

South Carolina Office of Regulatory Staff

Report on South Carolina Electric & Gas Company's Annual Request for Revised Rates

Docket No. 2015-160-E

July 30, 2015



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Introduction and Background

Pursuant to the Base Load Review Act (“BLRA”), South Carolina Electric & Gas Company (“SCE&G” or “Company”) may request to revise rates no earlier than one year after the request of a Base Load Review Order or any prior revised rates request. In Docket No. 2015-160-E, SCE&G filed its Annual Request for Revised Rates (“Request”) with the Public Service Commission of South Carolina (“Commission”) on May 29, 2015, with an effective date of May 30, 2015. The Company states that as of June 30, 2015, it will have invested \$596,541,000 in incremental Construction Work in Progress (“CWIP”) related to its construction of V.C. Summer Nuclear Station Units 2&3 (the “Units” or “Project”) that is not reflected in current rates and is requesting additional retail revenues of \$69,648,000 to recover associated financing costs for the Units.

In accordance with the BLRA, the South Carolina Office of Regulatory Staff (“ORS”) has two months to review SCE&G’s Request and file a report with the Commission indicating the results of its examination. ORS’s review of SCE&G’s Request focuses on the Company’s ability to adhere to the requirements of the BLRA and applicable Commission Orders. This report details the results of ORS’s examination.

On March 2, 2009, the Commission approved SCE&G’s request for the construction of the Units under the Engineering, Procurement and Construction (“EPC”) Contract with Westinghouse Electric Company and CB&I Stone & Webster, Inc. (collectively “the Consortium”). The Commission’s approval of the Units can be found in the Base Load Review Order No. 2009-104(A) filed in Docket No. 2008-196-E.

Subsequent to the Base Load Review Order, the Commission has held three (3) hearings regarding the Units and issued the following Orders:

- **Order No. 2010-12**: Issued on January 21, 2010 and filed in Docket No. 2009-293-E. The Commission approved the Company’s request to update milestones and capital cost schedules.
- **Order No. 2011-345**: Issued on May 16, 2011 and filed in Docket No. 2010-376-E. The Commission approved SCE&G’s petition for updates and revisions to schedules related to the construction of the Units which included an increase to the base project cost of approximately \$174 million.
- **Order No. 2012-884**: Issued on November 15, 2012 and filed in Docket No. 2012-203-E. The Commission approved SCE&G’s petition for updates and revisions to schedules related to the construction of the Units which included an increase to the base project cost of approximately \$278 million.

The anticipated dependable capacity from the Units is approximately 2,234 megawatts (“MW”), of which 55% (1,228 MW) will be available to serve SCE&G customers. South Carolina Public Service Authority (“Santee Cooper”) is currently contracted to receive the remaining 45% (1,006 MW) of the electric output when the Units are in operation and is paying 45% of the costs of the construction of the Units. In October 2011, SCE&G and Santee Cooper executed the permanent construction and operating agreements for the Units. The agreements grant SCE&G primary responsibility for oversight of the construction process and operation of the Units as they come online. On March 30, 2012, the Nuclear Regulatory Commission voted to issue SCE&G a Combined Construction and Operating License (“COL”) for the construction and operation of the Units.

In 2010, SCE&G reported that Santee Cooper began reviewing its level of ownership participation in the Units. Since then, Santee Cooper has sought partners in its 45% ownership. Santee Cooper signed a Letter of Intent with Duke Energy Carolinas, LLC in 2011. On January 28, 2014, Duke Energy Carolinas, LLC filed a report with the Commission stating that it concluded its negotiations with Santee Cooper which resulted in no change in ownership of the Units. On the day before, January 27, 2014, SCE&G announced that it had an agreement to acquire from Santee Cooper an additional 5% (110 MWs) ownership in the Units. The agreement is contingent upon the Commercial Operation Date of Unit 2. Ultimately, under the new agreement, SCE&G would own 60% and Santee Cooper would own 40% of the Units. The new agreement and the specific terms are subject to Commission approval. The Units continue to be governed by the ownership responsibilities as established in the EPC Contract.

Revised Rates Background

Pursuant to the BLRA, until a nuclear plant commences commercial operation, the rate adjustments related to the Units include recovery only of the weighted average cost of capital applied to the outstanding balance of CWIP, and shall not include depreciation or other items constituting a return of capital to the utility.

