# SOUTH CAROLINA ELECTRIC \& GAS COMPANY <br> OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-1:

Explain the benefits to Dominion Energy from added demand for natural gas due to the construction of a new gas-fired electric generation plant in South Carolina constructed by SCE\&G.
a. Please provide all analyses conducted, written reports, memos, reports, or documentation of any kind created in the evaluation and determination of a benefit.

## RESPONSE 6-1:

Dominion Energy Carolina Gas Transmission, LLC (DECGT) has no binding agreements in place at this time to provide interstate natural gas pipeline services to SCE\&G due to the construction of a new gas-fired generation plant in South Carolina constructed by SCE\&G. Consequently, no specific benefits to Dominion Energy have been evaluated or determined, and there are no analyses, written reports, memos, reports, or documentation responsive to the request. Generally, however, if a binding agreement between DECGT and SCE\&G was executed for the provision of interstate natural gas pipeline services to a new gas-fired generation plant in South Carolina constructed by SCE\&G, SCE\&G would benefit from the provision of reliable service at an economical rate, and DECGT would benefit from recovery of its reasonably incurred project costs and an acceptable return on its investment, all of which would be subject to FERC approval and require a thorough review and permit process. See also the response to ORS 6-4.

RESPONSIBLE PERSON: Gary Alexander

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY <br> OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-2:

Explain the financial impact on Dominion Energy, or its affiliates, related to the acquisition of SCANA's natural gas holdings.
a. Please provide all analyses conducted, written reports, memos, reports, or documentation of any kind created in the evaluation and determination of the impact to Dominion's stock value.

## RESPONSE 6-2:

No analysis was conducted to determine the financial impact on Dominion Energy, or its affiliates, specific to the acquisition of SCANA's natural gas holdings, nor was any analysis done to determine any such impact on Dominion's stock value.

Dominion Energy evaluated the financial impact of SCANA as a consolidated entity. Please see slide 11 of the Dominion Energy Investor Presentation dated January 3, 2018 for additional information. This presentation is available on Dominion Energy's Investor Relations website:
https://investors.dominionenergy.com/

RESPONSIBLE PERSON: Sonali Kripalani

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-3:

If the Atlantic Coast Pipeline were extended into South Carolina, how much natural gas capacity would be added to CGT?

## RESPONSE 6-3:

Atlantic Coast Pipeline, LLC currently has no plans to expand into South Carolina. Any future expansion project, including projects involving Dominion Energy Carolina Gas Transmission, LLC (DECGT), would be subject to FERC approval and would require a thorough review and permit process.

RESPONSIBLE PERSON: Margaret Peters

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-4:

Identify Dominion's plans for raising the capacity of CGT or for otherwise upgrading capacity for CGT.

## RESPONSE 6-4:

Future capacity increases of Dominion Energy Carolina Gas Transmission, LLC (DECGT) are not known at this time. As a FERC regulated interstate pipeline company, expansions are driven by customer demand and each expansion must be supported on a standalone basis by the subscribing customers so not to negatively affect the costs of existing customers. The timeline for placing expansion projects in service can exceed 4 years from the date of binding customer commitment. Ultimately, any future expansion projects will be driven by customer demand and designed to meet the needs of the market to serve as many contracted customers as possible to produce economical rates for the contracted parties. Any future expansion project would be subject to FERC approval and would require a thorough review and permit process.

## RESPONSIBLE PERSON: Gary Alexander

## SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-5:

Explain whether, in the five (5) years following the proposed merger, there are plans with the following entities or affiliates of the following entities to build facilities in the territories of SCE\&G and/or provide services (including, but not limited to, marketing/purchasing services and/or assuming the operations or function of any SCANA subsidiary) to SCE\&G or SCANA:
a. Dominion MLP Holding Company, LLC
b. Dominion Midstream GP, LLC
c. Any entity owned by (a) and/or (b)

## RESPONSE 6-5:

Dominion Energy Carolina Gas Transmission, LLC (DECGT) is the only Dominion Energy gas infrastructure entity that currently operates in SCE\&G's service territory and is a part of Dominion Energy Midstream. On March 1, 2018 DECGT placed into service the Charleston Project, a natural gas infrastructure project that serves South Carolina customers. More information on DECGT and the Charleston Project can be found on Dominion Energy's website:

## https://www.dominionenergy.com/about-us/moving-energy/dominion-carolina-gas-transmission

https://www.dominionenergy.com/about-us/moving-energy/dominion-carolina-gas-transmission/charleston-project

The DECGT pipeline system interconnects with the SCE\&G system at over 100 delivery interconnects all across the state. DECGT serves industrial, distribution, and power generation customers all across the state, including in existing SCE\&G territory. DECGT and SCE\&G both routinely and independently respond to economic development requests in efforts to attract industry to our state. In some cases the customer will prefer the DECGT business model for service, and in others, the SCE\&G business model is more appropriate. DECGT facility additions are driven by contracted customer demand and constructed in accordance with its FERC tariff and as authorized under the FERC review and permitting process.

Other than normal course of business for DECGT as described above, there are no plans at this time by Dominion MLP Holding Company, LLC, Dominion Midstream GP, LLC, their affiliates, or any entity owned by them, to build facilities in the territories of SCE\&G and/or provide services to SCE\&G or SCANA.

RESPONSIBLE PERSON: Sonali Kripalani

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY <br> OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-6:

Provide all documents, including emails, regarding the NND Project from the period April 1 through November 30, 2015 containing the words, "Kevin Marsh" and "Bechtel." Please conduct a search for the same time period for documents containing the words, "Kevin Marsh" and "project manager"

## RESPONSE 6-6:

SCE\&G objects to Request 6-6 on the basis that the documents sought are protected by the attorney-client privilege and the attorney work product doctrine. Notwithstanding this objection, SCE\&G states that it is currently conducting an extensive review of its own documents in connection with responding to subpoenas served on the company by the Federal Grand Jury and the Securities \& Exchange Commission as well as document requests served in pending civil litigation. SCE\&G states that it will produce non-privileged, non-work product documents in its possession responsive to this request after this review is complete.

Responsible person: Chad Burgess (legal matters)

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-7:

Provide all correspondence and documents, including emails, that concern the removal of the projected completion dates in the draft version of the Bechtel report dated Nov. 9, 2015, from the final version published in February 2016.

## RESPONSE 6-7:

SCE\&G objects to Request 6-7 on the basis that the documents sought are protected by the attorney-client privilege and the attorney work product doctrine. Notwithstanding this objection, SCE\&G states that it is currently conducting an extensive review of its own documents in connection with responding to subpoenas served on the company by the Federal Grand Jury and the Securities \& Exchange Commission as well as document requests served in pending civil litigation. SCE\&G states that it will produce non-privileged, non-work product documents in its possession responsive to this request after this review is complete.

Responsible person: Chad Burgess (legal matters)

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY <br> OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-8:

Provide all documents, including emails, that discuss the hiring of attorney George Wenick as it relates to the Bechtel corporation and the report it produced.

## RESPONSE 6-8:

SCE\&G objects to Request 6-6 on the basis that the documents sought are protected by the attorney-client privilege and the attorney work product doctrine. Notwithstanding this objection, SCE\&G states that it is currently conducting an extensive collection of its own documents in connection with responding to subpoenas served on the company by the Federal Grand Jury and the Securities \& Exchange Commission as well as document requests served in pending civil litigation. SCE\&G states that it will produce non-privileged, non-work product documents in its possession responsive to this request after this review is complete.

Responsible person: Chad Burgess (legal matters)

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY <br> OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-9:

Provide all documentation discussing release of the Bechtel report.

## RESPONSE 6-9:

SCE\&G objects to Request 6-9 on the basis that the documents sought are protected by the attorney-client privilege and the attorney work product doctrine. Notwithstanding this objection, SCE\&G states that it is currently conducting an extensive review of its own documents in connection with responding to subpoenas served on the company by the Federal Grand Jury and the Securities \& Exchange Commission as well as document requests served in pending civil litigation. SCE\&G states that it will produce non-privileged, non-work product documents in its possession responsive to this request after this review is complete.

Responsible person: Chad Burgess (legal matters)

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-10:

The Supplementary Key Executive Severance Benefits Plan included in the December 2017 10K identifies an amount of $\$ 110.7$ million for certain payments to qualified senior executive officers in connection with a change of control.
a. Identify the top five qualified senior executive officers eligible to receive the benefits;
b. Identify the amount set aside associated with the above positions;
c. Identify whether any amount is associated with employees whose primary responsibility was the new nuclear project.

## RESPONSE 6-10:

The information responsive to this request contains confidential and sensitive information. Due to the confidential and sensitive nature of the information requested, SCE\&G will make the information responsive to this request available to ORS for review and inspection at SCE\&G's administrative offices after the execution of a confidentiality agreement.

Responsible person: Chad Burgess (legal matters) and Denise Schelble

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-11:

Provide a listing of all employees who received a bonus incentive for the year 2018 by name, title, and the amounts received.

## RESPONSE 6-11:

The information responsive to this request contains confidential and sensitive information. Due to the confidential and sensitive nature of the information requested, SCE\&G will make the information responsive to this request available to ORS for review and inspection at SCE\&G's administrative offices after the execution of a confidentiality agreement.

Responsible person: Chad Burgess (legal matters) and Denis Schelble

## SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-12:

Provide a listing of all employees who received a raise in 2018 by name, title, previous salary amount, new salary amount and percentage increase.

## RESPONSE 6-12:

The information responsive to this request contains confidential and sensitive information. Due to the confidential and sensitive nature of the information requested, SCE\&G will make the information responsive to this request available to ORS for review and inspection at SCE\&G's administrative offices after the execution of a confidentiality agreement.

Responsible person: Chad Burgess (legal matters), and Denise Schelble

## SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-13:

Explain what monetary benefits employees may receive linked to stock price. Explain how the benefit is calculated and linked to or indexed to share price. In answering this question, the receipt of shares is not deemed a monetary benefit.
a. If monetary benefits are provided to employees that are linked to stock price, list the total amount paid by year for 2016, 2017, and 2018 and the total number of employees who received the benefit.
b. For each year of 2016, 2017, and 2018, list the five employees who received the greatest monetary benefit and the amount received.
c. State the total cost of monetary benefits SCANA employees will receive using Dominion's share-exchange bid price for SCANA. Please state the SCANA share price used as the basis for the calculation.

## RESPONSE 6-13:

The information responsive to this request contains confidential and sensitive information. Due to the confidential and sensitive nature of the information requested, SCE\&G will make the information responsive to this request available to ORS for review and inspection at SCE\&G's administrative offices after the execution of a confidentiality agreement.

Responsible person: Chad Burgess (legal matters) and Denise Schelble

## SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-14:

Provide the original substantial completion dates from the Westinghouse (WEC)/ Chicago Bridge \& Iron (CB\&I) Revised, Fully Integrated, Construction Schedule, that WEC/CB\&l provided to SCE\&G in the third quarter of 2014 as referenced in the Steve Byrne Direct Testimony from Docket 2015-103-E, Page 36, Line 10.

## RESPONSE 6-14:

On August 1, 2014, Westinghouse (WEC)/Chicago Bridge \& Iron (CB\&I) presented SCE\&G with different options/scenarios for substantial completion dates of the Units. More specifically, WEC \& CB\&I presented substantial completion dates of:
a) December 2018 (Unit 2) and December 2019 (Unit 3) and
b) June 2019 (Unit 2) and June 2020 (Unit 3).

Thereafter, SCE\&G evaluated these options/scenarios, including an additional option/scenario that provided for substantial completion in September 2018 (Unit 2) and November 2019 (Unit 3). The Company ultimately decided that the substantial completion dates of June 2019 for Unit 2 and June 2020 for Unit 3 were the most realistic.

Responsible person: Kyle Young

> SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST
> DOCKET NO. 2017-207-E (7th Continuing AIR)
> DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-15:

Provide the final SCE\&G approved substantial completion dates from the Revised, Fully Integrated, Construction Schedule, as referenced in the Steve Byrne Direct Testimony from Docket 2015-103-E, Page 36, starting at Line 18.

## RESPONSE 6-15:

The final SCE\&G approved substantial completion date for Unit 2 was June 19, 2019, and the final SCE\&G approved substantial completion date for Unit 3 was June 16, 2020.

Responsible person: Kyle Young

## SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-16:

Provide all correspondence including e-mails between WEC/CB\&I and the following SCE\&G employees: Kevin Marsh, Steve Byrne, Jeff Archie, Alan Torres, Kyle Young, and Bernie Hydrick, during the time period between July 2014 and April 2015 caused by, related to, or in reference to the WEC/CB\&I Revised, Fully Integrated, Construction Schedule that WEC/CB\&I provided to SCE\&G in the third quarter of 2014.

## RESPONSE 6-16:

SCE\&G objects to Request 6-16 on the basis that the documents sought are protected by the attorney-client privilege and the attorney work product doctrine. Notwithstanding this objection, SCE\&G states that it is currently conducting an extensive review of its own documents in connection with responding to subpoenas served on the company by the Federal Grand Jury and the Securities \& Exchange Commission as well as document requests served in pending civil litigation. SCE\&G states that it will produce non-privileged, non-work product documents in its possession responsive to this request after this review is complete. For now, however, please see the documents on the enclosed compact disc.

Responsible person: Chad Burgess (legal matters)

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-17:

Refer to page 113 of the SCANA 2017 10-K, which states:
A pre-tax impairment loss was recorded in the aggregate amount of $\$ 361$ million to write off costs which had been previously deferred, primarily as regulatory assets, in connection with the Nuclear Project. Such regulatory assets included deferred losses on interest rate swaps for which debt will not be issued due to the abandonment of the Nuclear Project, carrying costs on deferred tax assets arising from the capitalization of interest costs for tax purposes, net deferred costs and tax benefits related to foregone domestic production activities deductions (net of uncertain tax positions and credits) taken with respect to the project, and taxes associated with equity AFC.

In addition, refer to the response to ORS 1-137 which details $\$ 323.641$ million in regulatory assets that SCE\&G does not plan to seek recovery of by type, as outlined in Section 57.c. of the Joint Application.
a. Provide a reconciliation between the amount for each regulatory asset comprising the $\$ 361$ million included in the December 2017 actual writeoffs and the amount for each comparable regulatory asset comprising the $\$ 323.641$ million cited in response to ORS 1-137.
b. Refer to the response to part (a) of this question. Provide all workpapers used to calculate the actual regulatory asset writeoffs cited in the 2017 10-K and the regulatory asset writeoffs cited in response to ORS 1-137, including electronic spreadsheets in live format with all formulas intact.
c. Refer to the response to part (a) of this question. Provide the related income tax effects of the actual regulatory asset writeoffs cited in the 2017 10-K and the regulatory asset
writeoffs cited in response to ORS 1-137. Provide all workpapers used in calculating the income tax effects, including electronic spreadsheets in live format with all formulas intact.
d. Provide all journal entries, including accounts/subaccounts and amounts, related to the actual December 2017 regulatory asset writeoffs, including the related income tax journal entries. Provide a detailed description of each account/subaccount used for this purpose that is not listed and defined in the FERC USOA.

## RESPONSE 6-17:

a. The tax abandonment claim in December 2017 generated a net operating loss position for SCANA, including SCE\&G. SCANA's intention is to carryback a portion of this net operating loss to 2015, which would eliminate the $\$ 37.6$ million Domestic Production Activities Deduction (DPAD) claimed in that year. As SCANA and SCE\&G have committed that they will not recover the regulatory assets associated with the NND project, including foregone DPAD, the 2015 DPAD was written off in addition to the other regulatory assets as part of the $\$ 361$ million impairment.
b. - d. See attached files.

Responsible person: Keith Coffer, Jr. and Virginia Smith



Interest Calculation on all Tax Years (Federal)
Thru $12 / 31 / 2017$

| Date | Amount | Rate | Interest |
| :---: | :---: | :---: | :---: |
| 2008 Amended Return | 2,638,722 | - | - |
| 3/15/2009-3/31/2009 | 2,638,722 | 2.50\% | 2,893 |
| 4/1/2009-6/30/2009 | 2,641,615 | 1.50\% | 9,897 |
| 7/1/2009-9/30/2009 | 2,651,512 | 1.50\% | 10,044 |
| 10/1/2009-12/31/2009 | 2,661,556 | 1.50\% | 10,082 |
| 1/1/2010-3/15/2010 | 2,671,638 | 1.50\% | 8,137 |
| 2009 Amended Return | 6,940,365 | - | - |
| 3/16/2010-3/31/2010 | 9,620,140 | 1.50\% | 6,328 |
| 4/1/2010-6/30/2010 | 9,626,467 | 1.50\% | 36,067 |
| 7/1/2010-9/30/2010 | 9,662,534 | 1.50\% | 36,601 |
| 10/1/2010-12/31/2010 | 9,699,135 | 1.50\% | 36,739 |
| 1/1/2011-3/15/2011 | 9,735,874 | 0.50\% | 9,874 |
| 2010 Amended Return | 13,220,214 | - | - |
| 3/16/2011-3/31/2011 | 22,965,963 | 0.50\% | 5,034 |
| 4/1/2011-6/30/2011 | 22,970,997 | 1.50\% | 86,064 |
| 7/1/2011-9/30/2011 | 23,057,061 | 1.50\% | 87,338 |
| 10/1/2011-1,2/31/2011 | 23,144,399 | 0.50\% | 29,186 |
| 1/1/2012-3/15/2012 | 23,173,585 | 0.50\% | 23,821 |
| 2011 Amended Return | 13,941,096 | - | - |
| 3/16/2012-3/31/2012 | 37,138,502 | 0.50\% | 8,141 |
| 4/1/2012-6/30/2012 | 37,146,643 | 0.50\% | 46,335 |
| 7/1/2012-9/30/2012 | 37,192,977 | 0.50\% | 46,903 |
| 10/1/2012-12/31/2012 | 37,239,880 | 0.50\% | 46,962 |
| 1/1/2013-3/15/2013 | 37,286,84, | 0.50\% | 37,817 |
| 2012 Amended Return | 14,113,678 | - | - |
| 3/16/2013-3/31/2013 | 51,438,336 | 0.50\% | 11,275 |
| 4/1/2013-6/30/2013 | 51,449,611 | 0.50\% | 64,175 |
| 7/1/2013-9/30/2013 | 51,513,787 | 0.50\% | 64,962 |
| 10/1/2013-12/31/2013 | 51,578,749 | 0.50\% | 65,044 |
| 1/1/2014-3/15/2014 | 51,643,793 | 0.50\% | 52,377 |
| 2013 Tax Return | $(6,162,240)$ | - | - |
| 3/16/2014-3/31/2014 | 45,533,930 | 0.50\% | 9,981 |
| 4/1/2014-6/30/2014 | 45,543,911 | 0.50\% | 56,809 |
| 7/1/2014-9/30/201.4 | 45,600,720 | 0.50\% | 57,505 |
| 10/1/2014-12/31/2014 | 45,658,225 | 0.50\% | 57,578 |
| 1/1/2015-3/15/2015 | 45,73,5,803 | 0.50\% | 46,365 |
| 2014 Tax Return | $(7,095,997)$ | - | - |
| 3/16/2015-3/31/2015 | 38,666,171 | 0.50\% | 8,476 |
| 4/1/2015 - 6/30/201.5 | 38,674,647 | 0.50\% | 48,241 |
| 7/1/2015-9/30/2015 | 38,722,887 | 0.50\% | 48,832 |
| 10/1/2015-12/31/2015 | 38,771,71.9 | 0.50\% | 48,893 |
| 1/1/2016-3/15/2016 | 38,820,613 | 0.50\% | 38,840 |
| 2015 Return (Pilot) | $(67,279,397)$ | - | - |
| 2015 Return (Original) | (1,023,568) | - | - |
| 2015 - Overpayment | 165,927,704 | - | - |
| 3/16/2016-3/31/2016 | 136,484,191 | 0.50\% | 29,917 |
| 4/1/2016-6/30/2016 | 1,36,514,109 | 1.50\% | 511,471 |
| 7/1/2016-9/30/201.6 | 1.37,02,5,579 | 1.50\% | 519,039 |
| 10/2/2016-11/21/2016 | 137,544,618 | 1.50\% | 294,239 |
| 2015 - Refund | (167,567,352) | - | - |
| 11/22./2016 - 12/3.1/2016 | $(29,728,494)$ | 4.00\% | $(130,596)$ |
| 1/1/2017-3/31/2017 | (29,859,090) | 4.00\% | $(295,941)$ |

C:\Users\ow05177\AppData\Loca|\Microsoft\Windows\Temporary Internet Files\Content.Outlook\Q1.YUL846\6-17_b___reference__B___Fin_48_Interest_Exp__Pilot_

$$
\text { 539) Fin } 48 \text { Reserve on pilot claim included on the } 2016 \text { return }
$$

2016 Return (Pilot)
2016 Carryforwards
$\angle T O Z / 08 / 9-\angle T O Z / 6 \tau / \hbar$
7/1/2017-9/30/2017
$9 / 30 / 2017-12 / 31 / 2017$

$$
\begin{array}{rcc}
(30,1.55,031) & 4.00 \% & (59,539) \\
(145,1.63,208) & - & - \\
56,630,356 & & \\
(1,626,491) & - & - \\
(120,373,914) & 4.00 \% & (966,800) \\
(121,340,714) & 4.00 \% & (1,229,501) \\
(122,570,215) & 4.00 \% & (1,241,959) \\
\hline & \text { Total } & (1,306,055)
\end{array}
$$



## Table of Contents


Interest Expense Calculation on Pilot NND R\&D Strategy (State)
Thru 12/31/2017

| ARTER FIN48 UPDATE |  |  |  |
| :---: | :---: | :---: | :---: |
| Date | Amount | Rate | Interest |
| 2015 Return | 20,679,985 | - | - |
| 3/15/2016-3/31/2016 | 20,679,985 | 3.00\% | 27,212 |
| 4/1/2016-6/30/2016 | 20,707,198 | 4.00\% | 207,526 |
| 7/1/2016-9/30/2016 | 20,914,724 | 4.00\% | 211,921 |
| 10/1/2016-12/31/2016 | 21,126,645 | 4.00\% | 214,068 |
| 1/1/2017-3/31/2017 | 21,340,714 | 4.00\% | 211,514 |
| 4/1/2017-4/18/2017 | 21,552,227 | 4.00\% | 42,554 |
| 2016 Return | 40,814,449 | - | - |
| 2016 Carryforwards | $(17,385,588)$ | - | - |
| 4/19/2017-6/30/2017 | 45,023,642 | 4.00\% | 361,614 |
| 7/1/2017-9/30/2017 | 45,385,256 | 4.00\% | 459,872 |
| 10/1/2017-12/31/2017 | 45,845,128 | 4.00\% | 464,532 |
|  |  | TOTAL | 2,200,813 |


| Taxinterest | Diff. |
| ---: | ---: |
| $2,198,905$ | 1,908 |
| 195,753 | 1,396 | | $45,845,128$ | $4,00 \%$ | 464,532 |
| ---: | ---: | ---: |
|  | TOTAL | $2,200,813$ |
| 2016 ES Underpayment Penalty | 197,149 |  |
| 2017 ES Underpayment Penalty | - |  |
| Total Interest Expense | $2,397,962$ |  |

C: \Users\cw05177\AppData\Local\Microsoft\Windows\Temporary Internet Files\Content.Outlook\QLYUL846\6-17_b___reference_B__-Fin_48_Interest_Exp__Pilot_

## NND Fas 109 Calculation

WO 17 Equity AFUDC

Federal @ 33.25\% 36,920,067

Gross Up Factor 1.619433
Federal 59,789,582
State 8,990,915
68,780,496

$$
\begin{array}{cc} 
& \begin{array}{c}
\text { Year to Date } \\
\text { Amount } \\
\$ 173,506,180 \\
\$ 51,017,740 \\
\$ 10,734,412 \\
\$ 69,323,396 \\
\$ 19,058,800
\end{array} \\
& 1
\end{array}
$$

Reference

$\$ 56,691,219$ - Agrees to account 426.5090 on attached journals referenced as $C$.
Taxes calculated at applicable federal and state statutory tax rates.
Net of Tax Impact
Actual Cap Structure used by Fixed Assets to calculate AFUDC rates on a quarterly basis
As of December 31, 2017

| Description | Net Outstanding Principal | Weighting | Annual Cost | Embedded Cost | Weighted Cost |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Total long-term debt | 33,731,780,484 | 61.987\% | 1,408,625,147 | 4.176\% | 2.589\% |
| Short-term debt (13-month average) | 2,884,384,231 | 5.300\% | 41,548,897 | 1.440\% | 0.076\% |
| Total debt | 36,616,164,715 | 67.287\% | 1,450,174,045 | 3.960\% | 2.665\% |
| Total preferred stock | - | 0.000\% | - | 0.000\% | 0.000\% |
| Common stock | 9,903,119,611 | 18.198\% |  | 10.000\% | 1.820\% |
| Other paid-in capital | $(37,534,028)$ | -0.069\% |  | 10.000\% | -0.007\% |
| Retained earnings | 7,935,892,187 | 14.583\% |  | 10.000\% | 1.458\% |
| Adjustments | - | 0.000\% |  | 10.000\% | 0.000\% |
| Total common equity (excl AOCl) | 17,801,477,770 | 32.713\% |  | 10.000\% | 3.271\% |
| Total Capital | 54,417,642,485 | 100.000\% |  |  | 5.936\% |


| Capitalized Interest Rate |  |  |  |
| :--- | ---: | ---: | ---: |
| Long-term debt | $33,731,780,484$ | $92.123 \%$ | $4.176 \%$ |
| Short-term debt | $2,884,384,231$ | $7.877 \%$ | $1.440 \%$ |
| Total debt | $\mathbf{3 6 , 6 1 6 , 1 6 4 , 7 1 5}$ | $\mathbf{1 0 0 . 0 0 0 \%}$ | $0.847 \%$ |

Virginia Electric and Power Company

| Description | Net Outstanding Principal | Weighting | Annual Cost | Embedded Cost | Weighted Cost |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Total long-term debt | 11,178,979,778 | 47.214\% | 500,525,894 | 4.477\% | 2.114\% |
| Short-term debt (13-month average) | 285,626,159 | 1.206\% | 3,466,221 | 1.214\% | 0.015\% |
| Total debt | 11,464,605,937 | 48.420\% | 503,992,115 | 4.396\% | 2.129\% |
| Total preferred stock | - | 0.000\% | - | 0.000\% | 0.000\% |
| Common stock | 5,737,401,834 | 24.232\% |  | 10.000\% | 2.423\% |
| Other paid-in capital | 1,112,875,284 | 4.700\% |  | 10.000\% | 0.470\% |
| Retained earnings | 5,311,720,951 | 22.434\% |  | 10.000\% | 2.243\% |
| Adjustments | - | 0.000\% |  | 10.000\% | 0.000\% |
| Total common equity (excl AOCI) | 12,161,998,069 | 51.366\% |  | 10.000\% | 5.137\% |
| Job development tax credits |  |  |  |  |  |
| Allocation: debt | 24,247,267 | 0.102\% |  | 4.477\% | 0.005\% |
| Allocation: preferred stock | - | 0.000\% |  | 0.000\% | 0.000\% |
| Allocation: equity | 26,379,439 | 0.111\% |  | 10.000\% | 0.011\% |
| Total Job development tax credits | 50,626,706 | 0.214\% |  | 7.355\% | 0.016\% |
| Total Capital | 23,677,230,712 | 100.00\% |  |  | 7.281\% |


| Capitalized Interest Rate |  |  |  |
| :--- | ---: | ---: | ---: |
| Long-term debt | $11,178,979,778$ | $97.509 \%$ | $4.477 \%$ |
| Short-term debt | $285,626,159$ | $2.491 \%$ | $1.214 \%$ |
| Total debt | $11,464,605,937$ | $100.000 \%$ | $0.030 \%$ |

## Cost of Capital and Capital Structure <br> As of December 31, 2017

| Description | Net Outstanding Principal | Weighting | Annual Cost | Embedded Cost | Weighted Cost |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | 3.601\% | 1.506\% |
| Total long-term debt | 3,509,162,660 | 41.830\% $7.374 \%$ |  | 1.396\% | 0.103\% |
| Short-term debt (13-month average) | 618,599,472 | 7.374\% |  | 3.271\% | 1.609\% |
| Total debt | 4,127,762,132 | 49.204\% | 135,015,007 | 3.271\% | 1.609\% |
|  |  | 0.000\% | - | 0.000\% | 0.000\% |
| Total preferred stock |  |  |  |  |  |
|  |  | 0.000\% |  | 10.528\% | 0.000\% |
| Common stock |  | 40.681\% |  | 10.528\% | 4.283\% |
| Other paid-in capital | $3,412,718,346$ $848,553,574$ | 10.115\% |  | 10.528\% | 1.065\% |
| Retained earnings | 848,553,574 | 0.000\% |  | 10.528\% | 0.000\% |
| Adjustments |  | 50.796\% |  | 10.528\% | 5.348\% |
| Total common equity (excl AOCl) | 4,261,271,920 | 50.796\% |  |  |  |

$$
\begin{array}{|rr|}
\hline & \\
\hline 3,509,162,660 & 45.160 \% \\
4,261,271,920 & 54.840 \% \\
\hline 7,770,434,580 & 100.000 \% \\
\hline
\end{array}
$$

| Capitalized Interest Rate |  |  |  |  |
| :--- | ---: | ---: | ---: | ---: |
| Long-term debt | $3,509,162,660$ | $85.014 \%$ | $3.601 \%$ | $3.062 \%$ |
| Short-term debt | $618,599,472$ | $14.986 \%$ | $1.396 \%$ | $0.209 \%$ |
| Total debt | $\mathbf{4 , 1 2 7 , 7 6 2 , 1 3 2}$ | $\mathbf{1 0 0 . 0 0 0 \%}$ |  | $\mathbf{3 . 2 7 1 \%}$ |

Actual Cap Structure used by Fixed Assets to calculate AFUDC rates on a quarterly basis

## Dominion Resources, Inc.

 Cost of Capital and Capital StructureAs of December 31, 2016

| Description | Net Outstanding Principal | Weighting | Annual Cost | Embedded Cost | Weighted Cost |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Total long-term debt | 30,454,701,427 | 62.119\% | 1,194,040,261 | 3.921\% | 2.436\% |
| Short-term debt (13-month average) | 3,167,054,769 | 6.460\% | 28,545,236 | 0.901\% | 0.058\% |
| Total debt | 33,621,756,196 | 68.579\% | 1,222,585,497 | 3.636\% | 2.494\% |
| Total preferred stock | - | 0.000\% | - | 0.000\% | 0.000\% |
| Common stock | 8,594,709,159 | 17.531\% |  | 10.000\% | 1.753\% |
| Other paid-in capital | $(44,932,108)$ | -0.092\% |  | 10.000\% | -0.009\% |
| Retained earnings | 6,854,538,846 | 13.981\% |  | 10.000\% | 1.398\% |
| Adjustments | - | 0.000\% |  | 10.000\% | 0.000\% |
| Total common equity (excl AOCI) | 15,404,315,897 | 31.421\% |  | 10.000\% | 3.142\% |

[^0]Virginia Electric and Power Company

| Description | Net Outstanding Principal | Weighting | Annual Cost | Embedded Cost | Weighted Cost |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Total long-term debt | 10,400,735,726 | 44.205\% | 477,102,114 | 4.587\% | 2.028\% |
| Short-term debt (13-month average) | 1,260,815,371 | 5.359\% | 10,458,777 | 0.830\% | 0.044\% |
| Total debt | 11,661,551,097 | 49.564\% | 487,560,891 | 4.181\% | 2.072\% |
| Total preferred stock | - | 0.000\% | - | 0.000\% | 0.000\% |
| Common stock | 5,737,401,834 | 24.385\% |  | 10.000\% | 2.439\% |
| Other paid-in capital | 1,112,875,284 | 4.730\% |  | 10.000\% | 0.473\% |
| Retained earnings | 4,968,753,842 | 21.118\% |  | 10.000\% | 2.112\% |
| Adjustments | - | 0.000\% |  | 10.000\% | 0.000\% |
| Total common equity (excl AOCl) | 11,819,030,960 | 50.233\% |  | 10.000\% | 5.023\% |
| Job development tax credits |  |  |  |  |  |
| Allocation: debt | 22,364,251 | 0.095\% |  | 4.181\% | 0.004\% |
| Allocation: preferred stock | - | 0.000\% |  | 0.000\% | 0.000\% |
| Allocation: equity | 25,413,949 | 0.108\% |  | 10.000\% | 0.011\% |
| Total Job development tax credits | 47,778,200 | 0.203\% |  | 7.276\% | 0.015\% |
| Total Capital | 23,528,360,257 | 100.000\% |  |  | 7.110\% |
| Capitalized Interest Rate |  |  |  |  |  |
| Long-term debt | 10,400,735,726 | 89.188\% |  | 4.587\% | 4.091\% |
| Short-term debt | 1,260,815,371 | 10.812\% |  | 0.830\% | 0.090\% |
| Total debt | 11,661,551,097 | 100.000\% |  |  | 4.181\% |

Dominion Gas Holdings

| Cost of Capital and Capital Structure <br> As of December 31, 2016 |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Description | Net Outstanding Principal | Weighting | Annual Cost | Embedded Cost | Weighted Cost |
| Total long-term debt | 3,468,912,302 | 46.195\% | 118,848,191 | 3.426\% | 1.583\% |
| Short-term debt (13-month average) | 380,845,472 | 5.072\% | 3,227,964 | 0.848\% | 0.043\% |
| Total debt | 3,849,757,774 | 51.267\% | 122,076,154 | 3.171\% | 1.626\% |
| Total preferred stock | - | 0.000\% | - | 0.000\% | 0.000\% |
| Common stock | - | 0.000\% |  | 10.528\% | 0.000\% |
| Other paid-in capital | 3,412,718,346 | 45.447\% |  | 10.528\% | 4.784\% |
| Retained earnings | 246,741,242 | 3.286\% |  | 10.528\% | 0.346\% |
| Adjustments | - | 0.000\% |  | 10.528\% | 0.000\% |
| Total common equity (excl AOCI) | 3,659,459,588 | 48.733\% |  | 10.528\% | 5.130\% |
| Total Capital | 7,509,217,362 | 100.000\% |  |  | 6.756\% |
| FERC Methodology (excludes short-term debt): |  |  |  |  |  |
| Total long-term debt | 3,468,912,302 | 48.663\% |  |  |  |
| Total common equity | 3,659,459,588 | 51.337\% |  |  |  |
| Total long-term capital | 7,128,371,890 | 100.000\% |  |  |  |
| Capitalized Interest Rate |  |  |  |  |  |
| Long-term debt | 3,468,912,302 | 90.107\% |  | 3.426\% | 3.087\% |
| Short-term debt | 380,845,472 | 9.893\% |  | 0.848\% | 0.084\% |
| Total debt | 3,849,757,774 | 100.000\% |  |  | 3.171\% |


New Nuclear Abandonment Loss Impact
Account 426.5090
As of December 31, 2017

Net of Tax impact

$\$ 56,691,219$ - Agrees to account 426.5090 on attached journals referenced as $C$.

