

STATE OF SOUTH CAROLINA

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

In Re:)
)
Joint Application of South Carolina)
Public Service Authority and)
Dominion Energy South Carolina,)
Inc. for a Certificate of)
Environmental Compatibility and)
Public Convenience and Necessity for) **Docket No. 2025-323-E**
the Construction and Operation of an)
Advanced Class Combined Cycle)
Generating Plant and Associated)
Facilities in Colleton County, South)
Carolina, Pursuant to S.C. Code Ann.)
§ 58-33-10 et. seq.)
)

**DIRECT TESTIMONY OF LUCY METZ
ON BEHALF OF SIERRA CLUB**

PUBLIC VERSION

February 17, 2026

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1. INTRODUCTION AND PURPOSE OF TESTIMONY

1 **Q Please state your name and occupation.**

2 **A** My name is Lucy Metz. I am a Senior Associate at Synapse Energy Economics,
3 Inc. (Synapse). My business address is 485 Massachusetts Avenue, Suite 3,
4 Cambridge, Massachusetts 02139.

5 **Q Please describe Synapse Energy Economics.**

6 **A** Synapse is a research and consulting firm specializing in energy and
7 environmental issues, including electric generation, transmission and distribution
8 system reliability, ratemaking and rate design, electric industry restructuring and
9 market power, electricity market prices, stranded costs, efficiency, renewable
10 energy, future of gas utilities planning, environmental quality, and nuclear power.

11 Synapse's clients include state consumer advocates, public utilities commission
12 staff, attorneys general, environmental organizations, federal government
13 agencies, and utilities.

14 **Q Please summarize your work experience and educational background.**

15 **A** At Synapse, I conduct analysis and write publications on a variety of topics
16 related to power plant economics and integrated resource planning. I regularly
17 support the development of comments and testimony in litigated dockets across
18 the country, including performing analyses of electric power systems using
19 industry-standard models such as EnCompass and spreadsheet tools. I recently
20 sponsored testimony before the public service commissions of Georgia, Kansas,
21 North Carolina, and Wisconsin.

1 I hold a Bachelor of Science in Engineering Science from Smith College. A copy
2 of my current resume is attached as Exhibit LM-1.

3 **Q On whose behalf are you testifying in this case?**

4 **A** I am testifying on behalf of the Sierra Club.

5 **Q Have you previously testified before the Public Service Commission of South**
6 **Carolina (“Commission”)?**

7 **A** No, I have not previously testified before this Commission.

8 **Q What is the purpose of your testimony in this proceeding?**

9 **A** In my testimony, I assess whether the South Carolina Public Service Authority
10 (“Santee Cooper”) and Dominion Energy South Carolina (“DESC,” and together
11 with Santee Cooper, the “Joint Applicants”) have demonstrated that the full
12 capacity of the proposed Canadys combined-cycle plant (“Canadys CC”) is
13 needed. I assess how the Joint Applicants’ near-term resource plans and cost
14 projections for the Canadys CC have changed over time, and I evaluate the extent
15 to which prospective large-load customers are driving the claimed need for this
16 facility. I also assess whether approval of the Canadys CC should be contingent
17 on a firm commitment to retire the Winyah, Wateree, and Williams coal plants.
18 Next, I discuss the risks of continued investment in fossil fuel resources and the
19 benefits of replacing a portion of the Canadys CC’s capacity with clean energy
20 resources. Finally, I suggest actions the Commission could take to protect
21 ratepayers from future rate increases associated with the Canadys CC and other
22 resources that are constructed to serve prospective large-load customer additions.

1 **Q How is your testimony structured?**

2 **A** In Section 2, I summarize my findings and recommendations for the Commission.

3 In Section 3, I describe the Joint Applicants' requests in this docket related to
4 obtaining a Certificate of Environmental Compatibility and Public Convenience
5 and Necessity ("CECPCN") for the Canadys CC.

6 In Section 4, I assess the escalation of gas turbine costs since the Joint Applicants
7 started planning the Canadys CC, and I describe how the Joint Applicants' near-
8 term resource plans have shifted to rely more on fossil fuels over time.

9 In Section 5, I demonstrate that removing speculative large load from the resource
10 procurement forecast would allow the Joint Applicants to use the Canadys CC as
11 replacement capacity for the aging Winyah, Wateree, and Williams coal plants.

12 In Section 6, I explain the risks associated with gas CC buildout and the continued
13 operation of legacy coal plants. I recommend that the Joint Applicants study
14 whether a portion of the Canadys CC capacity could be replaced with battery
15 storage paired with renewables at lower cost and risk to ratepayers.

16 In Section 7, I recommend measures the Joint Applicants could take to protect
17 their existing ratepayers from cost-shifting associated with prospective large-load
18 customers.

19 **Q What documents do you rely upon for your analysis, findings, and**
20 **observations?**

21 **A** My analysis relies primarily upon the workpapers, exhibits, and discovery
22 responses provided by the Joint Applicants, as well as publicly available data.

1 Q Are you sponsoring any exhibits?

2 A Yes. I am sponsoring the following exhibits:

Exhibit	Description of Exhibit	Confidentiality
LM-1	Resume of Lucy Metz	Public
LM-2	DESC Response to ORS Data Request No. 1-30	Public
LM-3	DESC Response to ORS Data Request No. 1-31, "CONFIDENTIAL JOA Schedule 3.02 - Project Budget (CONFIDENTIAL).pdf."	Confidential
LM-4	DESC Response to Sierra Club Data Request No. 1-15	Public
LM-5	DESC Response to Sierra Club Data Request No. 1-08	Public
LM-6	Santee Cooper Response to CCL/SACE Data Request No. 2-4	Public
LM-7	DESC Response to CCL/SACE Data Request No. 1-65	Public
LM-8	DESC Response to Sierra Club Data Request No. 1-34, "DESC Response to Sierra Club 1-34.xlsx"	Public
LM-9	DESC Response to CCL/SACE Data Request No. 1-86	Public
LM-10	DESC Response to CCL/SACE Data Request No. 2-24	Confidential
LM-11	DESC Response to ORS Data Request No. 1-35; Santee Cooper Response to ORS Data Request No. 1-35	Public
LM-12	Santee Cooper Response to Sierra Club Data Request No. 1-16	Public
LM-13	DESC Response to Sierra Club Data Request No. 1-07 in DESC 2025 IRP Update	Public
LM-14	DESC Response to Sierra Club Data Request No. 1-08 in DESC 2025 IRP Update	Public

Exhibit	Description of Exhibit	Confidentiality
LM-15	Santee Cooper Response to Sierra Club Data Request No. 2-31c in Santee Cooper 2025 IRP Update	Public

2. FINDINGS AND RECOMMENDATIONS

1 **Q Please summarize your findings.**

2 **A My primary findings are the following:**

- 3 1. The per-kilowatt (kW) costs of the Canadys CC have escalated
- 4 substantially since the Joint Applicants began to consider constructing a
- 5 jointly owned resource.
- 6 2. Santee Cooper is currently planning to procure enough resources to serve
- 7 its full resource planning load, even though 539 MW of its prospective
- 8 large load—more than a third of Santee Cooper’s projected load growth
- 9 through 2033—is not backed by signed contracts.
- 10 3. The Joint Applicants failed to demonstrate that the full capacity of the
- 11 Canadys CC is needed to serve load growth, and neither utility has made a
- 12 firm commitment to retire any of its remaining coal plants when the
- 13 Canadys CC comes online.
- 14 4. Construction of the Canadys CC, in conjunction with the Joint Applicants’
- 15 continued reliance on legacy coal assets, [REDACTED]
- 16 [REDACTED] and will expose ratepayers to a variety of risks, including
- 17 fuel price volatility and environmental compliance costs.
- 18 5. The Canadys CC is still in an early stage of contracting and relies on
- 19 multiple gas pipeline and transmission projects. These interdependencies
- 20 create risks of project cost escalation and delays in the planned
- 21 commercial operation date.

- 1 6. Clean energy and capacity resources such as battery storage, solar, and
2 wind would shield ratepayers from future cost risks and can be procured
3 incrementally, allowing the Joint Applicants to build new resources as
4 load materializes, adapt to changing market conditions, and avoid costly
5 expenditures on supporting gas pipeline infrastructure.
- 6 7. Santee Cooper’s largest customer, Central Electric Cooperative
7 (“Central”), does not currently have a large-load tariff in place, even
8 though it projects substantial load growth from large-load customers with
9 signed contracts for service. DESC also does not currently have a large-
10 load tariff.

11 **Q Please summarize your recommendations.**

12 **A Based on my findings, I offer the following recommendations:**

- 13 1. Santee Cooper should procure resources to serve only large-load
14 customers with signed contracts for electric service. This will help Santee
15 Cooper avoid overbuilding and enable it to use new resources such as the
16 Canadys CC as replacement capacity for retiring coal plants.
- 17 2. The Commission should make approval of the Canadys CC contingent on
18 a firm commitment from Santee Cooper to retire the Winyah coal plant
19 and from DESC to retire the Wateree and Williams coal plants as soon as
20 the Canadys CC comes online.
- 21 3. Before approving a CECPCN for the Canadys CC, the Commission should
22 instruct Santee Cooper and DESC to study whether a portion of the
23 proposed Canadys CC capacity could be replaced with battery storage
24 paired with renewables, at lower cost and risk to ratepayers.
- 25 4. For the portion of the Canadys CC’s capacity the Commission does
26 approve, it should cap project costs at the total amount the Joint

1 Applicants currently estimate and require a separate demonstration of
2 prudence for any expenditures above the cost cap.
3 5. The Commission should consider large load tariffs—which commit large
4 load customers to paying their full incremental cost of service before new
5 assets are built to serve them—as a measure for DESC to protect existing
6 utility customers from the costs associated with new large load customers,
7 and a measure that co-ops such as Central can similarly use to protect
8 existing co-op customers.