The BLRA allows SCE&G to choose the date on which to calculate the outstanding balance of CWIP. SCE&G utilized the CWIP balance forecasted as of June 30, 2015. Exhibit C of the Request sets forth the capital structure and weighted average cost of capital. Exhibit D of the Request sets forth an increase in retail rates totaling \$69,648,000. It also shows the incremental CWIP balance for the Units, as of June 30, 2015 – which is not reflected in current retail rates – of \$596,541,000. The Company’s Request shows the total CWIP for the Units forecasted, as of June 30, 2015, to be approximately \$3.267 billion.

Table 1 shows the requested and approved increases from all prior Revised Rate Filings for the Units with the Commission.

Table 1:

SCE&G Revised Rates History						
Docket No.	Order No.	Requested Increase	ORS Examination	Approved Increase	Retail Increase	Rates Effective
2008-196-E	2009-104(A)	\$8,986,000	(\$1,183,509)	\$7,802,491	0.43%	4/1/2009
2009-211-E	2009-696	\$22,533,000	\$0	\$22,533,000	1.10%	10/30/2009
2010-157-E	2010-625	\$54,561,000	(\$7,260,000)	\$47,301,000	2.31%	10/30/2010
2011-207-E	2011-738	\$58,537,000	(\$5,753,658)	\$52,783,342	2.43%	10/30/2011
2012-186-E	2012-761	\$56,747,000	(\$4,598,087)	\$52,148,913	2.33%	10/30/2012
2013-150-E	2013-680(A)	\$69,671,000	(\$2,430,768)	\$67,240,232	2.87%	10/30/2013
2014-187-E	2014-785	\$70,038,000	(\$3,800,000)	66,238,000	2.82%	10/30/2014
2015-160-E	TBD	\$69,648,000	(\$5,122,719)	TBD	TBD	10/30/2015

CWIP Review

ORS's examination was limited to the actual CWIP reported for the review period of July 1, 2014, through June 30, 2015 ("Review Period") together with the associated revenue requirement and Allowance for Funds Used During Construction ("AFUDC") calculations. As agreed to by the Company and ORS, the June 2015 CWIP activity presented for recovery, and reviewed by ORS, was limited to accrued charges under the EPC contract. Likewise, no AFUDC charges for June were presented or reviewed. The ORS Audit Department reviewed only actual costs and did not examine or otherwise test any of the Company's projected results. The results of ORS's examination of the Request and the underlying financial records through June 30, 2015, are contained in Appendix A.

The purpose of the ORS Audit Department's examination was to verify that:

- The actual capital expenditures reflected in the Company's filing were complete, accurate, and supported by the books and records of the Company;
- The actual costs incurred were properly allocated between SCE&G and its co-owner, Santee Cooper, and accurately assigned to the cost categories set forth in the Request;
- The Company's gross cost of capital as of June 30, 2015 was calculated accurately and supported by the books and records of the Company; and
- The Company's calculations of the AFUDC were accurate and properly reflected in the CWIP balance at May 31, 2015.

Summary of Expenditure Examination Procedures

The key audit steps performed are summarized below:

- Interviewed key accounting personnel within SCE&G New Nuclear Deployment, and reviewed the audit work papers from the prior request to examine existing processes, and gain an understanding of any changes in the accounting team or new processes being performed.
- Toured the construction facility periodically during the Review Period to provide ORS with a visual frame of reference in conducting its examination.
- Obtained invoice-level listings of all charges to CWIP through May 31, 2015 of the Review Period, and of EPC accrued charges for June 2015.
- Selected samples of invoice and journal entry items to test in detail, including inter-departmental cross-charges. Verified the mathematical accuracy of sampled invoices and related support, and verified that each was incurred during the Review Period.
- Ensured that the nature of each sample expenditure appeared to relate to the Project, and that the amounts in question appeared reasonable.
- Analyzed the gross cost of capital rate.