Journal Entry Detail Report





Run Date $4 / 16 / 2018$
Run Time $9: 37 \mathrm{AM}$ $\Sigma(1)=173,506,180.00$
Total Credits: $\mathbf{\$ 2 3 6 , 7 5 7 , 2 0 6 . 1 9}$


Total Credits: $\$ 235,258,331,69$
Pager have a planned debt issue associated with them, as well as balances in accounts 1823096, and 1823072.
Pa 2
SCEG
UNHEDGED SWAP


## MICCRAVY, ERNEST E

## From:

Sent:
To:
Cc:
Subject:

COFFER, KEITH C JR
Thursday, January 11, 2018 3:40 PM
MCCRAVY, ERNEST E: GORTMAN, LYDIA K
SWAN, JAMES E IV; SMITH; VIRGINIA D; SPARKS, MARK L
December impairment Entries

Ike/Lydia,
As we discussed, please make the following entries in December's business associated with the NND abandonment:

## Lydia

1. Record a $\$ 180 \mathrm{~m}$ write off of work order 170000 to impair the project costs for the value of the proposed purchase of the Columbia Energy Center for which rate recovery will be foregone as part of the proposed NND settlement that SCE\&G:put forth.
2. Record an additional $\$ 280$ million write off to work order 170000 to impair the project costs in accordance with the proposed NND settlement that SCE\&G putt forth.

## Ike

1. Write off the losses associated with the termination of the interest rate swaps that no longer have a planned debt issue associated with them.
2. Write off the balance in account 182.3095 which represents previously deferred lost Section 41 and Section 199 tax benefits.
3. Write off the balance in account 182.3096 which represents fees associated with NND tax strategies.
4. Write off the balance in account 182.3072 which represents carrying cost accruals on certain NND ADIT positions.

The debit for all of the above should be charged as follows:
Account: 426.5090
Operating Unit: VCS2.
Resource Code: 901
Customer Code: 4NO
Please give me a copy of the entries when they are ready. Let me know if there are any questions.
Thanks,
Casey

$$
254,262,731.69
$$

|  | Account | December Thls Year | Decomber Last Year | Change From December | Docamber Last Year | Change From Last Yoar |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| SCEG | 1823281 Com Ind Dsm Accum Amort | (\$19,194,819.14) | (\$13,635,801.07) | (\$5,559,018.07) | (\$13,635,801.07) | (\$5,559,018.07) |
| SCEG | 1823282 Res Dsm Carrying Costs | \$10,134,925,76 | \$9,104,360.37 | \$1,030,575.38 | \$9,104,350.37 | \$1,030,575.30 |
| SCEG | 1823283 Com Ind Dsm Carrying Costs | \$6,141,820.10 | \$5,249,345.90 | \$892,474.20 | \$5,249,346.90 | \$892,474.20 |
| SCEG | 1823300 Reg Asset Oer Refirements | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823301 Reg Assel Supp Exec Relliramen | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823302 Reg Asset Nuc Wo99 Retlrement | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823303 Reg Asset Oer Only Rellrements | \$0.00 | \$0,00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823304 Reg Assat Ubs \#240 | \$0.00 | \$0,00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823305 Reg Asset U S Bank 1233 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823306 Reg Asset Mizuho \#238 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823307 Reg Asset Td Bank \#241 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823310 Reg Asset Severance \& Erip Pay | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823315 Reg Asset - Lld | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823316 Reg Asset - Lid-gas | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823320 Reg Assel Nuc W099 Severance | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823350 Reg Asset-t Lock 6626 Due 21 | (\$828,880.26) | (\$863,323.55) | \$34,443.29 | (\$863,323.55) | \$34,443.29 |
| SCEG | 1823351 Reg Asset-t-lock 680 Due 115 | (\$136,082.00) | (\$141,575.64) | \$5,493,64 | (\$141,576.64) | \$5,493.64 |
| SCEG | 1823352 Reg Asselt-lock 625 Due 71 | ( $\mathbf{7} 7,004,968.58$ ) | (\$7,211,443.42) | \$206,474.84 | (\$7,211,443,42) | \$206,474.84 |
| SCEG | 1823353 Reg Assel 530 T Lock Due 515 | \$8,450,446.48 | \$8,790,238,26 | (\$339,791.78) | \$8,790,238.26 | (\$339,791.78) |
| SCEG | 1823354 Reg Asset T Lack 525 Due 111 | \$275,758.82 | \$595,144.45 | (\$319,385.63) | \$595,144.45 | (\$319,385.63) |
| SCEG | 1823355 Reg Assel-t Lock 525 Due 31 | \$1,407,321.35 | \$1,456,989.39 | (\$48,648.04) | \$1,455,969.39 | (\$48,648.04) |
| SCEG | 1823366 Reg Asset-swap 605 Due1 153 | \$11,897,441,36 | \$12,178,310.92 | (\$280,869.66) | \$12,178,310.92 | (\$280,869.56) |
| SCEG | 1823357 Reg Asset-lock 605 Due 1162 | (\$427,785.94) | (\$438,481.73) | \$10,685.79 | ( $\$ 438,481.73$ ) | \$10,695,79 |
| SCEG | 1823358 Reg Asset - 150 mFmb | \$2,871,317.05 | \$2,935,586.95 | (\$64,269,90) | \$2,935,586.95 | ( $\$ 64,269.90$ ) |
| SCEG | 1823359 Reg Asset 125m Swap Boa | \$7,518,699.06 | \$7,667,762.28 | (\$148,063,23) | \$7,667,762.29 | (\$148,063.23) |
| SCEG | 1823360 Reg Asset 125 m Swap Wf | \$8,144,503.60 | \$8,303,900.34 | (\$159,396.74) | \$8,303,900.34 | (\$159,386.74) |
| SCEG | 1823361 Reg Asset 100m Csio | \$12,140,952.44 | \$12,362,037,06 | ( $\$ 221,084.62$ ) | \$12,362,037,06 | (\$221,084.62) |
| SCEG | 1823362 Reg Asset 75m Boa | \$23,028,919.28 | \$23,332,334.19 | (\$303,414.91) | \$23,332,334.19 | (\$303,414.91) |
| SCEG | 1823363 Reg Assel 75 m Wells Fargo | \$23,204,128.26 | \$23,508,443.19 | (\$304,314.93) | \$23,508,443.19 | (\$304,314.93) |
| SCEG | 1823365 Reg Asset 90 m Csfb | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823366 Reg Asset U S Bank \#228 | \$5,613,104,46 | \$5,641,747,27 | $(528,642.81)$ | \$5,641,747.27 | (\$28,642,81) |
| SCEG | 1823367 Reg Asset W/f \$226 | \$11,406,797.93 | \$11,464,793.77 | $(\$ 57,895.84)$ | \$11,464,793.77 | (\$57,995.84) |
| SCEG | 1823368 Reg Asset Jpm \#220 | \$5,692,725.53 | \$5,721,682.16 | (\$28,956.63) | \$5,721,682.16 | (\$28,956.63) |
| SCEG | 1823369 Reg Asset Jpm \#230 | \$10,952,062.29 | \$11,008,254.07 | (\$66,191.78) | \$11,008,254.07 | $(\$ 56,191.78)$ |
| SCEG | 1823370 Reg Asset U S Bank \#219 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823371 Reg Assat Td Bank \#221 | \$0.00 | \$0,00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823372 Reg Asset Mizuho \#225 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823373 Reg Asset Ubs \#232 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823374 Reg Asset Unton Bank \#233 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823375 Reg Asset Ubs \#231 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823376 Reg Assel Cs ${ }^{2} 218$ | \$0.00 | \$0,00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823377 Reg Asset Cs \#229 | \$0.00 | \$0,00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823378 Reg Assel WII $\# 217$ | \$36,856,016.00 (1) | \$36,856,916.00 | \$0.00 | \$36,856,916.00 | \$0.00 |
| SCEG | 1823379 Reg Asset Ms \#227 | \$37,989,250,00 | \$37,388,250,00 | \$0.00 | \$37,388,250.00 | \$0.00 |
| SCEG | 1823380 Reg Asset Boa \#222 | \$36,980,500.00 | \$36,980,500.00 | \$0.00 | \$36,980,500.00 | \$0.00 |
| SCEG | 1823381 Reg Asset \#234 | \$4,904,708.07 | \$4,038,641.54 | \$866,066.53 | \$4,038,641.54 | \$866,066.53 |
| SCEG | 1823382 Reg Asset - New Silma | \$6,124,937,35 | \$5.752,748.67 | \$372,188.68 | \$5,752,748,67 | \$372,188.68 |
| SCEG | 1823383 Reg Asset Us Bank \#236 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823384 Reg Asset Ubs \$237 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823385 Der/net - O\&m Incremental | \$907,686.70 | (\$322,887,97) | \$1,230,574.67 | (\$322,887.97) | \$1,230,574.67 |
| SCEG | 1823386 Reg Asset-jpm-\#242 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823387 Reg Asset-mizuho \$243 | \$0.00 | \$0.00 | \$0.00 | \$0,00 | \$0.00 |
| SCEG | 1823388 Reg Assel-ubs-\#244 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823389 Reg Assel-wf-\#245 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823390 Reg Assel-\$500mm Dobt Due 6- | \$146,812,835.64 | \$147,148,150.52 | (\$335,314.88) | \$147,148,150.62 | (\$335,314.88) |
| SCEG | 1823391 Der Avoided Costs | ( $\$ 4,079,170.05$ ) | (\$1,724,943.32) | (\$2,354,226.73) | (\$1,724,943.32) | ( $32,354,226.73$ ) |


|  | Account | December This Year | December <br> Last Year | Change From December | December Last Year | Change From Last Year |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| SCEG | 1823392 Der Capital - Incremental | (\$109,653.23) | \$96,563,45 | (\$206,216.68) | \$96,563.45 | (\$206,216.68) |
| SCEG | 1823393 Reg Asset Td Bank \#246 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823394 Reg Asset U S Bank \#247 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823395 Reg Asset M Stanley \#256 | \$3,865,000,00 (1) | 1) $\$ 822,002,87$ | \$3,142,097.03 | \$822,902,97 | \$3,142,097,03 |
| SGEG | 18333888 Reg Assel Wf \$267 | \$2,002,000.00 | \$688,541.13 | \$1,313,458,87 | \$688,541,13 | \$1,313,468,87 |
| SCEG | 1823397 Reg Asset Boa \$258 | \$2,883,840,00 | \$604,667.61 | \$2,379,172.39 | \$604,667.61 | \$2,379,172.39 |
| SCEG | 1823398 Der Incremenlal Nem Costs Def | \$0.00 | \$925,028.22 | (\$925,028.22) | \$925,028.22 | (\$926,028.22) |
| SCEG | 1823400 Reg Assot Env Remed Cur Vintg | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0,00 |
| SCEG | 1823401 Reg Assl Mgp Env Remd Cur Vn | \$24,044,095.27 | \$25,686,762.36 | (\$1,052,667.09) | \$25,696,762.36 | (\$1,052,667.09) |
| SCEG | 1823402 Reg Asst Env Remed Future Vnt | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823403 Reg Asst Mgp Env Rem Fir Vitg | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823405 Reg Asst Aegis Claim Env Lblis | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823409 Regulatory Asset Calhounpk Mgr | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823411 Reg Asset - Gas Sfas 158 Adj | \$28,204,995,00 | \$30,086,833.00 | (\$1,881,838.00) | \$30,086,833.00 | (\$1,881,838.00) |
| SCEG | 1823412 Reg Asset Elec Sfas 158 Adj | \$198,525,482.00 | \$211,676,663.00 | ( $\$ 13,151,181.00$ ) | \$211,676,663.00 | ( $\$ 13,151,181.00$ ) |
| SCEG | 1823414 Reg Asset - Elec Fas 87 Deferr | \$52,713,760.20 | \$54,701,594,16 | (\$1,987,833.96) | \$54,701,594.16 | (\$1,987,833,96) |
| SCEG | 1823415 Reg Asset - Gas Fas 87 Deferra | \$9,337,100.50 | \$10,366,007.50 | (\$1,029,507.00) | \$10,366,607.50 | (\$1,029,507.00) |
| SCEG | 1823500 Reg Asset Cust Aw Prg Vint-200 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823501 Reg Asset Cust Aw Pro Vrtg-20 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823502 Reg Asst Cust Aw Pro Vnig-200 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823503 Reg Asst Cust Aw Pro Vitg 201 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823504 Reg Asst Cust Aw Pro Vntg 201 | \$0.00 | \$36,040.30 | (\$36,040.30) | \$36,040.30 | (\$36,040.30) |
| SCEG | 1823505 Reg Asset Cust Aw Pro Vntg 20 | \$33,351.10 | \$73,372.42 | (\$40,021.32) | \$73,372.42 | (\$40,021,32) |
| SCEG | 1823506 Reg Asset Cust Aw Pro Vnig 20 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823507 Reg Asst Cust Aw Pro Vnig 201 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823508 Reg Asst Cust Aw Pro Vnig 201 | \$0.00 | \$104,166.70 | (\$104,166.70) | \$104,166.70 | (\$104,166.70) |
| SCEG | 1823600 Reg Assel-poll Control-cope Sc | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823601 Reg Asset-poll Cnitl-wms Seribr | \$7,660,942.19 | \$7,943,600.63 | (\$282,658.44) | \$7,943,600,63 | (\$282,658.44) |
| SCEG | 1823602 Reg Asset-poll Contrl-wat Serbr | \$24,094,015.56 | \$26,155,955.58 | (\$1,061,940.00) | \$25,155,955.56 | ( $\$ 1,061,940.00)$ |
| SCEG | 1823604 Jad Conlract Termination (coal | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823700 Gas Pipeline Integrity | \$7,937,764.54 | \$5,956,927.68 | \$1,980,836.86 | \$5,956,927.68 | \$1,980,836.86 |
|  | 1823 Accounts | \$1,890,068,417.91 \$ | \$1,848,568,507.64 | \$41,509,910.27 | \$1,848,668,607.64 | \$41,609,910.27 |
| SCEG | 1830000 Prelim Survay \& Investgin-misc | \$ $\$ 0.00$ | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830005 Psi Mcm Ash Land FHI Study | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830007 Psi Cdysi23 Low Nox Basin Tes | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830008 Psi Fps Elsc Control Rehab | \$0.00 | \$0.00 | \$0.00 | \$0,00 | \$0.00 |
| SCEG | 1830009 Psi Nuga Study Const | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830010 Psi Urq Precip Alr Flow Study | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830012 Pal Brnchull Coal Transld Facl | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830013 Psi Shkspr 2 d Storm Water Impr | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830016 Pst Parr Dam Modification | \$0,00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830019 Psi Sal Dam Stab Study | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830020 Psi Prelim Engr Vcs | \$0.00 | \$0,00 | \$0.00 | \$0.00 | \$0,00 |
| SCEG | 1830024 Psi Wateree Ash L.and Fill | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830027 Psi Carbon Burn Out Engr Study | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830029 Psi Huron Project | \$0,00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830032 Wateree 1 Cooling Tower | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830033 Wateree Low Temp Reheater | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830035 Ves Plant Life Extenston | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830038 New Generation Oplions | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830040 Cope Nox Test And Optlmizat | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0,00 |
| SCEG | 1830043 Wai High Temp Sh inlet Head | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0,00 |
| SCEG | 1830047 Wat Dyn Cissfrs And Cl Pipe | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830051 Wat Sanltary Sewer Upgrade | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830053 Synfuel Project - Waterea | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1830059 Wat 1 And 2 Scrs | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0,00 |

LH18352

|  | Account | December Thls Year | December Last Year | Change From December | December Last Year | Change From Last Year |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| SCEG | 1823034 Reg Assel Res Demand Under | \$23,222,511.95 | \$15,031,987.93 | \$8,190,624.02 | \$15,031,987.93 | \$8,190,524.02 |
| SCEG | 1823035 Reg Asset Comm Demand Unde | \$4,886,147.64 | \$3,588,003.62 | \$1,298,144.02 | \$3,588,003.62 | \$1,298,144.02 |
| SCEG | 1823036 Reg Assei Ind Demand Under | \$1,261,713.34 | \$431,757,36 | \$829,955.98 | \$431,757.36 | \$829,955,98 |
| SCEG | 1823041 Reg Assel Reagent Under Colec | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823044 Other Reg Assels-150.m Fss | \$0.00 | \$0.00 | \$0.0 | \$0.00 | \$0.00 |
| SCEG | 1823046 Elec Crew Qtr Remediation | \$0.00 | \$128,786.69 | (\$128,786.69) | \$128,786.69 | (\$128,786.69) |
| SCEG | 1823047 Hagood Remedia - Exxon Mobile | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| sceg | $18230482010 \$ 25 \mathrm{mil}$ Elec Withr AdJ | \$0.00 | \$0,00 | \$0.00 | \$0.0 | \$0.00 |
| SCEG | 18230492012 incremental Rate Case Exp | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823051 Interest income M/m Psc Accrl | \$1,047,801,20 | \$775,652.01 | \$272,149,19 | \$775,652.01 | \$272,149.19 |
| sceg | 1823052 Reg Asset - Environmental Psi | \$240,906.29 | \$335,689.25 | (\$94,782.96) | \$335,689.25 | (\$94,782,96) |
| ScEG | 1823053 Gas Wna Cap-winter 2012 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| sceg | 1823054 Elz Tax Credll - Overage | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| sceg | 1823055 Reg Asset Def Vcs Up-flow Mod | \$4,506,334,84 | \$4,690,150,84 | (\$183,816.00) | \$4,690,160.84 | (\$183,816.00) |
| sceg | 1823056 Reg Asst Recover Capacity Purc | \$752,333.04 | \$1,048,333.08 | ( $\$ 296,000.04$ ) | \$1,048,333.08 | (\$296,000.04) |
| SCEG | 1823057 Incremental Rate Case Expanses | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| sceg | 1823059 Elec Pension Rlder Underrcovy | \$1,419,411.56 | \$1,358,448.54 | \$60,963.02 | \$1,358,448.54 | \$60,963.02 |
| sceg | 1823062 Other Reg Asset - 150 m Swap | \$24,336,961.81 | \$24,782,895.44 | (\$445,933.63) | \$24,782,895.44 | ( $\$ 445.933 .63$ ) |
| sceg | 1823063 Reg Asset So2 Emisslon Allowar | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823064 Reg Asset-deler Capacily Purch | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823085 Reg Assel-fukushima-vcs | \$4,242,682.29 | \$4,093,629.72 | \$149,152.57 | \$4,093,529.72 | \$149,152.57 |
| SCEG | 1823066 Reg Assel - Defer Capacily Pur | \$2,134,511,49 | \$2,134,511,49 | \$0.00 | \$2,134,511.49 | \$0.00 |
| SCEG | 1823069 Reg Asset-def Cap-2014-2016-s | \$1,461,876.52 | \$6,363,840.76 | (\$4,901,965.24) | \$6,363,840.76 | (\$4,901,965.24) |
| SCEG | 1823070 Reg Asset-def Cap-2014-19 Coll | \$24,683,683.20 | \$8,567,877,96 | \$16,115,805.24 | \$8,567,877.96 | \$16,115,806.24 |
| - SCEG | 1823072 Reg Assel Nod Carrying Cosls | \$51,017,740,00 | \$32,203,282.00 | \$18.814,458.00 | \$32,203,282.00 | \$18,814,458.00 |
| SCEG | 1823073 Reg Assel - Clp 5 | \$12,248,143.74 | \$6,935,503.67 | \$5,312,640.07 | \$6,935,503.67 | \$5,312,640.07 |
| SCEG | 1823074 Nucl Refueling Outage Cost | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823075 Reg Asset-cyber Securily Comp | \$3,532,155.59 | \$2,203,154.61 | \$1,329,000.98 | \$2,203,154,61 | \$1,329,000,98 |
| SCEG | 1823070 Reg Asset - Ubs \#252 | \$7,230,000,00(1) | \$6,123,357.82 | \$1,106,642.18 | \$6,123,357.82 | \$1,106,642.18 |
| SCEG | 1823077 Reg Asset - Boa \#249 | \$7,829,830.00 | \$6,246,148,25 | \$1,583,689.75 | \$6,246,148,25 | \$1,683,689.75 |
| SCEG | 1823078 Reg Asset-morgan Stanley \#251 | \$17,867,000.00 | \$17,867,000,00 | \$0.00 | \$17,867,000.00 | \$0.00 |
| SCEG | 1823079 Reg Asset - Boa - Swap \#250 | \$6,910,757.50 | \$6,910,757.50 | \$0.00 | \$6,910,757,50 | \$0.00 |
| Scee | 1823080 Reg Asset - Us Bank Swap \#254 | \$6,464,828.00 | \$5,447,854.80 | \$1,016,973.20 | \$5,447,854,80 | \$1,016,973.20 |
| SCEG | 1823081 Reg Asset - Unton Bank Swap \# | \$4,226,125,00 | \$3,357,759.21 | \$868,365.79 | \$3,357,759,21 | \$868,365.79 |
| SCEG | 1823082 Reg Asset-morgan Stanlay-reg A | \$4,300,000,00 - | \$2,532,741.68 | \$1,767,268.32 | \$2,532,741.68 | \$1,767,258.32 |
| sceg | 1823083 Gas Wna Cap -winter 2015 | \$1,658,425.78 | \$2,091,058.54 | (\$432,632.76) | \$2,091,058,54 | (\$432,632.76) |
| SCE | 1823084 Gas Wha Cap -winter 2016 | \$1,407,143.80 | \$914,938.00 | \$492,205.80 | \$914,938.00 | \$492,206.80 |
| SCEG | 1823085 Reg Asset-cyber Secur Depr Ca | \$1,048,101.04 | \$1,540,054.39 | (\$491,953.35) | \$1,540,054.39 | (\$491,953.35) |
| sceg | 1823086 Reg Asset \$75mm Due 6/1/64 | \$21,249,352.98 | \$21,320,566.35 | (\$71,213.37) | \$21,320,566.35 | (\$71,213.37) |
| SCEG | 1823087 Reg Asset \$426mm Due 6/15/46 | \$118,775,997.60 | \$120,258,779.07 | ( $\$ 1,482,781.47$ ) | \$120,258,779,07 | (\$1,482,781,47) |
| SCEG | 1823088 Reg Asset Unton Bank \#260 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0,00 |
| sceg | 1823089 Reg Asset - Tdb \#261 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| sceg | 1823090 Reg Asset Rbc \#262 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.0 |
| Sceg | 1823091 Reg Asset - Cradit Sulsse \#263 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| sceg | 1823092 Gas Wna Cap- Winter 2017 | \$1,437,141.00 | \$0.00 | \$1,437,141,00 | \$0.00 | \$1,437,141.00 |
| SCEG | 1823095 Reg Assel Nnd 41/199 (pillot) | \$19,004,400.00 | \$12,166,000.00 | \$6,838,400.00 | \$12,166,000.00 | \$6,838,400.00 |
| 1 SCEG | 1823096 Reg Asset Nid Acci Feesfintere | \$10,734,411.68 | \$3,171,174.67 | \$7,563,237.02 | \$3,171,174.67 | \$7,563,237.02 |
| SCEG | 1823101 Reg Asst Def Start Up Cost Vas | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823102 Reg Asset Roto Shot Peen Vcs | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823103 Reg Asset Wesths Liligation | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823104 Reg Asset Doe D And D Fund | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 1823105 Reg Assel - Decom Aro | (\$12,567,512.97) | (\$6,502,772.86) | (\$7,064,740.11) | ( $55,502,772.86$ ) | (\$7,084,740,11) |
| SCEG | 1823106 Def Aro Acrellon And Arc Depr | \$326,295,964,38 | \$338,737,287,81 | (\$12,441,333.43) | \$338,737,297.81 | (\$12,441,333.43) |
| SCEG | 1823107 Def Econ Grant - Dixie Narco | \$175,000.03 | \$275,000.05 | ( $\$ 100,000.02$ ) | \$275,000.05 | (\$100,000.02) |
| SCEG | 1823108 Def Econ Grant - Michelin | \$333,333.40 | \$433,333.42 | ( $\$ 100,000.02$ ) | \$433,333.42 | (\$100.000.02) |
| sceg | 1823109 Def Econ Grant-bf Phase 1 | \$400,000.08 | \$500,000.10 | (\$100,000.02) | \$500,000.10 | (\$100,000.02) |