9 **3. SUMMARY OF THE JOINT APPLICANTS’ PROPOSAL**

10 **Q What are the Joint Applicants requesting in this docket?**

11 **A** The Joint Applicants seek a CECPCN to construct a 2,180 megawatt (MW)
12 combined-cycle gas plant (CC) at the Canadys site.¹ The proposed project
13 configuration consists of three independent 1x1 CC units² that would be fully
14 placed in commercial service by mid-2033,³ with a planned operating life of 36
15 years (through 2069).⁴ Santee Cooper and DESC would each have a 50 percent
16 ownership share of the plant.⁵

¹ Dominion Energy S.C. (DESC) and S.C. Pub. Serv. Auth., Joint Application for Certificate of Environmental Compatibility and Public Convenience and Necessity, S.C. Pub. Serv. Comm’n Docket No. 2025-323-E at 2 (Dec. 15, 2025) [hereinafter “Application”].

² *Id.* at 3.

³ *Id.* at 13.

⁴ DESC Response to South Carolina Office of Regulatory Staff (“ORS”) Data Request No. 1-30 (attached as Exhibit LM-2).

⁵ Application at 13.

1 **Q What is the Joint Applicants’ estimate for the cost of the Canadys CC?**

2 **A** As detailed in Table 1, the Joint Applicants estimate that the total cost of the
3 Canadys CC will be \$5 billion (2025\$), not including construction financing
4 costs.⁶ This is equivalent to \$2,294 per kW. This estimate includes [REDACTED]
5 for transmission facilities at the Canadys site, including construction of the Edisto
6 River Switchyard and associated infrastructure.⁷ It also includes [REDACTED] for
7 on-site gas infrastructure.⁸

8 The \$5 billion cost estimate does not include the cost of transmission network
9 upgrades, which will cost approximately \$328 million (2026\$) for DESC’s
10 system⁹ and \$275–350 million for Santee Cooper’s system.¹⁰ It also does not
11 include the costs of the three separate gas pipeline projects that are required to
12 serve the facility.¹¹ While the Joint Applications will not be responsible for the
13 full cost of the three pipelines—estimated at \$5.62 billion¹²—they are the
14 “Anchor Shipper”¹³ and will pay annual fixed costs to obtain firm gas service at

⁶ *Id.*

⁷ Confidential DESC Response to ORS Data Request No. 1-31, “CONFIDENTIAL JOA Schedule 3.02 - Project Budget (CONFIDENTIAL).pdf.” (attached as Confidential Exhibit LM-3).

⁸ *Id.*

⁹ DESC Response to Sierra Club Data Request No. 1-15 (attached as Exhibit LM-4).

¹⁰ Direct Testimony of Christopher M. Wagner on Behalf of the South Carolina Public Service Authority at 18-19 (Dec. 15, 2025) [hereinafter “Wagner Direct”].

¹¹ The three projects are the Mississippi Crossing Project (MXP) to connect the existing Southern Natural Gas Company (SNG) line to the gas fields in Texas and the gulf region, South System Expansion 4 (SSE4) to expand capacity at certain points on SNG existing network, and the Bridge project to connect SNG network to the Canady CC plant.

¹² Direct Testimony of M. Shaun Randall, P.E. on Behalf of Dominion Energy South Carolina, Inc. at 6-7 (Dec. 15, 2025) [hereinafter “Randall Direct”].

¹³ An Anchor Shipper gets priority access to the pipeline.

1 the facility. The annual fixed costs are estimated at [REDACTED] per year once the
 2 plant is operating at full capacity.¹⁴ These are costs that the Joint Applicants will
 3 pay each year over the 36-year lifetime of the plant and do not include the cost of
 4 the fuel itself.

5 **Table 1. Project budget for proposed Canadys CC (2025\$)**

Cost Category	Total Cost (\$M)	Cost per kW (\$/kW)
Project management	[REDACTED]	[REDACTED]
Equipment & materials		
Construction		
Jointly owned transmission facilities		
Jointly owned gas transmission facilities		
Other		
Contingency		
Total		

6 *Source: DESC Response to ORS Data Request No. 1-31, "CONFIDENTIAL JOA Schedule 3.02 -*
 7 *Project Budget (CONFIDENTIAL).pdf." (Exhibit LM-3). Costs do not include construction*
 8 *financing. The \$/kW costs are calculated using a capacity of 2,180 MW. Numbers do not sum*
 9 *exactly due to rounding.*

¹⁴ Santee Cooper Response to ORS Data Request No. 1-3, "1.3.6 ORS 12192025_Summary_Resources_Joint CECPCN CONFIDENTIAL.xlsx." The Company's response to ORS Data Request No. 1-3 and the associated attachments contain voluminous spreadsheet data and can be provided to the Commission and properly-authorized parties upon request. This value assumes that total firm transportation costs at the Canadys CC will be two times the estimate that Santee Cooper gives for its share of the unit.

1 **4. THE JOINT APPLICANTS’ RESOURCE COSTS AND RESOURCE PLANS HAVE SHIFTED**
2 **MULTIPLE TIMES OVER THE PAST THREE YEARS**

3 **Q When did the Joint Applicants begin considering constructing a jointly**
4 **owned CC at the Canadys site?**

5 **A** In November 2022, the Joint Applicants signed a memorandum of understanding
6 to evaluate a potential joint CC resource located at either Canadys or another
7 site.¹⁵ Santee Cooper and DESC then included the joint resource in their
8 respective 2023 Integrated Resource Plans (“IRPs”). Initially, Santee Cooper
9 planned for the resource to come online in 2031 and replace the Winyah coal
10 plant, which was scheduled to retire that year.¹⁶ DESC’s 2023 IRP showed the
11 Canadys CC coming online after the Wateree and Williams coal plants had
12 already retired at year-end 2028 and 2030, respectively.¹⁷

13 **Q How has Santee Cooper’s near-term resource plan changed since the 2023**
14 **IRP?**

15 **A** Table 2 compares Santee Cooper’s near-term resource plans in the 2023 IRP and
16 2024 and 2025 IRP Update proceedings, as well as the modeling that Santee
17 Cooper completed to support its CECPCN application in this docket. Over time,
18 Santee Cooper has delayed the retirement of Winyah, increased its planned CC

¹⁵ DESC, 2023 Integrated Resource Plan, S.C. Pub. Serv. Comm’n Docket No. 2023-9-E at 29 (Jan. 30, 2023) [hereinafter “DSEC 2023 IRP”], available at <https://dms.psc.sc.gov/Attachments/Matter/ee0417c1-e32f-47f4-a9ee-fd3dc0725186>.

¹⁶ Santee Cooper, 2023 Integrated Resource Plan, S.C. Pub. Serv. Comm’n Docket No. 2023-154-E at 157 (May. 15, 2023) [hereinafter “Santee Cooper 2023 IRP”], available at <https://www.santeecooper.com/About/Integrated-Resource-Plan/presentations/Santee-Cooper-2025-IRP-Update.pdf>.

¹⁷ DESC 2023 IRP at 13.

1 buildout, and reduced its planned solar resource additions. Santee Cooper initially
2 planned to retire Winyah no later than the end of 2028 to avoid compliance costs
3 under the 2020 federal Effluent Limitation Guidelines (“ELG”) Rules.¹⁸ Santee
4 Cooper then delayed the planned retirement of Winyah to January 1, 2031, in part
5 to give it time to bring the Canadys CC online.¹⁹ This choice resulted in Santee
6 Cooper incurring significant ELG compliance costs at Winyah.²⁰ Santee Cooper
7 has now extended the initial two-year delay in Winyah’s retirement to six years in
8 its 2025 IRP Update and the modeling for this docket.²¹ It now plans to retire
9 Winyah in 2035, a year and a half after the Canadys CC comes online in mid-
10 2033.²² It also plans to bring an additional 1,296 MW CC online in 2035.²³ At the
11 same time as Santee Cooper increased its planned gas buildout, it dramatically
12 decreased its planned solar additions from 2,400 MW in the 2023 IRP to 2,000
13 MW in the 2024 IRP Update, only 300 MW in the 2025 IRP Update, and 0 MW
14 in the modeling for this docket.²⁴

¹⁸ Santee Cooper 2023 IRP at 66.

¹⁹ *Id.*

²⁰ *Id.*

²¹ Santee Cooper, Integrated Resource Plan 2025 Update, S.C. Pub. Serv. Comm’n Docket No. 2025-18-E at 13 (Nov. 21, 2025) [hereinafter “Santee Cooper 2025 IRP Update”], available at <https://www.santeecooper.com/About/Integrated-Resource-Plan/presentations/Santee-Cooper-2025-IRP-Update.pdf>.

²² Direct Testimony of Franklin Clay Settle on Behalf of South Carolina Public Service Authority at 44 (Dec. 15, 2025) [hereinafter “Settle Direct”].

²³ *Id.*

²⁴ Santee Cooper 2023 IRP at 157; Santee Cooper, Integrated Resource Plan 2024 Update, S.C. Pub. Serv. Comm’n Docket No. 2024-18-E at 83 (Sept. 16, 2024) [hereinafter “Santee Cooper 2024 IRP Update”], available at <https://www.santeecooper.com/About/Integrated-Resource-Plan/Reports-and-Materials/Santee-Cooper-2024-IRP-Update.pdf>; Santee Cooper 2025 IRP Update at 9; Settle Direct at 44.