- Scrutinized the CWIP expenses under the EPC contract (“EPC Items”) to ensure the charges were approved by Company management prior to booking, and were coded into the appropriate construction cost categories as set forth in the Request. Base charges invoiced by the EPC vendors were verified against the EPC contract, and escalation amounts were recalculated for accuracy using the appropriate inflation indices.
- Obtained from the Company certain roll-forward and trend schedules; tested them to ensure the ending CWIP balance from June 30, 2014, together with incremental costs incurred during the Review Period, supported the reported balance at June 30, 2015, in total and by cost category.
- Verified that invoice items were accrued in the month incurred.
- Determined that the ending CWIP totals for each month reconciled properly to general ledger detail. For the quarter-end balances, ensured they agreed with the Company’s published Schedules 10-Q, as filed with the United States Securities & Exchange Commission (“SEC”) and with Form 1, as filed with the Federal Energy Regulatory Commission.
- Verified a sample of items from each month to ensure that payment had actually been made to the vendor by examining bank drafts and wire transfer acknowledgements.
- Traced each invoice item to the PeopleSoft® payment vouchers, ensuring that required approvals were present. Also traced the EPC Items to internal approval sheets signed by construction management.
- Performed a test of payroll costs charged to the Project, noting that employees’ gross pay was supported by the payroll department records, that their time appeared to be properly allocated to the Project, and that charges reconciled to the general ledger detail.
- Recalculated the AFUDC for the test year using actual CWIP expenditures in lieu of the projected amounts reflected in the Request. Total AFUDC of \$24,246,000 was calculated for the period under examination.

Detail of ORS Appendix A Revenue Requirement and CWIP through June 30, 2015

Appendix A shows the CWIP included in rates as of June 30, 2014, incremental additions to CWIP and AFUDC for the Review Period, and total CWIP as of June 30, 2015. Appendix A is designed to reflect “Revised Rates Filing” projected CWIP as compared to both the “Actual” CWIP per book amount, and the maximum “Allowable” CWIP. All amounts presented on Appendix A reflect the Company’s portion after applying the allocation to Santee Cooper.

Column (A) reflects Revised Rates Filing CWIP through June 30, 2015, of \$3,267,493,000 and an adjusted net incremental CWIP for the Review Period of \$596,541,000. Utilizing the resulting increase in the CWIP balance and the projected gross cost of capital, SCE&G’s projected incremental revenue requirement per the Request was \$72,002,000 in total, or \$69,648,000 after applying the retail allocation factor of 96.73%.

Column (B) presents Actual CWIP through June 30, 2015, as verified by ORS examination, totaling \$3,218,588,000. Incremental Actual CWIP for the Review Period was \$551,745,000 before removing deferrals of \$52,000 related to the COL Delay Study, and \$4,468,000 related to Costs Pending Approval in Docket No. 2015-103-E. Total adjusted incremental CWIP for the Review Period is \$547,225,000.

Column (C) reflects the Allowable CWIP through June 30, 2015, computed as \$3,218,587,000 which includes removal of non-allowable expenditures. Incremental Allowable CWIP for the Review Period was \$547,224,000 net of previously discussed deferrals. Utilizing the resulting increase in the CWIP balance and the gross cost of capital, the incremental, allowable revenue requirement is \$66,707,000 in total, or \$64,526,000 after applying the retail allocation factor of 96.73%.

Column (D) calculates the differences between Columns (A) and (B). The difference in incremental CWIP shown in the Revised Rates Filing figures versus the Actual column was \$49,316,000 indicating that the actual, audited CWIP, per the Company books, was less than the projected CWIP by that amount.

Column (E) reflects no costs to be carried over to the next Reporting Period.

Appendix A was prepared in accordance with recognized regulatory accounting practices and conforms to prior orders of the Commission.

Capital Structure

Section 58-33-280(B) of the BLRA states, “a utility must be allowed to recover through revised rates its weighted average cost of capital...calculated as of a date specified in the filing.” Exhibit C of SCE&G’s Request shows the capital structure for the Company as of March 31, 2015 adjusted for equity transfers and debt issuances planned through June 30, 2015.

The filed capital structure reflects two adjustments to the per-books amounts. An adjustment of \$200,000,000 to Common Equity included in Exhibit C of the Company’s filing reflects the projected transfer of additional equity by June 30, 2015 from the parent company, SCANA, to SCE&G. This transfer occurred. The second adjustment, to Long-Term Debt, reflects the issuance of \$500,000,000 in bonds anticipated at the time of the filing that has now occurred.

Three subsequent adjustments were not indicated in the filing. First, the embedded cost of Long-Term Debt changed from 5.63% to 5.86% due to the effect of the losses on interest-rate swaps. The second adjustment came from the addition of \$39,455,301 in Retained Earnings. A third very small adjustment of \$50,768 came from the amortization of Accumulated Other Comprehensive Income. As a result of the second and third adjustments after the filing, Common Equity rose from \$4,886,596,404 to \$4,926,102,473.