LH18352

|  | Account | Docember This Year | December Last Year | Change From December | Decombor Last Year | Chango From Last Year |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| SCEG | 2540011 Oth Reg Liab Nuclear Refualling | (\$7,092,978.70) | (\$11,677,071.90) | \$4,584,093.20 | (\$11,677,071,80) | \$4,584,093.20 |
| SCEG | 2540013 Reg Llab Elec - Unbllled Fuel | ( $\$ 21,093,933.00$ ) | (\$17,838,458.00) | ( $\$ 3,255.475 .00$ ) | (\$17,838,458,00) | (\$3,255,475.00) |
| SCEG | 2540016 Reg Lab Res Commondily Over | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540017 Reg Llab Com Commodity Over | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540018 Reg Liab ind Commodily Over | \$0,00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540019 Reg Liab Res Demand Over | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540020 Reg Llab Com Demand Over | \$0.00 | \$0,00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540021 Reg Llab Ind Demand Over | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540028 Olher Reg Liab-150m Fss | (\$19,551,108.62) | (\$20,057,880.63) | \$508,772.01 | (\$20,057,880.63) | \$506,772.01 |
| SCEG | 2540030 Other Reg And Liab 150 m Lock | (\$2,101,293.16) | ( $32,154,402.23$ ) | \$53,109.07 | (\$2,154,402.23) | \$53,109.07 |
| SCEG | 2540034 Oth Reg Liab 75m Jpm | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540035 Olh Reg Liab 75m Db | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540036 Oth Reg Liab 75 m Ubs | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540037 Oth Reg Liab 75m Bac | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540041 Reg Liab Reagent Over Collect | (\$1,682,799.48) | $(\$ 3,383,202.48)$ | \$1,700,403,00 | ( $33,383,202.48$ ) | \$1,700,403.00 |
| SCEG | 2540042 Other Reg Labllity-35 Fss | (\$4,924,897.74) | (\$4,626,030.87) | (\$299,266,87) | (\$4,625,630.87) | (\$299,268.87) |
| SCEG | 2640044 Other Reg t.lablily 80 m Swap U | (\$3,577,285.73) | $(\$ 3,663,201.46)$ | \$85,915,73 | (\$3,663,201.46) | \$85,915.73 |
| SCEG | 2540045 Other Reg Llabilly 80 m Swap M | (\$4,087,330.17) | (\$4,186,065.63) | \$98,735.36 | (\$4,186,065.53) | \$98,735.36 |
| SCEG | 2540046 Olher Reg Liablily 90m Swap C | (\$3,443,622,40) | $(\$ 3,525,840.16)$ | \$82,217.76 | (\$3,525,840.16) | \$82,217.76 |
| SCEG | 2540047 Olher Reg Liab - 90 m Swap Ubs | ( $\$ 14,351,737.19)$ | (\$14,688,248.31) | \$336,511.12 | (\$14,688,248.31) | \$336,511.12 |
| SCEG | 2540048 Other Reg Llab - 80m Swap Wf | (\$348,834.12) | (\$356,900.19) | \$8,066,07 | (\$356,900.19) | \$8,086.07 |
| SCEG | 2540049 Other Reg Lab - 80m Swap Boa | (\$12,832,130.10) | ( $\$ 13,133,243,29$ ) | \$301,113.19 | ( $\mathbf{\$ 1 3 , 1 3 3 , 2 4 3 . 2 9 )}$ | \$301,113.19 |
| SCEG | 2540050 Other Reg Liab - 80 m Swap Mizi | (\$496,673.69) | (\$508,171.07) | \$11,497,38 | (\$508,171.07) | \$11,497.38 |
| SCEG | 2540051 Other Reg Llab - 80m Swap Ms | ( $\$ 12,540,204.62)$ | (\$12,833,581.39) | \$293,376.87 | (\$12,833,581.39) | \$293,376.87 |
| SCEG | 2540052 Other Reg Llab - 80 m Swap Ob | (\$304,190.48) | (\$311,220.41) | \$7,029,93 | (\$311,220.41) | \$7,029,93 |
| SCEG | 2540074 Reg Liab 35m Sifma 234 | \$0.00 | \$0.00 | \$0.00 | \$0,00 | \$0.00 |
| SCEG | 2540075 Other Reg Liab-db Jpm Ubs Boa | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540076 Reg Liab \$100m Mizuho \$500m | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540077 Reg Liab $\$ 50 \mathrm{~m}$ Ubs $\$ 600 \mathrm{~m}$ Dabt | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540078 Reg L.lab-morgan Stanley \#256 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540078 Reg Llab-Boa \#258 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540080 Equity Dsm Residentlal Carry C | (\$2,420,014.78) | (\$3,036,668,07) | \$616,654.28 | (\$3,036,669,07) | \$616,654.28 |
| SCEG | 2540081 Equity Dsm Com/ind Carry Costs | (\$1,343,671,68) | (\$1,696,141.80) | \$352,470.22 | (\$1,696,141.80) | \$352.470.22 |
| SCEG | 2540082 Reg Liab - Wf \#257 | \$0.00 | \$0,00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540083 Reg Liab Swap\#260 Mub | (\$4,736,582.73) | (\$5,928,522.74) | \$1,191,840.01 | (\$5,928,522.74) | \$1,191,940.01 |
| SCEG | 2540084 Reg Liab Swap\#261 Tdb | (\$9,301,073.30) | (\$11,690,011.78) | \$2,388,938,49 | (\$11,690,011.79) | \$2,388,938.49 |
| SCEG | 2540085 Reg Liab Swap\#262 Rbc | (\$18,716,641.17) | (\$23,490,317.07) | \$4,773,675.90 | (\$23,490,317.07) | \$4,773,675.90 |
| SCEG | 2640086 Reg Llab Swapi\$263 Credit Sulss | (\$19,285,342,49) | (\$24,043,789.07) | \$4,758,446.58 | (\$24,043,789,07) | \$4,758,446.58 |
| SCEG | 2540087 Reg Liab Swap\#265 Morgan Sta | (\$931,882.80)(1) | ( $\$ 3,556,660.99$ ) | \$2,624,778.19 | (\$3,556,660.99) | \$2,624,778.19 |
| SCEG | 2540088 Reg Liab Swap \#286 Boa | (\$566,991.70) | (\$1,876,489,22) | \$1,309,497.52 | (\$1,876,489.22) | \$1,309,497,52 |
| SCEG | 2540089 Winnsboro Fuel Ovarcollacted | (\$92,509.01) | (\$63,709,60) | (\$38,799.41) | ( $\$ 53,709.60$ ) | (\$38,799.41) |
| SCEG | 2540090 Orangeburg Fuel Over Collecled | (\$1,396,484.51) | (\$1,813,635.13) | \$417,150.62 | ( $\$ 1,813,635.13$ ) | \$417,150.62 |
| SCEG | 2540091 Reg Liab Jpm Swap \#242 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540092 Reg Lab Mizuho Swap \#243 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540093 Reg Llab Ubs Swap \#244 | \$0.00 | \$0,00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540094 Reg Liab WI Swap \#245 | \$0.00 | \$0,00 | \$0.00 | 50.00 | \$0.00 |
| SCEG | 2540095 Reg Liab Td Bank Swap \#246 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540096 Reg Liab Us Bank Swap \#247 | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540098 Reg Liab - Enviromenlal Remedi | (\$113,152.69) | \$0.00 | (\$113,152.69) | \$0.00 | (\$113,152.69) |
| SCEG | 2540100 Reg Liab So2 Arp | (\$707.19) | (\$637.77) | (\$69.42) | (\$637.77) | (\$69.42) |
| SCEG | 2540101 Reg Llab S02 Csapr | (\$322.09) | (\$320.35) | (\$1.74) | (\$320.35) | (\$1.74) |
| SCEG | 2540110 Reg Liab Stale Adil Transit | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540118 Reg Liab-synfuel Fuel Disc Def | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540119 Reg Liab-synfuel Oper Loss-cdy | \$0.00 | \$0.00 | \$0,00 | \$0.00 | \$0.00 |
| SCEG | 2540120 Reg Liab-synfuel Oper L.oss-wa | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| SCEG | 2540121 St Adit Coaltch Op-wat | \$0.00 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |

LH18352

$$
\Sigma 0=173,506,180.00
$$



[^1]NND Fas 109 Calculation

|  | $111,037,795$ |
| ---: | ---: |
|  |  |
| Federal @ 33,25\% | $36,920,067$ |
| State @ $5 \%$ | $5,551,890$ |
|  |  |
| Gross Up Factor. | 1,619433 |
|  |  |
| Federal | $59,789,582$ |
| State | $8,990,915$ |
|  | $68,780,496$ |


Abandonment Journal Entry







4102000 (Deef Fed Tax Exp)
4102000 (Def ST Tax Exp)
$4121025($ Def Fed Tx Elec Depr)


 4310000 (Other interest Expense




Total Lines: 13
Business Unit FH


## Business Unit: NU



## Abandonment fournal Entry




[^2]X:\Broupdirs\B32\@@_LTR-Income Taxes\New Nuclear\Vourne.
Table of Contents
Interest Calculation on all Tax Years (Federal)
Thru 12/31/2017

| Date | Amount | Rate | Interest |
| :---: | :---: | :---: | :---: |
| 2008 Amended Retum | 2,638,722 | - | - |
| 3/15/2009-3/31/2009 | 2,638,722 | 2.50\% | 2,893 |
| 4/1/2009-6/30/2009 | 2,641,615 | 1.50\% | 9,897 |
| 7/1/2009-9/30/2009 | 2,651,512 | 1.50\% | 10,044 |
| 10/1/2009-12/31/2009 | 2,661,555 | 1.50\% | 10,082 |
| 3/1/2010-3/15/2010 | 2,671,638 | 1.50\% | 8,137 |
| 2009 Amended Return | 6,940,365 | - | - |
| 3/16/2010-3/31/2010 | 9,620,140 | 1.50\% | 6,328 |
| 4/1/2010-6/30/2010 | 9,626,467 | 1.50\% | 36,067 |
| 7/1/2010-9/30/2010 | 9,662,534 | 1.50\% | 36,601 |
| 20/1/2010-12/31/2010 | 9,699,335 | 1.50\% | 36,739 |
| 1/1/2011-3/15/2011 | 9,735,874 | 0.50\% | 9.874 |
| 2010 Amended Return | 13,220,214 | - | - |
| 3/16/2011-3/31/2011 | 22,965,963 | 0.50\% | 5,034 |
| 4/1/2011-6/30/2011 | 22,970,997 | 1.50\% | 86,064 |
| 7/1/2011-9/30/2011 | 23,057,061 | 1.50\% | 87,338 |
| 10/1/2012-12/31/2021 | 23,144,399 | 0.50\% | 29,186 |
| 1/1/2012 - $3 / 15 / 2012$ | 23,173,585 | 0.50\% | 23,821 |
| 2011 Amended Return | 13,941,096 | . | - |
| 3/16/2012 - 3/31/2012 | 37,138,502 | 0.50\% | 8,141 |
| 4/1/2012-6/30/2012 | 37,146,643 | 0.50\% | 46,335 |
| 7/1/2012-9/30/2012 | 37,292,977 | 0.50\% | 46,903 |
| 10/1/2012-12/31/2012 | 37,239,880 | 0.50\% | 46,962 |
| 1/1/2013-3/15/2013 | 37,285,842 | 0.50\% | 37,817 |
| 2012 Amended Return | 14,113,678 | - | - |
| 3/16/2013-3/31/2013 | 51,438,336 | 0.50\% | 11,275 |
| 4/1/2013-6/30/2013 | 51,449,611 | 0.50\% | 54,175 |
| 7/1/2013-9/30/2013 | 51,513,787 | 0.50\% | 64,962 |
| 10/1/2013-12/31/2013 | 51,578,749 | 0.50\% | 65,044 |
| 1/1/2014-3/15/2014 | 51,643,793 | 0.50\% | 52,377 |
| 2013 Tax Return | $(6,162,240)$ | - | - |
| 3/16/2014-3/31/2014 | 45,533,930 | 0.50\% | 9,981 |
| 4/1/2014-6/30/2014 | 45,543,911 | 0.50\% | 56,809 |
| 7/1/2014-9/30/2014 | 45,600,720 | 0.50\% | 57,505 |
| 10/1/2014-12/31/2014 | 45,658,225 | 0.50\% | 57,578 |
| 1/1/2015-3/15/2015 | 45,715,803 | 0.50\% | 46,365 |
| 2014 Tax Return | (7,095,997) | - | - |
| 3/26/2015-3/31/2015 | 38,665,171 | 0.50\% | 8,476 |
| 4/1/2015-6/30/2015 | 38,674,547 | 0.50\% | 48,241 |
| 7/1/2015-9/30/2015 | 38,722,887 | 0.50\% | 48,832 |
| 10/1/2015-12/31/2015 | 38,771,719 | 0.50\% | 48,893 |
| 1/1/2016-3/15/2025 | 38,820,613 | 0.50\% | 38,840 |
| 2015 Retum (Pilot) | (67,279,397) | . | . |
| 2015 Return (Original) | $(1,023,568)$ | - | - |
| 2015-Overpayment | 165,927,704 | - | - |
| 3/16/2016-3/32/2016 | 136,484,191 | 0.50\% | 29,917 |
| 4/1/2016-6/30/2015 | 136,514,109 | 1.50\% | 511,471 |
| 7/1/2016-9/30/2016 | 137,025,579 | 1.50\% | 519,039 |
| 10/1/2016-11/21/2016 | 137,544,618 | 1.50\% | 284,239 |
| 2015 - Refund | $(167,567,352)$ | - | - |
| 31/22/2016-12/31/2016 | $(29,728,494)$ | 4.00\% | ( 130,596 ) |
| 1/1/2017-3/31/2017 | (29,859,090) | 4.00\% | $(295,941)$ |

X:\groupdirs\812)@_LTR-Incorne Taxes\New Nuclear\Journa
APilot Iournal Entrij2017.12.31_2017 Pilot Model Entries

X:\groupdirs\812\@_LTR-Income Taxes\New Nuclear\Vourna



## Abandonment Journal Entry

| Beglnning Balance | Pending Dec. Entries | dr | (cr) | Ending Balance | $\begin{gathered} \text { Journal Entry } \\ \text { dr/(cr) } \\ \hline \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  | - |
| 10,733,745 | 667 |  |  | 10,734,412 | - |
| 19,004,400 | 54,400 | 38,328,900 | $(57,387,700)$ | - | (19,058,800) |
| 364,164,100 | - |  |  | 364,164,100 | - |
| 54,761,500 | - |  |  | 54,761,500 | - |
| 68,185,800 | - |  | (68,185,800) | +\% - - | (68,185,800) |
| 10,253,500 | - | + $\quad \therefore$ | (10,253,500) | - | (10,253,500) |
| $(358,111,200)$ | - | 1,312,004,800 | ( $240,413,400$ ) | 713,480,200 | 4072581400\% |
| $(29,491,223)$ | - | 190,097,300 | ( $28,956,500$ ) | 131,649,577 | 1614.40,800 |
| ( $34,383,400$ ) | (73,900) | 38,170,200 | ( $1,895,900$ ) | 1,817,000 | 36,274,300 |
| $(15,125,000)$ | 210,600 | 5,417,100 |  | (0,497,300) | 5,417,100 |
| (290,756,900) | (1,138,900) | 262,587,200 |  | (2),318,600) | 262,587,200 |
| (85,298,000) | (347,900) | 43,044,800 |  | ( $42,6010 \times 00$ ) | 43,044,800 |
| 276,980;800 | ( 6 (67,900) | 20,393,900 | (280,858,200) | 16,448,600 | 2260, 464 300 |
| 41,650;800 | . $(10,200)$ | 3,066,900 | ( $42,233,800$ ) | 2,473,700 | (394666900) |
| 36,438,400 | ara- - | 1,896,000 | ( $38,334,400$ ) | - | $(36,438,400)$ |
| 5,417,300 | - |  | ( $5,417,300)$ | - | ( $5,417,300)$ |
| ( $84,878,900$ ) | - | 84,878,900 |  | - | 84,878,900 |
| ( $12,763,700$ ) | * | 12,763,700 |  | - | 12,763,700 |
| 37,171,300 | - |  | $(37,171,300)$ |  | (37,171,300) |
| 5,589,700 | - - |  | (5,589,700) | - | ( $5,589,700$ ) |
| $(6,312,400)$ | - | 6,312,400 | - | - | 6,312,400 |
| $(949,400)$ | - | 949,400 | - | - | 949,400 |
| ( $470,307,900$ ) | $(2,853,000)$ | 472,160,900 | - | - | 472,160,900 |
| (70,723,100) | (278,600) | 71,001,700 | $\cdots$ | - | 71,001,700 |
| 285, 145700 | 1,109600 | 15065, 700 | (301, 21,000$)$ | - ${ }^{\text {a }}$ | (286,255,300) |
| 42,878,000 | 156,800 |  | (43,044,800) |  | $(43,044,800)$ |
| (6,319,000) | (18,100) | 19,084,500 | (12,74,400) |  | 6,337,100 |
| ( 850,200$)$ | ( 2.700$)$ | 2,869,300 | (1,916400) |  | 952,900 |
| (3,565700) | \% ${ }^{\text {a }}$, | 3565700 |  |  | 3,565,700 |
| - | - | 335,300 |  | <- | 536,300 |
| (kisw <br>  |  | Kiv kive |  |  | $\begin{array}{r} 16,963,400 \\ 2,550,900 \end{array}$ |
| W ${ }^{\text {a }}$ |  | 2703627.800 | ( 5 57, 724,4000 | (12,3078093:600) | (1,307,093,600) |
| \% | 3\% $\times$ + ${ }^{\text {a }}$ | 335009000 | (230,055,500) | 18965555001 | 1496,555,500 |
|  |  | $5$ | N |  | - |
| - | - | 257,375,000 | ( $1,651,496,000)$ | (1,394,121,000) | 1,394 |
| - | - | 28,956,500 | $(238,559,200)$ | (209,602,700) | 1209850.700 |
| - | - |  |  | - | " |
| * | - |  |  | - | - |
| - | - | 993,975,300 | $(1,896,000)$ | 992,079,300 | 992003360 |
| - | - | 142,273,800 |  | 142,273,800 | 442.273.800 |
| - | - |  |  | - | - |
| - | - |  |  | - |  |
| " | - | 657,684,900 | (358,804,100) | 298,880,800 | 2988808800 |
| - | - | 96,285,600 | $(5,956,500)$ | 90,329,100 | 90,329,100 |
| - | - | 68,185,800 | - | 68,185,800 | 68,185,800 |
| - | - | 10,253,500 | - | 10,253,500 | 10,253,500 |
| - | - |  |  | - | - |
| 214,049,568 | - | 57,387,700 |  | 272,437,268 | 57,387,700 |
| - | - |  |  | - | - |
| (16,886,011) | (2,935,133) | 5,240,212,800 | (5,240,212,800) | (19,821,144) | - |
| check |  | - |  |  |  |






C:\Users\ow05177\AppData\Local|Microsoft\Windows\Temporary Internet Files\Content.Outlook\QLYYL.846\6-17_b_-_reference_B_-_NND_Abandonent_JE_2nd_Pass


SCEG
UNHEDGED SWAP

## 

TRADE
DATE


# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-18:

Refer to pages 109 and 113 of the SCANA 2017 10-K, which indicate that SCE\&G recognized NND impairment losses before income taxes of $\$ 210$ million in September 2017 and $\$ 280$ million in December 2017.
a. Provide all workpapers used to calculate the actual NND impairment loss writeoffs cited in the 2017 10-K, including electronic spreadsheets in live format with all formulas intact.
b. Refer to the response to part (a) of this question. Provide the related income tax effects of the actual NND impairment loss writeoffs cited in the 2017 10-K. Provide all workpapers used in calculating the income tax effects, including electronic spreadsheets in live format with all formulas intact.
c. Provide all journal entries, including accounts/subaccounts and amounts, related to the actual NND impairment loss writeoffs in September and December 2017, including the related income tax journal entries. Provide a detailed description of each account/subaccount used for this purpose that is not listed and defined in the FERC USOA.

## RESPONSE 6-18:

The information responsive to this request was provided in SCE\&G's response to Audit Information Request 4-66. For clarification regarding the account descriptions requested in c. above, SCE\&G maintains its general ledger in accordance with the FERC USoA with the first four digits of the account number representing the defined FERC account for reporting purposes.

Responsible person: Keith Coffer, Jr.

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-19:

Refer to page 109 of the SCANA 2017 10-K, which reflects the amount associated with "Nuclear Project and switchyard assets transferred for use by Unit 1" as \$84 million. Refer also to the response to ORS 1-126. Provide a detailed description of each of the specific "Nuclear Project" and "switchyard" assets transferred for use by Unit 1 and a schedule of the related costs by FERC account/subaccount and any additional level of detail available. In addition, provide all reasons why each such asset is necessary or otherwise useful for Unit 1.

## RESPONSE 6-19:

Please see Attached

Responsible person: Kevin Kochems

| South Carolina Electric \& Gas Company |  |  |  |
| :---: | :---: | :---: | :---: |
| Office of Regulatory Staff's Continuing |  |  |  |
| Audit Information Request |  |  |  |
| Docket No. 2017-207-E (5th Continuing AIR) |  |  |  |
| Docket No. 2017-305-E (4th Continuing AIR) |  |  |  |
| Docket No. 2017-370-E (4th Continuing AIR) |  |  |  |
| 6-19 Attachment |  |  |  |
|  |  |  |  |
| Description | Total | Current FERC Plant Account | Reason for Transfer |
| Switchyard |  |  |  |
| To Transfer cost of Switchyard to Transmission | \$ 31,091,032 | 3531 - Trans. Station Equipmnt | The new section of the VCS switchyard would not have been built if the NND generators had not been expected to interconnect at the switchyard. However, the new section of the switchyard now has eleven transmission lines connected to it. All of these lines transmit power from VCS1. and Fairfield Pumped Hydro to other areas of the system. Eight of these lines are system network lines and include lines that interconnect the SCE\&G system with the Santee Cooper system and the Duke Energy Carolinas system improving the capability to support each other as system conditions require. The other three lines connect the new portion of the switchyard to the old portion of the switchyard. The entire VCS switchyard is used and useful in serving the customers of SCE\&G and improving the reliability of the system even without the NND generation project. |
| Off-Site Water System |  |  |  |
| Offsite Water System | \$ 23,154,501 | 1.070100-CWIP | The Off-Site Water System would have still been completed without Units 2 or 3. The current Unit I water treatment system was built at the time of initial construction and has aged significantly. It was cost beneficial to replace the current Unit 1 system with a new system rather than continue to repair and replace components through the end of life and eventual demobilization of Unit 1. |
| Nuclear Operations Building |  |  |  |
| Nuclear Operations Building (NOB) | \$ 10,510,783 | 3210-Structures and Improvements \& 3250-Misc Power Plant Equipment | The Nuclear Operations Building would have to still be completed without Units 2 or 3. The Unit 1 NOB was located at the current location of Unit 1 Interim Spent Fuel Storage Facility (ISFSI). Nuclear security regulations required the relocation of the NOB as part of this facility's construction. Also, the former Unit 1 NOB was built at the time of initial construction and had aged significantly. It was cost beneficial to replace the current Unit 1 building with a new system rather than continue to repair and replace the building through the end of life and eventual demobilization of Unit 1. |
|  |  |  |  |
| CHAMPS REPLACEMENT | \$ 6,534,286 | 1070100-CWIP | The software system formerly used by Unit 1 for work management had aged significantly and would no longer be supported. Therefore, Unit 1 chose to upgrade to this new version of the CHAMPS software. Units $2 \& 3$ simply shared in the cost as it was anticipated to be cost beneficial for all three plants to use a shared software platform. |
| Nuclear Learning Center Annex |  |  |  |
| NLC Annex | \$ 5,4,17,022 | 3210-Structures and Improvements | The new addition to the Nuclear Learning Center (NLC) will now be used to enhance the training of new and existing Unit 1 employees. In addition, this facility will become the new in-processing location for outages, which will allow for the retirement of the existing outage processing facility, which was a temporary building that was built at the time of initial Unit 1 construction. |
| Miscellaneous |  |  |  |
| Emergency Services Building | \$ 1,962,488 | 3210-Structures and Improvements | This building and associated equipment was constructed to meet regulatory and industry requirements, primarily due to new post-Fukushima regulation, and reduce insurance costs. Units 2\&3 simply shared in the cost as it was anticipated to be cost beneficial for all three plants to use a shared emergency response unit. |
| Security Training Facility (includes classroom trailers) | \$ 1,411,890 | 3210-Structures and Improvements | This facility was constructed to meet regulatory and industry requirements, primarily due to the old facility being in a recognized flood plain and within the boundary of the Parr Hydro FERC Project, which FERC did not approve as a long-term use. Units $2 \& 3$ simply shared in the cost as it was anticipated to be cost beneficial for all three plants to use a shared emergency response unit |
| Misc Assets including Fiber Huts | \$ 905,627 | 3250-Misc Power Plant Equipment | These facilities were constructed for Units $2 \& 3$ but are now an integral part of the SCANA IT network and serve multiple SCANA facilities, including VCS Unit 1 and ancillary facilities such as OWS. |


| South Carolina Electric \& Gas Company |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Office of Regulatory Staff's Continuing |  |  |  |  |
| Audit Information Request |  |  |  |  |
| Docket No. 2017-207-E (5th Continuing AIR) |  |  |  |  |
| Docket No. 2017-305-E (4th Continuing AIR) |  |  |  |  |
| Docket No. 2017-370-E (4th Continuing AIR) |  |  |  |  |
| 6-19 Attachment |  |  |  |  |
|  |  |  |  |  |
| Description |  | Total | Current FERC Plant Account | Reason for Transfer |
| N/A - nonutility land - Various tracts | \$ | 595,513 | 7891-Land Owned in Fee, Non Utility | This land is owned by SCE\&G and will be placed in a non-utility with the other adjacent land. |
| EMPACT 3.0 SOFTWARE | \$ | 475,805 | 3032-Misc Intangible Plant Nuc] | Various software systems formerly used by Unit 1 had aged significantly and would no longer be supported. Therefore, Unit 1 chose to upgrade to new versions. Units $2 \& 3$ simply shared in the cost as is was anticipated to be cost beneficial for all three plants to use shared software platforms. |
| NEW WASTEWATER TREATMENT FACILITY | \$ | 386,224 | 3210-Structures and Improvements | This would have still been completed without Units 2 or 3 . The current Unit 1 wastewater treatment system was built at the time of initial construction and has aged significantly. It was cost beneficial to replace the current Unit 1 system with a new system rather than continue to repair and replace components through the end of life and eventual demobilization of Unit 1. Units $2 \& 3$ shared in the cost because 3 - Unit shared facilities such as the NOB, NLC and ERB are served by this treatment facility. |
| WORKFORCE Work Hour TIME \& ATTEND SOFTWARE | \$ | 684,932 | 3032-Misc Intangible Plant Nuc) | Various software systems formerly used by Unit 1 had aged significantly and would no longer be supported. Therefore, Unit 1 chose to upgrade to new versions. Units $2 \& 3$ simply shared in the cost as is was anticipated to be cost beneficial for all three plants to use shared software platforms. |
| PRIMAVERA P6 SOFTWARE | \$ | 319,552 | 3032-Misc Intangible Plant Nucl | Various software systems formerly used by Unit 1 had aged significantly and would no longer be supported. Therefore, Unit 1 chose to upgrade to new versions. Units $2 \& 3$ simply shared in the cost as is was anticipated to be cost beneficial for all three plants to use shared software platforms. |
| WASTEWATER TREATMENT FACILITY | \$ | 311,417 | 3210-Structures and Improvements | This would have still been completed without Units 2 or 3 . The current Unit 1 wastewater treatment system was built at the time of initial construction and has aged significantly. It was cost beneficial to replace the current Unit 1 system with a new system rather than continue to repair and replace components through the end of life and eventual demobilization of Unit 1. Units $2 \& 3$ shared in the cost because 3 - Unit shared facilities such as the NOB, NLC and ERB are served by this treatment facility. |
| Network Hardware | \$ | 258,572 | 3250-Misc Power Plant Equipment | These facilities were constructed for Units $2 \& 3$ but are now an integral part of the SCANA IT network and serve multiple SCANA facilities, including VCS Unit 1 and ancillary facilities such as ows. |
| MAINTENANCE RULE | \$ | 224,192 | 3032-Misc Intangible Plant Nucl | Various software systems formerly used by Unit 1 had aged significantly and would no longer be supported. Therefore, Unit 1 chose to upgrade to new versions. Units $2 \& 3$ simply shared in the cost as is was anticipated to be cost beneficial for all three plants to use shared software platforms. |
| COMMUNICATIONS TOWER FROM SCl | \$ | 197,920 | 3250-Misc Power Plant Equipment | These facilities were constructed for Units $2 \& 3$ but are now an integral part of the SCANA IT network and serve multiple SCANA facilities, including VCS Unit 1 and ancillary facilities such as OWS. |
| IN/A - nonutility land - Burris-Fuller tract | \$ | 146,925 | 7891-Land Owned in Fee, Non Utility | This land is owned by SCE\&G and will be placed in a non-utility with the other adjacent land. |
| EMPACT SOFTWARE | \$ | 114,487 | 3032-Misc Intangible Plant Nucl | Various software systems formerly used by Unit 1 had aged significantly and would no longer be supported. Therefore, Unit 1 chose to upgrade to new versions. Units $2 \& 3$ simply shared in the cost as is was anticipated to be cost beneficial for all three plants to use shared software platforms. |
| PLATEAU SOFTWARE UPGRADE | \$ | 103,967 | 3032-Misc Intangible Plant Nucl | Various software systems formerly used by Unit 1 had aged significantly and would no longer be supported. Therefore, Unit 1 chose to upgrade to new versions. Units 2\&3 simply shared in the cost as is was anticipated to be cost beneficial for all three plants to use shared software platforms. |
| VCS COUNT ROOM SOFTWARE \& HARDWARE | \$ | 140,659 | 3032-Misc Intangible Plant Nucl \& 3250-Misc Power Plant Equipment | Various software systems formerly used by Unit 1 had aged significantly and would no longer be supported. Therefore, Unit 1 chose to upgrade to new versions. Units $2 \& 3$ simply shared in the cost as is was anticipated to be cost beneficial for all three plants to use shared software platforms. |


| South Carolina Electric \& Gas Company |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Office of Regulatory Staff's Continuing |  |  |  |  |
| Audit Information Request |  |  |  |  |
| Docket No. 2017-207-E (5th Continuing AIR) |  |  |  |  |
| Docket No. 2017-305-E (4th Continuing AIR) |  |  |  |  |
| Docket No. 2017-370-E (4th Continuing AIR) |  |  |  |  |
|  |  |  |  |  |
| T |  |  |  |  |
| Description |  | tal | Current FERC Plant Account | Reason for Transfer |
| WinCDMS | \$ | 12,833 | 3032-Misc Intangible Plant Nucl | Various software systems formerly used by Unit 1 had aged significantly and would no longer be supported. Therefore, Unit 1 chose to upgrade to new versions. Units $2 \& 3$ simply shared in the cost as is was anticipated to be cost beneficial for all three plants to use shared software platforms. |
| WebEOC ENF BOARD | \$ | 11,924 | 3032-Misc Intangible Plant Nucl | Various software systems formerly used by Unit 1 had aged significantly and would no longer be supported. Therefore, Unit I chose to upgrade to new versions. Units $2 \& 3$ simply shared in the cost as is was anticipated to be cost beneficial for all three plants to use shared software platforms. |
| ADD'L TIME \& ATTENDANCE KIOSKS | \$ | 9,684 | 3250-Misc Power Plant Equipment | These facilities were constructed for Units 283 but are now an integra! part of the SCANA IT network and serve multiple SCANA facilities, including VCS Unit 1 and ancillary facilities such as OWS. |
| EMPCENTER KIOSK REPLACEMENT | \$ | 8,951 | 3250-Misc Power Plant Equipment | These facilities were constructed for Units $2 \& 3$ but are now an integral part of the SCANA IT network and serve multiple SCANA facilities, including VCS Unit 1 and ancillary facilities such as OWS. |
| SIREN SYSTEM COMPUTER REPLACEMENT | \$ | 5,302 | 3250-Misc Power Plant Equipment | Various software systems formerly used by Unit 1 had aged significantly and would no longer be supported. Therefore, Unit 1 chose to upgrade to new versions. Units $2 \& 3$ simply shared in the cost as is was anticipated to be cost beneficial for all three plants to use shared software platforms. |
| RECORDS SHREDDER REPLACEMENT | \$ | 4,852 | 3250-Misc Power Plant Equipment | These facilities were constructed for Units $2 \& 3$ but are now an integral part of the SCANA IT network and serve multiple SCANA facilities, including VCS Unit 1 and ancillary facilities such as OWS. |
| DIGITAL FLOWMETER \& SAMPLING ASBLY. | \$ | 2,015 | 3250-Misc Power Plant Equipment | These facilities were constructed for Units $2 \& 3$ but are now an integral part of the SCANA IT network and serve multiple SCANA facilities, including VCS Unit 1 and ancillary facilities such as OWS. |
| COFFEE MAKERS FOR NOB | \$ | 602 | 3250-Misc Power Plant Equipment | These facilities were constructed for Units 283 but are now an integral part of the SCANA IT network and serve multiple SCANA facilities, including VCS Unit 1 and ancillary facilities such as ows. |
|  |  | 02,181 |  |  |
| * |  |  |  |  |

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-21:

Refer to the FERC Policy Statement issued in FERC Docket No. PL15-3-000 "regarding future implementation of hold harmless commitments offered by applicants as ratepayer protection mechanisms to mitigate adverse effects on rates that may result from transactions subject to section 203 of the Federal Power Act (FPA)."
a. Confirm that Dominion Energy and Dominion Energy Services intend to comply with the requirements set forth in the FERC Policy Statement regarding transaction and transition costs, not only for FERC jurisdictional transaction and transition costs, but also for SC retail jurisdictional transaction and transition costs.
b. Confirm that SCANA Corporation, SCANA Services, Inc., and SCE\&G intend to comply with the requirements set forth in the FERC Policy Statement regarding transaction and transition costs, not only for FERC jurisdictional transaction and transition costs, but also for SC retail jurisdictional transaction and transition costs.
c. On pages 31-32 of the FERC Policy Statement, the FERC provides a list of "transaction costs," which includes "internal labor costs of employees."
i. Describe how SCANA Corporation, SCANA Services, Inc., and SCE\&G track the "internal labor costs of employees" for this purpose. Provide a copy of all documentation that addresses how such costs are to be tracked by each entity.
ii. Describe how SCANA Corporation, SCANA Services, Inc., and SCE\&G account for such costs. Provide a copy of all documentation that addresses how such costs are to be accounted for by each entity.
iii. Describe any reimbursement provided by SCANA Corporation and/or SCANA Services, Inc. to SCE\&G for costs that SCE\&G incurs and the accounting for such reimbursement by each entity. Provide a copy of all documentation that addresses such reimbursement and the accounting for such reimbursements by each entity.
iv. Provide the expenses by month and by FERC account/subaccount from July 2017 through the most recent month for which actual information is available for such internal labor costs and reimbursements incurred by each entity.
d. On pages 37-38 of the FERC Policy Statement, the FERC states the following:
53. While applicants may present their case-by-case analysis when they seek to recover capital costs in an FPA section 205 proceeding, we advise applicants to present a clear case in their FPA section 203 application to avoid uncertainty when possible. Therefore, we advise applicants to clearly state which known capital costs related to the transaction will be included or excluded from a hold harmless commitment at the time of their FPA section 203 application. Further, we advise applicants to clearly explain a process for determining which capital costs-that may be unknown at the time of the application but are related to the transaction and determined at a future date-will be included or excluded from a hold harmless commitment at the time of their FPA section 203 application. Similarly, we advise applicants to explain the treatment of operation and maintenance costs incurred in relation to transaction-related capital costs if the related plant asset meets the used and useful criterion in providing utility service, the Commission may consider exclusion of such costs from the hold harmless commitment. A clear explanation in the FPA section 203 application of the treatment of capital costs will aid the Commission and third parties in understanding how a transaction will not have an adverse effect on rates both in considering the application and in future related proceedings, including any future FPA section 205 filing to show transaction-related savings.
i. Identify and quantify all known capital costs related to the transaction that will be recorded by Dominion, Dominion Services, SCANA Corporation, SCANA Services, and SCE\&G. Indicate which of these costs will be excluded from SCE\&G rate recovery and describe how Dominion and SCANA will ensure that each such cost will be excluded in future SCE\&G rate proceedings.
ii. Describe the process for determining which capital coststhat may be unknown at the time of the application but are related to the transaction and determined at a future datewill be included or excluded in future SCE\&G rate proceedings.
iii. Describe the operation and maintenance costs that will or may be incurred in relation to transaction-related capital costs if the related plant asset meets the used and useful criterion in providing utility service and the process for determining whether the costs will be included or excluded in future SCE\&G rate proceedings.