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Table 2. Near-term (2026–2035) resource additions in Santee Cooper IRP and IRP Update preferred portfolios

IRP	CC and Combustion Turbine (CT) additions	Winyah retirement	Other resource additions
2023 IRP	1,020 MW CC in 2031, 112 MW peaking resource in 2034	Year-start 2031	2,400 MW solar and 200 MW battery storage (“BESS”)
2024 IRP Update	1,020 MW CC in 2031, 447 MW CT in 2031	Year-start 2031	2,000 MW solar, 250 MW BESS, 500 MW wind
2025 IRP Update	998 MW CC in 2032–2033 (Canadys CC), 1,296 MW CC in 2035	Year-start 2035	300 MW solar, 250 MW BESS, 107 MW reciprocating internal combustion engine
2025 CECPCN modeling	1,098 MW in 2033 (Canadys CC), 1,296 MW CC in 2035	Year-start 2035	0 MW solar, 450 MW BESS, 108 MW aeroderivative

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Sources: Santee Cooper 2023 IRP at 157; Santee Cooper 2024 IRP Update at 83; Santee Cooper 2025 IRP Update at 9; Settle Direct at 44.

5 **Q**

How have DESC’s planned resource additions changed over time?

6 **A**

Similar to Santee Cooper, DESC’s resource plans show a trend towards delayed coal retirement, increased near-term CC buildout, and reduced solar and BESS additions (Table 3). In 2020, DESC intended to retire the Wateree and Williams coal plants by year-end 2028 to avoid ELG compliance costs.²⁵ At that time, DESC planned to add only 553 MW of CC capacity in 2028.²⁶ DESC subsequently delayed the retirement date for Williams to year-end 2030,²⁷ and

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²⁵ DESC, Modified 2020 Integrated Resource Plan, S.C. Pub. Serv. Comm’n Docket No. 2019-226-E at 7 (Feb. 19, 2021) [hereinafter “DESC Modified 2020 IRP”], available at <https://dms.psc.sc.gov/Attachments/Matter/2ff6b38d-c8f9-4f29-8d9f-cc756de01a4e>.

²⁶ *Id.*

²⁷ DESC 2023 IRP at 13; DESC, Integrated Resource Plan 2024 Update at 10 (Mar. 28, 2024) [hereinafter “DESC 2024 IRP Update”], available at <https://dms.psc.sc.gov/Attachments/Matter/3a27d786-346f-45cd-8a5a-05471ee1cedb>.

1 then delayed both Wateree and Williams to year-end 2031.²⁸ Now, DESC states
2 that it plans to retire Wateree and Williams at year-end 2032 but may delay the
3 retirement of Williams even further to year-end 2034.²⁹ These delays have led the
4 utility to incur substantial sunk costs in ELG investments at both plants.

5 At the same time as DESC delayed its planned retirement of Wateree and
6 Williams, it nearly doubled the size of its planned near-term CC addition from
7 553 MW in the Modified 2020 IRP to its current proposal of 1,098 MW for its
8 share of the Canadys CC.³⁰ As I discuss below, DESC does not have the resource
9 need to justify this increase in project size unless DESC commits to retire
10 Wateree and Williams when the Canadys CC comes online.

²⁸ Dominion Energy South Carolina, Inc., Integrated Resource Plan 2025 IRP Update at 4 (Mar. 31, 2025) [hereinafter “DESC 2025 IRP Update”], available at <https://www.dominionenergy.com/-/media/content/about/our-company/irp/pdfs/desc-integrated-resource-plan-2025.pdf>.

²⁹ Direct Testimony of James W. Neely on Behalf of Dominion Energy South Carolina, Inc., at 13–14 [hereinafter “Neely Direct”].

³⁰ DESC Modified 2020 IRP at 7.

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Table 3. Near-term (2026–2035) resource additions in DESC IRP and IRP Update preferred portfolios

IRP	CC and CT additions	Wateree and Williams retirement	Other resource additions
Modified 2020 IRP	553 MW CC and 523 MW CT in 2028	Wateree and Williams retire year-end 2028	700 MW solar, 300 MW BESS
2023 IRP	662 MW CC in 2031	Wateree retires year-end 2028, Williams retires year-end 2030	3,000 MW solar, 800 MW BESS
2024 IRP Update	402 MW CT in 2029, 662 MW CC in 2031	Wateree retires year-end 2028, Williams retires year-end 2030	3,000 MW solar, 400 MW BESS
2025 IRP Update	998 MW CC in 2032	Wateree and Williams retire at year-end 2031	1,800 MW solar, 400 MW paired solar and BESS
2025 CECPCN modeling		Wateree retires year-end 2032, Williams retires year-end 2032 or 2034	

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Sources: DESC Modified 2020 IRP at 7; DESC 2023 IRP at 13; DESC 2024 IRP Update at 10; DESC 2025 IRP Update at 4; DESC Response to ORS Data Request No. 1-3, “CONFIDENTIAL Plexos Optimized – Reference BP.xlsx” and “CONFIDENTIAL Plexos Optimized – ReferenceNoGHG BP.xlsx.” Supra note 14. DESC published a 2021 IRP that had the same resource additions from 2026–2035 as the Modified 2020 IRP and included additional solar and battery storage in 2023

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Q Do either of the Joint Applicants commit to retiring coal capacity once the Canadys CC comes online?

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A No. Neither Santee Cooper nor DESC has committed to retiring any coal capacity once the Canadys CC comes online. Santee Cooper states vaguely that the plant will “help facilitate the potential future retirement of coal-fired generation,”³¹ and that the resource is necessary “regardless of the retirement date of Santee

³¹ Direct Testimony of Jimmy D. Staton on Behalf of South Carolina Public Service Authority at 17 (Dec. 15, 2025) [hereinafter “Staton Direct”].

1 Cooper’s Winyah coal plant.”³² DESC makes similarly vague statements about
2 how the Canadys CC “could potentially serve as a catalyst to accomplish a
3 portion of these [coal] retirements”³³ and “the Canadys Joint Resource is
4 foundational in supporting potential future coal plant retirements.”³⁴

5 **Q How have the Joint Applicants’ estimates of the cost of the Canadys CC**
6 **changed over time?**

7 **A** The per-kW capital costs for CC units have increased dramatically since Santee
8 Cooper and DESC began planning to develop a jointly owned resource in 2023
9 (Table 4). During this time, Santee Cooper’s estimate of the per-kW cost of the
10 Joint Facility ██████████ while DESC’s estimate increased by about ██████
11 ██████³⁵ This is partly a result of the change in planned configuration from a 2x1
12 unit in the 2023 IRP and 2024 IRP Update to the current plan of multiple 1x1
13 units, and partly due to escalating turbine prices.

³² Settle Direct at 55.

³³ Direct Testimony of W. Keller Kissam on Behalf of Dominion Energy South Carolina, Inc., at 24 (Dec. 15, 2025) [hereinafter “Kissam Direct”].

³⁴ DESC Response to Sierra Club Data Request No. 1-08 (attached as Exhibit LM-5).

³⁵ The Joint Applicants presented several versions of resource cost data in discovery and in their IRPs, but none match up with the total project cost cited in the application, which works out to \$2,294/kW. While there may be differences in dollar year of the cost, use of installed cost versus overnight capital cost, inclusion of interconnection costs or gas adders relative to the IRP values, none of those factors would account for the substantial increase in cost since the IRPs were filed.

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Table 4. Santee Cooper CC capital costs estimates since the 2023 IRP (2025\$/kW)

	2x1 H class	1x1 H class (single unit)	Canadys CC
2023 IRP	\$882	\$1,220	\$994
2024 IRP Update	\$1,366	\$1,739	\$1,366
2025 IRP Update	Not modeled	\$1,783	\$1,516
CEPCN modeling	\$1,937	\$2,415	
Percent increase since 2023 IRP	120%	98%	

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Source: Santee Cooper 2023 IRP at 98; Santee Cooper 2024 IRP at 43; Santee Cooper 2025 IRP at 50; and Santee Cooper Response to ORS Data Request No. 3-1, “1.3.7 ORS 12192025_SC_Cost and Performance Study_25Nov25.xlsx,” and “1.3.6 12192025_Summary_Resources_Joint CECPCN_CONFIDENTIAL.xlsx.” Santee Cooper initially planned for the Canadys CC to consist of a 2x1 unit paired with a 1x1 unit (2023 IRP) and then changed to a 2x1 configuration in the 2024 IRP. Starting in the 2025 IRP, it planned for the Canadys CC to consist of multiple 1x1 units, with some cost savings relative to a single 1x1 CC as a result of efficiencies of scale from constructing multiple units at the same time.

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Table 5. DESC CC capital costs estimates since 2023 IRP (2025\$/kW)

	2x1 H class	1x1 H class (single unit)	Canadys CC
2023 IRP	\$1,265	\$1,579	\$1,265
2024 IRP Update	\$1,285	\$1,638	\$1,285
2025 IRP Update	\$1,963	\$2,134	\$1,869

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Source: DESC 2023 IRP at 52; DESC 2024 IRP at 64; DESC 2025 IRP at 64; and DESC response to ORS Data Request No. 1-3, “CONFIDENTIAL 2025.20.23 – 2026 IRP-DESC Fossil Greensheet Final with AFUDC – Siting Hearing.xlsx.” DESC initially planned for the Canadys CC to have a 2x1 configuration (2023 and 2024 IRPs). Starting in the 2025 IRP, it planned for the Canadys CC to consist of multiple 1x1 units, with some cost savings relative to a single 1x1 CC as a result of efficiencies of scale from constructing multiple units at the same time.

17 **Q**

What cost trends are you seeing in the gas turbine industry more broadly?

18 **A**

Utilities across the country are currently facing increasing costs and lead times for CC and CT units. Major contributors to this overall increase include rising costs for turbines, other key equipment (e.g., generator step-up transformers), and

20

1 labor.³⁶ These cost increases are driven primarily by load growth from data
2 centers, manufacturing facilities, and electrification, which together have caused
3 surging demand from utilities for gas equipment, as well as global competition for
4 turbines and other plant components.³⁷ Globally and domestically, increased
5 demand has led to equipment backlogs and has increased the market power of the
6 three major turbine manufacturers—GE Vernova, Siemens Energy, and
7 Mitsubishi Power. Finally, the industry is experiencing a shortage of skilled labor
8 and qualified engineering, procurement, and construction (“EPC”) contractors,
9 causing additional cost increases and delays.^{38,39}

10 Figure 1 shows data from a recent survey of CC costs in U.S. utility filings. The
11 initial costs (for a unit that comes online in 2026) are markedly higher than
12 industry estimates from before the increase in turbine costs began. Costs continue
13 to increase over time, and the cost of a CC that comes online in 2031 is nearly a
14 third higher in real terms than the cost of a similar resource that comes online in
15 2026, even before including the effects of inflation. In nominal dollars (i.e.,
16 including the effects of inflation), the upward trend in the data would be even
17 more pronounced.