Appendix B of this report shows the capital structure as filed for March 31, 2015, updated to June 30, 2015 for changes in Long-Term Debt and Common Equity. With Common Equity amounts and Embedded and Average Costs of Long-Term Debt updated, the Total Capitalization is now \$9,354,972,473, the Common Equity Ratio is 52.66%, its Weighted Average Cost is 5.79% and its Gross-of-Tax cost is 9.42%. The Embedded and Weighted Average Cost of Long-Term Debt reflect the increase in the cost-rate discussed above. As a result, the Net of Tax Return on Total Capitalization is 8.57%, as opposed to the 8.45% that was filed, because the Embedded Cost of Debt and the Ratio of Common Equity were higher than filed. The Cost of Capital Gross of Tax is 12.19%, twelve basis points higher than in the filing. As in the 2011, 2012, 2013, and 2014 Requests, the capital structure includes \$100,000 in Preferred Stock, as SCE&G filed its capital structure. This is a token amount with a zero cost rate, held by SCANA, but with no return, for the purposes of maintaining certain reporting requirements to the SEC. The Ratios of Long-Term Debt and Common Equity are proportions of the Total Capitalization, less the \$100,000 in Preferred Stock.

Rate Design and Allocation of Additional Revenue

Section 58-33-270(D) of the BLRA states, “In establishing revised rates, all factors, allocations, and rate designs shall be as determined in the utility’s last rate order...” ORS examined the Company’s proposed rate schedules in its Request and found the rate designs were consistent with those approved in the Company’s last rate order, which is Commission Order No. 2012-951 found in Docket No. 2012-218-E.

Section 58-33-270(D) of the BLRA also requires “... that the additional revenue requirement to be collected through revised rates shall be allocated among customer classes based on the utility’s South Carolina firm peak demand data from the prior year.” ORS verified that the Company used the summer firm peak demand day of August 22, 2014, along with the coincident class firm peaks, to determine the appropriate percentages upon which to allocate the additional revenue requirements. The firm peak demand was based on the approved four-hour coincident peak allocation methodology. The appropriate South Carolina retail firm demand allocation of the system total is 96.73% as shown on Exhibit B of SCE&G’s Request.

Revenue Verification

ORS verified that the corresponding approved base rates for 2015 reflect actual revenues generated in the test year of 2014. ORS then utilized the most recent approved rates in effect at the time the Company filed its Request to obtain the most current annualized rate revenues. That is, ORS utilized SCE&G’s rate schedules effective in May 2015.

Additionally, ORS verified that the proposed revised tariffs in Exhibit F of SCE&G’s Request generate additional revenues totaling \$69,647,053, which is shown in Exhibit E of the Company’s Request.¹ ORS’s review determined the appropriate retail revenue target increase to be \$64,525,281 instead of \$69,648,000 as proposed by the Company and shown in Exhibit D of its Request. The results of ORS’s examination are shown in Appendix A. ORS’s review reduced the Company’s Request by \$5,122,719 or 7.36%. The total additional revenues of \$64,525,281 allocated by class are shown in Appendix C. Appendix C also includes the annual revenues generated under the currently approved rates and the incremental change by customer class. Since the general lighting schedules do not contribute to SCE&G’s firm peak demand, those schedules of rates were not affected by the revised rates filing and received no increase in charges.

¹ Exhibit G of the Company’s Request provides general information based on internal financial reports estimating future revenue requirements and rate increases. It does not contain information necessary to evaluate the revenue increase being considered in this filing. Therefore, ORS does not utilize Exhibit G of the Company’s Request in its analysis and review.

It should be noted that it is difficult to set rates to produce precise dollar amounts due to the general complexity of rate designs of the various tariffs, their interdependent relationships, and the large number of billing determinants associated with these calculations. The commonly accepted practice is to adjust rates while maintaining the appropriate rate design and generate revenues close to the desired level without exceeding the targeted amount.

Based on ORS's review and a reduction of \$5,122,719 to the Company's Request, the resulting overall increase to the retail class (excluding lighting) is 2.57%. Residential customers using 1,000 kWhs would see an increase of approximately \$3.78 in their average monthly bill. If the Commission approves the findings of ORS's examination, the Company would then apply the reduced revenue amount in like proportion to the Company's Request using the above criteria. ORS will then verify that these new rates generate the approved revenue increase.