## RESPONSE 6-21:

b. SCANA confirms that SCANA Corporation, SCANA Services, Inc., and SCE\&G intend to comply with the requirements set forth in the FERC Policy Statement regarding transaction and transition costs, not only for FERC jurisdictional transaction and transition costs, but also for SC retail jurisdictional transaction and transition costs as well.
c. Internal labor costs are tracked using SCANA's accounting key. The accounting key uses a "resource code" to identify costs by nature of expenditure. Labor costs are assigned to the "100" series of resource codes. This allows SCANA to identify labor separately from non-labor charges. SCANA's accounting key also allows for an "event code" to be established to track specific events (a common use of an event code is to track costs incurred in storm response and restoration). Specific event codes have been established to track transaction and transition costs associated with the Dominion merger. As described by SCANA in previous responses, transaction costs associated with the merger will be incurred and reported at the corporate (Holding Company) level and as such SCE\&G will not seek recovery of such costs. Generally, transition costs will likewise be incurred and expensed at the respective Holding Company level and will not be pushed down or charged to SCE\&G or any other SCANA or Dominion subsidiary company. Any transition costs and one-time charges related to the Customer Benefits Plan that are required to be recorded on the books of SCE\&G under Generally Accepted Accounting Principles will be reflected on SCE\&Gs' books below-the-line in FERC account 426.5 - Other Deductions to ensure the amounts are excluded from rate recovery. Each pay period, SCANA employees enter their time in the applicable time reporting system and report time worked on specific projects. Any time spent by employees on transaction or transition activities are to be coded to the established event code using the proper below-the-line 426.5 account. Payroll taxes on labor charged to account 426.5 are charged below-theline to account 408.2 - Taxes Other Than Income Taxes, Other Income and Deductions. The Company's records other benefit costs associated with labor charged to account 426.5 below the line to account 417.1 - Expenses of Nonutility

Operations.
SCE\&G would like to further state and clarify, that although the resolution of matters related to the abandonment of the nuclear project must be addressed before the Commission regardless of the proposed merger transaction, out of an abundance of caution and to ensure full compliance with the intent of the hold harmless provisions, costs incurred related to the filing of the Joint Petition are being tracked and recorded as an below-the-line expense on the books of SCE\&G.

On a periodic basis, SCE\&G's accounting personnel query the accounting system to ensure that all labor and nonlabor charges assigned merger related event codes are recorded to the proper below-the-line account at the proper Company and make corrections, if necessary.

As described in SCE\&G's response to Audit Information Request 4-37, SCANA's accounting key also allows for costs to be identified by benefitting subsidiary (Business Unit) and area of operations (Operating Unit). If an SCE\&G employee provides services for the benefit of SCANA Holding Company, such costs are assigned to the SCANA Holding Company Business Unit and Operating Unit. These costs are then billed through an automated process from SCE\&G to SCANA Holding Company on a monthly basis so that the costs incurred by the Holding Company are properly recorded on its books and SCE\&G is reimbursed for such costs.

The attached pdf file titled "6-21c_cost tracking documentation" contains documentation of internal communication regarding the tracking of merger related costs.

The attached Excel file "Response 6-21c.iv" contains merger related costs and costs related to the joint petition by month through March 2018. It also identifies SCE\&G costs billed to reimbursed by SCANA Holding Company.

Responsible person: Keith Coffer, Jr.

## SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-21:

Refer to the FERC Policy Statement issued in FERC Docket No. PL15-3-000 "regarding future implementation of hold harmless commitments offered by applicants as ratepayer protection mechanisms to mitigate adverse effects on rates that may result from transactions subject to section 203 of the Federal Power Act (FPA)."
a. Confirm that Dominion Energy and Dominion Energy Services intend to comply with the requirements set forth in the FERC Policy Statement regarding transaction and transition costs, not only for FERC jurisdictional transaction and transition costs, but also for SC retail jurisdictional transaction and transition costs.
b. Confirm that SCANA Corporation, SCANA Services, Inc., and SCE\&G intend to comply with the requirements set forth in the FERC Policy Statement regarding transaction and transition costs, not only for FERC jurisdictional transaction and transition costs, but also for SC retail jurisdictional transaction and transition costs.
c. On pages 31-32 of the FERC Policy Statement, the FERC provides a list of "transaction costs," which includes "internal labor costs of employees."
i. Describe how SCANA Corporation, SCANA Services, Inc., and SCE\&G track the "internal labor costs of employees" for this purpose. Provide a copy of all documentation that addresses how such costs are to be tracked by each entity.
ii. Describe how SCANA Corporation, SCANA Services, Inc., and SCE\&G account for such costs. Provide a copy of all documentation that addresses how such costs are to be accounted for by each entity.
iii. Describe any reimbursement provided by SCANA Corporation and/or SCANA Services, Inc. to SCE\&G for costs that SCE\&G incurs and the accounting for such reimbursement by each entity. Provide a copy of all documentation that addresses such reimbursement and the accounting for such reimbursements by each entity.
iv. Provide the expenses by month and by FERC account/subaccount from July 2017 through the most recent month for which actual information is available for such internal labor costs and reimbursements incurred by each entity.
d. On pages $37-38$ of the FERC Policy Statement, the FERC states the following:
53. While applicants may present their case-by-case analysis when they seek to recover capital costs in an FPA section 205 proceeding, we advise applicants to present a clear case in their FPA section 203 application to avoid uncertainty when possible. Therefore, we advise applicants to clearly state which known capital costs related to the transaction will be included or excluded from a hold harmless commitment at the time of their FPA section 203 application. Further, we advise applicants to clearly explain a process for determining which capital costs-that may be unknown at the time of the application but are related to the transaction and determined at a future date-will be included or excluded from a hold harmless commitment at the time of their FPA section 203 application. Similarly, we advise applicants to explain the treatment of operation and maintenance costs incurred in relation to transaction-related capital costs if the related plant asset meets the used and useful criterion in providing utility service, the Commission may consider exclusion of such costs from the hold harmless commitment. A clear explanation in the FPA section 203 application of the treatment of capital costs will aid the Commission and third parties in understanding how a transaction will not have an adverse effect on rates both in considering the application and in future related proceedings, including any future FPA section 205 filing to show transaction-related savings.
i. Identify and quantify all known capital costs related to the transaction that will be recorded by Dominion, Dominion Services, SCANA Corporation, SCANA Services, and SCE\&G. Indicate which of these costs will be excluded from SCE\&G rate recovery and describe how Dominion and SCANA will ensure that each such cost will be excluded in future SCE\&G rate proceedings.
ii. Describe the process for determining which capital costs-that may be unknown at the time of the application but are related to the transaction and determined at a future date-will be included or excluded in future SCE\&G rate proceedings.
iii. Describe the operation and maintenance costs that will or may be incurred in relation to transaction-related capital costs if the related plant asset meets the used and useful criterion in providing utility
service and the process for determining whether the costs will be included or excluded in future SCE\&G rate proceedings.

## RESPONSE 6-21:

6-21 a - Confirmed - Dominion Energy and Dominion Energy Services intend to comply with the requirements set forth in the FERC Policy Statement regarding transaction and transition costs, not only for FERC jurisdictional transaction and transition costs, but also for SC retail jurisdictional transaction and transition costs.

6-21 b - SCANA
6-21 c - SCANA
6-21 di. Planning for the integration process is in the early stages, beginning with building a baseline understanding of each other's respective organization, thus there are no known capital costs related to the transaction at this time that will be recorded by Dominion, Dominion Services, SCANA Corporation, SCANA Services, and SCE\&G.

At this time, neither Dominion nor SCANA anticipate incurring any significant Merger related capital expenditures. SCE\&G does not intend to seek rate recovery of Merger related transaction and transition costs - regardless of expense versus capital treatment of the costs. Dominion and SCANA each have put in place appropriate accounting controls and procedures to designate, record, and track such transaction and transition related costs, consistent with Commission requirements. As transaction and transition costs are incurred, they will be recorded in specific projects and accounts and separately tracked on the applicable books.

If any transaction or transition costs are required to be recorded for Generally Accepted Accounting Purposes on SCE\&G's books, such costs will be to account 426.5 - Other Deductions, 417.1 - Expenses of Nonutility Operations, 408.2 - Taxes Other Than Income Taxes, which are all "below-the-line" accounts, or other FERC accounts as appropriate for the charge and will be excluded from rate recovery. If there are any costs that are capital and required to be recorded on SCE\&G's books, such costs will be recorded to FERC account 121 - Non-utility property and excluded from rate recovery.

6-21 dii. - Please see response 6-21-di.
6-21 diii. Transition or integration cost are generally expected to be expensed and include, but not limited to, information technology related costs, to convert, conform, and/or integrate SCANA Corporation and subsidiaries' systems into and with Dominion's systems. As noted above, SCE\&G does not intend to seek rate recovery of Merger related transaction and transition costs, regardless of whether the cost is O\&M or capital related.

HONEYCUTT, LISA W

| From: | GREENE, JOANNA G |
| :--- | :--- |
| Sent: | Thursday, January 18,2018 8:23 AM |
| To: | GRIFFIN, IRIS; GREENE, JOANNA G; MACK, INDIA L; PETERMAN, ANDREA; BRYANT, |
|  | RONALD S; BOWDEN, ANDREW V JR; BRADLEY, GUY M; PUTNAM, CHRISTINA M; |
|  | HONEYCUTT, LSA W; STANTON, MATTHEW; ELLIOTT, ANTONIO; BEST, EMILY (BETTY); |
|  | EICHELBERGER, SHANNON R; MCDONALD, BARRY S; BURNETTE, ANNETTE H; |
|  | RANDALL, TERRI; BOYER, RICHARD; HUTTON, ELIZABETH LAFFITTE; ROBINSON, RACHEL, |
|  | M; HIERS, JEAN BENBOW; TAYLOR, CATHERINE D; HUTCHENS, ANN R; EFFINGER, |
|  | THOMAS N; LIPPARD, GEORGE A II; STARLING, JAMES; AULL, CRAIG B; KOCHEMS, |
|  | SHANNON J; PERRY, SHANNON; DELK, HENRYE JR; NEWSOM, JOSEPH B; MILLER, |
|  | PATRICIA M; SWINDLER, SCOTT |
|  | Karla Haislip |
| Cc: | Transition Team |
| Subject: | Transition Team.xlsx |
| Attachments: |  |

We have worked with senior staff over the past week to identify a transition team for the proposed merger with Dominion Energy. The attached spreadsheet shows the individuals selected to represent the various areas across $S C \wedge N A$. There are two separate components to the team as follows:

- Transition Team - includes individual representatives from essentially cach area of the service company and each of the major operations groupings. This group will:
o participate in the kickoff and periodic status and communication meetings,
o serve as liaisons for their respective organizations,
o coordinate with others in their area as needed to address transition issues related to their organizations (this is expected to be minimal for operations areas), and
o provide guidance as needed on decisions from other groups that may impact their area(s).
- Service Company Project Leads - designated transition team members who will serve as project managers for one or more areas of SCANA Services. These individuals will:
o Participate in transition team meetings
o Coordinate schedule and deliverables for their area and others as designated

As the transition progresses, we expect additional employees will be involved with specific reviews of practices and procedures and determination of best practices and other anticipated changes. These groups will be pulled together as needed going forward.

Getting the merger approved is the current priority and focus now, however, we expect an overall transition team kickoff meeting in the first quarter.

We are in the process of linalizing appropriate ways to transmit information to ensure that we have a log of all data provided and that information is sent in a safe and secure manner. Until we can initiate that process, please coordinate discussions and transmission of information through me.

In the interim if you perform any work directly on the merger and transition, time and incremental expenses should be charged as follows:

Dominion Merger Accounting Distribution
Operating Unit: SIICO
Account Number: 426.5013

Resource: Appropriate for Charge
Department: Initiating Department
Event Code: "DOM" - FOR NON-LEGAL RELATED COSTS
"MLA"-- FOR LEGAL FEES AND TME

Incremental non-labor costs (such as external consultants and attorneys) should be charged to this distribution. Only labor costs directly related to the merger and transition activities should be coded to the merger. Time spent attending employee informational meetings should be charged to the employce's regular payroll distribution.

If you have any questions please give me a call.

## Thanks!

```
Joanna Greene
```

igreene1@scana.com
w 803.217.7354/c 803.609.1930

| From: | GREENE, JOANNA G |
| :--- | :--- |
| ,ent: | Tuesday, January 16, 20184:32 PM |
| To: | HUTTON, ELIZABETH LAFFTTE; HUTCHENS, ANN R; STANTON, MATTHEW; PUTNAM, |
|  | CHRISTINA M; HONEYCUTT, LISA W; BOYER, RICHARD; ROBINSON, RACHEL M; |
|  | RANDALL, TERRI |
| Cc: | COFFER, KEITH C JR; GRIFFIN, IRIS |
| Subject: | accounting related to Dominion work |

I am still waiting on some final blessing before sending out an email to the whole transition team, but since I know some of your areas have aiready been performing merger work and it is almost time for timesheets wanted to at least get this out and around... please share within your groups as appropriate.
if you perform any work directly on the merger and transition, time and incremental expenses should be charged as follows:

Dominion Merger Accounting Distribution
Operating Unit: SHCO
Account Number: 426.5013
Resource: Appropriate for Charge
Department: Initiating Department
Event Code: "DOM" - FOR NON-LEGAL RELATED COSTS
"MLA" - FOR LEGAL FEES AND TME

Incremental non-labor costs (such as external consultants and attorneys) should be charged to this distribution. Only labor costs directly related to the merger and transition activities should be coded to the merger. Time spent attending


## Thanks!

Joanna Greene
igreene1@scana.com
w $803.217 .7354 / \mathrm{k} 803.609 .1930$

## COFFER, KEITH C JR

| From: | COFFER, KEITH C JR |
| :--- | :--- |
| Sent: | Monday, January 08, 2018 8:13 PM |
| To: | GREENE, JOANNA G |
| Subject: | Merger Accounting Distribution |

Below is the accounting distribution we have set up for the merger. Also some suggested wording on the guidance, but feel free to edit.

Casey

The accounting distribution below has been established to capture costs associated with the Dominion merger. Incremental non-labor costs (such as external consultants and attorneys) should be charged to this distribution. Only labor costs directly related to the merger and transition activities should be coded to the merger. Time spent attending employee informational meetings should be charged to the employee's regular payroll distribution.

If you have any questions, you can contact \{insert name, the accounting transition lead at ext. XXXXX\} or your business unit accounting representative.

Dominion Merger Accounting Distribution
Operating Unit: SHCO
Account Number: 426.5013
Resource: Appropriate for Charge
Department: Initiating Department
Event Code: "DOM" - FOR NON-LEGAL RELATED COSTS
"MLA" - FOR LEGAL FEES AND TME

## HONEYCUTT, LISA W

## From:

## Sent:

To:

COFFER, KEITH CJR
Wednesday, February 14, 2018 6:20 PM
HINSON, BYRON W; ROBINSON, RACHEL M; ROOKS, ALLEN W; HENDRIX, JOHN R; SMITH, JATON R; HARRISON, TAMMY B; KOCHEMS, KEVIN R; SWAN, JAMES E IV; SMITH, VIRGINIA D; BURGESS, KENNETH CHAD; GISSENDANNER, MATTHEW W; DELK, HENRY E JR; STANTON, MATTHEW; SCHELBLE, DENISE W; HONEYCUTT, LISA W; WITHYCOMBE, LESLIE S; SCURRY, EMBRE B (Accounting); CHEWNING, RICHARD WOODRUFF V; CLEMENTS, CAROL H; GORTMAN, LYDIA K; MCCRAVY, ERNEST E; MORRIS, BILLIE KAY; SPARKS, MARK L.
Cc:
Subject:

JACKSON, KENNETH R; GRIFFIN, IRIS
Time Coding For ORS Audit Information Request

All -
The FERC has very specific requirements that must be followed when incurring merger related costs. The objective of these requirements is to ensure that ratepayers are protected from adverse effects on rates that may result from such transactions. The policies are commonly referred to as "hold harmless" provisions. There is a 76 page ferc policy statement that addresses this issue, but it can really be boiled down to the following statement:
"Specifically, the Commission's long-standing policy is that costs incurred to effectuate a merger are nonoperating in nature, and they should be recorded in Account 426.5, Other Deductions."

The issue we have to consider is that although the data request we are responding to looks a lot like a retail ratemaking issue, and issues that presumably were going to have to be addressed regardless of whether there was a merger or not, the Joint Petition has an aspect of seeking merger approval.

I have consulted with Sara and Chad and they have advised that in order to be in compliance with the hold harmless
 or ratemaking issue.

They acknowledge, and I think we would all agree, the practicality of that becomes difficult. Therefore, it has been decided that we should code all activity related to responding to this request to account 426.5. The distribution is below. We have also provided an event code. It is important that the event code is used to allow us to be able to identify the costs so that we can report as O\&M in our SEC filings.

Thanks and if you have any questions please let me know.

Casey
Distribution to use for data reguest response:
Operating Unit: RADM
Account Number: 426.5000
Event Code: JPR

## EBS

## ACCOUNT NUMRER / WORK ORDER ADDITION / UPDATE



## EBS <br> ACCOLUNT NUMBER / WORK ORDER ADDITION / UPDATE

Requested by: Jordan Hunter
Date: $1 / 8 / 18$
Area/Department Responsible for account:
Individual Responsible for account:
Approved by, C. Coffer
Date, 1/8/18
Entered by:
(Mainframe Valid Accoumt IIle)
Date:
Entered by:
Mrees)
Date:

## EBS <br> CIISTOMER - SERVICE - EVENT CODE ADDITION/LIPDATE



## EBS <br> CUSTOMER - SERVICE - EVENT CODF ADDITION/I IPDATE,



## CIISTOMFR - SERVICF - FVFNT CODF ADDITION/IIPDATE

\begin{tabular}{|c|c|c|c|}
\hline \& \& \& <br>
\hline Add Change \& Event \& \& 11318 , <br>
\hline \multicolumn{4}{|l|}{} <br>

\hline  \& \multicolumn{3}{|l|}{\begin{tabular}{l}
Active Inactive Active $\square$ Inactive

$\square$ Inactive <br>
SERVICES CODES: Please chech responsible area.
Electric Service Products/Services
Environmental Services
Federal Energy Services
Fleet Services
Gas
Information Systems
Telecommunications
Power Deliverv Oneratinns VCS Accounting
$\square$ PSNC Accounting
Other: Legal <br>
HWENT CODES: Please select appropriate hierarchy.
Ash Handling
MJM $=$ PSC Accrual
MM - Other
Major Stoms
Minor Storms
Synfuel
Tree Trimming
Other Event Codes
\end{tabular}} <br>

\hline
\end{tabular}





 201801101 - Normal Time










 201801101 - Normal Time
 201801101 - Normal Time 201801102 - Overtin 201801106 - Indirect Payroll
 201801106 - indirect Payroli 201801 106-Indirect Payroll 201801106 - Indirect Payroll 201801106 - indirect Payrolf 201801106 - Indirect Payrol! 201801 106- Indirect Payroll




 201801106 - Indirect Payroll


| Number | Resource Code |
| :---: | :---: |
| 201801 | 106 - Indirect Payroil |
| 201801 | 106 - Indirect Payroll |
| 201801 | 106 - Indirect Payroll |
| 201801 | 106 - Indirect Payroll |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 -Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |




 $\stackrel{\stackrel{y y}{*}}{\stackrel{\circ}{3}}$


## Number Resource Code <br> 201801 192-Employee Benefits <br> Month Number

 201801192 -Employee Benefits
 201801192 -Employee Benefits 201801 192-Employee Benefits 201801193 -Taxes Other Than Income 201801193 - Taxes Other Than Income

 201801193 - Taxes Other Than Income 201801193 - Taxes Other Than Income 201801193 - Taxes Other Than income

 201801193 -Taxes Other Than Income








 201802 101-Normal Time








 2018021.01 - Normal Time

2


$\qquad$


```
2
```

$\qquad$ $+$
SCE\&G Costs Billed
to and Reimbursed
by SCANA Holding
Company






葡


Number Resource Code

 $\stackrel{\stackrel{y}{c}}{\stackrel{1}{c}}$









 $\stackrel{\stackrel{N}{E}}{\stackrel{1}{E}}$




 $\stackrel{y}{\stackrel{y}{E}}$







 201802 101 - Normal Time





 201802 106-Indirect Payroll




$\frac{\text { Month }}{\frac{\text { Number }}{201802} \quad 106 \text {-Indirect Payroll }} \quad$ Resource Code 201802106 - Indirect Payroll 201802106 - Indirect Payroll
 201802 106-Indirect Payroll



 201802 106-Indirect Payroll 201802 191-Pensions





 201802191 - Pensions
















 suo!suad- T6T Z08T0Z
 Event
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs

Account
4171000 - Exp From Non-utility Opertns
 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns
4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns
 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns



 $\sum_{i} \sum_{i}^{c}$ $\stackrel{\Sigma}{\Sigma}$文 $\stackrel{\sum}{\stackrel{\rightharpoonup}{c}}$ $\sum \underset{\substack{\alpha}}{\sum}$ $\underset{\substack{2}}{\Sigma}$ $\Sigma$ 88 온 온 8 888 온 온 온 SHCO 8
 들


SCANA Merger Related Labor Costs
Resource Code 201802 192-Employee Benefits
 201802192 -Employee Benefits



































SCANA Merger Related Labor Costs
ORS Audit Information Request 6-21.c.iv


DOM - Dominion Merger Costs
MLA - Merger Matters Legal Advice
 MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice
 MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice JPR - Joint Petition Responses JPR - Joint Petition Responses
 JPR - Joint Petition Responses DOM - Dominion Merger Costs JPR - Joint Petition Responses JPR - Joint Petition Responses
 JPR - Joint Petition Responses IPR - Joint Petition Responses


 səsuodsəy uonulad quilor - yd!
 JPR - Joint Petition Responses
 JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses





 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns
 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 9260001 - A And G Benefits 9260001 - A And G Benefits

4082000 - Tx Oth Than Inc Tx Oth Inc-ded


 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than inc Tx Oth Inc-ded




 4082000 - Tx Oth Than Inc Tx Oth Inc-ded








 $\stackrel{\sum}{\stackrel{1}{4}}$ 온
 RADM RADM
 $\sum_{0}$
 $\sum_{\substack{d \\ \circledR}}$ $\sum_{0}$高 RADM $\sum_{\substack{\circ \\ థ}}$
 RADM 8 808
둔资

ORS Audit Information Request 6-21.c.iv
 온 온 온운 9 운 온 온 온 온운 온 08 $\sum_{\substack{~}}^{\substack{\alpha}}$ $\sum_{\substack{0 \\ d \\ \text { 우N } \\ \text { in }}}$㖒: Operating Unit DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs
 DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice
 MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice JPR - Joint Petition Responses
 JPR - Joint Petition Responses DOM - Dominion Merger Costs DOM - Dominion Merger Costs

## Account

 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - TX Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded

 4082000 - Tx Oth Than Inc Tx Oth Inc-ded



 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded





 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded



4082000 - Tx Oth Than Inc Tx Oth Inc-ded




 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4265000 - Other Deductions

 4265013 - Dominion Merger Expenses 4265013 - Dominion Merger Expenses


 JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses sasuodsəy uolul?əd zu!o - - ydr JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses səsuodsəy uo!l?7əd zu!̣or - ydr sesuodsəy uo!t!led zu!̣ - ydr səsuodsəy uol?!?əd zu!or - ydr səsuodsəy uo!t!ləd zu!or - ydr JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses səsuodsəy uo!lułəd zulor - ydr səsuodsey uo!!!? səsuodsəy uo!?!ləd zu!̣of - ydr səsuodsəy uo!l!tad zu!or - ydr
 JPR - Joint Petition Responses JPR - Joint Petition Responses sesuodsəy uo!!! \#əd quior-yd səsuodsəy uo!t! fed みu!or - yd JPR - Joint Petition Responses DOM - Dominion Merger Costs S4soj aə8גəw uoluluog - WOO



 $n$
0
0
0
0
0
0
0
0
0
0
$\vdots$
0
0
0
0
0

DOM - Dominion Merger Costs มีอл3
 DOM - Dominion Merger Costs


 DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs



 DOM - Dominion Merger Costs









 S7SOJ גə8ıəW uoluluog - WOO







Operating Unit
品
UUUU U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U



SCANA Merger Related Labor Costs
ORS Audit Information Request 6-21.c.iv

DOM - Dominion Merger Costs MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice
 MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice
 MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses DOM - Dominion Merger Costs JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses
 JPR - Joint Petition Responses sasuodsəy uo!ntad zulor-ydi JPR - Joint Petition Responses JPR - Joint Petition Responses





 JPR - Joint Petition Responses

| Account |
| :--- |
| 4265013 - Dominion Merger Expenses |
| 4265000 - Other Deductions |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 9200000 - A And G Salaries |
| 9200000 - A And G Salaries |
| 9200000 - A And G Salaries |
| 9200000 - A And G Salaries |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265013 - Dominion Merger Expenses |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |




## ¥uno

 4265000 －Other Deductions
 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses səsuədx גə 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses




 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265000 －Other Deductions

4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses
 4265013 －Dominion Merger Expenses

Resource Code 201803106 －Indirect Payroll 201803106 －Indirect Payroll 201803106 －Indirect Payroll 201803106 －Indirect Payroll
 201803106 －Indirect Payroll 201803106 －Indirect Payroll 201803106 －Indirect Payroll 201803106 －Indirect Payroll

 201803106 －Indirect Payroll


 201803 106－Indirect Payroll 201803106 －Indirect Payroil





 201803106 －Indirect Payroll 201803106 －Indirect Payroll 201803106 －Indirect Payroll







 201803106 －Indirect Payroll



| $N$ |
| :--- |
|  |
|  |



$$
\begin{aligned}
& \text { Event } \\
& \text { MLA - Merger Matters Legal Advice } \\
& \text { MLA - Merger Matters Legal Advice } \\
& \text { MLA - Merger Matters Legal Advice } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs }
\end{aligned}
$$

$\frac{\frac{\text { Month }}{\text { Number }}}{201803} \quad 106$ - Indirect Payroll $\quad$ Resource Code 201803106 - Indirect Payroll 201803106 - Indirect Payroll 2018031.91 - Pensions 201803191 - Pensions 201803 191-Pensions 201803191 - Pensions




 201803191 - Pensions

 201803191 - Pensions 201803191 - Pensions 201803191 - Pensions 201803191 - Pensions



