

Jeffrey B. Archie  
Vice President, Nuclear Operations  
803.345.4214



April 1, 2005

U. S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Dear Sir / Madam:

Subject: VIRGIL C. SUMMER NUCLEAR STATION (VCSNS)  
DOCKET NO. 50/395  
OPERATING LICENSE NO. NPF-12  
GUARANTEE OF PAYMENT OF DEFERRED PREMIUMS ANNUAL  
10CFR140.21(e) REPORT

In accordance with 10CFR140.21(e), South Carolina Electric & Gas Company (SCE&G), acting for itself and as agent for South Carolina Public Service Authority, is hereby submitting the required 2004 actual and 2005 projected cash flow statements.

Portions of the 2005 cash flow information are considered company confidential, and as such we request that it be withheld from public disclosure pursuant to 10CFR2.790(b)(1). The affidavit to support this request is provided as Attachment 1. Proprietary and non-proprietary versions of the cash flow information are provided by Attachment 2 and Attachment 3 respectively.

Should you have any questions, please contact Mrs. Donna Railey at (803) 345-4107.

Very truly yours,

Jeffrey B. Archie

DWR/JBA/dr  
Attachments (3)

1. SCE&G Affidavit to Request Withholding of Proprietary Information from Public Disclosure
2. SCE&G's 2004 Actual Cash Flow and 2005 Projected Cash Flow (Proprietary Version)
3. SCE&G's 2004 Actual Cash Flow and 2005 Projected Cash Flow (Non-Proprietary Version)

c: N. O. Lorick  
S. A. Byrne  
N. S. Carns  
T. G. Eppink (without attachments)  
R. J. White  
W. D. Travers  
K. R. Cotton

NRC Resident Inspector  
Winston & Strawn  
NSRC  
RTS (L-99-0359)  
File (818.02-4, RR 8175)  
DMS (RC-05-0053)

4001

**Attachment 2 Contains SCE&G Proprietary Information**

**UNITED STATES NUCLEAR REGULATORY COMMISSION**

**SOUTH CAROLINA ELECTRIC & GAS COMPANY                      OPERATING LICENSE NO. NPF-12**

**VIRGIL C. SUMMER NUCLEAR STATION    DOCKET NO. 50/395**

**Request to Withhold Proprietary Information from Public Disclosure**

South Carolina Electric & Gas Company, a South Carolina corporation, hereby requests that Attachment 2 to the letter entitled "Guarantee of Payment of Deferred Premiums" dated April 1, 2005, be withheld from public disclosure due to its proprietary nature. The details of this request are provided in the following affidavit:

**AFFIDAVIT**

I, Jeffrey B. Archie, being duly sworn, depose and state as follows:

- (1) I am Vice President, Nuclear Operations, South Carolina Electric & Gas Company (SCE&G) and have been delegated the function of reviewing the information described in paragraph (2) which is sought to be withheld, and have been authorized to apply for its withholding.
- (2) The information sought to be withheld consists of portions of the 2005 Projected Cash Flow that is included in Attachment 2 to SCE&G's April 1, 2005 letter to the NRC entitled "Guarantee of Payment of Deferred Premiums". Attachment 2, a one-page document, has the words "SCE&G Proprietary Information" on the bottom of the page.
- (3) In making this application for withholding of proprietary information of which it is the owner, SCE&G relies upon the exemption from disclosure set forth in the NRC regulation 10 CFR 2.790(b)(1) for confidential financial information.
- (4) Justification for the request for withholding from public disclosure is provided by addressing the five items identified in 10 CFR 2.790(b)(4).

To the best of my knowledge and belief:

- a. This information is considered company confidential and has been held in confidence by SCE&G.
- b. This information is of the type customarily held in confidence by SCE&G and the rationale basis is that it would provide an unfair advantage to competitors if it were disclosed.

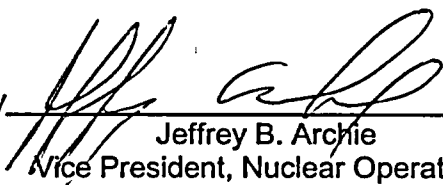
- c. This information is transmitted in confidence to the NRC and the purpose of this request is to maintain its confidentiality.
- d. The 2005 projected cash flow information is not available from public sources.
- e. Public disclosure of the information sought to be withheld is likely to cause harm to SCE&G's competitive position and reduce the availability of profit-making opportunities.

This letter contains no restricted or other defense information.

I certify under penalty of perjury that the foregoing is true and correct.

SOUTH CAROLINA ELECTRIC & GAS COMPANY

4/1/05  
\_\_\_\_\_  
Executed on

By   
\_\_\_\_\_  
Jeffrey B. Archie  
Vice President, Nuclear Operations

SOUTH CAROLINA ELECTRIC & GAS COMPANY  
 INTERNAL CASH FLOW PROJECTION  
 FOR V. C. SUMMER NUCLEAR POWER STATION  
 Excludes SC Generating Company

(MILLIONS OF DOLLARS)

	PRIOR YEAR 2004 ACTUAL TOTAL	PROJECTION YEAR 2005 TOTAL
NET INCOME AFTER TAXES	\$ 233	Withheld from public disclosure per Affidavit
LESS DIVIDENDS PAID	\$ (151)	
RETAINED EARNINGS	\$ 82	
ADJUSTMENTS		
DEPRECIATION AND AMORTIZATION	\$ 233	
DEFERRED INCOME TAXES AND INVESTMENT TAX CREDITS	\$ 29	
ALLOWANCE FOR FUNDS USED DURING CONSTRUCTION	\$ (22)	
TOTAL ADJUSTMENTS	\$ 240	
INTERNAL CASH FLOW	\$ 322	
AVERAGE QUARTERLY CASH FLOW	\$ 81	

Source: 2004 10K and 2005 Rating Agency Forecast (Raty205).

**NON-PROPRIETARY VERSION**