³⁶ GridLab, Energy Futures Group, and Halcyon. 2025. *The New Reality of Power Generation: An Analysis of Increasing Gas Turbine Costs in the U.S.*, available at <https://gridlab.org/gas-turbine-cost-report/>.

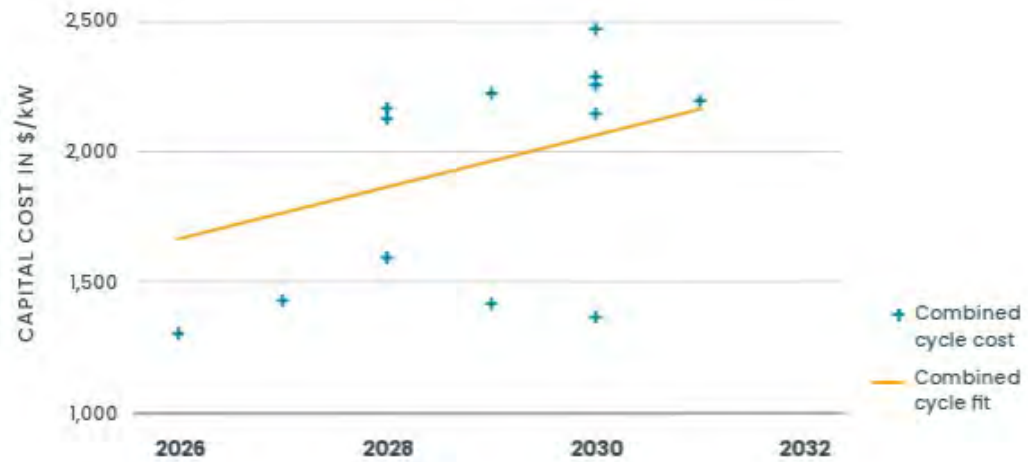
³⁷ *Id.*

³⁸ *Id.*

³⁹ Shenk, M. 2025. “Rush for US gas plants drives up costs, lead times.” *Reuters* (July 21, 2025), available at <https://www.reuters.com/business/energy/rush-us-gas-plants-drives-up-costs-lead-times-2025-07-21/>.

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Figure 1. Combined-cycle capital costs from recent utility dockets (2025\$)



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3 *Source: GridLab, Energy Futures Group, and Halcyon. 2025. The New Reality of Power*
4 *Generation: An Analysis of Increasing Gas Turbine Costs in the U.S., available at*
5 *<https://gridlab.org/gas-turbine-cost-report/>. Each blue data point represents the cost from a*
6 *recent utility docket, and the yellow line shows a linear regression fitted to the data.*

7 **Q How do the costs of the Canadys CC compare to industry benchmarks?**

8 **A** In the context of rising turbine costs nationwide, the Joint Applicants' current cost
9 estimate for the Canadys CC is aligned with industry benchmarks for a resource
10 coming online in the early 2030s. However, constructing the Canadys CC now
11 will lock ratepayers into currently elevated turbine prices, so it is particularly
12 important to ensure that the resource is right-sized to the Joint Applicants'
13 capacity needs, as I discuss in the next section.

1 **5. THE JOINT APPLICANTS SHOULD REMOVE SPECULATIVE LARGE LOAD FROM THEIR**
2 **RESOURCE PROCUREMENT PLANNING TO ALLOW NEW CAPACITY, INCLUDING THE**
3 **CANADYS CC, TO DIRECTLY REPLACE RETIRING COAL PLANTS**

4 ***i. Santee Cooper’s load projection includes prospective large-load customers***
5 ***without signed contracts for electric service, overstating the size of the***
6 ***Company’s certain capacity need over the next decade***

7 **Q What is Santee Cooper’s capacity position going forward?**

8 **A** Considering existing resources only, Santee Cooper projects that it will have a
9 resource shortfall of 290 MW starting in 2027 and increasing to 1,007 MW in
10 2033—the year that the proposed Canadys CC is scheduled to come online.⁴⁰

11 However, Santee Cooper’s calculation of its capacity shortfall [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]

15 [REDACTED]⁴¹ After including these
16 resources, the shortfall is reduced to [REDACTED] by 2033, as shown in Confidential
17 Figure 2.

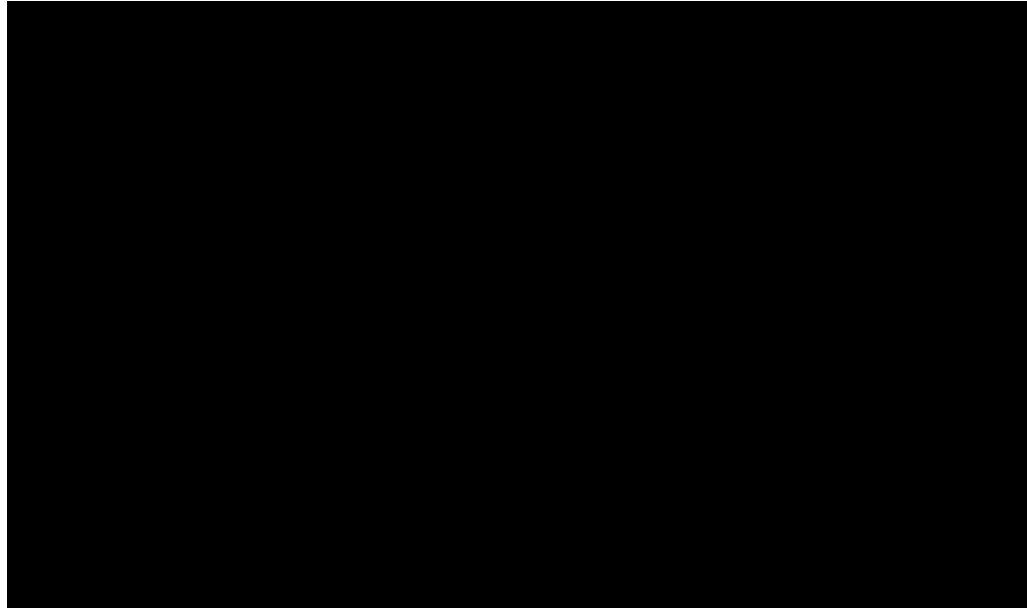
18 In the short term, Santee Cooper’s capacity shortfall is primarily a result of load
19 growth from large-load customers. In the medium term, the capacity shortfall
20 increases further when the Winyah coal plant retires in 2035, thereby removing

⁴⁰ Settle Direct at 20.

⁴¹ Santee Cooper Response to ORS Data Request No. 1-3, “1.3.2 ORS 12192025_Canadys CECPCN EnCompass Outputs_CONFIDENTIAL.xlsx” and “1.3.4 ORS 12192025 Canadys CECPCN Results Template_CONFIDENTIAL.xlsx.” *Supra* note 14.

1 1,150 MW of capacity from the Company’s portfolio. Confidential Figure 2 also
2 shows an adjusted load forecast for Santee Cooper that removes customers
3 without signed contracts for electric service, as I discuss in more detail below.

4 **Confidential Figure 2. Santee Cooper capacity position including existing and near-**
5 **term planned resources only**



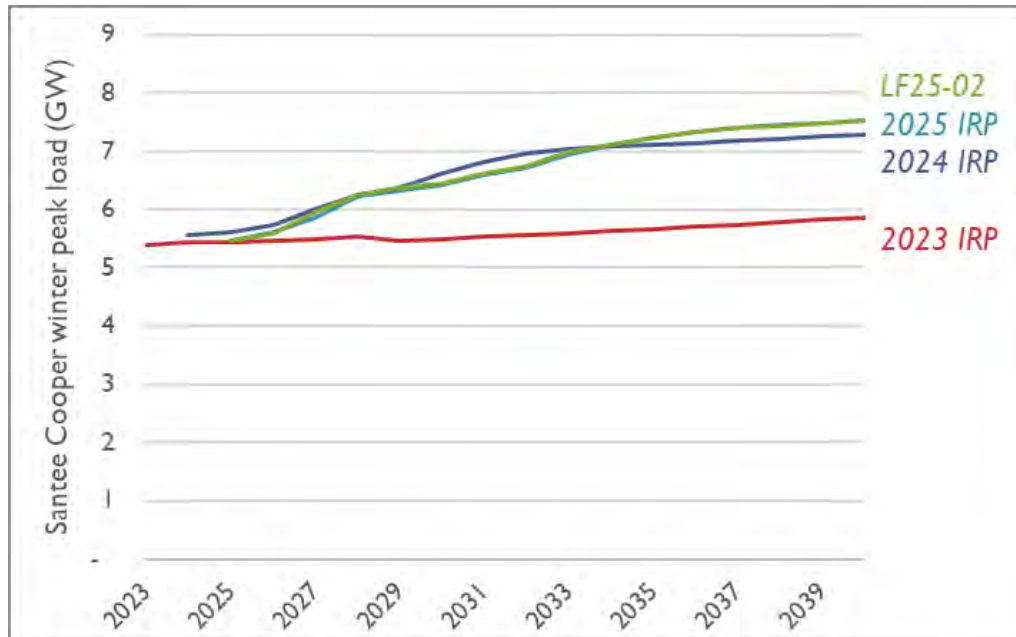
6
7 *Sources: Santee Cooper Response to ORS Data Request No. 1-3, “1.3.2 ORS 12192025_Canadys*
8 *CECPCN EnCompass Outputs_CONFIDENTIAL.xlsx,” “1.3.4 ORS 12192025 Canadys CECPCN*
9 *Results Template_CONFIDENTIAL.xlsx,” and “1.3.16 ORS 12192025 LF25-02*
10 *EnCompass.xlsx.”*