 201803191 - Pensions 201803191 - Pensions 201803 191-Pensions 201803191 - Pensions 201803 191-Pensions


 | 0 |
| :---: |
| 0 |
| 0 |
| 0 |
| 0 |
| 1 |
| 1 |
| $\vdots$ |
|  |
| 0 |
| 0 |
| 0 |
| 0 |




 suo!suəd- โ6โ ع08T0Z

Number Resource Code
201803191 - Pensions


 201803191 - Pensions
 $n$
0
0
0
0
0
1
1
-
-1
-
0
0
0
0
0















 | $n$ |
| :--- |
| $\vdots$ |
| $\vdots$ |
| 0 |
| 0 |
| 1 |
| 1 |
| - |
| 7 |
| 7 |
| 0 |
| 0 |
| 0 |



 nefits

 201803192 - Employee Benefits


 201803192 -Employee Benefits



皆 | $\pm$ |
| :--- |
| 0 |
| 0 |
|  |
|  |

 i
i
i
 $\circ$
Ni
N
in
in $\stackrel{M}{M}$
 n
N
H.
in $\$ 150.38$

 $n$
$\vdots$
$\vdots$
$\vdots$
$\vdots$
 JPR - Joint Petition Responses səsuodsəy uo!ulyəd fu!or - ydr JPR - Joint Petition Responses JPR - Joint Petition Responses
 JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses DOM - Dominion Merger Costs DOM - Dominion Merger Costs

 DOM - Dominion Merger Costs
 DOM - Dominion Merger Costs DOM - Dominion Merger Costs




 DOM - Dominion Merger Costs
 DOM - Dominion Merger Costs
 DOM - Dominion Merger Costs



 DOM - Dominion Merger Costs
Month
Number Resource Code



 201803 192-Employee Benefits 201803192 -Employee Benefits






 201803192 -Employee Benefits 201803192 -Employee Benefits






 201803192 -Employee Benefits











 201803 192-Employee Benefits


 201803192 - Employee Benefits 201803192 - Employee Benefits 201803192 -Employee Benefits 201803192 -Employee Benefits 201803192 - Employee Benefits 201803 192-Employee Benefits
 201803192 -Employee Benefits
 201803192 - Employee Benefits 201803192 -Employee Benefits 201803192 - Employee Benefits 201803192 -Employee Benefits 201803193 - Taxes Other Than Income


















 201803 193-Taxes Other Than Income
 Event
JPR - Joint Petition Responses
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
MLA - Merger Matters Legal Advice
MLA - Merger Matters Legal Advice
MLA - Merger Matters Legal Advice
MLA - Merger Matters Legal Advice
MLA - Merger Matters Legal Advice
MLA - Merger Matters Legal Advice
MLA - Merger Matters Legal Advice Account
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4081000 - Tx Oth Than Inc Tx UtiI
4081000 - Tx Oth Than Inc Tx UtiI
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded


 $\stackrel{n}{0}$
0
0
0気

UUUU U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U

SCANA Merger Related Labor Costs
ORS Audit Information Request 6-21.c.iv
201803193 - Taxes Other Than Income
 201803193 - Taxes Other Than Income 201803193 - Taxes Other Than Income

 201803 193-Taxes Other Than Income 201803193 - Taxes Other Than Income $\stackrel{\text { U }}{\stackrel{1}{0}}$

 201803 193-Taxes Other Than Income


 201803 193-Taxes Other Than Income


 201803193 - Taxes Other Than Income 201803 193-Taxes Other Than Income












 201803193 - Taxes Other Than Income

## 苞

Resource Code
Month
Number

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-21:

Refer to the FERC Policy Statement issued in FERC Docket No. PL15-3-000 "regarding future implementation of hold harmless commitments offered by applicants as ratepayer protection mechanisms to mitigate adverse effects on rates that may result from transactions subject to section 203 of the Federal Power Act (FPA)."
a. Confirm that Dominion Energy and Dominion Energy Services intend to comply with the requirements set forth in the FERC Policy Statement regarding transaction and transition costs, not only for FERC jurisdictional transaction and transition costs, but also for SC retail jurisdictional transaction and transition costs.
b. Confirm that SCANA Corporation, SCANA Services, Inc., and SCE\&G intend to comply with the requirements set forth in the FERC Policy Statement regarding transaction and transition costs, not only for FERC jurisdictional transaction and transition costs, but also for SC retail jurisdictional transaction and transition costs.
c. On pages 31-32 of the FERC Policy Statement, the FERC provides a list of "transaction costs," which includes "internal labor costs of employees."
i. Describe how SCANA Corporation, SCANA Services, Inc., and SCE\&G track the "internal labor costs of employees" for this purpose. Provide a copy of all documentation that addresses how such costs are to be tracked by each entity.
ii. Describe how SCANA Corporation, SCANA Services, Inc., and SCE\&G account for such costs. Provide a copy of all documentation that addresses how such costs are to be accounted for by each entity.
iii. Describe any reimbursement provided by SCANA Corporation and/or SCANA Services, Inc. to SCE\&G for costs that SCE\&G incurs and the accounting for such reimbursement by each entity. Provide a copy of all documentation that addresses such reimbursement and the accounting for such reimbursements by each entity.
iv. Provide the expenses by month and by FERC account/subaccount from July 2017 through the most recent month for which actual information is available for such internal labor costs and reimbursements incurred by each entity.
d. On pages 37-38 of the FERC Policy Statement, the FERC states the following:
53. While applicants may present their case-by-case analysis when they seek to recover capital costs in an FPA section 205 proceeding, we advise applicants to present a clear case in their FPA section 203 application to avoid uncertainty when possible. Therefore, we advise applicants to clearly state which known capital costs related to the transaction will be included or excluded from a hold harmless commitment at the time of their FPA section 203 application. Further, we advise applicants to clearly explain a process for determining which capital costs-that may be unknown at the time of the application but are related to the transaction and determined at a future date-will be included or excluded from a hold harmless commitment at the time of their FPA section 203 application. Similarly, we advise applicants to explain the treatment of operation and maintenance costs incurred in relation to transaction-related capital costs if the related plant asset meets the used and useful criterion in providing utility service, the Commission may consider exclusion of such costs from the hold harmless commitment. A clear explanation in the FPA section 203 application of the treatment of capital costs will aid the Commission and third parties in understanding how a transaction will not have an adverse effect on rates both in considering the application and in future related proceedings, including any future FPA section 205 filing to show transaction-related savings.
i. Identify and quantify all known capital costs related to the transaction that will be recorded by Dominion, Dominion Services, SCANA Corporation, SCANA Services, and SCE\&G. Indicate which of these costs will be excluded from SCE\&G rate recovery and describe how Dominion and SCANA will ensure that each such cost will be excluded in future SCE\&G rate proceedings.
ii. Describe the process for determining which capital coststhat may be unknown at the time of the application but are related to the transaction and determined at a future datewill be included or excluded in future SCE\&G rate proceedings.
iii. Describe the operation and maintenance costs that will or may be incurred in relation to transaction-related capital costs if the related plant asset meets the used and useful criterion in providing utility service and the process for determining whether the costs will be included or excluded in future SCE\&G rate proceedings.

## RESPONSE 6-21:

b. SCANA confirms that SCANA Corporation, SCANA Services, Inc., and SCE\&G intend to comply with the requirements set forth in the FERC Policy Statement regarding transaction and transition costs, not only for FERC jurisdictional transaction and transition costs, but also for SC retail jurisdictional transaction and transition costs as well.
c. Internal labor costs are tracked using SCANA's accounting key. The accounting key uses a "resource code" to identify costs by nature of expenditure. Labor costs are assigned to the "100" series of resource codes. This allows SCANA to identify labor separately from non-labor charges. SCANA's accounting key also allows for an "event code" to be established to track specific events (a common use of an event code is to track costs incurred in storm response and restoration). Specific event codes have been established to track transaction and transition costs associated with the Dominion merger. As described by SCANA in previous responses, transaction costs associated with the merger will be incurred and reported at the corporate (Holding Company) level and as such SCE\&G will not seek recovery of such costs. Generally, transition costs will likewise be incurred and expensed at the respective Holding Company level and will not be pushed down or charged to SCE\&G or any other SCANA or Dominion subsidiary company. Any transition costs and one-time charges related to the Customer Benefits Plan that are required to be recorded on the books of SCE\&G under Generally Accepted Accounting Principles will be reflected on SCE\&Gs' books below-the-line in FERC account 426.5 - Other Deductions to ensure the amounts are excluded from rate recovery. Each pay period, SCANA employees enter their time in the applicable time reporting system and report time worked on specific projects. Any time spent by employees on transaction or transition activities are to be coded to the established event code using the proper below-the-line 426.5 account. Payroll taxes on labor charged to account 426.5 are charged below-theline to account 408.2 - Taxes Other Than Income Taxes, Other Income and Deductions. The Company's records other benefit costs associated with labor charged to account 426.5 below the line to account 417.1 - Expenses of Nonutility

Operations.
SCE\&G would like to further state and clarify, that although the resolution of matters related to the abandonment of the nuclear project must be addressed before the Commission regardless of the proposed merger transaction, out of an abundance of caution and to ensure full compliance with the intent of the hold harmless provisions, costs incurred related to the filing of the Joint Petition are being tracked and recorded as an below-the-line expense on the books of SCE\&G.

On a periodic basis, SCE\&G's accounting personnel query the accounting system to ensure that all labor and nonlabor charges assigned merger related event codes are recorded to the proper below-the-line account at the proper Company and make corrections, if necessary.

As described in SCE\&G's response to Audit Information Request 4-37, SCANA's accounting key also allows for costs to be identified by benefitting subsidiary (Business Unit) and area of operations (Operating Unit). If an SCE\&G employee provides services for the benefit of SCANA Holding Company, such costs are assigned to the SCANA Holding Company Business Unit and Operating Unit. These costs are then billed through an automated process from SCE\&G to SCANA Holding Company on a monthly basis so that the costs incurred by the Holding Company are properly recorded on its books and SCE\&G is reimbursed for such costs.

The attached pdf file titled "6-21c_cost tracking documentation" contains documentation of internal communication regarding the tracking of merger related costs.

The attached Excel file "Response 6-21c.iv" contains merger related costs and costs related to the joint petition by month through March 2018. It also identifies SCE\&G costs billed to reimbursed by SCANA Holding Company.

Responsible person: Keith Coffer, Jr.

## SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-21:

Refer to the FERC Policy Statement issued in FERC Docket No. PL15-3-000 "regarding future implementation of hold harmless commitments offered by applicants as ratepayer protection mechanisms to mitigate adverse effects on rates that may result from transactions subject to section 203 of the Federal Power Act (FPA)."
a. Confirm that Dominion Energy and Dominion Energy Services intend to comply with the requirements set forth in the FERC Policy Statement regarding transaction and transition costs, not only for FERC jurisdictional transaction and transition costs, but also for SC retail jurisdictional transaction and transition costs.
b. Confirm that SCANA Corporation, SCANA Services, Inc., and SCE\&G intend to comply with the requirements set forth in the FERC Policy Statement regarding transaction and transition costs, not only for FERC jurisdictional transaction and transition costs, but also for SC retail jurisdictional transaction and transition costs.
c. On pages 31-32 of the FERC Policy Statement, the FERC provides a list of "transaction costs," which includes "internal labor costs of employees."
i. Describe how SCANA Corporation, SCANA Services, Inc., and SCE\&G track the "internal labor costs of employees" for this purpose. Provide a copy of all documentation that addresses how such costs are to be tracked by each entity.
ii. Describe how SCANA Corporation, SCANA Services, Inc., and SCE\&G account for such costs. Provide a copy of all documentation that addresses how such costs are to be accounted for by each entity.
iii. Describe any reimbursement provided by SCANA Corporation and/or SCANA Services, Inc. to SCE\&G for costs that SCE\&G incurs and the accounting for such reimbursement by each entity. Provide a copy of all documentation that addresses such reimbursement and the accounting for such reimbursements by each entity.
iv. Provide the expenses by month and by FERC account/subaccount from July 2017 through the most recent month for which actual information is available for such internal labor costs and reimbursements incurred by each entity.
d. On pages $37-38$ of the FERC Policy Statement, the FERC states the following:
53. While applicants may present their case-by-case analysis when they seek to recover capital costs in an FPA section 205 proceeding, we advise applicants to present a clear case in their FPA section 203 application to avoid uncertainty when possible. Therefore, we advise applicants to clearly state which known capital costs related to the transaction will be included or excluded from a hold harmless commitment at the time of their FPA section 203 application. Further, we advise applicants to clearly explain a process for determining which capital costs-that may be unknown at the time of the application but are related to the transaction and determined at a future date-will be included or excluded from a hold harmless commitment at the time of their FPA section 203 application. Similarly, we advise applicants to explain the treatment of operation and maintenance costs incurred in relation to transaction-related capital costs if the related plant asset meets the used and useful criterion in providing utility service, the Commission may consider exclusion of such costs from the hold harmless commitment. A clear explanation in the FPA section 203 application of the treatment of capital costs will aid the Commission and third parties in understanding how a transaction will not have an adverse effect on rates both in considering the application and in future related proceedings, including any future FPA section 205 filing to show transaction-related savings.
i. Identify and quantify all known capital costs related to the transaction that will be recorded by Dominion, Dominion Services, SCANA Corporation, SCANA Services, and SCE\&G. Indicate which of these costs will be excluded from SCE\&G rate recovery and describe how Dominion and SCANA will ensure that each such cost will be excluded in future SCE\&G rate proceedings.
ii. Describe the process for determining which capital costs-that may be unknown at the time of the application but are related to the transaction and determined at a future date-will be included or excluded in future SCE\&G rate proceedings.
iii. Describe the operation and maintenance costs that will or may be incurred in relation to transaction-related capital costs if the related plant asset meets the used and useful criterion in providing utility
service and the process for determining whether the costs will be included or excluded in future SCE\&G rate proceedings.

## RESPONSE 6-21:

6-21 a - Confirmed - Dominion Energy and Dominion Energy Services intend to comply with the requirements set forth in the FERC Policy Statement regarding transaction and transition costs, not only for FERC jurisdictional transaction and transition costs, but also for SC retail jurisdictional transaction and transition costs.

6-21 b - SCANA
6-21 c - SCANA
6-21 di. Planning for the integration process is in the early stages, beginning with building a baseline understanding of each other's respective organization, thus there are no known capital costs related to the transaction at this time that will be recorded by Dominion, Dominion Services, SCANA Corporation, SCANA Services, and SCE\&G.

At this time, neither Dominion nor SCANA anticipate incurring any significant Merger related capital expenditures. SCE\&G does not intend to seek rate recovery of Merger related transaction and transition costs - regardless of expense versus capital treatment of the costs. Dominion and SCANA each have put in place appropriate accounting controls and procedures to designate, record, and track such transaction and transition related costs, consistent with Commission requirements. As transaction and transition costs are incurred, they will be recorded in specific projects and accounts and separately tracked on the applicable books.

If any transaction or transition costs are required to be recorded for Generally Accepted Accounting Purposes on SCE\&G's books, such costs will be to account 426.5 - Other Deductions, 417.1 - Expenses of Nonutility Operations, 408.2 - Taxes Other Than Income Taxes, which are all "below-the-line" accounts, or other FERC accounts as appropriate for the charge and will be excluded from rate recovery. If there are any costs that are capital and required to be recorded on SCE\&G's books, such costs will be recorded to FERC account 121 - Non-utility property and excluded from rate recovery.

6-21 dii. - Please see response 6-21-di.
6-21 diii. Transition or integration cost are generally expected to be expensed and include, but not limited to, information technology related costs, to convert, conform, and/or integrate SCANA Corporation and subsidiaries' systems into and with Dominion's systems. As noted above, SCE\&G does not intend to seek rate recovery of Merger related transaction and transition costs, regardless of whether the cost is O\&M or capital related.

HONEYCUTT, LISA W

| From: | GREENE, JOANNA G |
| :--- | :--- |
| Sent: | Thursday, January 18,2018 8:23 AM |
| To: | GRIFFIN, IRIS; GREENE, JOANNA G; MACK, INDIA L; PETERMAN, ANDREA; BRYANT, |
|  | RONALD S; BOWDEN, ANDREW V JR; BRADLEY, GUY M; PUTNAM, CHRISTINA M; |
|  | HONEYCUTT, LSA W; STANTON, MATTHEW; ELLIOTT, ANTONIO; BEST, EMILY (BETTY); |
|  | EICHELBERGER, SHANNON R; MCDONALD, BARRY S; BURNETTE, ANNETTE H; |
|  | RANDALL, TERRI; BOYER, RICHARD; HUTTON, ELIZABETH LAFFITTE; ROBINSON, RACHEL, |
|  | M; HIERS, JEAN BENBOW; TAYLOR, CATHERINE D; HUTCHENS, ANN R; EFFINGER, |
|  | THOMAS N; LIPPARD, GEORGE A II; STARLING, JAMES; AULL, CRAIG B; KOCHEMS, |
|  | SHANNON J; PERRY, SHANNON; DELK, HENRYE JR; NEWSOM, JOSEPH B; MILLER, |
|  | PATRICIA M; SWINDLER, SCOTT |
|  | Karla Haislip |
| Cc: | Transition Team |
| Subject: | Transition Team.xlsx |
| Attachments: |  |

We have worked with senior staff over the past week to identify a transition team for the proposed merger with Dominion Energy. The attached spreadsheet shows the individuals selected to represent the various areas across $S C \wedge N A$. There are two separate components to the team as follows:

- Transition Team - includes individual representatives from essentially cach area of the service company and each of the major operations groupings. This group will:
o participate in the kickoff and periodic status and communication meetings,
o serve as liaisons for their respective organizations,
o coordinate with others in their area as needed to address transition issues related to their organizations (this is expected to be minimal for operations areas), and
o provide guidance as needed on decisions from other groups that may impact their area(s).
- Service Company Project Leads - designated transition team members who will serve as project managers for one or more areas of SCANA Services. These individuals will:
o Participate in transition team meetings
o Coordinate schedule and deliverables for their area and others as designated

As the transition progresses, we expect additional employees will be involved with specific reviews of practices and procedures and determination of best practices and other anticipated changes. These groups will be pulled together as needed going forward.

Getting the merger approved is the current priority and focus now, however, we expect an overall transition team kickoff meeting in the first quarter.

We are in the process of linalizing appropriate ways to transmit information to ensure that we have a log of all data provided and that information is sent in a safe and secure manner. Until we can initiate that process, please coordinate discussions and transmission of information through me.

In the interim if you perform any work directly on the merger and transition, time and incremental expenses should be charged as follows:

Dominion Merger Accounting Distribution
Operating Unit: SIICO
Account Number: 426.5013

Resource: Appropriate for Charge
Department: Initiating Department
Event Code: "DOM" - FOR NON-LEGAL RELATED COSTS
"MLA"-- FOR LEGAL FEES AND TME

Incremental non-labor costs (such as external consultants and attorneys) should be charged to this distribution. Only labor costs directly related to the merger and transition activities should be coded to the merger. Time spent attending employee informational meetings should be charged to the employce's regular payroll distribution.

If you have any questions please give me a call.

## Thanks!

```
Joanna Greene
```

igreene1@scana.com
w 803.217.7354/c 803.609.1930

| From: | GREENE, JOANNA G |
| :--- | :--- |
| ,ent: | Tuesday, January 16, 20184:32 PM |
| To: | HUTTON, ELIZABETH LAFFTTE; HUTCHENS, ANN R; STANTON, MATTHEW; PUTNAM, |
|  | CHRISTINA M; HONEYCUTT, LISA W; BOYER, RICHARD; ROBINSON, RACHEL M; |
|  | RANDALL, TERRI |
| Cc: | COFFER, KEITH C JR; GRIFFIN, IRIS |
| Subject: | accounting related to Dominion work |

I am still waiting on some final blessing before sending out an email to the whole transition team, but since I know some of your areas have aiready been performing merger work and it is almost time for timesheets wanted to at least get this out and around... please share within your groups as appropriate.
if you perform any work directly on the merger and transition, time and incremental expenses should be charged as follows:

Dominion Merger Accounting Distribution
Operating Unit: SHCO
Account Number: 426.5013
Resource: Appropriate for Charge
Department: Initiating Department
Event Code: "DOM" - FOR NON-LEGAL RELATED COSTS
"MLA" - FOR LEGAL FEES AND TME

Incremental non-labor costs (such as external consultants and attorneys) should be charged to this distribution. Only labor costs directly related to the merger and transition activities should be coded to the merger. Time spent attending


## Thanks!

Joanna Greene
igreene1@scana.com
w $803.217 .7354 / \mathrm{k} 803.609 .1930$

## COFFER, KEITH C JR

| From: | COFFER, KEITH C JR |
| :--- | :--- |
| Sent: | Monday, January 08, 2018 8:13 PM |
| To: | GREENE, JOANNA G |
| Subject: | Merger Accounting Distribution |

Below is the accounting distribution we have set up for the merger. Also some suggested wording on the guidance, but feel free to edit.

Casey

The accounting distribution below has been established to capture costs associated with the Dominion merger. Incremental non-labor costs (such as external consultants and attorneys) should be charged to this distribution. Only labor costs directly related to the merger and transition activities should be coded to the merger. Time spent attending employee informational meetings should be charged to the employee's regular payroll distribution.

If you have any questions, you can contact \{insert name, the accounting transition lead at ext. XXXXX\} or your business unit accounting representative.

Dominion Merger Accounting Distribution
Operating Unit: SHCO
Account Number: 426.5013
Resource: Appropriate for Charge
Department: Initiating Department
Event Code: "DOM" - FOR NON-LEGAL RELATED COSTS
"MLA" - FOR LEGAL FEES AND TME

## HONEYCUTT, LISA W

## From:

## Sent:

To:

COFFER, KEITH CJR
Wednesday, February 14, 2018 6:20 PM
HINSON, BYRON W; ROBINSON, RACHEL M; ROOKS, ALLEN W; HENDRIX, JOHN R; SMITH, JATON R; HARRISON, TAMMY B; KOCHEMS, KEVIN R; SWAN, JAMES E IV; SMITH, VIRGINIA D; BURGESS, KENNETH CHAD; GISSENDANNER, MATTHEW W; DELK, HENRY E JR; STANTON, MATTHEW; SCHELBLE, DENISE W; HONEYCUTT, LISA W; WITHYCOMBE, LESLIE S; SCURRY, EMBRE B (Accounting); CHEWNING, RICHARD WOODRUFF V; CLEMENTS, CAROL H; GORTMAN, LYDIA K; MCCRAVY, ERNEST E; MORRIS, BILLIE KAY; SPARKS, MARK L.
Cc:
Subject:

JACKSON, KENNETH R; GRIFFIN, IRIS
Time Coding For ORS Audit Information Request

All -
The FERC has very specific requirements that must be followed when incurring merger related costs. The objective of these requirements is to ensure that ratepayers are protected from adverse effects on rates that may result from such transactions. The policies are commonly referred to as "hold harmless" provisions. There is a 76 page ferc policy statement that addresses this issue, but it can really be boiled down to the following statement:
"Specifically, the Commission's long-standing policy is that costs incurred to effectuate a merger are nonoperating in nature, and they should be recorded in Account 426.5, Other Deductions."

The issue we have to consider is that although the data request we are responding to looks a lot like a retail ratemaking issue, and issues that presumably were going to have to be addressed regardless of whether there was a merger or not, the Joint Petition has an aspect of seeking merger approval.

I have consulted with Sara and Chad and they have advised that in order to be in compliance with the hold harmless
 or ratemaking issue.

They acknowledge, and I think we would all agree, the practicality of that becomes difficult. Therefore, it has been decided that we should code all activity related to responding to this request to account 426.5. The distribution is below. We have also provided an event code. It is important that the event code is used to allow us to be able to identify the costs so that we can report as O\&M in our SEC filings.

Thanks and if you have any questions please let me know.

Casey
Distribution to use for data reguest response:
Operating Unit: RADM
Account Number: 426.5000
Event Code: JPR

## EBS

## ACCOUNT NUMRER / WORK ORDER ADDITION / UPDATE



## EBS <br> ACCOLUNT NUMBER / WORK ORDER ADDITION / UPDATE

Requested by: Jordan Hunter
Date: $1 / 8 / 18$
Area/Department Responsible for account:
Individual Responsible for account:
Approved by, C. Coffer
Date, 1/8/18
Entered by:
(Mainframe Valid Accoumt IIle)
Date:
Entered by:
Mrees)
Date:

## EBS <br> CIISTOMER - SERVICE - EVENT CODE ADDITION/LIPDATE



## EBS <br> CUSTOMER - SERVICE - EVENT CODF ADDITION/I IPDATE,



## CIISTOMFR - SERVICF - FVFNT CODF ADDITION/IIPDATE

\begin{tabular}{|c|c|c|c|}
\hline \& \& \& <br>
\hline Add Change \& Event \& \& 11318 , <br>
\hline \multicolumn{4}{|l|}{} <br>

\hline  \& \multicolumn{3}{|l|}{\begin{tabular}{l}
Active Inactive Active $\square$ Inactive

$\square$ Inactive <br>
SERVICES CODES: Please chech responsible area.
Electric Service Products/Services
Environmental Services
Federal Energy Services
Fleet Services
Gas
Information Systems
Telecommunications
Power Deliverv Oneratinns VCS Accounting
$\square$ PSNC Accounting
Other: Legal <br>
HWENT CODES: Please select appropriate hierarchy.
Ash Handling
MJM $=$ PSC Accrual
MM - Other
Major Stoms
Minor Storms
Synfuel
Tree Trimming
Other Event Codes
\end{tabular}} <br>

\hline
\end{tabular}





 201801101 - Normal Time










 201801101 - Normal Time
 201801101 - Normal Time 201801102 - Overtin 201801106 - Indirect Payroll
 201801106 - indirect Payroli 201801 106-Indirect Payroll 201801106 - Indirect Payroll 201801106 - indirect Payrolf 201801106 - Indirect Payrol! 201801 106- Indirect Payroll




 201801106 - Indirect Payroll


| Number | Resource Code |
| :---: | :---: |
| 201801 | 106 - Indirect Payroil |
| 201801 | 106 - Indirect Payroll |
| 201801 | 106 - Indirect Payroll |
| 201801 | 106 - Indirect Payroll |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 191 - Pensions |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 -Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |
| 201801 | 192 - Employee Benefits |




 $\stackrel{\stackrel{y y}{*}}{\stackrel{\circ}{3}}$


## Number Resource Code <br> 201801 192-Employee Benefits <br> Month Number

 201801192 -Employee Benefits
 201801192 -Employee Benefits 201801 192-Employee Benefits 201801193 -Taxes Other Than Income 201801193 - Taxes Other Than Income

 201801193 - Taxes Other Than Income 201801193 - Taxes Other Than Income 201801193 - Taxes Other Than income

 201801193 -Taxes Other Than Income








 201802 101-Normal Time








 2018021.01 - Normal Time

2


$\qquad$


```
2
```

$\qquad$ $+$
SCE\&G Costs Billed
to and Reimbursed
by SCANA Holding
Company






葡


Number Resource Code

 $\stackrel{\stackrel{y}{c}}{\stackrel{1}{c}}$









 $\stackrel{\stackrel{N}{E}}{\stackrel{1}{E}}$




 $\stackrel{y}{\stackrel{y}{E}}$







 201802 101 - Normal Time





 201802 106-Indirect Payroll




$\frac{\text { Month }}{\frac{\text { Number }}{201802} \quad 106 \text {-Indirect Payroll }} \quad$ Resource Code 201802106 - Indirect Payroll 201802106 - Indirect Payroll
 201802 106-Indirect Payroll



 201802 106-Indirect Payroll 201802 191-Pensions





 201802191 - Pensions
















 suo!suad- T6T Z08T0Z
 Event
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
JPR - Joint Petition Responses
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs

Account
4171000 - Exp From Non-utility Opertns
 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns
4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns
 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns



 $\sum_{i} \sum_{i}^{c}$ $\stackrel{\Sigma}{\Sigma}$文 $\stackrel{\sum}{\stackrel{\rightharpoonup}{c}}$ $\sum \underset{\substack{\alpha}}{\sum}$ $\underset{\substack{2}}{\Sigma}$ $\Sigma$ 88 온 온 8 888 온 온 온 SHCO 8
 들


SCANA Merger Related Labor Costs
Resource Code 201802 192-Employee Benefits
 201802192 -Employee Benefits



































SCANA Merger Related Labor Costs
ORS Audit Information Request 6-21.c.iv


DOM - Dominion Merger Costs
MLA - Merger Matters Legal Advice
 MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice
 MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice JPR - Joint Petition Responses JPR - Joint Petition Responses
 JPR - Joint Petition Responses DOM - Dominion Merger Costs JPR - Joint Petition Responses JPR - Joint Petition Responses
 JPR - Joint Petition Responses IPR - Joint Petition Responses


 səsuodsəy uonulad quilor - yd!
 JPR - Joint Petition Responses
 JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses





 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns
 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 4171000 - Exp From Non-utility Opertns 9260001 - A And G Benefits 9260001 - A And G Benefits

4082000 - Tx Oth Than Inc Tx Oth Inc-ded


 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than inc Tx Oth Inc-ded




 4082000 - Tx Oth Than Inc Tx Oth Inc-ded








 $\stackrel{\sum}{\stackrel{1}{4}}$ 온
 RADM RADM
 $\sum_{0}$
 $\sum_{\substack{d \\ \circledR}}$ $\sum_{0}$高 RADM $\sum_{\substack{\circ \\ థ}}$
 RADM 8 808
둔资

ORS Audit Information Request 6-21.c.iv
 온 온 온운 9 운 온 온 온 온운 온 08 $\sum_{\substack{~}}^{\substack{\alpha}}$ $\sum_{\substack{0 \\ d \\ \text { 우N } \\ \text { in }}}$㖒: Operating Unit DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs
 DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice
 MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice JPR - Joint Petition Responses
 JPR - Joint Petition Responses DOM - Dominion Merger Costs DOM - Dominion Merger Costs

## Account

 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - TX Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded

 4082000 - Tx Oth Than Inc Tx Oth Inc-ded



 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded





 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4082000 - Tx Oth Than Inc Tx Oth Inc-ded



4082000 - Tx Oth Than Inc Tx Oth Inc-ded




 4082000 - Tx Oth Than Inc Tx Oth Inc-ded 4265000 - Other Deductions

 4265013 - Dominion Merger Expenses 4265013 - Dominion Merger Expenses


 JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses sasuodsəy uolul?əd zu!o - - ydr JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses səsuodsəy uo!l?7əd zu!̣or - ydr sesuodsəy uo!t!led zu!̣ - ydr səsuodsəy uol?!?əd zu!or - ydr səsuodsəy uo!t!ləd zu!or - ydr JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses səsuodsəy uo!lułəd zulor - ydr səsuodsey uo!!!? səsuodsəy uo!?!ləd zu!̣of - ydr səsuodsəy uo!l!tad zu!or - ydr
 JPR - Joint Petition Responses JPR - Joint Petition Responses sesuodsəy uo!!! \#əd quior-yd səsuodsəy uo!t! fed みu!or - yd JPR - Joint Petition Responses DOM - Dominion Merger Costs S4soj aə8גəw uoluluog - WOO



 $n$
0
0
0
0
0
0
0
0
0
0
$\vdots$
0
0
0
0
0

DOM - Dominion Merger Costs มีอл3
 DOM - Dominion Merger Costs


 DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs DOM - Dominion Merger Costs



