Request of South Carolina Electric & Gas Company for an order authorizing the withdrawal of certain funds from its Storm Damage Reserve Fund to offset those costs incurred in connection with its tree trimming and vegetation management programs for its electric transmission and distribution systems.

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NUMBER: 2008 - 416 - E

(Please type or print)

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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)

☐ Electric
☐ Electric/Gas
☐ Electric/Telecommunications
☐ Electric/Water
☐ Electric/Water/Telecom.
☐ Electric/Water/Sewer
☐ Gas
☐ Railroad
☐ Sewer
☐ Telecommunications
☐ Transportation
☐ Water
☐ Water/Sewer
☐ Administrative Matter
☐ Other:

NATURE OF ACTION (Check all that apply)

☐ Affidavit
☐ Agreement
☐ Answer
☐ Appellate Review
☐ Application
☐ Brief
☐ Certificate
☐ Comments
☐ Complaint
☐ Consent Order
☐ Discovery
☐ Exhibit
☐ Expedited Consideration
☐ Interconnection Agreement
☐ Interconnection Amendment
☐ Late-Filed Exhibit
☐ Letter
☐ Memorandum
☐ Motion
☐ Objection
☐ Petition
☐ Petition for Reconsideration
☐ Petition for Rulemaking
☐ Petition for Rule to Show Cause
☐ Petition to Intervene
☐ Petition to Intervene Out of Time
☐ Prefiled Testimony
☐ Promotion
☐ Proposed Order
☐ Protest
☐ Publisher’s Affidavit
☐ Report
☐ Request
☐ Request for Certification
☐ Request for Investigation
☐ Resale Agreement
☐ Resale Amendment
☐ Reservation Letter
☐ Response
☐ Response to Discovery
☐ Return to Petition
☐ Stipulation
☐ Subpoena
☐ Tariff
☐ Other:
January 20, 2011

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive (29210)
Post Office Drawer 11649
Columbia, South Carolina 29211

RE: Request of South Carolina Electric & Gas Company for an order authorizing the withdrawal of certain funds from its Storm Damage Reserve Fund to offset those costs incurred in connection with its tree trimming and vegetation management programs for its electric transmission and distribution systems
Docket No. 2008-416-E

Dear Ms. Boyd:

The purpose of this letter is to request that the Public Service Commission of South Carolina ("Commission") issue an accounting order, for regulatory accounting purposes, authorizing South Carolina Electric & Gas Company ("SCE&G" or "Company") to withdraw from its Commission-approved Storm Damage Reserve Fund those funds necessary to offset the incremental expenses that will be incurred by the Company in calendar year 2011 to accelerate tree trimming and vegetation management programs for its electric transmission and distribution systems. Specifically, SCE&G requests authorization to withdraw $1,800,000 from the Storm Damage Reserve Fund during calendar year 2011.

On February 26, 2009, the Commission issued Order No. 2009-87 authorizing SCE&G to withdraw up to a maximum of $9,000,000 from its Storm Damage Reserve Fund during the 2008-2009 time period to offset incremental costs incurred in connection with the Company’s distribution and transmission tree trimming and vegetation management programs. For the two-year period 2008-2009, the Company withdrew a total of $8,948,614 from the Storm Damage Reserve Fund for tree trimming and vegetation management activities. During that time period, the Company completed approximately 5,045 miles of tree trimming and vegetation management activities along its distribution line routes and 1,242 miles of tree trimming and vegetation management activities along its transmission line routes.

(Continued . . .)
On December 4, 2009, the Commission issued Order No. 2009-845 authorizing SCE&G to withdraw $6,800,000 from the Storm Damage Reserve Fund to offset the incremental expense incurred by the Company in the calendar year 2010 to accelerate its tree trimming and vegetation management programs for its electric transmission and distribution systems. The Company expects to withdraw $6,800,000 from the Storm Damage Reserve Fund by December 31, 2010 to complete its planned tree trimming and vegetation management activities along approximately 2,956 miles of distribution line and approximately 618 miles of transmission line in the calendar year 2010. As of June 30, 2010, the Company had completed approximately 1,909 miles of its planned tree trimming and vegetation management activities along its distribution line routes and approximately 215 miles of its planned tree trimming and vegetation management activities along its transmission line routes.

With the authorization granted by the Commission in Order Nos. 2009-87 and 2009-845, SCE&G’s Transmission Vegetation Management Program ("TVMP") and its Distribution Vegetation Management Program ("DVMP") are contributing to the improved reliability of the Company’s electric system and increasing the system’s tolerance to weather related events. Transmission and distribution line clearing initiatives and progress made as a result of the issuance of Order Nos. 2009-87 and 2009-845 include: (i) major movement towards the optimal, five-year vegetation management cycle; (ii) full compliance with NERC-mandated vegetation guidelines; (iii) significant reduction in circuit System Average Interruption Duration Index ("SAIDI"), which is the tracking mechanism used to measure the frequency and duration of power outages; (iv) more miles of vegetation cleared away from power lines and subsequently sprayed to suppress unwanted new vegetation; and (v) ultimately, the potential preservation of the Storm Damage Reserve Fund level by reducing the potential for storm related damages in the future and the need to draw upon the fund. The success of the additional tree trimming and vegetation management activity is evidenced by a 76.18% reduction (as of September 30, 2010) in tree related incidents as measured by SAIDI for the specific circuits cleared in accordance with the vegetation management program specifications in 2008-2009 and an 81.40% reduction (as of September 30, 2010) in tree related incidents as measured by SAIDI for the specific circuits cleared in accordance with the vegetation management program specifications in 2010.

In light of the success of SCE&G’s TVMP and DVMP, the Company respectfully requests that the Commission issue an accounting order, for regulatory accounting purposes, authorizing SCE&G to withdraw from its Commission-approved Storm Damage Reserve Fund $1,800,000. These funds will be used to offset those incremental expenses, defined as expenditures in excess of the level currently provided for in base rates (approximately $13.2 million), incurred by the Company in calendar year 2011 for tree trimming and vegetation management programs for its electric transmission and distribution systems. SCE&G anticipates that the increased funding for its TVMP and DVMP will provide the Company with an opportunity to reach its goal of placing all its transmission and distribution circuits on the optimal five-year vegetation management cycle by 2011 and thus, further improve the Company’s SAIDI rating by reducing vegetation related events.

(Continued . . .)
The Honorable Jocelyn G. Boyd
January 20, 2011

The request for relief set forth herein will not involve a change to any of SCE&G’s retail rates or prices, or require any change in any Commission rule, regulation or policy. In addition, the issuance of the requested accounting order will not prejudice the right of any party to address this issue in a subsequent general rate case proceeding. Accordingly, neither notice to the public at-large, nor a hearing is required regarding this request.

By copy of this letter, we are serving counsel for the South Carolina Office of Regulatory Staff with the Company’s request.

Thank you for your time and consideration. If you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,

K. Chad Burgess
KCB/kms

cc: John W. Flitter
Jeffrey M. Nelson, Esquire
(both via electronic mail and First Class U.S. Mail w/enclosure)