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August 1, 2018

Shannon Bowyer Hudson, Nanette S Edward  
Jenny R. Pittman, Jeffrey M. Nelson  
Andrew M. Bateman  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201

Re: Joint Applicants' First Set of Requests for Admission, Second Set of Interrogatories,  
and Second Set of Requests for Production of Documents

Docket No. 2017 – 207 – E;

Docket No. 2017 – 305 – E;

Docket No. 2017 – 370 – E

Dear Colleagues:

Enclosed and served upon you, please find Joint Applicants' First Set of Requests for Admission, Second Set of Interrogatories, and Second Set of Requests for Production of Documents.

Sincerely,

Belton T. Zeigler

BTZ/tm  
Enclosure

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**

**DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E**

**IN RE:**

Friends of the Earth and Sierra Club,

Complainants/Petitioners,

v.

South Carolina Electric & Gas Company,

Defendant/Respondent.

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**IN RE:**

Request of the Office of Regulatory Staff for Rate Relief to South Carolina Electric & Gas Company's Rates Pursuant to S.C. Code Ann. § 58-27-920.

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**IN RE:**

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc., for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., as may be required, and for a prudence determination regarding the abandonment of the V.C. Summer Units 2 & 3 Project and associated customer benefits and cost recovery plan.

**JOINT APPLICANTS' FIRST SET OF**  
**REQUESTS FOR ADMISSION, SECOND**  
**SET OF INTERROGATORIES, AND**  
**SECOND SET OF REQUESTS FOR**  
**PRODUCTION OF DOCUMENTS**

**TO: COUNSEL FOR THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF**

South Carolina Electric & Gas Company (“SCE&G”) and Dominion Energy, Inc. (“Dominion Energy,” or, collectively with SCE&G, “Joint Applicants”), by and through the undersigned counsel and pursuant to 10 S.C. Code Ann. Regs. 103-833 and S.C.R. Civ. P. 26, 33, 34, and 36, hereby requests that the South Carolina Office of Regulatory Staff (“ORS”) answer fully and separately, in writing and under oath, the following requests for admissions, interrogatories, and requests for production of documents within the time prescribed by 10 S.C. Code Ann. Regs. R. 103-833 and the South Carolina Rules of Civil Procedure and produce for inspection and copying the following designated documents in your possession or control at the offices of Womble Bond Dickinson (US) LLP, 1221 Main Street, Suite 1600, Columbia, South Carolina 29201, on or before August 21, 2018.

**INSTRUCTIONS**

ORS’s responses to Joint Applicants’ First Set of Requests for Admission, Second Set of Interrogatories, and Second Set of Requests for Production of Documents (collectively, the “Requests”) should include not only all information and documents available to ORS, but also all information and documents available to its attorneys, investigators, consultants, agents, or other representatives acting on its behalf. Please respond to the Requests in accordance with the following instructions:

1. **Claims of Privilege and Exception to Discovery.** If you refuse to disclose any document requested herein, in whole or in part, based on any claim of privilege or immunity, please identify the specific privilege or protection claimed and state the basis for the claim, identifying the pertinent circumstances with sufficient specificity to permit Joint Applicants to assess the basis of any such claim.

2. **Continuing Nature.** These Requests are intended to be, and shall be, answered or responded to fully as of the date of response and shall be deemed to be continuing thereafter until the conclusion of this matter. If you should subsequently acquire any further responsive information or documents called for by these requests, you should promptly furnish such information or documents to the undersigned counsel.

3. **Objections.** If you have a good-faith objection to any of these Requests, or any part thereof, the specific nature of the objection and whether it applies to the entire Request or to a certain portion thereof shall be clearly stated. If there is an objection to any part of a Request, then the part or parts objected to should be indicated and documents responsive to the remaining unobjectionable parts should be provided.

4. **Language.** The use of the singular form of any word includes the plural and vice versa. Reference to one gender includes the other gender. The word “all” means any and all. The word “including” means “including without limitation.”

5. **Time Period.** Unless otherwise indicated, these Requests cover the time period from January 1, 2015, until the present.

#### **DEFINITIONS**

1. **“2015 Bechtel Report.”** The term “2015 Bechtel Report” is used herein to refer to the draft “Project Assessment Report” regarding the V.C. Summer Nuclear Generating Station Units 2 & 3, which was written by Bechtel and dated November 9, 2015.

2. **“2016 Bechtel Report.”** The term “2016 Bechtel Report” is used herein to refer to the “Project Assessment Report” regarding the V.C. Summer Nuclear Generating Station Units 2 & 3, which was written by Bechtel and dated February 5, 2016.

3. **“2016 NND Update Docket.”** The term “2016 NND Update Docket” is used herein to refer to the proceeding before the Public Service Commission of South Carolina

(“Commission”) pursuant to Docket No. 2016-223-E, which was initiated on May 26, 2016, by SCE&G’s filing of its “Petition of South Carolina Electric & Gas Company for Updates and Revisions to Schedules Related to the Construction of a Nuclear Base Load Generation Facility at Jenkinsville, South Carolina.”

4. “Act 258” The term “Act 258” is used to refer to Act 258 of 2018 and Act 285 of the General Assembly of the State of South Carolina as well as the predecessor bills considered in arriving those acts, including without limitation. H. 4375 and S. 954.

