

November 23, 2015

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

Re: DOCKET NO. 2015-362-E
In the Matter of: Joint Application of Duke Energy Carolinas, LLC, Duke
Energy Progress, LLC and South Carolina Electric & Gas Company for
Approval of the Revised South Carolina Interconnection Standard

Dear Ms. Boyd:

Please find attached for electronic filing *Petition to Intervene*. in the above-referenced matter.

Please contact me if you have any questions concerning this matter.

Sincerely,

/s/ Robert Guild

Robert Guild
Attorney at Law
314 Pall Mall
Columbia, SC 29201
Telephone: 803-252-1419
Email: bguild@mindspring.com

Attorney for the Interstate Renewable Energy
Council, Inc.

(Caption of Case)

Joint Application of Duke Energy Carolinas, LLC.
 Duke Energy Progress, LLC and South Carolina
 Electric & Gas Company for Approval of the
 Revised South Carolina Interconnection Standad

BEFORE THE
 PUBLIC SERVICE COMMISSION
 OF SOUTH CAROLINA

COVER SHEET

DOCKET
 NUMBER: 2015 - 362 - E

(Please type or print)

Submitted by: Robert Guild

SC Bar Number: 2358

Address: 314 Pall Mall

Telephone: 803-252-1419

Columbia, SC 29201

Fax: n/a

Other: _____

Email: bguild@mindspring.net

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: Routine

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input checked="" type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	_____
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	_____
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

Print Form

Reset Form

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2015-362-E

In the Matter of:)
)
) PETITION TO INTERVENE
Joint Application of Duke Energy)
Carolinas, LLC; Duke Energy Progress,)
LLC; and South Carolina Electric & Gas)
Company for Approval of the Revised)
South Carolina Interconnection Standard)
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In accordance with Rule 103-825 of the South Carolina Public Service Commission’s (“Commission”) Rules and Regulations, the Interstate Renewable Energy Council, Inc. (“IREC”) respectfully petitions to intervene in the above-captioned proceeding.

I. IREC’S INTEREST IN THIS PROCEEDING

IREC is a 501(c)(3) non-partisan, non-profit organization working nationally to expand and simplify customer access to reliable and affordable distributed clean energy by: (1) developing and advancing regulatory policy innovations; (2) generating and promoting national model rules, standards, and best practices; and (3) providing workforce training, education, and credentialing. IREC works independently from renewable energy industries, trade associations, technologies, and advocacy organizations to promote the creation of robust, competitive clean energy markets.

This proceeding was initiated to develop standards for interconnection of renewable energy facilities and other nonutility-owned generation to South Carolina’s grid. The

application was made by Duke Energy Carolinas, LLC; Duke Energy Progress, LLC; and South Carolina Electric and Gas Company. The proposed interconnection standard is intended to accomplish the purposes and goals of Act 236.

IREC is heavily involved in updating interconnection processes across the United States to facilitate nationwide deployment of distributed energy resources. IREC's work includes incorporating distributed energy resource growth into utility distribution system planning and operations. As such, IREC has a substantial interest in this proceeding's development of rules for interconnection of distributed generation facilities. Further, IREC brings its unique expertise to the proceeding, which will assist stakeholders and the Commission in developing South Carolina's interconnection standard.

II. THE GROUNDS FOR AND POSITION OF IREC'S INTERVENTION

IREC's interest in achieving South Carolina's distributed energy resource goals makes it a valuable participant in this proceeding. Over the past five years, IREC has worked in nearly 40 states to implement successful regulatory policies and programs that have greatly reduced barriers for interconnection of distributed energy resources. IREC will leverage this knowledge of state and federal policies to provide useful, nationally based insight into the Commission's consideration of how to develop the regulatory framework for interconnection. IREC's participation will contribute meaningfully to the Commission's development of an interconnection standard for South Carolina.

III. SERVICE

Service of notices, orders, and other correspondence in this proceeding should be directed to the addresses set forth below:

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AND

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IV. RELIEF REQUESTED

For the reasons stated above, IREC hereby petitions the Commission for permission to intervene in and be made a party of record in the above-referenced proceeding.

DATED: November 23, 2015

LAW OFFICES OF ROBERT GUILD

By: /s/Robert Guild
ROBERT GUILD

DATED: November 23, 2015

SHUTE, MIHALY & WEINBERGER LLP

By: /s/ Sky C. Stanfield
SKY C. STANFIELD
*Application for Pro Hac Vice
has been submitted*

Attorneys for INTERSTATE RENEWABLE
ENERGY COUNCIL, INC.

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2015-362-E

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Joint Application of Duke Energy)
Carolinas, LLC, Duke Energy Progress,)
LLC and South Carolina Electric & Gas)
Company for Approval of the Revised)
South Carolina Interconnection Standard)
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CERTIFICATE OF SERVICE

The undersigned, Amy Zehring, does hereby certify that the following persons have been served with in the above captioned proceeding by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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Executed in San Francisco, CA on November 23, 2015

/s/Amy Zehring
Amy Zehring

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