ORS's Review of SCE&G's Quarterly Reports

As required by the BLRA, SCE&G must include its most recent quarterly report on the status of construction of the Units. Accordingly, SCE&G included its 2015 1st Quarter Report ("Report") which was filed on May 15, 2015. The Report is in Commission Docket No. 2008-196-E and covers the quarter ending March 31, 2015. Subsequently, ORS completed and produced a document describing its review of the Report. ORS's review of the Report is attached as Appendix D. ORS also included in Appendix D its prior reviews of SCE&G's quarterly reports since the last revised rates request.

With reference to Section 58-33-275(A) of the BLRA, ORS's review of the Company's quarterly reports focuses on SCE&G's ability to adhere to (1) the approved construction schedule and (2) the approved capital cost schedules. The following information summarizes ORS's review of SCE&G's Report:

Approved Schedule and Budget Review

During the 1st quarter 2015, the project continued to make progress toward the completion of several major construction milestones. However, the project continues to experience delays due to design and delivery issues. The critical path work is centered on Unit 2 Nuclear Island work necessary to allow additional concrete pours inside the Containment Vessel and within the Auxiliary Building perimeter walls. ORS continues to monitor this work closely.

On March 12, 2015, SCE&G filed with the Commission in Docket No. 2015-103-E a Petition seeking approval to update the construction milestone schedule as well as the capital cost schedule for the Units. In its Petition, SCE&G is requesting the Commission to modify the construction schedule to reflect new substantial completion dates of June 19, 2019 and June 16, 2020 for Unit 2 and Unit 3, respectively. SCE&G reports to ORS that the Consortium continues to experience delays in fabrication and delivery of sub-modules for the Units and that these delays are the primary purpose for issuing a Revised Schedule.

This Petition includes incremental capital costs that total approximately \$698 million (SCE&G's portion in 2007 dollars); of which \$539 million are associated with these delays and other contested costs. The total project capital cost is now estimated at approximately \$5.2 billion (SCE&G's portion in 2007 dollars) or \$6.8 billion including escalation and allowance for funds used during construction (SCE&G's portion in future dollars). The cumulative project cash flow amount projected to be spent on the Units by December 31, 2015 is \$3.7 billion.

The construction schedule and budget presented in SCE&G's Quarterly Report is based on SCE&G's Petition. Therefore, until the Commission issues an order in response to SCE&G's Petition, ORS will not have the ability to provide complete updates on the status of the approved schedule or approved budget.

On June 29, 2015, SCE&G, ORS and the South Carolina Energy Users Committee entered into a Settlement Agreement ("Agreement") related to the Company's Petition. In the Agreement, the parties agree that beginning with any revised rates filing made on or after January 1, 2016, and prospectively thereafter until such time as the Units are completed, SCE&G will develop and calculate its revised rates filings using 10.5% as the return on common equity rather than the approved return on common equity of 11%. With the reduction of the return on equity from 11% to 10.5%, the total impact is estimated to be approximately \$15 million in savings to ratepayers. The Agreement is filed in Docket No. 2015-103-E and subject to approval by the Commission.

Conclusions

The purpose of the BLRA is to provide for recovery of financing costs associated with prudently incurred costs of new base load plants when constructed by investor-owned electrical utilities, while at the same time protecting customers of investor-owned electrical utilities from responsibility for imprudent financial obligations or costs. ORS reviewed SCE&G's Request, conducted an on-site examination of the Company's books and records regarding the Company's capital expenditures, and found the expenditures to be prudently incurred.

Based on the information reviewed, the additional revenue requested by SCE&G should be reduced by \$5,122,719 to reflect actual CWIP through June 30, 2015; and, the appropriate revenue increase is \$64,525,281.

Appendix A

CWIP through June 30, 2015

South Carolina Office of Regulatory Staff
SCE&G - 2015 Revised Rates Filing
Construction Work In Progress (CWIP) through June 30, 2015
Docket No. 2015-160-E

(\$ in Thousands)

