



K. Chad Burgess  
Director & Deputy General Counsel

[chad.burgess@scana.com](mailto:chad.burgess@scana.com)

December 5, 2018

**VIA ELECTRONIC MAIL**  
**AND U.S. FIRST CLASS MAIL**

Nanette S. Edwards, Esquire  
Jeffrey M. Nelson, Esquire  
Jenny R. Pittman, Esquire  
Andrew M. Bateman, Esquire  
**South Carolina Office of Regulatory Staff**  
1401 Main Street, Suite 900  
Columbia, South Carolina 29201

RE: Friends of the Earth and Sierra Club, Complainant/Petitioner v.  
South Carolina Electric & Gas Company, Defendant/Respondent  
Docket No. 2017-207-E

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  
Docket No. 2017-305-E

Joint Application and Petition of South Carolina Electric & Gas  
Company and Dominion Energy, Incorporated for Review and  
Approval of a Proposed Business Combination between SCANA  
Corporation and Dominion Energy, Incorporated, 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 Plans  
Docket No. 2017-370-E

Dear Counsel:

Enclosed on behalf of South Carolina Electric & Gas Company ("SCE&G") and Dominion Energy, Inc. (collectively, the "Parties"), you will find a copy of SCE&G's Response to the South Carolina Office of Regulatory Staff's ("ORS") Audit Information Request dated November 21, 2018, with regard to the above-captioned matters. Additionally, you will also find enclosed the Verification of South Carolina Electric & Gas Company.

(Continued . . .)

If you have any questions, please do not hesitate to contact us.

Very truly yours,



K. Chad Burgess

KCB/kms  
Enclosure

**SOUTH CAROLINA ELECTRIC & GAS COMPANY  
OFFICE OF REGULATORY STAFF'S CONTINUING  
AUDIT INFORMATION REQUEST  
DATED NOVEMBER 21, 2018  
DOCKET NO. 2017-207-E (6th Continuing AIR)  
DOCKET NO. 2017-305-E (5th Continuing AIR)  
DOCKET NO. 2017-370-E (5th Continuing AIR)**

**REQUEST:**

With reference to Mr. Richards' pre-filed testimony and his sworn testimony before the Public Service Commission of South Carolina ("Commission") in the consolidated dockets listed above, was there any information presented to the Commission by Mr. Richards that the Company or Mr. Richards now believe to be inaccurate? If so, please identify the inaccuracies in your response to ORS and contemporaneously provide notification to the Commission.

**RESPONSE:**

It is South Carolina Electric & Gas Company's ("SCE&G") understanding that the request above is based upon an anonymous telephone call that the South Carolina Office of Regulatory Staff ("ORS") received alleging that the projected construction completion date of December 31, 2018, regarding the remainder of VCS2-St. George 230 kV Lines No. 1 and No. 2 (specifically, those portions of the lines that run from VCS2-Orangeburg and SRT-St. George) ("Transmission Lines") is inaccurate and that the projected in-service date of January 31, 2019, for the Transmission Lines is also inaccurate.

In light of this allegation, SCE&G has reviewed its construction schedule for the Transmission Lines and hereby confirms that the projected construction completion date for the Transmission Lines is December 31, 2018, and the projected in-service date for the Transmission Lines is January 31, 2019.

As ORS is aware, Mr. Richards made a correction to Exhibit 3 of his pre-filed direct testimony from the witness stand on November 16, 2018; that correction was accurate then and continues to be accurate as of December 5, 2018. Moreover, Mr. Richards' sworn testimony was accurate when made, and it continues to be accurate as of December 5, 2018.

Person Responsible: Kelvin J. Rogers, Sr.  
General Manager, Electric Transmission Construction

**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, )  
Complainant/Petitioner v. South Carolina )  
Electric & Gas Company, )  
Defendant/Respondent )  
)  
)

**IN RE:** Request of the South Carolina Office of )  
Regulatory Staff for Rate Relief to SCE&G )  
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, Incorporated for Review )  
and Approval of a Proposed Business )  
Combination between SCANA Corporation )  
and Dominion Energy, Incorporated, 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 Plans )  
)

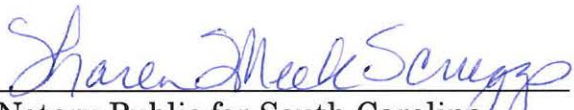
**VERIFICATION FOR RESPONSE OF SOUTH CAROLINA ELECTRIC &  
GAS COMPANY TO THE SOUTH CAROLINA OFFICE OF REGULATORY  
STAFF'S CONTINUING AUDIT INFORMATION REQUEST FOR RECORDS  
AND INFORMATION DATED NOVEMBER 21, 2018**

Personally appeared before me K. Chad Burgess who, being duly sworn, deposes and says under oath that he is the Director and Deputy General Counsel for SCANA Corporation, that he is authorized to execute this Verification on behalf of South Carolina Electric & Gas Company, and that on his information and belief the

facts alleged in the foregoing Response to the South Carolina Office of Regulatory Staff's Continuing Audit Information Request for Records and Information dated November 21, 2018, are true and correct to the best of his knowledge.

  
K. Chad Burgess

Sworn to before me this  
5<sup>th</sup> day of December, 2018

  
Notary Public for South Carolina  
My Commission Expires: 1/20/26

