Managers' companies are based in South Carolina.

7) On behalf of these Trade Members' business interests and upon request of the South Carolina Office of Regulatory Staff ("ORS"), SCSBA past Board Chair Grant Reeves appeared before this Honorable Commission on April 16, 2014, for an Allowable Ex Parte Briefing to Discuss Solar Power Potential in South Carolina, including the impact on solar of, then, Senate Bill, 1189 and, now, Act 236 of 2014 ("Act" or "the Act"). (See SCPSC Docket 2014-12-E)

8) On June 5, 2014, this Honorable Commission was petitioned by the ORS pursuant to Section 58-40-20(F)(4) of the Act to open a docket in compliance with the Act's requirement of a generic Commission proceeding "for the purposes of implementing the requirements of Chapter 40, Net Metering, with respect to the net energy metering rates, tariffs, charges and credits of electrical utilities, and specifically to establish the methodology to set any necessary charges and credits." (See SCPSC Docket 2014-246-E)

9) Recognizing the broad implications of that proceeding, the General Assembly explicitly stated in the Act that "all interested parties shall be allowed to participate" and "propose methodologies" for setting net metering rates and credits in the generic proceeding. (See S.C. Code Section 58-40-20(F)(4))

10) SCSBA has previously petitioned this Honorable Commission to participate in Commission Dockets 2014-246-E, 2015-53-E, 2015-54-E, and 2015-55-E all stemming from Act 236 of 2014, alleging that:

A) SCSBA had standing to intervene as an "interested party" pursuant to Section 58-40-20(F)(4),
B) SCSBA Trade Members had direct and material interests in the issues to be addressed and resolved by this Honorable Commission, and
C) SCSBA's interests could not be represented adequately by any other party.

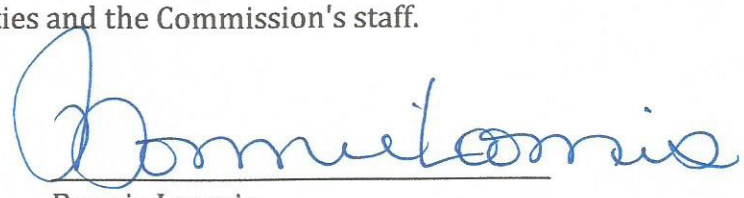
11) In those Petitions, SCSBA further alleged standing to intervene pursuant to the long-standing practice of this Honorable Commission to grant such Petitions when "it is in the public interest to grant the relief requested in the Petition so that the Commission may consider all of the relevant information in the instant proceeding" (See SCPSC Docket 84-10-C, Order No. 84-498, Page 2) and intervention of the Petitioning party will "aid us in developing a full record in this case . . .." (See SCPSC Docket No. 95-835-C, Order No. 1999-20, Page 2) SCSBA additionally asserted that involvement of South Carolina's only solar trade alliance would unquestionably serve to promote the public interest, better allow this Honorable Commission to consider all of the relevant information and ensure the development of a full record in that Docket.

12) SCSBA's Petitions in those prior dockets were not objected to by any Party or Intervenor (most of whom are the same as those involved in these three dockets), and this Honorable Commission granted Intervenor status to SCSBA.

13) SCSBA subsequently actively participated the multi-party negotiations that resulted the settlements proposed to, and later approved by and made Orders of, this Honorable Commission, in those prior dockets.

14) SCSBA remains situated today as it was when this Honorable Commission granted Intervenor status in those prior Act dockets and respectfully invokes this Honorable Commission's prior reasoning as the Commission gives consideration to SCSBA's Petitions to Intervene in these current dockets.

WHEREFORE, Petitioner prays that this Honorable Commission grant SCSBA's Petitions to Intervene in dockets 2015-203-E, 2015, 204-E, and 2015-205-E and all related proceedings, including, but not limited to, the ability to appear as a party, engage in discovery, and participate in all hearings by offering testimony and exhibits and cross-examining the testimony and exhibits of other parties. Petitioner requests receipt of all notices, documents, exhibits and data submitted by all parties and the Commission's staff.



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July 16, 2015
Columbia, South Carolina

BEFORE
THE PUBIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NOS. 2015-203-E, 2015-204-E, & 2015-205-E

In re: Application of Duke Energy Carolinas, LLC for Approval of Rider RNM, Renewable Net Metering	)	
Application of Duke Energy Progress, Incorporated for Approval of Renewable Net Metering Rider, RNM-1	)	CERTIFICATE OF SERVICE
Application of South Carolina Electric & Gas Company for Approval of Rider to Retail Rates – Net Metering for Renewable Facilities	)	

This is to certify that I, Jessica N. Peyton, have this date served one (1) copy of the PETITION TO INTERVENE OF THE SC SOLAR BUSINESS ALLIANCE in the above-referenced matters to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown:

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220 Operation Way – MC C222
Cayce, SC 29033-3701

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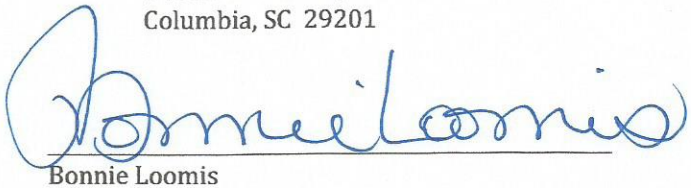

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