 DOM - Dominion Merger Costs









 S7SOJ גə8ıəW uoluluog - WOO







Operating Unit
品
UUUU U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U



SCANA Merger Related Labor Costs
ORS Audit Information Request 6-21.c.iv

DOM - Dominion Merger Costs MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice
 MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice
 MLA - Merger Matters Legal Advice MLA - Merger Matters Legal Advice JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses DOM - Dominion Merger Costs JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses
 JPR - Joint Petition Responses sasuodsəy uo!ntad zulor-ydi JPR - Joint Petition Responses JPR - Joint Petition Responses





 JPR - Joint Petition Responses

| Account |
| :--- |
| 4265013 - Dominion Merger Expenses |
| 4265000 - Other Deductions |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 4265013 - Dominion Merger Expenses |
| 9200000 - A And G Salaries |
| 9200000 - A And G Salaries |
| 9200000 - A And G Salaries |
| 9200000 - A And G Salaries |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265013 - Dominion Merger Expenses |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |
| 4265000 - Other Deductions |




## ¥uno

 4265000 －Other Deductions
 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses səsuədx גə 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses




 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses 4265000 －Other Deductions

4265013 －Dominion Merger Expenses 4265013 －Dominion Merger Expenses
 4265013 －Dominion Merger Expenses

Resource Code 201803106 －Indirect Payroll 201803106 －Indirect Payroll 201803106 －Indirect Payroll 201803106 －Indirect Payroll
 201803106 －Indirect Payroll 201803106 －Indirect Payroll 201803106 －Indirect Payroll 201803106 －Indirect Payroll

 201803106 －Indirect Payroll


 201803 106－Indirect Payroll 201803106 －Indirect Payroil





 201803106 －Indirect Payroll 201803106 －Indirect Payroll 201803106 －Indirect Payroll







 201803106 －Indirect Payroll



| $N$ |
| :--- |
|  |
|  |



$$
\begin{aligned}
& \text { Event } \\
& \text { MLA - Merger Matters Legal Advice } \\
& \text { MLA - Merger Matters Legal Advice } \\
& \text { MLA - Merger Matters Legal Advice } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { JPR - Joint Petition Responses } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs } \\
& \text { DOM - Dominion Merger Costs }
\end{aligned}
$$

$\frac{\frac{\text { Month }}{\text { Number }}}{201803} \quad 106$ - Indirect Payroll $\quad$ Resource Code 201803106 - Indirect Payroll 201803106 - Indirect Payroll 2018031.91 - Pensions 201803191 - Pensions 201803 191-Pensions 201803191 - Pensions




 201803191 - Pensions

 201803191 - Pensions 201803191 - Pensions 201803191 - Pensions 201803191 - Pensions



 201803191 - Pensions 201803191 - Pensions 201803 191-Pensions 201803191 - Pensions 201803 191-Pensions


 | 0 |
| :---: |
| 0 |
| 0 |
| 0 |
| 0 |
| 1 |
| 1 |
| $\vdots$ |
|  |
| 0 |
| 0 |
| 0 |
| 0 |




 suo!suəd- โ6โ ع08T0Z

Number Resource Code
201803191 - Pensions


 201803191 - Pensions
 $n$
0
0
0
0
0
1
1
-
-1
-
0
0
0
0
0















 | $n$ |
| :--- |
| $\vdots$ |
| $\vdots$ |
| 0 |
| 0 |
| 1 |
| 1 |
| - |
| 7 |
| 7 |
| 0 |
| 0 |
| 0 |



 nefits

 201803192 - Employee Benefits


 201803192 -Employee Benefits



皆 | $\pm$ |
| :--- |
| 0 |
| 0 |
|  |
|  |

 i
i
i
 $\circ$
Ni
N
in
in $\stackrel{M}{M}$
 n
N
H.
in $\$ 150.38$

 $n$
$\vdots$
$\vdots$
$\vdots$
$\vdots$
 JPR - Joint Petition Responses səsuodsəy uo!ulyəd fu!or - ydr JPR - Joint Petition Responses JPR - Joint Petition Responses
 JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses JPR - Joint Petition Responses DOM - Dominion Merger Costs DOM - Dominion Merger Costs

 DOM - Dominion Merger Costs
 DOM - Dominion Merger Costs DOM - Dominion Merger Costs




 DOM - Dominion Merger Costs
 DOM - Dominion Merger Costs
 DOM - Dominion Merger Costs



 DOM - Dominion Merger Costs
Month
Number Resource Code



 201803 192-Employee Benefits 201803192 -Employee Benefits






 201803192 -Employee Benefits 201803192 -Employee Benefits






 201803192 -Employee Benefits











 201803 192-Employee Benefits


 201803192 - Employee Benefits 201803192 - Employee Benefits 201803192 -Employee Benefits 201803192 -Employee Benefits 201803192 - Employee Benefits 201803 192-Employee Benefits
 201803192 -Employee Benefits
 201803192 - Employee Benefits 201803192 -Employee Benefits 201803192 - Employee Benefits 201803192 -Employee Benefits 201803193 - Taxes Other Than Income


















 201803 193-Taxes Other Than Income
 Event
JPR - Joint Petition Responses
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
DOM - Dominion Merger Costs
MLA - Merger Matters Legal Advice
MLA - Merger Matters Legal Advice
MLA - Merger Matters Legal Advice
MLA - Merger Matters Legal Advice
MLA - Merger Matters Legal Advice
MLA - Merger Matters Legal Advice
MLA - Merger Matters Legal Advice Account
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4081000 - Tx Oth Than Inc Tx UtiI
4081000 - Tx Oth Than Inc Tx UtiI
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded
4082000 - Tx Oth Than Inc Tx Oth Inc-ded


 $\stackrel{n}{0}$
0
0
0気

UUUU U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U U

SCANA Merger Related Labor Costs
ORS Audit Information Request 6-21.c.iv
201803193 - Taxes Other Than Income
 201803193 - Taxes Other Than Income 201803193 - Taxes Other Than Income

 201803 193-Taxes Other Than Income 201803193 - Taxes Other Than Income $\stackrel{\text { U }}{\stackrel{1}{0}}$

 201803 193-Taxes Other Than Income


 201803 193-Taxes Other Than Income


 201803193 - Taxes Other Than Income 201803 193-Taxes Other Than Income












 201803193 - Taxes Other Than Income

## 苞

Resource Code
Month
Number

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-22:

Refer to the Attachment to the response to ORS 4-61. Extend the schedule to include months after September 2017 through the most recent month for which actual amounts are available. In addition, separate all balance to date amounts into directs and AFUDC.

RESPONSE 6-22:
Please see the attached.

Responsible person: Kevin Kochems
Response No．6－22
VCS 2 and 3 CWIP Docket No．2017－207－E（5th Continuing AIR）
Docket No．2017－305－E（4th Continuing AIR）
Docket No．2017－370－E（4th Continuing AIR）
South Carolina Electric \＆Gas Company
Office of Regulatory Staff＇s Continuing
Audit Information Request
Docket No．2017－207－E（5th Contin

|  | J |  |
| :---: | :---: | :---: |
|  | ザツ | $\stackrel{\infty}{\circ}$ |
|  | N＇ | N8 |
|  |  |  |
|  |  | m |










 18
$\varrho$



 | PTD |
| :---: |
| Dec－14 |

 | $\$ 2,633,730$ |
| :--- |
| $\$ \quad 108,641$ |


 WO 17 －NND only＊ WO 17 －NND only
Direct Expenditures 8
$\frac{0}{0}$
0
0
$\frac{2}{2}$
0
0 Balance to Date

Transmission WO＇s Direct Expenditures AFUDC

CWIP for Period Balance to Date

## Total BLRA

Direct Expenditures AFUDC

CWIP for Period Balance to Date

WO 17 －NND only＊ Direct Expenditures AFUDC

CWIP for Period Balance to Date

Transmission WO＇s Direct Expenditures AFUDC CWIP for Period 0
0
0
0
0
0
0
0
0
0
0
0

Total BLRA
Direct Expenditures
WIP for Period
Balance to Date

\[

\]

\[

\]

\[

\]

PTD
Dec-16

[^3]- dMO \& pue て SOA


# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-23:

Refer to the top-side accounting entries to reclassify the NND CWIP to regulatory assets at September 30, 2017 and December 31, 2017 provided in response to ORS 4-62 and refer to the NND CWIP costs by month provided in the Attachment to the response to ORS 4-61. Reconcile the differing NND CWIP amounts at September 30, 2017. Confirm that the difference is due to the $\$ 210$ million impairment loss recorded at September 30, 2017. If confirmed, then explain why the impairment loss was not recorded as a reduction to the NND CWIP amount for September 30, 2017 provided in response to ORS 4-61.

## RESPONSE 6-23:

Confirmed, as noted in the footnote to response 4-61, the impairment charges as of September 30, 2017, were not reflected in the financial schedule.

SCE\&G did not include the $\$ 210$ million impairment recorded in September 2017 in the response to question 4-61 because this schedule was intended to reflect CWIP charges only.

Responsible person: Kevin Kochems

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY <br> OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-24:

Refer to the top-side accounting entries to reclassify the NND CWIP to regulatory assets at September 30, 2017 and December 31, 2017 provided in response to ORS 4-62.
a. Reconcile and describe each difference between the amounts at September 30, 2017 and December 31, 2017. The total difference is $\$ 544,663,374$.
b. The response indicates that the impairment loss as of December 31, 2017 was $\$ 670$ million, yet the 2017 SCANA $10-\mathrm{K}$ indicates that the NND project costs impairment loss was $\$ 210$ million in September 2017 plus another $\$ 280$ million in December 2017, or a total of $\$ 490$ million. The difference between the $\$ 670$ million and the $\$ 490$ million is $\$ 180$ million.
i. Confirm that the $\$ 180$ million is the cost to acquire the Columbia Energy Center.
ii. If confirmed, then explain why the cost to acquire the Columbia Energy Center was used to reduce the NND project costs.
iii. Provide and describe the SCE\&G accounting entries that it will record when it actually acquires the Columbia Energy Center, including the accounts/subaccounts and amounts, as well as the related income tax effects. Indicate whether the Company will reverse the impairment loss taken in December 2017 used to reduce the NND project costs recorded in CWIP. If the response to the latter question is no, then explain why it will not do so.
iv. Confirm that Dominion and SCE\&G's commitment that SCE\&G will not include the cost of the acquisition of the Columbia Energy Center in rate base also includes the commitment that it will not include the related asset ADIT in rate base in future rate proceedings. Explain the response.
v. Confirm that if SCE\&G reduces the NND project costs by the cost of acquiring the Columbia Energy Center, then this effectively includes the related asset ADIT in the proposed CCR as a reduction to the NND project cost liability ADIT. Explain your response and indicate if this result was intended or unintended. If intended, then explain why SCE\&G believes this is appropriate for ratemaking purposes.

## RESPONSE 6-24:

a. See attached excel file "6-24(a) Response".
b.i Yes, the $\$ 180$ million represents the initial costs to acquire the Columbia Energy Center ("CEC").
b.ii The impairments recognized to date by SCE\&G have been done so in the absence of specific regulatory orders establishing the recoverability of any costs and, as such, represent SCE\&G's best estimates of such impairments by applying the guidance in Accounting Standards Codification (ASC) 980-360-35 for utility plant abandonments and the guidance for loss contingencies in general in ASC 450-20. ASC 980-360-35-3 indicates that an entity should focus on the facts and circumstances related to the specific abandonment in determining the amount of any disallowance of the abandoned plant that is probable and reasonably estimable, which in turn determines the carrying value of the abandoned plant asset (in the case of SCE\&G, the regulatory asset) to be recognized in accordance with ASC 980-360-35-3. When assessing the totality of events that transpired in the fourth quarter of 2017 (culminating with the formal filing of a regulatory petition with the SCPSC on January 12, 2018) and reaching its determination that a further impairment (over that which had been recorded as of the end of the third quarter) was necessary, SCE\&G determined that, as a result of the public offer to forego recovery of CEC on November 16, 2017 and the formal filing of that position in the January 12, 2018 petition, the probable and reasonably estimable loss associated with such foregone recovery was, in substance, directly tied to the abandonment of the nuclear project and should be considered in the determination of the estimated probable disallowance of project costs.
b.iii SCE\&G maintains its accounts in accordance with the Federal Energy Regulatory Commission (FERC) Uniform System of Accounts (USoA). In accordance with USoA Electric Plant Instruction No. 5, upon acquisition, SCE\&G will record the purchase of the Facility to account 102 - Electric Plant Purchased or Sold. For regulatory accounting purposes, SCE\&G must then submit its proposed entries to clear account 102 and complete the necessary acquisition accounting to the FERC, which it intends to do expeditiously. Upon approval from the FERC of the proposed accounting treatment, account 102 will be cleared to record the original cost of the

Facility to Electric Plant in Service and to record the related accumulated depreciation to Accumulated Provision for Depreciation of Electric Utility Plant. An acquisition adjustment will be recorded for any difference between the $\$ 180$ million consideration paid for the Facility and the net book value upon acquisition. An estimate (as allowed pursuant to Electric Plant Instruction No. 5) of each of the original cost and the related accumulated depreciation of the facility will be finalized as the acquisition process is completed and is not available at this time. SCE\&G will then immediately recognize an impairment charge by removing the acquisition adjustment and fully depreciating the Facility. The resulting charge, which will be equal to the acquisition price paid, will be recorded as a below-the-line expense to account 426.5-Other Deductions. The proposed entries are as follows:

DR: Account 102 - Electric Plant Purchased or Sold
CR: Account 131 - Cash
To record purchase of the Columbia Energy Center generating facility.
DR: Account 101 - Electric Plant in Service
CR: Account 108 - Accumulated Provision for Depreciation of Electric Utility Plant
DR/CR: Account 114 - Electric Plant Acquisition Adjustment
CR: Account 102 - Electric Plant Purchased or Sold
To clear balance in Account 102 - Electric Plant Purchased or Sold.

DR: Account 190 - Accumulated Deferred Income Taxes
CR: Account 411.1 - Provision for Deferred Income Taxes - Credit
DR/CR: Account 410.1-Provision for Deferred Income Taxes
CR: Account 283 - Accumulated Deferred Income Taxes
To record deferred taxes associated with the initial investment in the Columbia Energy Center facility.

DR: Account 426.5 - Other Deductions
CR: Account 108 - Accumulated Provision for Depreciation of Electric Utility Plant
DR/CR: Account 114 - Electric Plant Acquisition Adjustment
To record impairment of the carrying value associated with the initial investment in the Columbia Energy Center facility.

In order to prevent the write-off charge from being recognized twice, the impairment charge that will be recognized upon acquisition will be offset by a reversal of the impairment charge recorded in 2017 against the NND project regulatory asset. In this manner, the below the line impairment charge will have been recorded (one time only) in 2017, with the initial carrying value of the Facility in SCE\&G's rate base being zero going forward. The proposed entry is as follows:

DR: Account 182.2 - Unrecovered Plant and Regulatory Study Costs
CR: Account 426.5-Other Deductions
To reverse impairment charge recorded in 2017 against the NND project regulatory asset.
A noted above, the entries to clear account 102 and complete the regulatory accounting must be approved by the FERC prior to being implemented for FERC reporting purposes. For the preparation of financial statements in accordance with Generally Accepted Accounting Principles (GAAP), the above entries will be recorded upon acquisition of CEC. A difference between the GAAP accounting basis presentation and FERC regulatory accounting basis presentation will exist until such entries are implemented for FERC reporting purposes.
b.iv SCE\&G and Dominion confirm that the related ADIT asset will also be excluded from rate base in future rate proceedings. We believe the exclusion of the related ADIT asset from rate base is a logical and appropriate treatment under traditional rate-making concepts.
b.v As noted in b.iii above, the reduction to NND project costs will be reversed upon the acquisition of CEC. As a result, the related deferred tax asset associated with CEC will no longer reduce the deferred tax liability associated with the nuclear project regulatory asset.

Responsible person: Keith Coffer, Jr.
SCE\&G
Response to ORS Audit Information Requests 6-24 (a)
Regulatory Asset Balance at September 30, 2017

## Fourth Quarter 2017 Activity


\$4,520,183,565

| $(\$ 544,663,374)$ |
| ---: |
| $\$ 3,975,520,191$ |

True Up of YTD July 31, 2017 AFUDC to Final Annual Rate Calculated in Accordance with FERC Order No. 561 and Uniform System of Accounts Electric Plant Instruction No. 3.17
December Costs Subsequently Moved to Below-the-Line Expenses in Q1 2018 \{1\}
Regulatory Asset Balance at December 31, 2017
\{1\} SCE\&G clears project costs incurred subsequent to September 30, 2017 to below-the-line expenses each month. In December, a late expenditure was charged to the project after SCE\&G had cleared current month costs. This immaterial amount was moved to below-the-line expenses in the first quarter

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-25:

Refer to page 53 of the SCE\&G 2017 10-K related to the $\$ 180$ million impairment loss associated with the Company's "entry into an agreement in the fourth quarter of 2017 to purchase in 2018 an existing 540-MW combined cycle gas generating station." Provide a copy of the purchase agreement.

## RESPONSE 6-25:

The information responsive to this request contains confidential and sensitive information. Due to the confidential and sensitive nature of the information requested, SCE\&G will make the information responsive to this request available to ORS for review and inspection at SCE\&G's administrative offices after the execution of a confidentiality agreement.

Responsible Person: Chad Burgess (legal matters) and Jim Landreth

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY <br> OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-26:

Refer to lines 5-6 of the Summary tab of the Attachment (Excel workbook) to the response to ORS 4-64, which provides the federal and state ADIT effect by month of the NND cost book impairment losses. Lines 5-6 do not include the federal and state ADIT effect of the December 2017 NND cost book impairment loss, which appear to be included in lines 23-24, although it is not separately shown. Provide a version of the Summary tab that separately shows the federal and state ADIT effect of the December 2017 NND cost book impairment loss.

## RESPONSE 6-26:

Under generally accepted accounting principles, ADIT is computed by comparing the book basis of an asset or liability to the tax basis of that asset or liability rather than componentizing/separating activity for book and tax into a "gross" presentation. For book purposes, the net carrying value of the unrecovered NND costs is $\$ 3.9$ billion, which is net of the $\$ 670$ million impairments recorded. Absent the tax abandonment claim, deferred tax assets (or a reduction in the recorded deferred tax liability on the difference in the book and tax basis of the NND project) associated with/resulting from these impairments would have been recorded as shown on lines 5-6 of the Summary tab of the attachment to ORS 4-64.

The recording of the book impairment losses in September and December reduced the amount of the ADIT liability that would have resided on the balance sheet, absent the tax abandonment, in the amounts of $\$ 33.5$ million for state ADIT and $\$ 133.7$ million for federal ADIT.

As of the end of 2017, there is an ADIT liability recorded of $\$ 983.8$ million. (See Purple Tab of Attachment to the response to ORS 4-64). As noted in the first paragraph, and as a result of the tax abandonment claim, the deferred tax liability recorded in the financial statements is the difference in the book basis, net of impairments, of $\$ 3.9$ billion and the tax basis after the abandonment $\$ 32.5$ million. This deferred tax liability is shown on line 23-24.

Responsible person: Virginia Smith

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-27:

Refer to line 6 of the Purple tab of the Attachment (Excel workbook) to the response to ORS 4-64, which indicates that the book basis of the regulatory asset for the NND costs is $\$ 3,975,479,168$. Confirm that this amount is consistent and approximately equivalent to the $\$ 3,975,520,191$ NND cost regulatory asset at December 31, 2017. In addition, confirm that the $\$ 3,975,479,168$ reflects a reduction in the NND costs for the $\$ 180$ million cost to acquire the Columbia Energy Center and that the related ADIT shown on lines $9-10$ of this Attachment reflects the asset ADIT on the $\$ 180$ million. Explain your response.

## RESPONSE 6-27:

Yes, the $\$ 3,975,479,168$ is consistent and approximately equivalent to the $\$ 3,975,520,191$. The difference of $\$ 41,023$ represents a December 2017 charge to the regulatory asset that was subsequently moved to below-the-line expenses in the first quarter of 2018 as further explained in SCE\&G's response to question 6-24(a).

As discussed in the response to ORS 6-26, the amounts on lines $9 \& 10$ of the purple tab of the Attachment to response to ORS 4-64 reflects a reduction in the ADIT liability related to the $\$ 180$ million impairment. The reduction in the ADIT liability was $\$ 9$ million for state and $\$ 35.9$ million for federal.

As noted in response 6-24, when the CEC property is acquired the deferred tax asset representing tax basis in excess of book basis is required to be recorded under generally accepted accounting principles, however, the deferred tax asset will be excluded from rate base.

|  | After Tax Reform Future <br> Deductible Costs | Without Columbia Energy <br> Center Impairment | ADIT Impact |
| :--- | ---: | ---: | ---: |
| Book | $3,975,479,168$ | $4,155,479,168$ |  |
| Tax | $32,550,174$ | $32,550,174$ |  |
| Difference | $3,942,928,994$ | $4,122,928,994$ |  |
| @ $5 \%$ | $(197,146,500)$ | $(206,146,500)$ | $(9,000,000)$ |
| @ 19.95\% | $(786,614,300)$ | $(822,524,300)$ | $(35,910,000)$ |

Responsible person: Virginia Smith

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY <br> OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-28:

Refer to the 12-2.1 tab of the Attachment (Excel workbook) provided in response to ORS 4-65, which provides a copy of the journal entry for the impairment loss to acquire the Columbia Energy Center as a reduction to the NND costs CWIP.
a. Explain why SCE\&G credited the impairment loss for the cost to acquire the Columbia Energy Center against the NND costs CWIP. Provide all authoritative support for this accounting and a copy of all documentation that addresses this accounting, including, but not limited to, internal correspondence such as memos and emails.
b. Provide a copy of all other journal entries related to the acquisition of the Columbia Energy Center, including all income tax effects to date. Also provide a copy of all documentation related to the cost and income tax effects.
c. Describe the status of the acquisition of the Columbia Energy Center. If it has not yet been acquired, then provide the date on which the transaction is expected to close.

## RESPONSE 6-28:

a. See response to 6-24b.ii for a discussion that is responsive to this request. Also, see attached file titled "Attachment 6-28(a)".
b. The closing of the transaction has not yet occurred. See response to 624b.iii for a description and explanation of the proposed journal entries, to include the related tax entries, to be recorded upon the completion of the acquisition.
c. By directive dated April 11, 2018, the Public Service Commission of South Carolina authorized the transaction and SCE\&G is awaiting the issuance of the final order. By order dated April 17, 2018 issued in Docket No. EC18-50-000, the Federal Energy Regulatory Commission authorized the transaction. The Federal Trade Commission granted the request for early termination of the waiting period pursuant to the Hart-Scott-Rodino Act
effective January 24, 2018. SCE\&G anticipates closing on the transaction on or about May 10, 2018.

Responsible person: Keith Coffer, Jr.

## COFFER, KEITH C JR

| From: | SWAN, JAMES E IV |
| :--- | :--- |
| Sent: | Wednesday, November 08, 2017 7:18 PM |
| To: | GRIFFIN, IRIS; ADDISON, JIMMY E |
| Subject: | thoughts from Deloitte on this morning's conversation |

We had several conversations with Sean today, and a long call with Tricia and Bill that just finished. Here are the highlights/lowlights:

They don't think right now that talking to the House about the approach would constitute an "offer" that would have to be viewed as a new "floor" of a loss computation, but they are going to have another internal conversation with Doug Barton about it to be sure.

That means (tentatively) that we would instead view it as part of the overall landscape to consider when closing Q4 and doing the quarterly impairment analysis. That also means that they do not think that an Item 2.068 -K would be triggered by the presentation of the approach to the House (or the leak of it).

A primary reason for their thinking is that this all sounds like rate-making / sausage-making, and the House is but one of the intervenors rather than the actual regulator. (But they do understand that they will be a very influential intervenor.)

They think we can successfully argue that this approach could be viewed as a specific disallowance of cost rather than a loss of a full return on - and that is a great thing from a math perspective, particularly any math ahead of an actual hearing/ruling/order. But we would need to try to have input into the language of the PSC order when we got to that.

Less good news, though:
They don't think we can consider the $\$ 180$ LS "separately," and if/when we do consider an impairment charge that involves the idea of not charging ratepayers for it, we should analogize to the "cost cap" view that would make us iust
 we should put the plant on the books at $\$ 180$ when we close on it. We would then make the income statement amortization of the regulatory asset "lower" in the early years to the extent that the LS power depreciation expense is higher than it would be with a 60 year amortization. The effect on the income statement going forward would be the same, but we would have just taken the $\$ 180$ million debit earlier.

Let me know what you think -

Thanks!

Jim

## MCCRAVY, ERNEST E

|  |  |
| :--- | :--- |
| From: | COFFER, KETTH C JR |
| Sent: | Thursday, January 11,2018 3:40 PM |
| To: | MCCRAVY, ERNESTE; GORTMAN, LYDIAK |
| Cc: | SWAN, JAMES E N; SMITH, VIRGINIA D; SPARKS, MARKL |
| Subject: | DeCember Impairment Entries |

Ike/Lydia,
As we discussed, please make the following entries in December's business associated with the NND abandomment:
Lydia

1. Record a $\$ 180 \mathrm{M}$ write off of work order 170000 to impair the project costs for the value of the proposed purchase of the Columbia Energy Center for which rate recovery will be foregone as part of the proposed NND settlement that SCE\&G put forth.
2. Record an additional $\$ 280$ million write off to work order 170000 to impair the project costs in accordance with the proposed NND settlement that SCE\&G put forth.

Ike

1. Write off the losses associated with the termination of the interest rate swaps that no longer have a planned debt issue associated with them.
2. Write off the balance in account 182.3095 which represents previously deferred lost Section 41 and Section 199 tax benefits.
3. Write off the balance in account 182.3096 which represents fees associated with NND tax strategies.
4. Write off the balance in account 182.3072 which represents carrying cost accruals on certain NND ADIT positions.

The debit for all of the above should ha sharsed as fnllomic.
Account: 426.5090
Operating Unit: VCS2
Resource Code: 901
Customer Code: 4NU

Please give me a copy of the entrles when they are ready. Let me know if there are any questions.
Thanks,
Casey

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-29:

Refer to page 10 of the Attachment to the response to ORS 4-66 related to nuclear fuel impairment loss writeoffs.
a. Indicate whether the nuclear fuel costs were included in the NND project costs before the impairment loss writeoff. If so, what is the amount related to the return on these costs included in present revised rates? Provide all data, assumptions, calculations, and workpapers, including electronic spreadsheets that support your response.
b. The nuclear fuel impairment loss writeoffs are shown for NU and SCFC business units. Identify the accounts that SCE\&G used to record the nuclear fuel cost assets on its accounting books.

## RESPONSE 6-29:

a. Nuclear fuel costs were not included in NND project costs.
b. Business Units are an element of SCANA's accounting key and represent a complete balanced set of books used for internal reporting purposes. They may or may not represent a separate legal entity. For example, the legal reporting entity of SCE\&G is comprised of a number of individual Business Units that roll up to the SCE\&G legal entity for external reporting purposes. The NU (Nuclear) Business Unit is one such Business Unit that rolls up to SCE\&G. The SCFC Business Unit represents South Carolina Fuel Company, Inc. and fully consolidates into SCE\&G as a variable interest entity for external reporting purposes.

The nuclear fuel costs associated with the NND project are recorded in account 120.2 - Nuclear Fuel Materials and Assemblies - Stock Account.

Responsible person: Keith Coffer, Jr.

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST 

DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-30:

Refer to page 11 of the Attachment to the response to ORS 4-66 related to nuclear fuel impairment loss writeoffs.
a. Provide the documentation that supports a remaining carrying value of $\$ 22,740,654$ for Unit 2 and $\$ 21,043,281$ for Unit 3.
b. Describe the status of the disposition of these nuclear fuel assets and the resolution of the carrying value of the related costs.

## RESPONSE 6-30:

a. Attached are files providing documentation that supports the fuel carrying value as of December 31, 2017. Working Excel files are also provided. In addition, in the first quarter of 2018, SCE\&G recorded a further impairment to the carrying value of the Unit 2 and 3 fuel based on current market prices. Attached is the journal entry to record the incremental impairment in March 2018 along with supporting documentation and working Excel files. Also attached is SCE\&G's nuclear fuel impairment assessment memo. Please note that certain portions of the memo contain information that is protected by the attorney-client privilege. SCE\&G has redacted the information from the memo that is protected by the attorney-client privilege.
b. The disposition of these nuclear fuel assets has not yet been determined. SCE\&G has engaged a third party consultant to perform an analysis of current market conditions, future market forecasts, contract options for use of the fuel, as well as, potential market opportunities to either sell or process the fuel into a form useable in Unit 1. SCE\&G has received a preliminary draft of the consultant's report and is currently reviewing its results for accuracy and completeness. A final report is expected in May 2018. The Company will consider the final report findings, along with other factors, in evaluating its options concerning the disposition of the fuel material acquired for Units 2 and 3.

Responsible person: Keith Coffer, Jr. and Michael Shinn


| Unit 3 Fuel - at SCE\&G's 55\% |  |  |  |
| :---: | :---: | :---: | :---: |
|  |  |  | Expected |
|  | Possible | Probability | Undiscounted |
| Course of Action | Cash Flows | Assessment | Cash Flows |
| Sell | 19,904,218.24 | 50\% | 9,952,109.12 |
| Exchange | 22,182,345.08 | 50\% | 11,091,172.54 |
|  |  |  | 21,043,281.66 |
|  | Current Carrying Value |  | 56,994,492.93 |
|  |  |  | (35,951,211.28) |
|  |  |  |  |

Total Impairment
$(86,830,845.41)$

|  | Original <br> Carrying Value | December <br> Impairment | Net of <br> Impairment |
| :--- | ---: | :---: | :---: |
| Unit 2 | $73,620,288$ | $(50,879,634)$ | $22,740,654$ |
| Unit 3 | $56,994,493$ | $(35,951,211)$ | $21,043,282$ |
|  | $130,614,781$ | $(86,830,845)$ | $43,783,936$ |



|  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Option 1: Evolution Markets Estimated Market Value:KgU FeedSWU:.. |  |  |  |  |  |
| 1) Unit 2: 499,113 260,384 |  |  |  |  |  |
| 2) Unit 3: | 422,939 $\quad 310,083$ | 310,083 |  |  |  |
| 922,052 570,467 |  |  |  |  |  |
|  | Current Price for UF6 is : | \$61.25 | per KgU | \$36.00 | perswu |
| 10\% Slippage in price for immediate sell: |  | \$55.13 | per KgU | \$32.40 | perswU |
| Estimated Approximate Value: Estimated Immediate Value: |  | \$56,475,685 | per KgU | \$20,536,812 | per SWU |
|  |  | \$50,828,116 | per KgU | \$18,483,130 | perswu |
| Brokerage Fee: ( $0.3 \%$ of sell price) |  |  |  |  |  |

Option 2: Urenco Trade Option
Proposed Trade with Urenco: email dated December 8th, 2017 from Sarah Reidel to Tim Bussey

1) Estimated Aproximate Value is similar to Option 1.
2) Estimated Cost of Transaction is $\$ 5.2$ million ( $\$ 2.6$ million/unit)
3) Assumed assay is $4.85 \%$
4) $\$ 49 /$ SWU non-binding Offer
Assumptions:
5) Unit 2 Initial core material is currently unsellable/tradable due to DOC restrictions.