Cost Categories	SCE&G Revised Rates Filing	ORS Examination				Carry Over to 2015-2016
		Actual	Allowable	Difference		
	(A)	(B)	(C)	(D) (A - B)	(E)	
CWIP in Rates as of June 30, 2014 <i>Per Commission Order No. 2014-785</i>	\$ 2,666,843	\$ 2,666,843	\$ 2,666,843	\$ -	\$ -	
Incremental Actual Additions to CWIP through March 31, 2015	\$ 413,264	\$ 413,264	\$ 413,264	\$ -	\$ -	
Incremental AFUDC through March 31, 2015	\$ 20,500	\$ 20,500	\$ 20,500	\$ -	\$ -	
Incremental Additions to CWIP April 1 through June 30, 2015 ¹	\$ 163,172	\$ 114,235	\$ 114,234	\$ 48,937		
Incremental AFUDC April 1 through June 30, 2015	\$ 3,714	\$ 3,746	\$ 3,746	\$ (32)	\$ -	
CWIP as of June 30, 2015 ²	\$ 3,267,493	\$ 3,218,588	\$ 3,218,587	\$ 48,905		
Incremental CWIP before Adjustment	\$ 600,650	\$ 551,745	\$ 551,744	\$ 48,905		
Deferral of 1/2 of Change Order No. 11 <i>(COL Delay Study Costs)</i>	\$ (52)	\$ (52)	\$ (52)	\$ -	\$ -	
Removal of Costs Pending Approval in Docket No. 2015-103-E ³	\$ (4,057)	\$ (4,468)	\$ (4,468)	\$ 411	\$ -	
Incremental CWIP, as adjusted	\$ 596,541	\$ 547,225	\$ 547,224	\$ 49,316	\$ -	
Gross Cost of Capital	12.07%		12.19%			
Incremental Revenue Requirement	\$ 72,002		\$ 66,707			
Allocation Factor for Retail Operation	96.73%		96.73%			
Allocated Retail Revenue Requirement	\$ 69,648		\$ 64,526			

¹ CWIP reflects ORS's removal of non-allowable expenditures.

² SCE&G's May 30, 2015 Request utilized projected incremental CWIP amounts. ORS's examination reflects actual incremental CWIP amounts through May 31, 2015, and EPC charges only for June 2015.

³ Pending costs include AFUDC.

Appendix B

Capitalization Ratios and Cost of Capital

South Carolina Office of Regulatory Staff
SCE&G - 2015 Revised Rates Filing

Capitalization Ratios and Cost of Capital
As of June 30, 2015*
Docket No. 2015-160-E

Capital Cost Category	Amount	Ratio	Embedded Cost	Weighted Average Cost of Capital	Gross of Tax
Long-Term Debt	\$4,428,770,000	47.34%	5.86%	2.77%	2.77%
Preferred Stock †	\$100,000	0.00%	0.00%	0.00%	0.00%
Common Equity	\$4,926,102,473	52.66%	11.00%	5.79%	9.42%
Total Capitalization	\$9,354,972,473	100.00%		8.57%	12.19%

* Reflects \$500,000,000 Long-Term Debt issuance included in filing and issued on May 15, 2015, anticipated Equity transfers in filing, now realized, in the amount of \$200,000,000, and updated Debt Cost and Equity Dollars.

† The Preferred Stock amount is nominal in that it is used for Total Capitalization but not for the calculation of the Ratio Column because of Preferred Stock's 0.00% Embedded Cost.

Appendix C

Revenue Requirement

South Carolina Office of Regulatory Staff

SCE&G - 2015 Revised Rates Filing

Revenue Requirement

Docket No. 2015-160-E

Rate Class	Approved Annual Revenue	ORS Examination Annual Revenue	Incremental Change \$	Incremental Change %
	(A)	(B)	(C) (B - A)	(D) (C / A)
Residential	\$ 1,169,954,845	\$ 1,200,313,990	\$ 30,359,145	2.59%
Small General Service	\$ 453,290,834	\$ 465,440,944	\$ 12,150,110	2.68%
Medium General Service	\$ 244,548,778	\$ 251,356,195	\$ 6,807,417	2.78%
Large General Service	\$ 639,309,746	\$ 654,518,355	\$ 15,208,609	2.38%
Retail Total (Excluding Lighting)	\$ 2,507,104,203	\$ 2,571,629,484	\$ 64,525,281	2.57%

Appendix D

ORS's Review of SCE&G's Quarterly Reports

The following reviews of SCE&G's Quarterly Reports under Appendix D have already been posted on our website for your viewing:

<http://www.regulatorystaff.sc.gov/Pages/default.aspx>

- 7/30/2015- ORS Review of SCE&G 2015 1st Quarter Report on VC Summer Units 2&3 Status of Construction
- 3/19/2015- ORS Review of SCE&G 2014 4th Quarter Report on VC Summer Units 2&3 Status of Construction
- 12/18/2014- ORS Review of SCE&G 2014 3rd Quarter Report on VC Summer Units 2&3 Status of Construction
- 9/22/2014- ORS Review of SCE&G 2014 2nd Quarter Report on VC Summer Units 2&3 Status of Construction