5. “**Bechtel.**” The term “Bechtel” is used herein to refer to the Bechtel Power Corporation, as well as all of its predecessors, subsidiaries, related entities, agents, directors, employees, officers, and representatives.

6. “**BLRA.**” The term “BLRA” is used herein to refer to the Base Load Review Act

7. “**CB&I.**” The term “CB&I” is used herein to refer to Chicago Bridge & Iron Company, as well as all of its predecessors, subsidiaries, related entities, agents, directors, employees, officers, and representatives.

8. “**Central Electric.**” The term “Central Electric” is used herein to refer to Central Electric Cooperative, Inc. as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

9. “**Clean Power Plan.**” The term “Clean Power Plan is used herein to refer to the EPA’s Clean Power Plan rule, 80 Fed. Reg. 64,662, and the plan developed by DHEC for South Carolina pursuant to that rule.

10. “**Communication.**” The word “communication” is used herein to refer to any transmission or exchange of information, whether orally, electronically, or in writing, including,

without limitation, any conversations, memoranda, telephone calls, telegraphs, telexes, telecopiers, facsimiles, e-mails, cables, or any other mediums of transmission.

11. **“Consortium.”** The term “Consortium” is used herein to refer to the association of companies, led by partners Westinghouse and CB&I, that undertook construction responsibilities with respect to the NND Project.

12. **“Describe,” “Description,” “Summarize,” or “Summary.”** The words “describe,” “description,” “summarize,” and “summary,” when used with respect to any act, negotiation, practice, process, occurrence, occasion, transaction, incident, or course of conduct, means to provide the following information: (i) the time and place thereof; (ii) a chronological account setting forth each element thereof, what such element consisted of, and what transpired as a result thereof; and (iii) the identity of each person involved.

13. **“DHEC.”** The term “DHEC” is used herein to refer to the South Carolina Department of Health and Environmental Control, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

14. **“Document” or “Documents.”** The words “document” and “documents” are used herein in the most comprehensive and inclusive sense permitted by the regulations of the Commission and Rule 34 of the South Carolina Rules of Civil Procedure, and therefore include, but are not limited to, all forms of recorded information in your actual or constructive possession, custody, or control, whether handwritten, typed, printed, recorded, or stored on computer or personal storage devices, diskettes, videotapes, audio tapes, or photographic film, as well as electronically stored information and data compilations. The terms “document” and “documents” also include any drafts or versions thereof, and all copies on which any mark, alteration, writing, attachment, or any other change from the original appears. By way of

example and not limitation, the terms “document” and “documents” include: letters, correspondence, memoranda, e-mail and other electronic communications, voice-mail recordings, facsimile or telefax transmissions, telex or telegrams, film or photographic prints, video or audio recordings, blueprints, drawings, charts, specimens, models, word processing files, PowerPoint files, spreadsheets, images, metadata, programs, databases, and data compilations.

15. **“ECSC” and “Electric Cooperatives.”** The terms “ECSC” and “Electric Cooperatives” are used herein to refer to the Electric Cooperatives of South Carolina, Inc. as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

16. **“Energy Advisory Council.”** The term “Energy Advisory Council” is used herein to refer to the Energy Advisory Council in the South Carolina General Assembly, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

17. **“EPC Contract.”** The term “EPC Contract” is used herein to refer to that Engineering, Procurement, and Construction Agreement entered into by and between SCE&G, Santee Cooper, and the Consortium on or about May 23, 2008 in connection with the NND Project, as well as all subsequent amendments and alterations made thereto.

18. **“EPA.”** The term “EPA” is used herein to refer to the United States Environmental Protection Agency, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

19. **“Friends of the Earth.”** The term “Friends of the Earth” is used herein to refer to that organization commonly referred to as Friends of the Earth, which filed a complaint with

the Commission against SCE&G on June 22, 2017, thereby initiating Docket No. 2017-207-E, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

20. **“Identify.”** The word “identify,” when used with respect to a document, shall mean to state with respect thereto, to the extent known: (i) its name or title; (ii) the nature and substance of the document with sufficient particularity to enable it to be identified; (iii) the date of preparation; and (iv) the author(s), addressee(s), and recipient(s). When used with respect to a person, the word “identify” shall mean to state with respect thereto, to the extent known: (i) his or her name; (ii) if a natural person, his or her last-known residential address, telephone number, and e-mail address; and (iii) if a business organization, its last-known complete address and telephone number. With respect to a communication, the word “identify” shall mean to state with respect thereto, to the extent known: (i) the date and place thereof; (ii) the type of communication (*e.g.*, in-person conversation, e-mail, letter, telephone conversation); (iii) the name, business address, job title, and responsibilities of each person who participated therein, or witnessed or heard any part thereof; (iv) the substance of what was said by each person who participated therein; and (v) the identity of all documents relating thereto.

21. **“LCI Committee.”** The term “LCI Committee” is used herein to refer to the Labor, Commerce & Industry Committee in the South Carolina General Assembly, as well as all of its predecessors, subsidiaries, related entities, agents, attorneys, directors, employees, officers, members, and representatives.

22. **“Merger Approval Case.”** The term “Merger Approval Case” is used herein to refer to the proceedings before the Commission in Docket No. 2017-370-E, which were initiated