11 **Q How has prospective large load affected Santee Cooper’s resource planning**
12 **forecast since 2023?**

13 **A** Santee Cooper saw a large jump in projected load between its 2023 IRP and 2024
14 IRP Update, when it began incorporating a manual adjustment for prospective
15 large-load customers in its load forecast (Figure 3). In its most recent load
16 forecast (LF25-02), Santee Cooper projects 1.5 gigawatts (GW) of load growth

1 between 2025 and 2033.⁴² This includes 539 MW of prospective large-load
2 customers without signed contracts for electric service by 2033.⁴³

3 **Figure 3. Santee Cooper load forecasts over time**



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5 *Source: Santee Cooper 2023 IRP at 61; Santee Cooper 2024 IRP at 28; Santee Cooper 2025 IRP*
6 *at 38; and Santee Cooper Response to ORS Data Request No. 1-3, “1.3.18 ORS 12192025 Load*
7 *Forecast LF25-02 to 2025 LF Comparison.xlsx.” The LFS25-02 and 2025 IRP forecasts overlap*
8 *throughout the study period.*

9 **Q How does Santee Cooper decide how much prospective large load to include**
10 **in its resource planning forecast?**

11 **A** Santee Cooper includes large-load customers with signed contracts in its base
12 forecast.⁴⁴ It then uses a probabilistic model to project load materialization from

⁴² Santee Cooper Response to ORS Data Request No. 1-3, “1.3.18 ORS 12192025 Load Forecast LF25-02 to 2025 LF Comparison.xlsx.” *Supra* note 14.

⁴³ Santee Cooper Response to ORS Data Request No. 1-3, “1.3.16 ORS 12192025 LF25-02 EnCompass.xlsx.” *Supra* note 14.

⁴⁴ Settle Direct at 12.

1 prospective large-load customers without signed contracts.⁴⁵ The total size of the
2 large-load pipeline (the input to the probabilistic model) is approximately 3,900
3 MW.⁴⁶ The output of the model is the large-load adjustment shown in orange in
4 Figure 4. This adjustment includes speculative, uncontracted load only. By 2033,
5 there is 539 MW of uncontracted load in the forecast, rising to 711 MW by 2035
6 and 798 MW from 2037 onwards.⁴⁷

7 Santee Cooper stated in testimony that it has approximately 700 MW of large-
8 load customers with signed contracts embedded in Santee Cooper and Central's
9 base forecasts.⁴⁸ Load from Santee Cooper's direct-served residential,
10 commercial, and industrial customers—including signed large-load customers—is
11 projected to increase by only 186 MW over the next decade (2025–2034). That
12 means that a majority of large-load customers with signed contracts (at minimum,
13 514 MW out of the total 700 MW) must be located in Central's service area.
14 However, Santee Cooper does not provide a clear breakout of how much large
15 load is included in Central's load forecast each year, claiming that it does not
16 have access to this information.⁴⁹

⁴⁵ Santee Cooper 2025 IRP Update at 35.

⁴⁶ Settle Direct at 14.

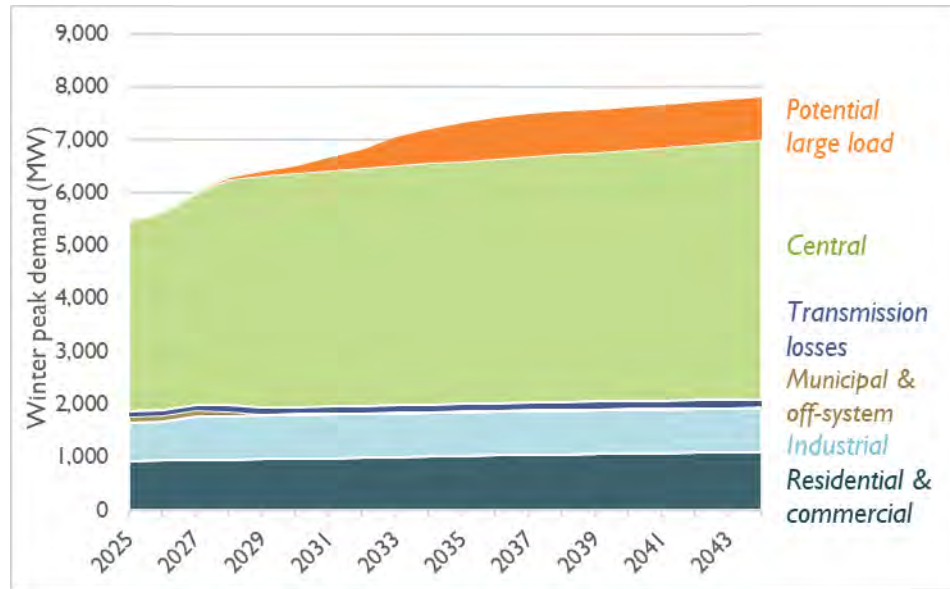
⁴⁷ Santee Cooper Response to ORS Data Request No. 1-3, "1.3.16 ORS 12192025 LF25-02 EnCompass.xlsx." *Supra* note 14.

⁴⁸ Settle Direct at 14.

⁴⁹ Santee Cooper Response to South Carolina Coastal Conservation League and Southern Alliance for Clean Energy ("CCL/SACE") Data Request No. 2-4 (attached as Exhibit LM-6).

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Figure 4. Santee Cooper load forecast by sector (LF25-02)



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Source: Santee Cooper Response to ORS Data Request No. 1-3, “1.3.16 ORS 12192025 LF25-02 EnCompass.xlsx.” The potential large-load category includes customers without signed contracts only. An additional 700 MW of load from large-load customers is embedded in the other load categories, mainly in Central’s load.

7

Q What are the risks of procuring load to serve prospective customers without signed contracts?

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A It is risky to build for uncontracted load, because these customers may never materialize. If that happens, existing ratepayers will be stuck covering the cost of resources they do not need, absent action by the Commission to protect them. There are a variety of reasons why prospective load may not ultimately materialize or may materialize more slowly than customers’ initial requests suggest. First, data center customers frequently engage in venue shopping, submitting interconnection requests in multiple utility service areas in search of the most competitive rates. As a result of venue shopping, not all project developers that succeed will choose South Carolina as their location, or one of the Joint Applicants as their service provider. Second, not all large-load projects

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1 succeed financially, and even projects that eventually move forward may be
2 delayed. Third, prospective customers may overestimate their peak load in their
3 initial requests, since the lack of financial commitment at this stage gives them
4 little incentive to forecast accurately.

5 **Q Should Santee Cooper procure resources to serve the full amount of load in**
6 **its resource planning forecast?**

7 **A** Not necessarily. While historically load forecasts for resource planning and
8 procurement have been largely the same, the pace and magnitude of load growth
9 from prospective data center customers necessitates distinguishing between the
10 two processes. A single large-load customer may add a gigawatt or more of load
11 to the system, in contrast to historical load growth from residential and small
12 industrial and commercial customers, which was more incremental.

13 The forecasts based on the probabilistic large-load results are intended to inform
14 resource *planning* and other preliminary resource procurement activities.

15 Resource *procurement* involves a higher level of financial commitment on the
16 Joint Applicants' part, as well as a request from the Joint Applicants to recover
17 costs from ratepayers. Therefore, Santee Cooper should only procure resources
18 for customers with signed contracts in place. This is consistent with DESC's
19 approach of only including customers with signed contracts in its load forecast.⁵⁰

20 Santee Cooper can use the higher load forecast that includes the probabilistic
21 large-load adjustment as a sensitivity in its IRP, but it should remove the large-
22 load adjustment in determining its immediate resource procurement needs.

⁵⁰ DESC Response to CCL/SACE Data Request No. 1-65 (attached as Exhibit LM-7).

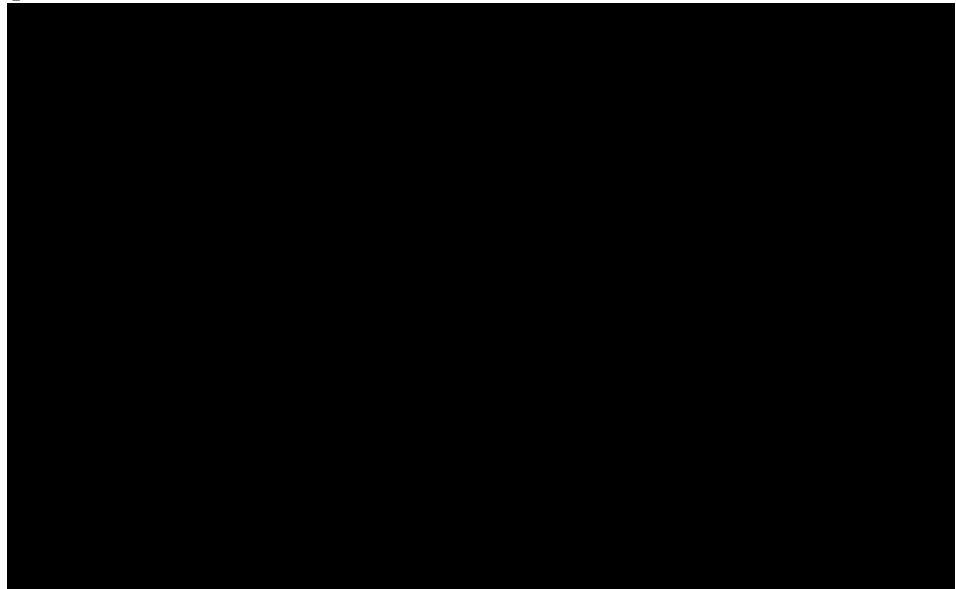
1 Critically, my recommendation is not that the Joint Applicants should turn away
2 potential business or create reliability risks. Rather, my recommendation is that
3 the Joint Applicants should right-size their capacity additions to match the true
4 pace of load materialization in South Carolina. This strategy will enhance South
5 Carolina’s competitiveness because it will minimize costs, increase transparency,
6 and ensure resources are tailored to the current needs of prospective customers.
7 Data centers and industrial customers that are serious about siting in South
8 Carolina will not be competing with phantom loads and will have more certainty
9 about where they are in the queue.

