

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2008-196-E**

IN RE: Combined Application of South Carolina ) Electric and Gas Company for a Certificate) ) of Environmental Compatibility and Public) ) Convenience and Necessity and for a Base) ) Load Review Order for the Construction ) ) and Operation of a Nuclear Facility in ) ) Jenkinsville, South Carolina ) ) _____ )	<b>SOUTH CAROLINA OFFICE OF REGULATORY STAFF'S FIFTH CONTINUING "CHG" AUDIT INFORMATION REQUEST</b>
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**TO: BELTON T. ZEIGLER, K. CHAD BURGESS, AND MITCHELL WILLOUGHBY, ATTORNEYS FOR SOUTH CAROLINA ELECTRIC & GAS COMPANY:**

The South Carolina Office of Regulatory Staff ("ORS") hereby requests, pursuant to S.C. Code Ann. § 58-27-1570 (Supp. 2007) and as directed by the South Carolina Office of Regulatory Staff under S.C. Code Ann. § 58-27-40 (Supp. 2007), that South Carolina Electric & Gas Company (hereafter referred to as "SCE&G" or "the Company") provide responses in writing and under oath and serve the undersigned within ten (10) days after service of this request to ORS and CHG as set forth below in item VIII. If you are unable to respond to any of the audit 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, you may attach to your responses a copy of the document and identify the person responsible for 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.

**IT IS THEREFORE REQUESTED:**

- I. That all information requested below, unless otherwise specified, shall be limited to Company's South Carolina Electric Retail Operations in this docket or other period identified in the question.
- II. That all information shall be provided to ORS in the format requested.
- III. That all responses to the audit requests below be labeled using the same numbers as used herein.
- IV. That the requested information be punched for 3-ring binders with numbered tabs between each question.
- V. That if information requested is found in other places or other exhibits, reference shall not be made to those; instead, that the information be reproduced and placed in the audit request in the appropriate numerical sequence.
- VI. That any inquiries or communications relating to questions concerning clarification of the information requested below should be directed to John W. Flitter or Jay R. Jashinsky, of ORS.
- VII. That this entire list of questions be reproduced and included in front of each set of responses.
- VIII. That each question be reproduced and placed in front of each response provided. That unless otherwise specified, the Company provide six (6) paper copies of responses to ORS at 1441 Main Street, Suite 300, Columbia, SC 29201 and four

(4) paper copies of responses to CHG with attention to Mark Crisp, Senior Consultant at C.H. Guernsey & Company at 1100 Circle 75 Parkway, Suite 950, Atlanta, GA 30339. In addition and if technically feasible, it is requested that the Company provide one (1) electronic version of the responses.

- IX. That all exhibits be reduced or expanded to 8 ½" x 11" format, where practical.
- X. If the response to any request is that the information requested is not currently available, please state when the information requested will be available and provided to the ORS.
- XI. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This audit request shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.
- XIV. Each answer should incorporate the requested information for South Carolina Generating Company, Inc. ("GENCO"), where applicable.

**REQUESTS:**

The following questions concern the pre-filed direct testimony of Mr. Joseph Lynch:

- CHG-5-1 Please provide all information supporting Mr. Lynch's claim on page 12, lines 1-3 that "... in California on the peak day of July 24, 2006, 2,500 MWs of possible wind capacity was only able to produce 255 MWs of power ...."
- CHG-5-2 Please provide all information supporting Mr. Lynch's claim on page 12, lines 4-6 that "... in Texas on February 26, 2008, the wind abruptly stopped and, just as abruptly, the Electric Reliability Council of Texas ("ERCOT") lost 1,700 MWs of generation."
- CHG-5-3 Please provide all reports, analyses, memos, studies and other information that support Mr. Lynch's claim at page 12, lines 9-12 that "... about 90% of the capacity from a wind farm is typically backed up with some other form of generation ...."

CHG-5-4 Please provide all results, all data utilized, all spreadsheets and all reports concerning the additional studies on additional DSM measures, described by Mr. Lynch on pages 27-28 of his direct testimony.

CHG-5-5 When developing SCE&G's annual Integrated Resource Plan, please explain whether a comparison is made between potential DSM measures to potential supply-side resources. If not, please explain why.

The following question concerns the pre-filed direct testimony of Mr. David Pickles

CHG-5-6 Please provide all information supporting Mr. Pickle's opinion that "... DSM programs will not eliminate the need for the plants." (page 8, lines 17-19)

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