

**IN RE:** South Carolina Electric & Gas Company ) Office of Regulatory Staff's  
Activities and Events Related to the Intention ) Second Continuing Audit  
to Abandon V.C. Summer for Units 2 & 3 ) Information Request for Records  
Site in Jenkinsville, SC ) and Information  
)

**TO: K. CHAD BURGESS, ESQ., MATTHEW W. GISSENDANNER, ESQ., AND  
BYRON HINSON REPRESENTATIVES FOR SOUTH CAROLINA ELECTRIC  
& GAS COMPANY:**

**I. INSTRUCTIONS**

The South Carolina Office of Regulatory Staff ("ORS") hereby requires, pursuant to S.C. Code Ann. § 58-4-55(A), 58-27-160, and 58-27-1570 that South Carolina Electric & Gas Company ("SCE&G" or "Company") provide responses in writing and under oath and serve the undersigned on or before November 9, 2017 to the attention of Shannon Bowyer Hudson of ORS at 1401 Main Street, Suite 900, Columbia, South Carolina, 29201 and to the attention of Gary Jones of Jones Partners at 1555 North Astor Street, Apt. 22W, Chicago, IL 60610. If you are unable to respond to any of the requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these audit requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. As used in these audit requests, "address" means mailing address and business address. When asked to identify or provide a document, "identify" and "provide" mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, a copy of the document may be attached with the identity of the person who has custody of it. When the word "document" is

used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this audit request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

**IT IS THEREFORE REQUESTED:**

- Pursuant to S.C. Code Ann. § 58-4-55(A) that responses be submitted under oath.
- All information shall be provided to ORS and Gary Jones of Jones Partners in the format requested.
- All responses to the requests below must be labeled using the same numbers as the requests.
- Unless otherwise agreed, the requested information shall be bound in 3-ring binders with numbered tabs between each question. The question should be reproduced at the beginning of each tab for the responses included. All exhibits shall be reduced or expanded to 8 ½" x 11" formats, where practical.
- If information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place a copy of the requested information in the appropriate numerical sequence.
- Any inquiries or communications requesting clarification of the information requested should be directed to Jeffrey M. Nelson, Esquire [803.737.0823], Shannon Bowyer Hudson, Esquire [803.737.0889] or M. Anthony James [803.737.2090] of ORS.
- This entire list of questions shall be reproduced and included in front of each set of responses.
- Unless otherwise set forth below, SCE&G shall provide three (3) paper copies/binders of responses to ORS. In addition, and if technically feasible, it is requested that SCE&G provide one (1) electronic version with working spreadsheets (not in Adobe) each to ORS and to Gary Jones of Jones Partners [gary@jonespartners.net].

- If the response to any request is that the information requested is not currently available, please state when the information requested will be provided to ORS. This statement is not a waiver of the deadline for all other responses.
- In addition to the signature and verification at the close of SCE&G's responses, the SCE&G witness(es), employee(s), contractor(s) or agent(s) responsible for the information contained in each response shall be indicated.
- This request shall be deemed to be continuing so as to require SCE&G to supplement or amend its responses as any additional information becomes available.
- If the information requested is kept, maintained, or stored using spreadsheets, please provide fully functional electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.
- Provide all responses to reflect SCE&G's 55% participation where possible. Where this request is not possible, please clearly identify whether the responses reflect 100% or 55% dollars.

## **II. REQUESTS**

- 1-1. Please provide a copy of the professional services agreement dated August 6, 2015, between Bechtel and Smith Currie.<sup>1</sup>
- 1-2. Please identify the provisions of the tax code that the Company relies upon for the proposition of taking a tax loss associated with new nuclear.
- 1-3. Explain why this tax loss has greater value to SCE&G if taken by 12/31/2017.
- 1-4. Explain the actions that SCE&G believes must be taken in order to qualify for the tax loss.
- 1-5. Identify the actions that SCE&G is taking in order to claim abandonment and the tax loss, and reference the associated tax code provisions, and when these actions were or are to be taken.
- 1-6. With regard to the Toshiba parental guarantee, explain why SCE&G believes this amount is income and does not qualify as payment for damages.
- 1-7. Please provide all invoices related to the Bechtel Power Corporation study begun in 2015.
- 1-8. Provide invoices for any other reports prepared by project consultants related to V.C. Summer Units 2 and 3.

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<sup>1</sup> ORS sent this request to the Company on September 11, 2017, with the request that the documents be provided as soon as available. As of November 2, 2017, the Company has not provided the documents.



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Columbia, South Carolina  
November 2, 2017