10 **Q How does Santee Cooper’s capacity need change after removing speculative**
11 **large load and adding near-term planned resources?**

12 **A** After removing speculative large load and accounting for near-term planned
13 additions, Santee Cooper does not have a capacity need until [REDACTED], as shown in
14 Confidential Figure 5. The capacity need is small [REDACTED], so adding
15 Santee Cooper’s 1,098 MW share of the Canadys CC [REDACTED]
16 until Winyah retires in 2035. Allowing Santee Cooper to move ahead with the
17 Canadys CC without a clear commitment to retire Winyah puts ratepayers at risk
18 [REDACTED]
19 [REDACTED] To protect ratepayers, Santee Cooper should commit
20 to retiring Winyah as soon as the Canadys CC comes online. Confidential Figure
21 5 also shows that the generic CC Santee Cooper plans to add in 2035 [REDACTED]
22 [REDACTED]

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Confidential Figure 5. Santee Cooper capacity position including both existing and planned resources



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Sources: Santee Cooper Response to ORS Data Request No. 1-3, “1.3.2 ORS 12192025_Canadys CECPCN EnCompass Outputs_CONFIDENTIAL.xlsx,” “1.3.4 ORS 12192025 Canadys CECPCN Results Template_CONFIDENTIAL.xlsx,” and “1.3.16 ORS 12192025 LF25-02 EnCompass.xlsx.” The Company’s response to ORS Data Request No. 1-3 and the associated attachments contain voluminous spreadsheet data and can be provided to the Commission and properly-authorized parties upon request.

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ii. DESC projects lower levels of near-term load growth than Santee Cooper, and its load forecasts have been stable over the past three IRPs

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Q What is DESC’s capacity position going forward?

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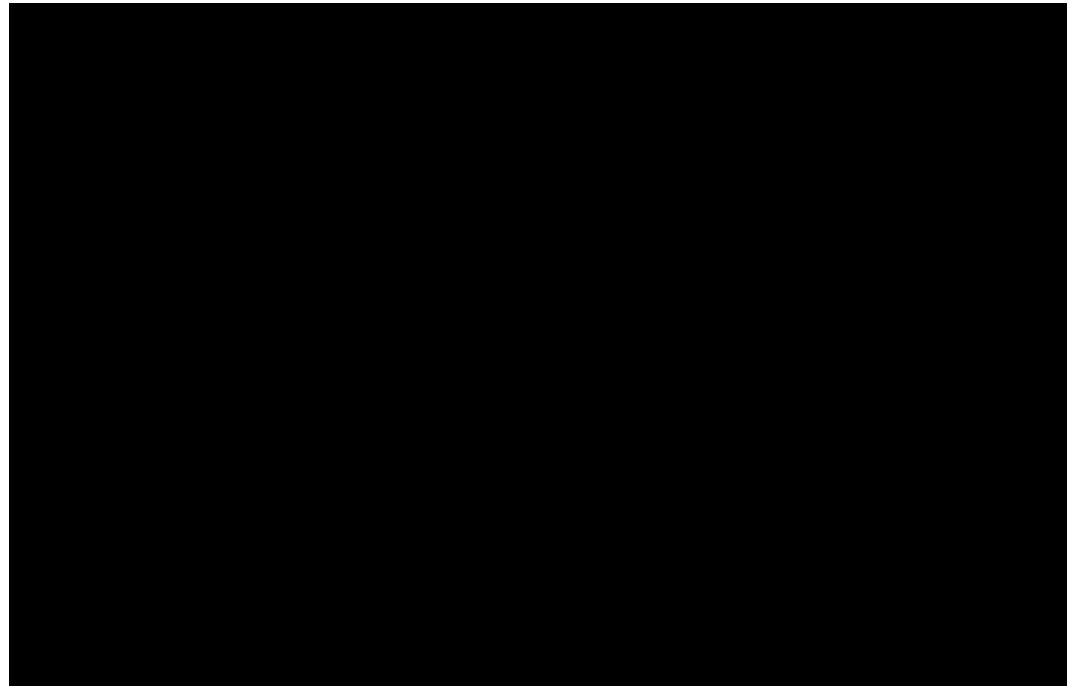
A Confidential Figure 6 shows DESC’s capacity position including existing resources only. 



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[REDACTED]⁵¹ DESC suggests that it may delay the retirement of Williams until year-end 2034 if the Section 111 Greenhouse Gas (“GHG”) Rules are formally rescinded or modified to allow the continued operation of coal capacity.⁵²

Confidential Figure 6. DESC winter capacity position including existing resources only



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Source: DESC Response to ORS Data Request No. 3-1, “CONFIDENTIAL Plexos Optimized – Reference BP.xlsx.” Figure includes the planned addition of the Urquhart CT in 2029.

⁵¹ DESC Response to ORS Data Request No. 3-1, “CONFIDENTIAL Plexos Optimized – Reference BP.xlsx.” The Company’s response to ORS Data Request No. 1-3 and the associated attachments contain voluminous spreadsheet data and can be provided to the Commission and properly-authorized parties upon request.

⁵² Neely Direct at 14.

1 **Q How has DESC’s load forecast changed over the past three years?**

2 **A**Unlike Santee Cooper, DESC’s peak load forecast has been stable over the past
3 three years (Figure 7). DESC’s 2025 IRP Update forecast, which is the same
4 forecast DESC uses in this docket, is slightly lower in all years than its 2024
5 forecast. DESC does not project the same level of load growth from large-load
6 customers as Santee Cooper. Specifically, DESC projects only 540 MW of winter
7 peak load growth between 2026 and 2033 across all customer classes,⁵³ including
8 248 MW from two large-load customers (a manufacturing facility and a data
9 center⁵⁴) and 74 MW of other industrial-sector growth.⁵⁵ DESC has not signed
10 any new contracts with large-load customers since the 2024 IRP Update.⁵⁶

11 Unlike Santee Cooper, DESC only includes customers with signed contracts in its
12 load forecast.⁵⁷ This is beneficial to DESC’s ratepayers, because it means that
13 DESC is not incurring additional costs to procure resources for speculative load.

⁵³ DESC 2025 IRP at 53.

⁵⁴ Kissam Direct at 6.

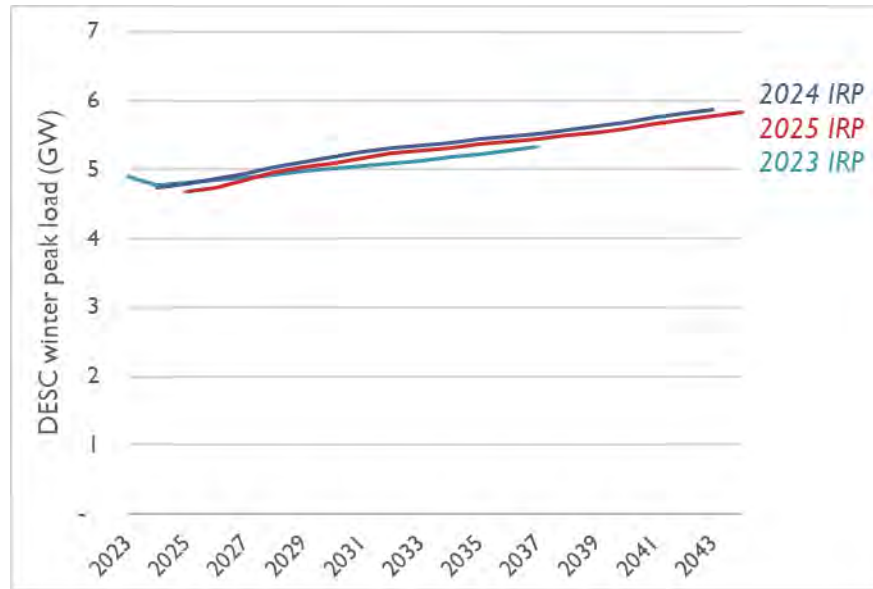
⁵⁵ DESC Response to Sierra Club Data Request No. 1-34, “DESC Response to Sierra Club 1-34.xlsx” (attached as Exhibit LM-8).

⁵⁶ DESC Response to CCL/SACE Data Request No. 1-86 (attached as Exhibit LM-9).

⁵⁷ DESC Response to CCL/SACE Data Request No. 1-65 (Exhibit LM-7).

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Figure 7. DESC IRP load forecasts over time



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Sources: DESC 2023 IRP at 45; DESC 2024 IRP at 52; and DESC 2025 IRP at 53.

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Q Does DESC have enough capacity to retire the Wateree and Williams coal plants once the Canadys CC comes online?