[^4]| Unit 2 Fuel - at SCE\&G's 55\% |  |  |  |
| :---: | :---: | :---: | :---: |
|  |  |  | Expected |
|  | Possible | Probability | Undiscounted |
| Course of Action | Cash Flows | Assessment | Cash Flows |
| Sell | 19,713,207.57 | 50\% | 9,856,603.79 |
| Exchange | 21,969,472.39 | 50\% | 10,984,736,20 |
|  |  |  | 20,841,339.98 |
| Current Carrying Value as of March 31, 2018 |  |  | 22,740,654.00 |
| Additional Impairment Necessary |  |  | (1,899,314.02) |
|  |  |  |  |
|  |  |  |  |
| Unit 3 Fuel - at SCE\&G's 55\% |  |  |  |
|  |  |  | Expected |
|  | Possible | Probability | Undiscounted |
| Course of Action | Cash Flows | Assessment | Cash.Flows |
| Sell C | 18,293,614.88 | 50\% | 9,146,807.44 |
| Exchange | 20,387,400.96 | 50\% | 10,193,700,48 |
|  |  |  | 19,340,507.92 |
| Current Carrying Value as of March 31, 2018 |  |  | 21,043,282.00 |
| Additional Impairment Necessary |  |  | (1,702,774.08) |
|  |  |  |  |

Total Impairment
$(3,602,088.10)$
This estimate is for $\mathbf{1 0 0 \%}$ of Initial Core material


Option 2: Urenco Trade Option
Proposed Trade with Urenco: email dated December 8th, 2017 from Sarah Reldel to Tim Bussey

1) Estimated Aproximate Value is simitar to Option 1
2) Estimated Cost of Transaction is $\$ 5.2$ million ( $\$ 26$ million/unit)
3) Assumed assay is $4.85 \%$
4) $\$ 49 /$ SWU nor-binding Offer
[^5]
## SHINN, MICHAEL D

| From: | UxC News [news@uxc.com](mailto:news@uxc.com) |
| :--- | :--- |
| Sent: | Monday, March 26, 2018 6:25 PM |
| To: | SHINN, MICHAEL D |
| Subject: | Ux Weekly, 32-13, March 26, 2018 |
| Attachments: | UxW32-13.pdf |

***This is an EXTERNAL emall from "UxC News" (bounces+3862929-3bf7mshinn=scana.com@sendgrid.uxc.com). Please do not click on a link or open any attachments unless you are confident it is from a trusted source.


| Ux Weekly Indicators |  |  |
| :---: | :---: | :---: |
| $\mathrm{Ux} \mathrm{U}_{3} \mathrm{O}_{8}$ Price | (\$21.10/1b | (-0.75) |
| $\mathrm{Ux}_{3} \mathrm{U}_{3} \mathrm{O}_{8} 3$-Year Forward Price | \$25.50/b | $(-0.75)$ |
| $\mathrm{Ux} \mathrm{U}_{3} \mathrm{O}_{8} 5$-Year Fonward Price | \$30.25/lb | (-0.75) |
| Ux Month-end Indicators |  |  |
| Ux U3088 Price | \$21.10/b | (-0.15) |
| $\mathrm{Ux} \mathrm{U}_{3} \mathrm{O}_{8}$ Monthly Average Price | \$21.78/b | (+0.09) |
| Ux U3O8 3-Year Forward Price | \$25.50/lb | ( $\because$ ) |
| $\mathrm{Ux} \mathrm{U}_{3} \mathrm{O} 85$-Year Forward Price | \$30.25/b | ( : : ) |
| Ux LT U3O8 Price | \$30.00/lb | ( ) |
| Ux NA Conversion Price | \$6.35/kgU | (+0.10) |
| Ux LT NA Conversion Price | \$12.00/kgU | (....) |
| Ux EU Conversion Price | \$6.85/kgU | (+0.35) |
| Ux LT EU Conversion Price | \$12.00/kgU | ( $\because$ ) |
| Ux NA UFs Price | ( $\$ 61.25 / \mathrm{kgU}$ | (-0.75) |
| Ux NA UF6 Value | \$61.48/kgU | (-0.29) |
| UxEU UF8 Value | - 561.981 kgU | (-0.04) |
| Ux SWU Price | -\$36.00/SWU | (-1.00) |
| Ux LT SWU Price | \$44.00/SWU | ( $\because$ |

## 2017 Conversion market Review (Cover Siory)

President Trump signs $\$ 1.3$ trillion spending bill
DOE Secretary Rick Perry suspends excess uranium sales

| Unit 2 Fuel - at SCE\&G's 55\% |  |  |  |
| :--- | :---: | ---: | :---: |
|  |  |  | Expected |
|  | Possible | Probability | Undiscounted |
| Course of Action | Cash Flows | Assessment | Cash Flows |
| Sell | $19,713,207.57$ | $50 \%$ | $9,856,603.79$ |
| Exchange | $21,969,472.39$ | $50 \%$ | $10,984,736.20$ |
|  |  |  |  |
| Current Carrying Value as of March 31, 2018 | $20,841,339.98$ |  |  |
| Additional Impairment Necessary |  | $(1,899,654.00$ |  |
|  |  |  |  |



Total Impairment
$(3,602,088.10)$
This estimate is for $\mathbf{1 0 0 \%}$ of initial Core material


| Option 1: Evolution Markets Estimated Market Value: |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Kgu Feed SWU |  |  |  |  |  |
| 1) Unit 2: 499,113 260,384 |  |  |  |  |  |
| 2) Unit 3: $\quad 422,939$ 年 $\quad$ 310,083 |  |  |  |  |  |
| 922,052 570,467 |  |  |  |  |  |
| Current Price for UF6 is : |  | \$67.50 | per KgU | \$38.00 | per 5WU |
| 10\% Slippage in price for immediate sell: |  | \$60.75 | per KgU | \$34.20 | perSWU |
| Estimated Approximate Value: |  | \$62,238,510. | per KgU | \$21,677,746 | persWU |
| Estimated Immediate Value: |  | \$56,014,659 | perkgU | \$19,509,971 | perSWU |
| Brokerage Fee: ( $0.3 \%$ of sell price) |  |  |  |  |  |

Option 2: Urenco Trade Option
Proposed Trade with Urenco: email dated December 8th, 2017 from Sarah Reidel to Tim Bussey

1) Estimated Aproximate Value is similar to Option 1
2) Estimated Cost of Transaction is $\$ 5.2$ million ( $\$ 2.6$ million/unit)
3) Assumed assay is $4.85 \%$
4) $\$ 49 /$ SWU non-binding Offer
Assumptions:
5) This estimate is for $100 \%$ of the Core Material
6) Unit 2 Initial core material is currently unsellable/tradable due to DOC restrictions.
$4$


藤

This estimate is for $100 \%$ of Initial Core material
(

Option 2: Urenco Trade Option
Proposed Trade with Urenco: email dated December 8th, 2017 from Sarah Reidel to Tim Bussey

1) Estimated Aproximate Value is similar to Option 1
2) Estimated Cost of Transaction is $\$ 5.2$ miltion ( $\$ 2.6$ million/unit)
3) Assumed assay is $4.85 \%$
4) $\$ 49 / \mathrm{SWU}$ non-binding Offer.

[^6]$\frac{B}{k}$

| Unit 2 Fuel - at SCE\& ${ }^{\text {' }}$ ' 55\% |  |  |  |
| :---: | :---: | :---: | :---: |
|  |  |  | Expected |
|  | Possible | Probability | Undlscounted |
| Course of Action | Cash Flows | Assessment | Cash fiows. |
| Sell _ C B | 21,509,712,85 | 50\% | 10,754,856.42 |
| Exchange $/ 2$ | 23,971,595.73 | 50\% | 11,985,797,86 |
|  |  |  | 22,740,654.29 |
|  | Current Carrying | alue | 73,620,288.42 |
| . |  | . | (50,879,634,13) |
|  |  |  |  |


| Unit 3 Fuel - at SCE\&G's 55\% |  |  |  |
| :--- | :---: | ---: | :---: |
|  |  |  | Expected |
|  | Possible | Probability | Undiscounted |
|  | Course of Action | Cash Flows | Assessment |
| Sell | Cash Flows |  |  |
| Exchange | $19,904,218.24$ | $50 \%$ | $9,952,109.12$ |
|  | $22,182,345.08$ | $50 \%$ | $11,091,172.54$ |
|  |  |  | $21,043,281.66$ |
|  |  |  |  |
|  | Current Carrying Value | $56,994,492.93$ |  |
|  |  |  | $(35,951,211.28)$ |
|  |  |  |  |

Total impairment
$(86,830,845,41)$

|  | Original <br> Carrying Value | December <br> Impairment | Net of <br> Impairment |
| :--- | ---: | ---: | ---: |
| Unit 2 | $73,620,288$ | $(50,879,634)$ | $.22,740,654$ |
| Unit 3 | $56,994,493$ | $(35,951,211)$ | $21,043,282$ |
|  | $130,614,781$ | $(86,830,845)$ | $43,783,936$ |

# Behind the Recent Production Cuts 

Last year marked the first year that the uranium industry experienced significant across-the-board production cuts since the Fukushima accident occured in March 2011. There were negligible production cuts by various producers leading up to 2017, but these had very little, if any, impact on forward uranium prices as demonstrated by their deterioration leading up to 2017. As we begin 2018, we have received repeated questions from clients asking for clarity on the mega production cuts amounced in 2017 and what their impact will mean for the market over the next few years. While we will not provide a definitive answer to the latter question in this medium, we will attempt to better define what the cuts mean.

After the spot uranium price dropped to a low of $\$ 18$ in late 2016, Kazatomprom came out of the gate in the second week of January 2017 stating that it would cut Kazakh production by $\sim 10 \%$. The company said the reduction would be over $2,000 \mathrm{tU}\left(\sim 5.2\right.$ million pounds $\left.\mathrm{U}_{3} \mathrm{O}_{8}\right)$ of the planned $2017 \mathrm{Ka}-$ zakh production. Without an announced 2017 Kazakh production target, many industry analysts took this to mean a $10 \%$ cut to Kazakhstan's 2016 production level of $\sim 64$ million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$. However, in reality, the $10 \%$ cut was to annual production volumes specified under the provisions of the subsoil use contracts governing each production enterprise. Additionally, the reduced volume in production could be different among each enterprise, so long as to not exceed an aggregate $10 \%$ reduction from the planned 2017 target per the subsoil use agreements. Making things difficult to decipher is also the fact that individual uranium projects in Kazakhstan have been able to legally operate by as much as $20 \%$ above or below the production capacities expressed in their subsoil use contracts. For instance, in 2016, JV Inkai produced nearly 6.0 million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$, which was $15 \%$ above its production capacity of 5.2 million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$ per the subsoil use agreement at that time. Similarly, Karatau yielded 5.4 million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$ in 2015 , which was $4 \%$ higher than the production capacity under its subsoil use contract.

In early December 2017, Kazatomprom further announced its intention to reduce plamed uranium production by $20 \%$ under the subsoil use agreements for individual enterprises for a period of three years starting in January 2018. The company said this will result in an estimated production deferral of $4,000 \mathrm{tU}\left(\sim 10.4\right.$ million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$ ) for 2018 , and a $7,000 \mathrm{tU}\left(\sim 18.2\right.$ million pounds $\left.\mathrm{U}_{3} \mathrm{O}_{8}\right)$ reduction to 2019 and

| Ux Price Indicators |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  <br>  |  |  |  |  |  |
| Month end (12/25/17) "Calculated valu |  |  |  |  |  |
|  | Sp | \$23.75 |  | NA Spot NA Term EU Spot EU Term | \$5.75 |
|  | Spo | \$24.83 |  |  | $\$ 13.50$ |
|  | $3-\mathrm{Yr}$ | 00 |  |  | 0 |
|  | $5-\mathrm{Yr}$ Forward | \$32.50 |  |  | \$13.50 |
|  | Long-Term | \$31.00 |  | Spot | 83800 |
|  | NA Price | - 667.50 |  | Long TE: | \$45:00 |
|  | NA Value* | \$67.81 |  | ASpot* | \$ 930 |
|  | EUValue* | \$68.06 |  | NA Term* | \$1,246 |

2020. Assuming an equal reduction to 2019 and 2020 production, this would amount to $\sim 3,500 \mathrm{tU}(\sim 9.1$ million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$ ) for each year. Again, it is important to iterate that this will not be a reduction to the 2017 Kazakh production level, but to targeted nominal production capacities per the subsoil use agreements for each project/enterprise. Specifically, over the 2018 through 2020 period, there are individual Kazakh projects, such as Karatau and Inkai, whose production capacities do increase under their subsoil use agreements. For instance, the permitted production capacity of the Karatan project increases from 6.1 million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$ in 2017 to 8.3 million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$ starting in 2019. Thus, while cuts are being made to targets under individual subsoil use agreements, production capacilies for a few mines continue to increase.

In late December 2017, Kazatomprom's new CEO Galymzhan Pirmatov provided greater clarity to the Kazakh production situation, noting that he expects 2017 Kazakh production to total $23,000 \mathrm{fU}\left(\sim 59.8\right.$ million pounds $\left.\mathrm{U}_{3} \mathrm{O}_{8}\right)$, a drop of about $6 \%$ from almost $24,595 \mathrm{fU}(\sim 63.9$ million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$ ) in 2016. Pirmatov further noted that he expects Kazakhstan to produce a similar level of 23,000 tU in 2018. For 2018, Pirmatov highlighted that without the $4,000 \mathrm{tU}$ cut to production capacities under the subsoil use agreements, Kazakhstan would be capable of yielding more than 27,000 $\mathrm{tU}\left(\sim 70.2\right.$ million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$ ). Based on the announced 2019 and 2020 cuts, UxC expects Kazakl production in those years to be slightly higher at around 61 million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$.

The other major production cut amouncement came in
early November when Cameco said it would suspend production from the McArthur River/Key Lake project in northern Saskatchewan due to continued uranium price weakness. According to Cameco, the temporary suspension is expected to start by the ond of Jamuary 2018 and last for ~10 months, with the company reviewing market conditions at the end of the period. Assuming a small amount of production is yielded from McArthur River/Key Lake this month, 2018 production would likely total no more than $\sim 1.3$ million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$, or neatly 15 million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$ lower than estimated for 2017.
For 2018, global production will finally see the correction it has long needed at approximately 139 million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$, which is 13 million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$, or $9 \%$, lower than estimated 2017 production of 152 million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$. However, 2019 and 2020 xemain siguificantly oversupplied based on UxC's current mid-case production scenario, with global production in those years expected to be as high as 144 million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$ and 149 million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$, respectively. Much of the production increase in those years stems from the ramp-up of CGN's Husab mega project in Namibia, which could eventually reach a nominal capacity of 15 million pounds $\mathrm{U}_{3} \mathrm{O}_{8}$. The Husab project is somewhat of a wild card going forward, as it has been plagued by initial start-up issues. Whether Husab will even get close to its maximum nominal capacity remains to be seen. Nevertheless, even with a muted ramp-up of flusab, oversupply will continue to be a factor in the years ahead given the volume of secondary sources available to the market. This begs the question of whether more production cuts are in the oards for 2018, specifically for higher-cost uranim projects that should have been shuttered years ago.

## News Briefs

## California approves Diablo Canyon's closure Last week, California's Public Utilities Commission

 (CPUC) granted approval for PG\&B's plan to close its two 1,100 MWe reactors at the Diablo Canyon Power Plant (DCPP) when their operating licenses expire in 2024 and 2025. PG\&E decided to close the reactors in 2016. The Commission's decision allows the utility to recover from ratepayers approximately $\$ 240$ million in costs associated with the closure along with additional funding of about $\$ 210$ million to keep employees on until the plant shuts down, and about $\$ 30$ million in other expenses. However, the Commission rejected plans to recover another $\$ 85$ million for a community mitigation program, but said that PG\&E could still go forward with that program as long as it does not use ratepayer funds to do so. Additionally, only a portion of the finding the company sought from ratepayers for employce retraining was approved. Approval of the plan avoids an even earlier closure for the two reactors."The joint proposal represents an array of interests from many parties who joined together to promote the best path

## ndustyy Calendar

- January 17, 2018

NEI Fuel Supply Forum
Nuclear Energy Institute
bllpi/lwwwnelol.org/Conferences
The Mayflower Hotel, Washington, D.C., USA

- January 30-31, 2018

Nuclear New Build Summit, Egypt 2018
Inforvalue Consulting
hllo:IMucleareqvpl.cani/
Cairo, Egypt

- Pebuary 12-13, 2018
$6^{\mathrm{h}}$ Asiau Nuclear Power Briefing 2018
Strategic Communications
hitp:ilstralcoms.com/6ihAslanBriefing $18 /$
Tokyo, Japan
- March 6-7, 2018

International Nuclear Power Plants Summit
hittos://Www. nuclearpowerplanissummilt, com/
Puilman Istanbul Convention Center, Turkey

- March 27-28, 2018
$8^{\text {th }}$ Ammual SMR and Advauced Reactor Summit Nuclear Energy Insider

Westin Hotel, Buckhead, Atlanta, USA.
- April 17-18, 2018

Woild Nuclear Fuel Cycle 2018
NEI/WNA
ntip:llwwe, wnfo, infol
The Westin Palace, Madrid, Spain

- May 14-16, 2018

ATOMEXPO 2018
Rosatom
htip://2018.alomexportuleng
Sochi, Russia

- June 7-8, 2018

Decommissioning Strategy Forum
hitlos://www.exchangemonilor.com/evixidecommisioning-2018/
Gaylord Opryland Resort \& Convention Center, Nash-
ville, TN, USA

- June 26-28, 2018

UxC Nuclear Fuel Training Seminar
UxC
http://wwrw,uxc.com/products/uxc semmar,aspx
InterContinental Buckhead, Atlanta, GA, USA

- Septenber 5-7;2018

WNA $43^{\text {rd }}$ Annual Symposium
World Nuclear Association
hilt:/l/www.wna-sympostum, oral
Park'Plaza Westminster Bridge, London, UK
Detalls are avallable al:

forward for our state and PG\&E's customers," said a statement from the utility. "Since the full proposal was not approved, in line with our agreement, PG\&E will be meeting to confer with our labor, community and environmental group partners in the days ahead about the decision, our next steps and the path forward."


```
From:
                                    Michael Goldenberg <MGoldenberg@evomarkets.com>
Sent:
To:
Subject:
Thursday, December 21, 2017 2:32 PM
SHINN, MICHAELD
RE:Merry Christmas
```

***This is an EXTERNAL email. Please do not click on a link or open any attachments unless you are confident it is from a trusted source.

Michael,
I've been thinking about this since you sent the email. The SWU is interesting because it is not a regularly traded market.
With 570,467 SWU to sell/mark, comes at an even more delicate time for this market. I do believe there are buyers for this size, but recent over production from the primary producers, has significantly hurt the market price.

We would have to consider selling out in time, at least a year or 2 , with current prices hovering at $\$ 40$ or just under there per SWU.

For marking purposes I would place at $\$ 40$, due to the $.30 \%$ tails, with a $10 \%$ slippage to mid- $\$ 30$ 's if you needed to make a sale soon. It would most likely have to go to multiple buyers if you are prepared to market this.

If you had more time, possibly you could benefit from some bounce if the enrichers slowed down. I do not think this is going to happen, but you could lower the slippage of price if you had the ability to deliver in a year or so.

I wish I could be more accurate. It certainly is a sellable asset.... Debating the pricing is something different. I hope this was helpful.

Happy Holidays!!!

## Best regards

Michael Goldenberg

From: SHINN, MICHAEL D [mailto:MSHINN@scana,com]
Sent: Wednesday, December 20, 2017 9:55 AM
To: Michael Goldenberg [MGoldenberg@evomarkets.com](mailto:MGoldenberg@evomarkets.com)
Subject: RE: Merry Christmas
Thanks Michael, this is a big help. I look forward to seeing your update.

From: Michael Goldenberg [mailto:MGoldenberg@evomarkets.com]
Sent: Tuesday, December 19, 2017 4:06 PM
To: SHINN, MICHAEL D [MSHINN@scana.com](mailto:MSHINN@scana.com)
Subject: RE: Merry Christmas
***This is an EXTERNAL email. Please do not click on a link or open any attachments unless you are confident it is from a trusted source.

Michael,
Considering the large amount of UF6 (Feed) and SWU you have in stock, I believe the best way to tackle this is to look at it 2 ways. One is an end of year quote with current levels, assuming some slippage in price if you acted to sell the entire amount in one attempt. The other is to look out down the curve, and sell in multiple tranches.
(I) 1. If you sold the entire amount of UF6, feed from VC Summer 2 and 3 , that would be a total of $922,052 \mathrm{kgU}$. The current price for UF6 for Q1 delivery is $\sim \$ 69-\$ 70$ per Kgu . Assuming a $10 \%$ slippage in price to move the entire amount, we are talking about an approximate value of $\$ 58,000,000.00$. If we assume no slippage, then we are at $\sim \$ 64,000,000.00$. The brokerage fee is $\$ .3 \%$ or $\$ 174,000-\$ 192,000$ in total for this sale.
2. If we look at placing the UF6 out in time, further than current spot price, we could find buyers in multiple delivery months for front or back half 2018. Possibly seeing some price increases and contango from the above stated amounts. If we assume quarterly delivery of UF6, we are looking at $230,513 \mathrm{kgU}$ per quarter in 2018. Assuming less to no slippage in price for lower volumes per quarter, we could see a $3-5 \%$ average increase in price, allowing an average value of $\sim \$ 67,000,000.00$ for the average over the year. This example assumes there is no price decrease in Uf6 prices for the year. The brokerage fee would be ${ }^{\sim} \$ 200,000.00$ for the entire amount at these levels.
SWU
I am still evaluating this scenario. I will update possibly by tomorrow.
1 hope this helps, please contact me if you have any questions.
Best regards,


Michael Goldenberg

From: SHINN, MICHAEL D [mailto:MSHINN@scana.com]
Sent: Monday, December 18, 2017 4:36 PM
To: Michael Goldenberg [MGoldenberg@evomarkets.com](mailto:MGoldenberg@evomarkets.com)
Subject: RE: Merry Christmas
Thanks so much. Find some more detailed information below and look forward to talking with you.

| VC Summer Unit 2 |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Product Assay | Tails Assay | kg U | kgu Feed | SWU |
| 0.711 | 0.30 | 8,660 | 8,660 |  |
| 1580 | 0.30 | 27,960 | 87,067 | 29,078 |
| 3.200 | 0.30 | 13,215 | 93,244 | 50,045 |
| 3.200 | 0.30 | 3,543 | 25,000 | 13,418 |
| 3.400 | 0.30 | 4,275 | 32,246 | 17,758 |
| 3800 | 0.30 | 3,337 | 28,414 | 16,346 |
| 3.800 | 0.30 | 6,815 | 58,040 | 33,389 |
| 4.000 | 0.30 | 3,325 | 29,932 | 17,543 |
| 4.200 | 0.30 | 3,206 | 30,422 | 18,133 |
| 4.400 | 0.30 | 2,973 | 29,656 | 17,953 |
| 4.400 | 0.30 | 4,924 | 49,124 | 29,737 |
| 4800 | 0.30 | 2,494 | 27,307 | 16,984 |
|  |  | 84,727 | 499,113 | 260,384 |
|  |  |  |  |  |
| VC Summer Unit 3 |  |  |  |  |
|  |  |  |  |  |
| Broductisssay | Tall Assay | - kgul | kgUFeed | S.WU |
| 1.580 | 0.22 | 27,960 | 77,449 | 36,180 |
| 3200 | 0.22 | 16,758 | 101,704 | 75,629 |
| 3.400 | 0.22 | 4,275 | 27,689 | 21,114 |
| 3800 | 0.22 | 10,152 | 74,018 | 58,882 |
| 4.000 | 0.22 | 3,325 | 25,599 | 20,735 |
| 4.200 | 0.22 | 3,206 | 25,988 | 21,397 |
| 4.400 | 0.22 | 7,897 | 67,227 | 56,187 |
| 4.800 | 0.22 | 2,494 | 23,264 | 19,959 |
|  |  | 76,067 | 422,939 | 310,083 |

From: Michael Goldenberg [mailto:MGoldenberg@evomarkets.com]
Sent: Monday, December 18, 2017 4:30 PM
To: SHINN, MICHAEL D [MSHINN@scana.com](mailto:MSHINN@scana.com)
Subject: Re: Merry Christmas
***This is an EXTERNAL email. Please do not click on a link or open any attachments unless you are confident it is from a trusted source.

Hi Mike,

I certainly can. On a train right now, heading to a meeting. I can put something together for you tomorrow. But to start the standard brokerage fee is $.3 \%$ of the notional value.

I will be in touch.

Best

Michael
Sent from my iPhone

On Dec 18, 2017, at 4:25 PM, SHINN, MICHAEL D [MISHINN@scana.com](mailto:MISHINN@scana.com) wrote:
Michael,

I hope you and your family are preparing for the Christmas season and it is going flawlessly. My last day at work this week is Wednesday so I am excited about that.

Also wanted to ask for your help on some pricing information. We have some accounting adjustments to do at year end on the initial cores for Units 2 \& 3 and 1 am in need of some professional opinions of what the outright sell value might be of the material. Don't need a detailed study or anything but just what you think the market value might be. What is a standard broker fee in the industry, we also need to include this in our accounting adjustments.

If you think you might be able to help let me know and I will forward more detailed information on the cores.

Thanks for considering and Merry Christmas,
Michael

```
From:
Sent: Friday, December 08, 2017 7:54 PM
To:
Subject:
Importance:
BUSSEY, TIMOTHY JAMES
STANLEY, JAMES E; SHINN, MICHAEL D; WEILAND, PAUL M; BRYSON, DAMON V;
TWINING, DUANE M; SMITH, NATHANIEL
Fwd: V.C. Summer re-enrichment opportunity
High
```

From: Riedel, Sarah [Sarah.Riedel@urenco.com]

```
Sent: December 8, 2017 at 3:44:31 PM
URÉNT: Trade option
To: BUSSEY, TIMOTHY JAMES
Subject: RE: V.C. Summer re-enrichment opportunity
\({ }^{* * *}\) This is an EXTERNAL email. Please do not click on a link or open any attachments unless you are confident it is from a trusted source.
```

Tim,
We appreciate your patience as we discussed this opportunity with our production team.
Upon review, we estimate the Unit 2 core re-enrichment needs to be approximately $28.6 t S W$ and Unit 3 core reenrichment needs to be approximately 25.9 SW for a total of 54.5 SW. In comparison to the rough numbers from SCEG, this is around half of what SCEG initially estimated.

From a pricing perspective, while we have a contract in place that this could technically fall under at $\$ 96 /$ SWU, if SCEG could make a decision by mid-January 2018, we would be willing to amend the contract to provide this service for $\$ 49 /$ SWU. This price takes into account the spot market price, the opportunity costs associated with altering our production plans to account for these various assays as well as leveraging our global logistics capabilities to meet SCEG's requirements. This transaction would happen on a book transfer basis where SCEG would book transfer US-origin initial core material to URENCO at Westinghouse Columbia and URENCO would book transfer re-enriched material legal for use in United States reactors at $4.85 \%$ and $.22 \%$ tails.

I understand that you have a meeting on Monday to discuss this indicative proposal-if your team decides that they want to move forward on a more formal basis, I am happy to draft a formal offer for your review.

I am available Monday morning if you have any questions --please don't hesitate to call me on my mobile at (202) 4127281.

Regards,

## Sarah

## Sarah M. Riedel

Manager, Marketing \& Sales
URENCO, Inc.
1560 Wilson Boulevard, Suite 300
Arlington, VA 22209-2463
Office: +1 (703) 682-5206

From: BUSSEY, TMOTHY JAMES [mailto:TIMOTHY.BUSSEY@scana.com]
Sent: Thursday, December 07, 2017 11:22 AM
To: Riedel, Sarah
Subject: RE: V.C. Summer re-enrichment opportunity
Thanks for the swift response. Talk soon.
From: Riedel, Sarah [mailto:Sarah.Riedel@urenco.com]
Sent: Thursday, December 07, 2017 11:10 AM
To: BUSSEY, TIMOTHY JAMES [TIMOTHY.BUSSEY@scana.com](mailto:TIMOTHY.BUSSEY@scana.com)
Subject: RE: V.C. Summer re-enrichment opportunity
${ }^{* * *}$ This is an EXTERNAL email. Please do not click on a link or open any attachments unless you are confident it is from a trusted source.

Hi Tim,
I should be able to give you a non-binding price estimate tomorrow. We had a call on Tuesday and Kirk and I are working through the details.

Enjoy your day off tomorrow! I'll be in touch.

Regards,
Sarah
Sarah M. Riedel
Manager, Marketing \& Sales
URENCO, Inc.
1560 Wilson Boulevard, Suite 300
Arlington, VA 22209-2463
Office: +1 (703) 682-5206
Mobile: +1 (202) 412-7281
Email: sarah.riedel@urenco.com
-------Original Message -.....-
From: BUSSEY, TIMOTHY JAMES [TIMOTHY.BUSSEY@scana.com]
Sent: Thursday, December 07, 2017 07:31 AM Mountain Standard Time
To: Riedel, Sarah
Subject: RE: V.C. Summer re-enrichment opportunity
Good morning Sarah,
I just wanted to touch base and see if any progress had been made on our initial core trade discussion. As a reminder, we have a meeting on Monday with the President, CNO, and accounting director about initial core disposition so any
information you could share would be appreciated. I am off work tomorrow but have email on my phone in case you get something to pass along.

Hope you are having a good week,
Tim ßussey
Nuclear Fuels and Analysis Supervisor
Nuclear Fuels \& Analysis
SCE\&G | V.C. Summer Nuclear Station
Office: 803.941.9147 Ext: 89147 | Timothy.Bussey@scana.com
4 L mex
A SCANA COIHPANY

From: Riedel, Sarah [mailto:Sarah.Riedel@urenco.com]
Sent: Tuesday, November 21, 2017 6:54 PM
To: BUSSEY, TIMOTHY JAMES [TIMOTHY.BUSSEY@scana.com](mailto:TIMOTHY.BUSSEY@scana.com)
Subject: RE: V.C. Summer re-enrichment opportunity
***This is an EXTERNAL email. Please do not click on a link or open any attachments unless you are confident it is from a trusted source.

