STATE OF SOUTH CAROLINA

(Caption of Case)
Request for Rate Relief to South Carolina Electric and Gas Company's Rates Pursuant to S.C. Code Ann. § 58-27-920

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET NUMBER: 2017 - 305 - E

(Please type or print)
Submitted by: Stephanie U. Eaton
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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: 

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<th>NATURE OF ACTION (Check all that apply)</th>
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<td>Electric/Telecommunications</td>
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<td>Other:</td>
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□ Request for Certification
□ Response
□ Resale Agreement
□ Response to Discovery
□ Return to Petition
□ Resale Amendment
□ Stipulation
□ Reservation Letter
□ Subpoena
□ Response
□ Other: 

Print Form
Reset Form
October 5, 2017

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

Re: Request for Rate Relief to South Carolina Electric and Gas Company’s Rates Pursuant to S.C. Code Ann. § 58-27-920
Docket No. 2017-305-E

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene on behalf of Wal-Mart Stores East, LP, and Sam’s East, Inc. (together, "Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail and First-Class Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By

Stephanie U. Eaton
(SC Bar No. 80073)

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Counsel to Wal-Mart Stores East, LP and Sam’s East, Inc.

SUE/sds
Attachments
c: Certificate of Service
STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2017-305-E

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

PETITION TO INTERVENE OF WAL-MART STORES EAST, LP AND SAM'S EAST, INC.

Pursuant to Rule 103-825 and other applicable rules and regulations of the South Carolina Public Service Commission ("Commission"), Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On September 26, 2017, the South Carolina Office of Regulatory Staff ("ORS") filed a Request for Rate Relief to South Carolina Electric & Gas Company ("SCE&G") Rates ("Request") with the Commission. In the Request, ORS asks the Commission to issue an order for SCE&G to immediately suspend collection of all revised rates under the Base Load Review Act ("BLRA"). Additionally, the ORS requests that if the BLRA is amended, revoked, or declared unconstitutional, the Commission order SCE&G to cease and desist from collecting revised rates and credit future bills or make refunds to customers for prior revised rate collections. ORS Request, pp. 1-2.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2001 SE 10th Street, Bentonville, AR 72716-0550.

3. Walmart is a large commercial customer of SCE&G. Walmart has approximately
facilities in South Carolina that are served by SCE&G, which include Walmart Supercenters, Sam's Clubs, and gas stations. Walmart purchases more than 140 million kWh annually from SCE&G. Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to SCE&G's electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina. As such, Walmart has a direct and substantial interest in the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from SCE&G pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

4. The attorneys representing Walmart in this proceeding are:

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Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson and Ms. Brandfass be added jointly to the service list as Walmart may seek Mr. Williamson's and Ms. Brandfass' admissions to appear before the Commission pro hac vice in the near future.
5. This Petition to Intervene is timely filed as no intervention deadline has yet been set.

WHEREFORE, Wal-Mart Stores East, LP and Sam's East, Inc., respectfully request that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By ________________________________
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Dated: October 5, 2017
STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2017-305-E

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

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Counsel to The Electric Cooperatives of South Carolina, Inc., and Central Electric Power Cooperative, Inc.

Dated: October 5, 2017

Stephanie U. Eaton (SC Bar No. 80073)