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A Yes. DESC modeled two variations of an optimized reference scenario. The Optimized Reference with GHG Rules portfolio shows both coal plants retiring when the Canadys CC comes online in 2033,

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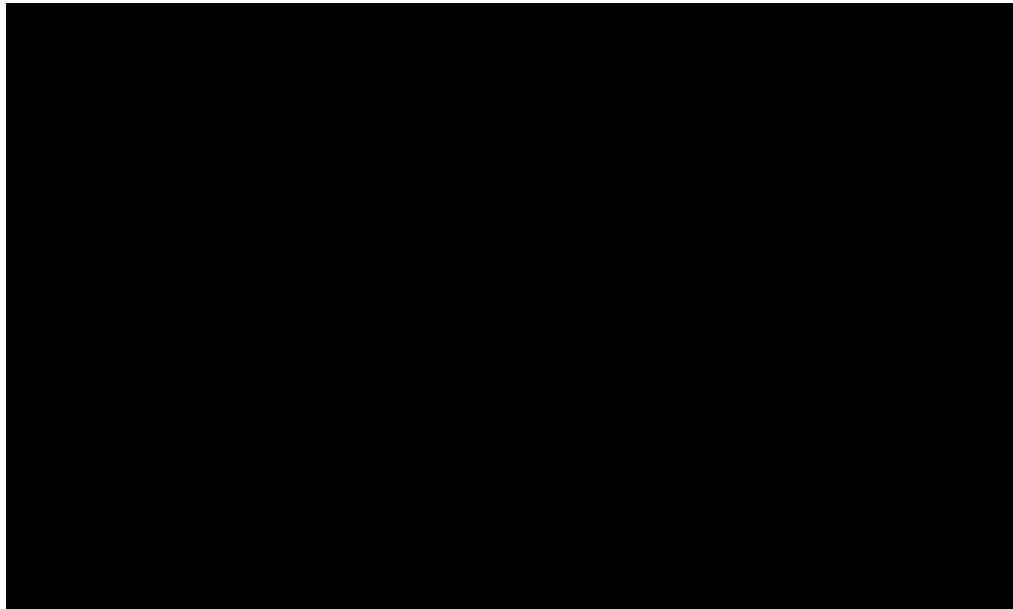
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[REDACTED] (Confidential Figure 8).⁵⁸ Regardless of the status of the Section 111 GHG Rules, the modeling results from this scenario show that [REDACTED]. In [REDACTED].

⁵⁸ DESC states that it modeled Wateree and Williams retiring December 31, 2032 (Neely Direct at 13). Because the Canadys CC will not be online until mid-2033 (Joint Application at 13), it is unclear how DESC is planning to meet its capacity needs in the first half of 2033. DESC should clarify what online date it modeled for the Canadys CC in Plexos, and it should plan to retire Wateree and Williams as soon as replacement capacity from the Canadys CC is online.

1 the reference scenario without GHG Rules, DESC delays the retirement of
2 Williams to year-end 2034, [REDACTED]
3 [REDACTED]⁵⁹ [REDACTED]
4 [REDACTED], the Commission should make
5 approval of the Canadys CC contingent on a firm commitment from DESC to
6 retire both Wateree and Williams as soon as the Canadys CC comes online in
7 mid-2033.

8 **Confidential Figure 8. DESC winter capacity position, existing and planned**
9 **resources in Optimized Reference with GHG Rules scenario**



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Source: DESC response to ORS Data Request No. 3-1, “CONFIDENTIAL Plexos Optimized – Reference BP.xlsx.” Battery storage category includes both hybrid and standalone battery resources.

⁵⁹ DESC Response to ORS Data Request No. 3-1, “CONFIDENTIAL Plexos Optimized – ReferenceNoGHG BP.xlsx.” *Supra* note 51.

1 **6. TO REDUCE COST AND RISK TO RATEPAYERS, THE COMMISSION SHOULD INSTRUCT**
2 **THE JOINT APPLICANTS TO STUDY WHETHER BESS PAIRED WITH RENEWABLES**
3 **COULD REPLACE A PORTION OF THE PROPOSED CC CAPACITY**

4 ***i. The Canadys CC creates a risk of increasing capital costs, delayed timelines,***
5 ***and increasing ratepayer exposure to fuel price volatility***

6 **Q Have the Joint Applicants finalized any of the major equipment or developer**
7 **contracts associated with the Canadys CC?**

8 **A** No. The Joint Applicants have not yet finalized any of the major contracts
9 associated with the Canadys CC. The Joint Applicants have selected an Original
10 Equipment Manufacturer (“OEM”) that will provide the power island equipment
11 (combustion turbine, heat recovery steam generator, and steam turbine).⁶⁰ They
12 have also secured manufacturing slots and delivery schedule commitments, but
13 they are still in the process of commercial negotiations with the OEM to finalize
14 the Turbine Supply Agreement. Similarly, the Joint Applicants are in the process
15 of finalizing contracts for necessary transformer equipment.⁶¹

16 The Joint Applicants expect to have an EPC contract finalized by early 2027.⁶²

17 
18  ⁶³

⁶⁰ Direct Testimony of Andrew R. Walker on Behalf of Dominion Energy South Carolina, Inc at 21-22 (Dec. 15, 2025) [hereinafter “Walker Direct”].

⁶¹ *Id.* at 22.

⁶² *Id.* at 23.

⁶³ DESC Response to CCL/SACE Data Request No. 2-24 (attached as Confidential Exhibit LM-10).

1 EPC costs are the single largest contributor to project costs, so this creates
2 substantial uncertainty in the budget.

3 **Q Is there a risk that the final cost of the Canadys CC will escalate beyond**
4 **what the Joint Applicants currently project?**

5 **A** Yes. As I explained in Section 4, gas turbines, transformers, and qualified EPC
6 contractors are all currently in high demand and face escalating prices and wait
7 times as a result. Because the Joint Applicants are at an early stage of contracting,
8 there is a risk that project costs will escalate beyond the Joint Applicants' current
9 projections. DESC Witness Walker acknowledges this possibility in his
10 testimony, stating, “[w]hile DESC and Santee Cooper have worked extensively to
11 refine project costs, it is possible that today’s estimated total project cost of
12 approximately \$5 billion could change or even increase as procurement activities
13 and EPC contract negotiations are finalized.”⁶⁴ To protect ratepayers from the
14 impacts of future cost escalation, I recommend that the Commission cap project
15 costs at the total amount the Joint Applicants currently estimate and require a
16 separate demonstration of prudence for any expenditures above the cost cap.

17 **Q In addition to the risk of cost increase, is there a risk of the commercial**
18 **operation date of the plant being delayed?**

19 **A** Yes. The Canadys CC depends upon the construction of three new gas pipelines
20 and multiple transmission network upgrades. These interdependencies create a
21 timeline risk. Santee Cooper plans to obtain gas transportation from the
22 Mississippi Crossing Project (“MPX”), Southern System Expansion 4 (“SSE4”),

⁶⁴ Walker Direct at 31.

1 and Elba Express pipeline extension (“Bridge Project”).⁶⁵ Witness Walker notes
2 that potential delays with these pipeline expansion projects are outside of the Joint
3 Applicants’ control but could impact the timeline and cost of the Canadys CC
4 project:

5 Permitting and regulatory delays for either the generating facility or
6 the natural gas pipeline expansion projects are factors beyond
7 DESC’s and Santee Cooper’s control that could impact the overall
8 proposed schedule for the project and associated cost estimates.
9 Completion of the Bridge Project interstate natural gas pipeline
10 expansion by the Elba Express Company to the site will be
11 necessary to support the commissioning of the generating facility;
12 there is an inherent inter-dependability between the schedule for the
13 Bridge Project and the construction of the Canadys Joint Resource.⁶⁶

14 In addition, Santee Cooper and DESC are both still in the process of determining
15 the final scope of transmission network upgrades that will be necessary to support
16 the Canadys CC project.⁶⁷ If transmission upgrades are not completed in time, the
17 Joint Applicants may operate the Canadys CC under restricted operating
18 procedures.⁶⁸ It is unclear how this would affect the firm capacity rating of the
19 unit while these restrictions are in effect.

⁶⁵ Randall Direct at 3–4.

⁶⁶ Walker Direct at 35.

⁶⁷ DESC Response to ORS Data Request No. 1-35; Santee Cooper Response to ORS Data Request No. 1-35 (combined and attached as Exhibit LM-11).

⁶⁸ Santee Cooper Response to Sierra Club Data Request No. 1-16 (attached as Exhibit LM-12).

1 **Q Will the Canadys CC increase ratepayer exposure to fuel price volatility?**

2 **A** Yes. Because the Canadys CC is a baseload gas plant, designed to run at high
3 capacity factors, it exposes ratepayers to fuel price volatility. Santee Cooper
4 projects its reliance on gas [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]⁶⁹ DESC also projects that gas will increase [REDACTED]

8 [REDACTED]⁷⁰

9 **Q Explain the risks posed to ratepayers by fuel price volatility.**

10 **A** Heavy reliance on gas resources can expose ratepayers to fuel price volatility for
11 which they cannot plan. Because gas is a global commodity, both domestic and
12 global market forces impact price and demand for the resource. After roughly
13 doubling from 2019 to 2024, North American liquified natural gas (“LNG”)
14 export capacity is projected to more than double again by 2029, from current
15 levels of 11.4 billion cubic feet (Bcf) per day to more than 28 Bcf per day in
16 2029.⁷¹ To put this in perspective, U.S. total gas consumption in 2023 averaged

⁶⁹ Santee Cooper Response to ORS Data Request No. 1-3, “1.3.2 ORS 12192025_Canadys CECPCN EnCompass Outputs_CONFIDENTIAL.xlsx.” *Supra* note 14.

⁷⁰ DESC Response to ORS Data Request No. 3-1, “CONFIDENTIAL Plexos Optimized – Reference BP.xlsx.” *Supra* note 51.

⁷¹ Young, J. 2025. “North America’s LNG export capacity could more than double by 2029.” U.S. Energy Information Administration, available at <https://www.eia.gov/todayinenergy/detail.php?id=66384>.

1 roughly 89 Bcf per day.⁷² This leaves domestic markets exposed to global market
2 dynamics.

3 **Q How are volatile fuel costs passed on to ratepayers?**

4 **A** Fuel costs are a direct pass-through, meaning that they are fully passed on to
5 customers. The Joint Applicants have little financial incentive to minimize these
6 costs because they can recover whatever amount they spend from ratepayers.
7 When the global market is constrained and fuel prices spike, ratepayers may face
8 unexpected bill increases as a result of increased fuel charges. This happened in
9 2022 when Russia invaded Ukraine and European gas customers turned
10 increasingly to U.S. gas. This drove up domestic gas prices, and those high costs
11 were passed on directly to ratepayers.