## Hi Tim,

I have forwarded your request to our production team; I will come back to you as soon as I have their response.
If I don't hear back from our team before Thanksgiving, have a wonderful holiday with your family and friends.

Regards,
Sarah
Sarah M. Riedel
Manager, Marketing \& Sales
URENCO, Inc.
1560 Wilson Boulevard, Suite 300
Arlington, VA 22209-2463
Office: +1 (703) 682-5206
Mobile: +1 (202) 412-7281
Email: sarah.riedel@urenco.com
-----Original Message-----
From: BUSSEY, TIMOTHY JAMES [TIMOTHY.BUSSEY@scana.com]
Sent: Tuesday, November 21, 2017 07:58 AM Mountain Standard Time

To: Riedel, Sarah
Subject: V.C. Summer re-enxichment opportunity
Sarah,
V.C. Summer would like to know if URENCO has the capability of re-enriching our initial core material to a useable assay on either our Unit One core or to potentially liquidate at the higher enrichment. If we were to reuse the material on Unit 1 we would likely ask for $4.85 \%$ and if we were to choose to liquidate the material we would ask for $4.80 \%$. I will give you a call to discuss.

Unit 2 Assays

| Qroduct Ass say | kyH |
| :---: | :---: |
| 0.711 | 868 |
| 1.580 | 8,726 |
| 3200 | 9,345 |
| 3.200 | 2,506 |
| 3.400 | 3,232 |
| 3,800 | 2,848 |
| 3.800 | 5,817 |
| 4.000 | 3,000 |
| 4.200 | 3,049 |
| 4.400 | 2,972 |
| 4.400 | 4,923 |
| 4800 | 2,737 |

Unit 3 Assays

| Productuissay | kg ${ }^{\text {d }}$ |
| :---: | :---: |
| 1.580 | 8,303 |
| 3.200 | 10,903 |
| 3.400 | 2,968 |
| 3.800 | 7,935 |
| 4.000 | 2,744 |
| 4.200 | 2,786 |
| 4.400 | 7,207 |
| 4800 | 2,494 |

Thank you,
Tim $\beta$ ussey
Nuclear Fuels and Analysis Supervisor
Nuclear Fuels \& Analysis
SCE\&G | V.C. Summer Nuclear Station
Office: 803.941.9147 Ext: 89147 | Timothy.Bussey@scana.com

A SCANA CORFANY

## Memo to File <br> Re: Accounting for NND Nuclear Fuel <br> As of December 31, 2017

SCE\&G acquired nuclear fuel material for the first core load of V.C. Summer Units 2 and 3 . With the abandonment of the NND construction project, this fuel will no longer be needed at units 2 and 3. SCE\&G is currently evaluating options for disposing of this fuel. As of November 30, 2017, SCE\&G had the following carrying value on its books for NND nuclear fuel:

Unit 2: $\$ 73,620,288.42$
Unit 3: $\$ 56,994,492.93$
Total: \$130,614,781.35

The Unit 2 and 3 material is stored at Westinghouse as fungible material in WEC's pool of uranium onsite. The Unit 2 material currently has Department of Commerce restrictions attached to it that require it to be used in an initial core. The Unit 2 material also contains 9 tons of non-enriched natural uranium. The Unit 3 material does not have the Department of Commerce restrictions and does not contain any natural uranium. The enriched product was specifically purchased for AP1000 first core purposes.

The two likely scenarios for the disposal of this material that are currently being evaluated are:

1. Sell As Is into the market.
2. Exchange the material for material that is useable at Unit 1.

## Sell Into Market

Since the enrichments were specially acquired for an AP1000 first core, there are limited markets for this material. The Department of Commerce restrictions on the unit 2 material further limit the market. On November 21, 2017, SCE\&G sent a letter to USEC requesting that USEC request permission from the Department of Commerce to remove the initial core restrictions. The nuclear fuel market in general is depressed, and large sales such as this could affect an already depressed market. Further, SCE\&G acquired the material when market prices were significantly higher than the current market. As such, any sale into the market would result in a loss.

SCE\&G received estimated market prices for the Unit 2 and 3 material as of December 31, 2017 from nuclear fuel suppliers. The suppliers estimated the market value by applying an estimated "slippage" or discount off current market prices. Based on the information obtained, SCE\&G estimates that the fair market values net of expenses to sell the material, of its $55 \%$ share of the Unit 2 and 3 fuel material:

Unit 2: \$21,509,712.85
Unit 3: \$19,904,218.24
Total: \$41,413,931.09

## Exchange for Unit 1 Material

URENCO offered to make a "trade" of the Unit 2 and 3 material to a desired assay that is useable at unit 1. This would be done through what is considered a "book transfer". In effect, SCE\&G would relinquish title to the existing unit 2 and 3 material and obtain title to material that is useable at Unit 1 . The
estimated market prices, as received from fuel supply vendors, for SCE\&G's $55 \%$ share of the material to be received for Unit 1 as of December 31, 2017, are:

Received in Exchange For Unit 2 Material: $\$ 23,971,595.73$
Received in Exchange For Unit 3 Material: $\$ 22,182,345.08$
Total: \$46,153,940.81

## Accounting Considerations

Due to its nature, and in accordance with the FERC Uniform System of Accounts, nuclear fuel is considered a long-lived asset and is classified within utility plant on the balance sheet of SCE\&G (and SCANA). ASC 360-10 provides the relevant accounting guidance for assessing impairments of long-lived PP\&E. ASC 360-10-35-21 states:

A long-lived asset (asset group) shall be tested for recoverability whenever events or changes in circumstances indicate that its carrying amount may not be recoverable.

ASC 360-10-35-17 states the following:

An impairment loss shall be recognized only if the carrying amount of a long-lived asset (asset group) is not recoverable and exceeds its fair value. The carrying amount of a long-lived asset (asset group) is not recoverable if it exceeds the sum of the undiscounted cash flows expected to result from the use or eventual disposition of the asset (asset group). That assessment shall be based on the carrying amount of the asset (asset group) at the date tested for recoverability, whether in use or under development. An impairment loss shall be measured as the amount by which the carrying amount of a long-lived asset (asset group) exceeds its fair value.

Due to the decision to abandon Units 2 and 3, the need to dispose of the related nuclear fuel material and management's determination that recovery from any loss on the disposal of the fuel material will not be sought from customers, SCE\&G has determined that an impairment analysis in accordance with ASC $360-10$ is necessary.

Based on the estimated market prices (shown above) obtained from fuel supply vendors, the cash that would be received from the sale of the unit 2 and 3 fuel material would be less than SCE\&G's carrying amount and a loss would be incurred.

In an exchange scenario, ASC 845-10-30-1 states that the cost of a nonmonetary asset acquired in an exchange for another nonmonetary asset is the fair value of the asset surrendered to obtain it, and a gain or loss shall be recognized on the exchange. It further states that the fair value of the asset received shall be used to measure the cost if it is more clearly evident than the fair value of the asset surrendered. Whether the fair value of the fuel surrendered or the fair value of the fuel received is used, SCE\&G would incur a loss based on current market prices. However, due to the many variables affecting the estimated market value of the Unit 2 and 3 fuel material, SCE\&G believes that the market price for Unit 1 fuel received would be more clearly evident.

Although final determination on the method of disposal has not yet been made, SCE\&G has concluded that in either scenario it will not recover its full carrying amount in the fuel and therefore an impairment exists since management has determined that it will not seek to recover any loss on the sale or exchange of this fuel material from customers through utility rates. Therefore, SCE\&G will recognize an impairment loss in 2017's business.

In a "held for sale" scenario, ASC 360-10-35-40 states that a loss shall be recognized for any initial or subsequent write down to fair value less cost to sell. In an exchange scenario, a loss should be recognized based on the fair value of the asset surrendered or given depending on which fair value is used to measure the cost of the asset received in accordance with ASC 845-10-30-1. As indicated above, SCE\&G believes that the fair value of the Unit 1 fuel received would be more clearly evident.

Since the final method of disposition of the fuel is not yet known, SCE\&G should consider the provisions of ASC $360-10-35-30$ which states, in part, the following:

However, if alternative courses of action to recover the carrying amount of a long-lived asset (asset group) are under consideration or if a range is estimated for the amount of possible future cash flows associated with the likely course of action, the likelihood of those possible outcomes shall be considered. A probability-weighted approach may be useful in considering the likelihood of those possible outcomes.

Based on our conversations with fuel procurement, it is difficult to assign a probability to each outcome at this point in time. This is partly because in an exchange scenario, an extension or renegotiation of a future service agreement may be considered. Because of these uncertainties, for the purpose of the December 31, 2017 impairment calculation, the probability of each potential alternative will be assigned at 50\%. Following the example given in ASC 360-10-55-23 through ASC 360-10-55-29, the calculated probability weighted cash flows, based on quoted prices received are as follows:

| Unit 2 Fuel - at SCE\&G's 55\% |  |  |  |  |
| :--- | :---: | ---: | :---: | :---: |
|  |  |  | Expected |  |
|  | Possible | Probability | Undiscounted |  |
| Course of <br> Action | Cash Flows | Assessment | Cash Flows |  |
| Sell | $21,509,712.85$ | $50 \%$ | $10,754,856.42$ |  |
| Exchange | $23,971,595.73$ | $50 \%$ | $11,985,797.86$ |  |
|  |  |  | $22,740,654.29$ |  |
|  | Current Carrying <br> Value |  | $73,620,288.42$ |  |
|  |  |  | $(50,879,634.13)$ |  |
|  |  |  |  |  |


| Unit 3 Fuel - at SCE\&G's 55\% |  |  |  |  |
| :--- | :---: | ---: | :---: | :---: |
|  |  |  | Expected |  |
|  | Possible | Probability | Undiscounted |  |
| $\frac{\text { Course of }}{\text { Action }}$ | Cash Flows | Assessment | Cash Flows |  |
| Sell | $19,904,218.24$ | $50 \%$ | $9,952,109.12$ |  |
| Exchange | $22,182,345.08$ | $50 \%$ | $11,091,172.54$ |  |
|  |  |  | $21,043,281.66$ |  |
|  | Current Carrying <br> Value |  | $56,994,492.93$ |  |
|  |  |  | $(35,951,211.28)$ |  |
|  |  |  |  |  |

Therefore, the impairment loss to be recognized in December 2017 is as follows:

| Unit 2 Fuel Material: | $\$ 50,879,634.13$ |
| :--- | ---: |
| Unit 3 Fuel Material: | $\$ 35,951,211.28$ |
| Total Estimated Impairment at December 31, 2017 | $\$ 86,830,845.41$ |

## Other Considerations

## Income Statement Presentation

The fuel impairment will be recorded on the general ledger in account 426.5090, which is the nonoperating below-the-line account where the unit 2 and 3 abandonment impairment is being recorded. For SEC reporting purposes, the unit 2 and 3 impairment, including the fuel impairment charge, will be presented in a separate line item within operating expenses.

## Cash Flow Statement Presentation

The unit 2 and 3 impairment, including the impairment for nuclear fuel, will be shown as a reconciling adjustment to net income within the operating section of the cash flow statement.

Balance Sheet Presentation

ASC 360-10-45-9 provides specific criteria, all of which must be met, to classify an asset as held for sale on the balance sheet. All of this criteria has not been met and accordingly the adjusted carrying value in the unit 2 and 3 fuel will not be reclassified as held for sale. Since a possible outcome is the exchange of fuel to be used in unit 1, SCE\&G will continue to classify its adjusted carrying value as nuclear fuel within the utility plant section of its balance sheet.

## SCFC Credit Agreement Considerations

Nuclear fuel is acquired through SCFC. SCFC financed the acquisition of the Unit 2 and 3 fuel through the issuance of short-term commercial paper. Liquidity support for the commercial paper is provided by SCFC's 5-year credit agreement with a syndicate of banks. Members of SCE\&G's accounting and treasury groups discussed the expected nuclear fuel write down and disposal with Jennifer Blumenthal, external counsel with the McNair Firm


FERC Regulatory Considerations
Members of SCE\&G's accounting and treasury groups discussed the expected nuclear fuel write down and disposal with Sara Weinberg, SCANA internal FERC regulatory counsel. Sara is researching potential FERC jurisdictional considerations related to the transactions. On January 3, 2018, Sara responded with the following e-mail:


Please let me know if you have any further questions.
Thank you,
Sara

## Fair Value Disclosure

ASC 820 requires certain disclosures when assets are measured at fair value on a nonrecurring basis in the statement of financial position after initial recognition, including the valuation techniques and inputs used to develop those measurements. (ASC 820-10-50-1a)

At a minimum, disclosures for nonrecurring fair value measurements should include the fair value and reasons for measurement, the level of the hierarchy within which the fair value measurements are categorized, a description of valuation techniques and inputs (if Level 2 or 3) and quantitative information about significant unobservable inputs (if Level 3). Finally, a description of the valuation processes used (e. g., how an entity decides its valuation policies and procedures and analyzes changes in fair value measurements from period to period) for Level 3.

Based on the information documented above, the nonrecurring fair value measurement of nuclear fuel inventory was required because the asset's fair value less costs to sell was determined to be lower than its carrying amount, in accordance with ASC 360. The method used to fair value the asset (i.e., vendor quotes) is not considered an observable input for this purpose, so we conclude the hierarchy level would be Level 3. The fair value as of $12 / 31 / 17$ is $\$ 43.8$ million. The valuation processes employed are assessing the fair value quarterly in accordance with ASC 360 and obtaining inputs (likely from vendors) as required to update the analysis.

The above information will be incorporated into Note 7 Fair Value Measurements for 2017 10-K purposes.

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-31:

Refer to the Attachment to the response to ORS 4-71. The Attachment shows various retail allocation factors for the Rate History.
a. Provide the appropriate retail allocation factor for the recoverable NND costs. Provide all support developed and/or relied on for the calculation of the retail allocation factor.
b. Describe whether, and if so, how, SCE\&G plans to recover the wholesale portion of the recoverable NND costs.

## RESPONSE 6-31:

a. Appropriate retail allocation factors, as audited by ORS, were provided with response 4-71. A portion of the supporting information for the calculation of the retail allocation factors contains confidential and sensitive information. Due to the confidential and sensitive information requested, SCE\&G will make the information responsive to this request available to ORS for review and inspection at SCE\&G's administrative offices after execution of a confidentiality agreement. Notwithstanding the foregoing, a redacted version of SCE\&G's supporting information is on the enclosed CD entitled "Attachment 6-31 (REDACTED)."
b. SCE\&G's existing wholesale contracts for power supply to Orangeburg and Winnsboro include provisions under which the stated rates would have been adjusted when VCS2 and VCS3 would have come on-line. However, the stated rates in these contracts do not break out specifically identifiable cost components (beyond fuel and other variable costs) for recovery, and no adjustments to the stated rates in these contracts are specifically triggered by the abandonment of NND. However, NND abandonment costs may be considered going forward in the implementation of any applicable formula rate calculations.

The costs related to NND Transmission, which are not being abandoned, will be included in the FERC Transmission formula rate as those projects are placed into service.

Responsible person: Allen Rooks, Eddie Folsom

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-32:

Refer to the responses to ORS 4-76 and 4-77, which asked for the protected and unprotected excess deferred income taxes by temporary difference, respectively. The responses do not provide the excess deferred income taxes by temporary difference, except for the abandonment loss and investment tax credit. The response groups other temporary differences into categories. Provide the information that was requested in ORS 4-76 and 4-77 by temporary difference.

## RESPONSE 6-32:

Where applicable, we have included the requested temporary difference details within the several categories provided in the earlier responses.

Category A: Non protected excess deferred taxes - see attached
Category B: Tax abandonment - see response ORS 4-76. The tax abandonment is considered to be the sole temporary difference within this category.

Category C: Net Operating Loss Carryforward - see response ORS 4-76. The net operating loss carryforward is considered to be the sole temporary difference within this category.

Category D: Property basis - see attached
Category E: Property - see attached
Category F: Federal Investment Tax Credit - Carryforward - see response ORS 476. The credit carryforward is considered to the be sole temporary difference within this category.

Responsible person: Virginia Smith

## Category A - Non protected

Pension
Prepayments
Demand Side Management
Defer Capacity / Short Term Capacity
Storm Damage
Major Maintenance
Cybersecurity
Reacquired Debt
Unit One VCS Costs
Fukishima Reg Asset
Grants
Accrued Bonus
EPA Cleanup
Deferred Fuel
Long Term Disability
Net Metering
Uncollected Accounts
Accrued Vacation
Injuries and Damages
Nuclear Refueling
Rabbi Director Trust
ERIP
Executive Deferred Compensation Plan
OPEB
Gas Inventory 263A
Pipeline Integrity

ELECTRIC
28.0
9.0
8.3
3.8
3.2
2.5
2.2
1.7
0.6
0.6
0.4
0.3
-
(0.1)
(0.1)
(0.4)
(0.5)
(0.5)
(0.9)
(1.0)
(1.1)
(1.1)
(2.0)
(18.9)
(0.1)
(0.2)
(0.2)
(0.4)
(2.9)
(0.2)
1.0
5.7

Category D - Non protected property

Repairs
Research \& Experimentation
Regulatory Assets
Basis differences
ELECTRIC
GAS
86.1

10
0.4
6.9
$-1.7$

| 101.3 | 0.4 |
| :---: | :---: |

## Category E - Property

Depreciation (including method/life)
Cost of removal
Equity AFUDC
Book Interest
Tax interest
Contribution in aid of construction
Basis differences

## ELECTRIC <br> GAS

$446.4 \quad 64.6$
$-32.2 \quad-6.9$
-23.4 -2.3
$6.4 \quad 0.1$
-21.2 -0.3
$\begin{array}{ll}-7.4 & 0.7\end{array}$

| -15.9 | 1.2 |
| ---: | ---: |
| 352.7 | 57.1 |

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY <br> OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-33:

Provide a forecast of SCE\&G's capital structure following the acquisition by Dominion, including the implementation of the CBP. Provide this forecast for 2018 through 2023.

## RESPONSE 6-33:

Dominion Energy, through SCANA, will provide equity, as needed, to SCE\&G with the intent of maintaining SCE\&G's current capital structure. The anticipated impact of the Customer Benefits Plan is reflected in the attachment to the response for ORS Request 1-143. In addition, Dominion Energy will infuse equity to SCE\&G as needed in order to maintain its current capital structure.

RESPONSIBLE PERSON: Sarah French

## SOUTH CAROLINA ELECTRIC \& GAS COMPANY

OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST
DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-34:

Provide a detailed description of Dominion's plans for SCE\&G's capital structure following the acquisition, including all analyses, studies, and other supporting documentation. Indicate whether Dominion plans to maintain SCE\&G's current equity and debt ratios if the transaction is consummated. If not, then provide Dominion's rationale for modifying the capital structure.

## RESPONSE 6-34:

See Response 6-33.
RESPONSIBLE PERSON: Sarah French

## SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-35:

Provide the year-end capitalization amounts and percentages for Dominion and each of its subsidiaries for the last five calendar years.

## RESPONSE 6-35:

The attachments provided include the regulatory capital structures for Dominion Energy's entities with third-party debt.

See the following attachments:

- DE Attachment ORS 6-35 Combined 2016-2017
- DE Attachment ORS 6-35 DGH 2013
- DE Attachment ORS 6-35 DGH 2014
- DE Attachment ORS 6-35 DGH 2015
- DE Attachment ORS 6-35 DEI 2013
- DE Attachment ORS 6-35 DEI 2014
- DE Attachment ORS 6-35 DEI 2015
- DE Attachment ORS 6-35 VP 2013
- DE Attachment ORS 6-35 VP 2014
- DE Attachment ORS 6-35 VP 2015

RESPONSIBLE PERSON: Sarah French

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-36:

Provide the year-end capitalization amounts and percentages for SCANA and each of its subsidiaries for the last five calendar years.

## RESPONSE 6-36:

See the following attachments for SCE\&G:

- ORS 6-36 DecEMB16
- ORS 6-36 DecemberEMB15
- ORS 6-36 December EMB14
- ORS 6-36 DecEMB13
- ORS 6-36 DecEMB17

RESPONSIBLE PERSON: Christina Putnam

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-37:

Provide and describe all commitments offered by Dominion in this proceeding to maintain local management control and decision-making in South Carolina, including access by regulators and lawmakers to local management.

## RESPONSE 6-37:

Dominion Energy plans to operate SCE\&G in substantially the same way as it is currently being operated and intends to maintain SCE\&G's corporate headquarters in Cayce, South Carolina. SCE\&G will be managed from an operations standpoint as a separate regional business under Dominion Energy with responsibility for making decisions that achieve the objectives of customer satisfaction, reliable service, customer, public, and employee safety, environmental stewardship, and collaborative and productive relationships with customers, regulators, other governmental entities, and interested stakeholders. As discussed in response to ORS 3-5, decisions made at the "local" level without further confirmation or permission from Dominion Energy will generally involve those related to operations, system reliability, safety and compliance program implementation, customer service and local stakeholder relations.

The Commission will continue to exercise its regulatory authority over SCE\&G in the same way it does today, thereby ensuring continued protection of the interests of South Carolina customers. In addition, officers and employees of Dominion Energy, including SCE\&G local management, will continue to be accessible to regulators and lawmakers, including the Commission. As part of this and future regulatory proceedings, Dominion Energy and SCE\&G will continue to provide information about Dominion Energy or its other subsidiaries relevant to matters within the Commission's jurisdiction to the Commission upon request of the Commission.

## RESPONSIBLE PERSON: Karla Haislip

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-38:

Confirm that Dominion will maintain local access to SCE\&G's accounting books and records if the merger is consummated. If confirmed, then describe how Dominion will ensure and provide local access.

## RESPONSE 6-38:

It is confirmed that Dominion Energy will maintain local access to SCE\&G's accounting books and records if the merger is consummated. SCE\&G will continue to use PeopleSoft as their source financial system and "book of record" until the transition to Dominion Energy's financial system of record, SAP, takes place. Access to PeopleSoft historical and transactional data will be maintained. Upon transitioning to SAP, a complete and separate set of books containing all the underlying financial transactions and certain linked source documentation (e.g., invoices) for SCE\&G will be maintained in SAP with easy accessibility by authorized users in any location.

RESPONSIBLEPERSON: Josh Blakeney

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING <br> AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) <br> DOCKET NO. 2017-305-E (6th Continuing AIR) <br> DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-39:

Provide and describe all commitments offered by Dominion in this proceeding to maintain local employment, including maintaining staffing and/or functions presently performed locally by SCANA Service Company or transferring staffing and/or functions from Dominion Energy Services, Inc. after Dominion transitions common and shared services to Dominion Energy Services, Inc. from SCANA Services, Inc.

## RESPONSE 6-39:

Dominion Energy has committed to maintaining SCE\&G's headquarters in Cayce.

RESPONSIBLE PERSON: Carmen Anderson

## SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST

DOCKET NO. 2017-207-E (7th Continuing AIR)
DOCKET NO. 2017-305-E (6th Continuing AIR)
DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-40:

Indicate whether SCANA Services, Inc. presently charges its affiliates, including SCE\&G, a rate of return applied to rate base or the equivalent of rate base investment. If so, then describe how the rate of return is developed, including the cost of equity and any related income tax gross-up, cost of long-term debt, and cost of short-term debt. In addition, describe how the rate base or the equivalent of rate base investment is calculated for this purpose.

## RESPONSE 6-40:

SCANA Services, Inc. does not charge its affiliates, including SCE\&G, a rate of return applied to rate base or the equivalent of rate base investment.

Responsible person: Keith Coffer, Jr.

## SOUTH CAROLINA ELECTRIC \& GAS COMPANY

 OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUESTDOCKET NO. 2017-207-E (7th Continuing AIR)
DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-41:

Indicate whether Dominion Energy Services, Inc. charges its affiliates, including SCE\&G, a rate of return applied to rate base or the equivalent of rate base investment. If so, then describe how the rate of return is developed, including the cost of equity and any related income tax gross-up, cost of long-term debt, and cost of short-term debt. In addition, describe how the rate base or the equivalent of rate base investment is calculated for this purpose.

## RESPONSE 6-41:

No, Dominion Energy Services, Inc. does not include a rate of return applied to rate base or the equivalent of rate base in charges to its affiliates.

RESPONSIBLE PERSON: Josh Blakeney

## SOUTH CAROLINA ELECTRIC \& GAS COMPANY

OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST
DOCKET NO. 2017-207-E (7th Continuing AIR)
DOCKET NO. 2017-305-E (6th Continuing AIR)
DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-42:

Refer to pages 3,5 and 6 of Exhibit 9 attached to the Application in this proceeding. Indicate whether Dominion plans to move or reposition any SCANA legal entities after the merger is consummated, e.g., Public Service Company of North Carolina from a subsidiary of SCANA Corp. to a subsidiary of Dominion Energy Gas Holdings, LLC, the parent of The East Ohio Gas Company. Provide a copy of all analyses, studies, and correspondence that address these issues.

## RESPONSE 6-42:

At the time the Merger is effective as defined in the Merger Agreement ("Effective Time"), Sedona Corp., a wholly-owned subsidiary of Dominion Energy, Inc. ("Dominion Energy"), will merge with and into SCANA Corporation ("SCANA"), a South Carolina corporation, with SCANA being the surviving entity. At the Effective Time, SCANA, as the surviving entity, will become a wholly-owned subsidiary of Dominion Energy that will continue to exist as a separate legal entity. All current subsidiaries of SCANA are expected to remain as direct subsidiaries of SCANA in its current structure at the Effective Time. No additional changes to SCANA legal entity structure are contemplated at this time.

RESPONSIBLE PERSON: Karen Doggett

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-43:

Provide all accounting Dominion guidance and procedures that address the accounting for transaction and transition costs before and after a transaction is consummated.

## RESPONSE 6-43:

As transaction and transition costs are incurred, they will be recorded in specific projects and accounts and separately tracked on the applicable books of the Dominion entities incurring such costs.

Transaction fees are one-time fees associated with the Merger transaction. As noted in Response 4-8, transaction costs include costs incurred in connection with completion of the acquisition by Dominion Energy, Inc. of the equity interests of SCANA Corporation, including costs of obtaining all necessary regulatory approvals for the merger. Examples of such costs include legal fees and expenses, regulatory filing fees and costs of developing and pursuing regulatory approvals, accounting fees, costs related to securities issuances and proxy solicitations, financial advisory fees and investment banking fees.

As noted in Response 4-11, transition costs are generally costs arising from the activities necessary to integrate the purchased entity into the acquiring entity. Examples of transition costs include those related to, but not limited to, the integration of financial, IT, human resource, billing, accounting, and telecommunications systems and processes. Other costs could include severance payments to employees and costs related to changes to signage, changes to employee benefit plans and termination of any duplicative leases, contracts, operations, etc.

Generally, any transaction or transition cost related to the merger will be incurred and expensed at the Dominion Energy, Inc. (Holding Company) level. As such, SCE\&G will not seek recovery of these costs from customers and will not be charged to SCE\&G or any other SCANA or Dominion subsidiary company. Similarly, due to the nature of the costs incurred, some may originate at Dominion Energy Services, Inc. (DES) and will be charged to the Holding Company by using the specific project codes. Any transition costs and one-time charges attributable to the Customer Benefits Plan that are required to be recorded on the books of SCE\&G under Generally Accepted Accounting Principles will be reflected on SCE\&G's books in below-the-line in FERC accounts such as 426.5 Other Deductions, 417.1 - Expenses of Nonutility Operations, 408.2 - Taxes and Other

Than Income Taxes, or other FERC account as appropriate for the charge to ensure the amounts are excluded from rate recovery.

RESPONSIBLE PERSON: Josh Blakeney

# SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST <br> DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR) 

## REQUEST 6-44:

Describe all changes in SCANA Corp. and SCE\&G accounting that will be necessary to conform their accounting to that of Dominion if the merger is consummated. Provide a copy of all analyses, studies, and correspondence that address this issue.

## RESPONSE 6-44:

Planning for the integration process is in the early stages, beginning with building a baseline understanding of each other's respective organization and policies. The process of understanding and conforming accounting policies has not begun. However, based on previous experience in the acquisition of Carolina Gas Transmission, Inc., Dominion does expect to change SCANA's estimate for pipeline asset retirement obligations, which we refer to as AROs, to the methodology used by Dominion Energy. The cash flows used to measure Dominion Energy's pipeline AROs reflect the cost and timing of activities legally required to retire component sections of pipeline as they are removed from service. The cash flows previously used to measure SCANA's pipeline AROs are those legally required to retire the entire pipeline system at one point in time. As we move through the integration process, a detailed analysis will be performed to determine the impact.

SOUTH CAROLINA ELECTRIC \& GAS COMPANY OFFICE OF REGULATORY STAFF'S CONTINUING AUDIT INFORMATION REQUEST DOCKET NO. 2017-207-E (7th Continuing AIR) DOCKET NO. 2017-305-E (6th Continuing AIR) DOCKET NO. 2017-370-E (6th Continuing AIR)

## REQUEST 6-45:

Refer to SCANA Corp.'s 425 filing with the SEC on February 20, 2018, which states in part:

Other news reports suggest the filing shows that companies other than Dominion were interested in buying SCANA. Is that accurate?

To be clear, although we had conversations with other utilities that expressed some form of interest, those expressions of interest did not result in actual offers to buy SCANA. Dominion presented us with a customer-focused proposal, which was the only offer we received.

Describe all efforts made by SCANA Corp. to solicit offers other than from Dominion, including, but not limited to, the retention of an investment banking firm to solicit, evaluate, and negotiate such offers on behalf of SCANA Corp. and its shareholders, if any.

## RESPONSE 6-45:

Please see Response 1-3 and more specifically, Form S-4 which was provided to ORS on March 2, 2018.

Responsible person: Chad Burgess


[^0]:    Total Capital $\quad 49,026,072,093 \quad 100.000 \%$

    | Capitalized Interest Rate |  |  |  |
    | :--- | ---: | ---: | ---: |
    | Long-term debt | $30,454,701,427$ | $90.580 \%$ | $3.921 \%$ |
    | Short-term debt | $3,167,054,769$ | $9.420 \%$ | $0.901 \%$ |
    | Total debt | $\mathbf{3 3 , 6 2 1 , 7 5 6 , 1 9 6}$ | $\mathbf{1 0 0 . 0 0 0 \%}$ | $0.085 \%$ |

[^1]:    Description: Tax and Depreciation Journal - To record impact of a future to impairment. $J$ for $V$ Smith Page 1 of 1

[^2]:    

[^3]:    South Carolina Electric \& Gas Company
    Office of Regulatory Staff's Contin
    

[^4]:    

[^5]:    Assumptions:

    1) This estimate is for $100 \%$ of the Core Material
    2) Unit 2 Initial core material is currently unsellable/tradable due to DOC restrictions.
[^6]:    Assumptions:
    Assumptions:

    1) This estimate is for $100 \%$ of the Core Material
    2) Unit 2 Initial core material is currently unsellab
    3) Unit 2 Initial core material is currently unsellable/tradable due to DOC restrictions.