12 DESC reported large fuel under-recoveries in 2022 following the war in Ukraine
13 and filed for a mid-period adjustment in August 2022, due to under-recovery of
14 \$202 million in base fuel costs.⁷³ While fuel adjustments usually happen annually,
15 DESC wrote that it was forced to file for a mid-period adjustment because of
16 “significant and unforeseen market changes and commodity price increases.”⁷⁴
17 DESC’s under-recovery on base fuel costs reached \$452 million by the end of
18 year.⁷⁵ The utility stated the under-recovery was largely driven by shifts in gas

⁷² U.S. Energy Information Administration. 2025. “Natural Gas Consumption by End Use,” available at https://www.eia.gov/dnav/ng/ng_cons_sum_dcu_nus_a.htm.

⁷³ DESC, Application for a Mid-Period Adjustment to Increase Base Rates for the Recovery of Electric Fuel Costs, Docket No. 2022-259-E at 9 (Aug. 9, 2022), available at <https://dms.psc.sc.gov/Attachments/Matter/5430373d-17df-45cd-8d08-66bee88ec69e>.

⁷⁴ *Id.* at 4.

⁷⁵ Corrected Direct Testimony of Allen W. Rooks, Docket No. 2032-2-E at 5 (Mar. 8, 2023) [hereinafter “Rooks Direct”], available at <https://dms.psc.sc.gov/Attachments/Matter/77d48784-7447-4e2d-88ea-626170570291>.

1 markets, including “higher commodity prices, coupled with higher gas-fired
2 generation demand driven by issues related to coal supply, interstate pipeline
3 maintenance, an increase in natural gas export activity, and lower-than-average
4 natural gas inventories.”⁷⁶ Under-recoveries during future volatility events could
5 be even larger after the Canadys CC comes online and the Joint Applicants’
6 reliance on gas increases.

7 ***ii. Continued operation of Winyah, Wateree, and Williams will expose ratepayers***
8 ***to a risk of cost increases, so the Joint Applicants should commit to retiring***
9 ***these plants***

10 **Q What risks do the Joint Applicants face from continued reliance on coal**
11 **assets?**

12 **A** Continued reliance on coal assets creates risk related to fuel price escalation,
13 environmental compliance costs, and unexpected capital expenditures to maintain
14 plant operations.

15 **Q What fuel price risks do coal assets pose to the Joint Applicants?**

16 **A** As with gas assets, coal plants pose risk to ratepayers related to fuel price
17 volatility. The coal market has seen dramatic price volatility in some parts of the
18 United States over the past few years.⁷⁷ Additionally, as coal plants across the
19 United States retire and the demand for coal decreases, coal companies could

⁷⁶ Direct Testimony of Rose M. Jackson, Docket No. 2032-2-E at 5 (Feb. 15, 2023), available at <https://dms.psc.sc.gov/Attachments/Matter/b71532cd-457c-49a5-9d7a-8f7f26231a70>.

⁷⁷ U.S. Energy Information Administration, “Coal Markets,” available at <https://www.eia.gov/coal/markets/>.

1 consolidate. Concentration of the coal supply among fewer companies means less
2 competition, which in turn can lead to higher coal prices.⁷⁸

3 Electric power sector coal consumption was down in 2023–2024 relative to prior
4 years, with coal accounting for around 16–17 percent of total utility-scale
5 generation.⁷⁹ This is novel because coal’s national market share of electric
6 generation had been around 20 percent each month between 2020 and 2022, and
7 prior to 2020, coal had never comprised less than 20 percent of the market in any
8 month.⁸⁰ Decreased demand for coal is already impacting coal supply in the
9 southeast. A coal mine in West Virginia announced in January 2026 that it will
10 close permanently in the spring due to a lack of customer demand.⁸¹ Santee
11 Cooper’s latest IRP also showed an increase in projected coal fuel costs of nearly
12 a third relative to the prior IRP, suggesting that these trends are affecting the
13 operation of its coal plants (Figure 9).

⁷⁸ *In the Matter of Biennial Consolidated Carbon Plan and Integrated Resource Plans of Duke Energy Carolinas, LLC, and Duke Energy Progress, LLC Pursuant to N.C.G.S. § 62-110.9 and § 62-110.1(c)*, North Carolina Utilities Commission Docket No. E-100, Sub 190, Petition for Approval of 2023-2024 Carbon Plan and Integrated Resource Plans of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, Appendix F: “Coal Retirement Analysis” at 2 (Jan. 31, 2024), available at <https://www.duke-energy.com/-/media/pdfs/our-company/carolinas-resource-plan/appendix-f-coal-retirement-study.pdf?rev=4c1c4df441a14248b2e23ba0368d9855>.

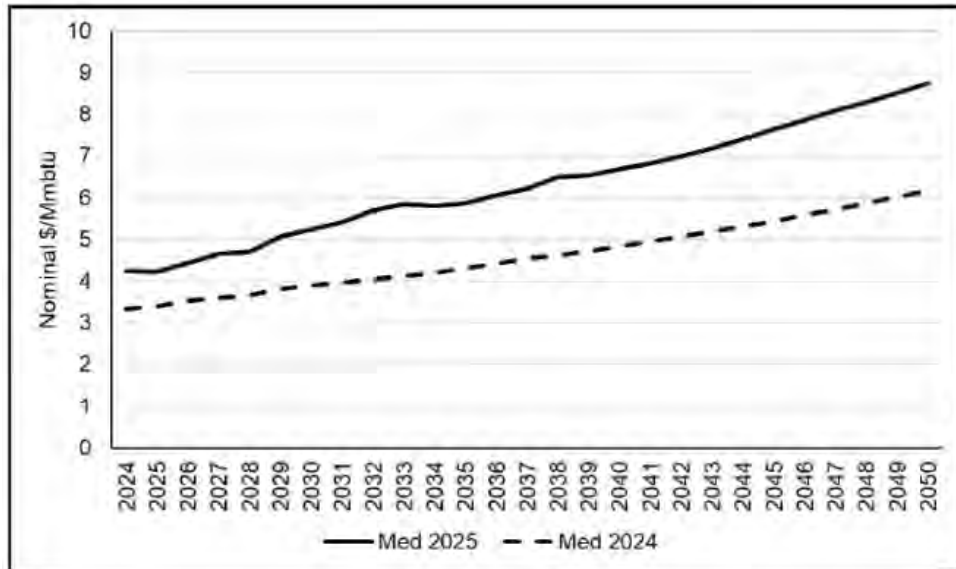
⁷⁹ U.S. Energy Information Administration. 2025. “Coal-fired power plant are well-stocked this year,” available at <https://www.eia.gov/todayinenergy/detail.php?id=65787>.

⁸⁰ Institute for Energy Economics and Financial Analysis, “Coal Use at U.S. Power Plants Continues Downward Spiral; Full Impact on Mines to be Felt in 2024,” (Nov. 2, 2023), available at <https://ieefa.org/resources/coal-use-us-power-plants-continues-downward-spiral-full-impact-mines-be-felt-2024>.

⁸¹ Rather, J., “Mittiki Coal closing Tucker County mine; nearly 200 to be laid off.” 12 WBOY, (Jan. 29, 2026), available at <https://www.wboy.com/news/tucker/mettiki-coal-to-close-tucker-county-mine-nearly-200-laid-off/>.

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Figure 9. Change in Santee Cooper medium coal price projection between 2024 and 2025 IRP Updates



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Source: Review of South Carolina Public Service Authority's (Santee Cooper) 2025 Integrated Resource Plan Update, Docket No. 2025-18-E, South Carolina Office of Regulatory Staff Report at 30 (December 15, 2025), available at <https://dms.psc.sc.gov/Attachments/Matter/3cbf198e-a36e-4460-a56b-0354334c49e2>.

8 **Q**
9

What environmental compliance costs will the Joint Applicants need to incur to enable the continued operation of Winyah, Wateree, and Williams?

10 **A**
11
12
13
14

Environmental regulation could result in higher costs and higher risks for the Joint Applicants if they continue operating Winyah, Wateree, and Williams. While many environmental regulations are being challenged or relaxed at present, these coal plants will continue to face environmental regulation going forward from existing and new programs, including the 2020 and 2024 ELG Rules,^{82,83} Mercury

⁸² *Steam Electric Reconsideration Rule*, 85 Fed. Reg. 64,650 (Oct. 13, 2020), available at <https://www.govinfo.gov/content/pkg/FR-2020-10-13/pdf/2020-19542.pdf>.

⁸³ *Supplemental Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category*, 89 Fed. Reg. 40,198 (May 9, 2024), available at <https://www.govinfo.gov/content/pkg/FR-2024-05-09/pdf/2024-09185.pdf>.

1 and Air Toxics Standards (“MATS”),⁸⁴ and the Clean Air Act Section 111 GHG
2 Rules.⁸⁵

3 In the near term, all three plants face sizeable ELG compliance costs. Santee
4 Cooper and DESC originally intended to retire Winyah, Williams, and Wateree
5 by 2028 to avoid compliance costs under the 2020 ELG Rule. Costs for
6 compliance with the 2020 ELG Rule are now sunk, since both Santee Cooper and
7 DESC do not intend to retire their coal plants by 2028. Because of this decision,
8 the Joint Applicants face additional compliance costs under the 2024 ELG Rule
9 by the end of 2034,⁸⁶ including the costs to install a zero liquid discharge
10 (“ZLD”) system.

11 In DESC’s 2025 IRP Update proceeding, the company disclosed that total past
12 and future spending on ELG compliance at Wateree will be \$250 million,
13 including an upcoming \$25 million expenditure in 2029 to install a ZLD system.⁸⁷
14 At Williams, total past and future ELG compliance costs total \$230 million,

⁸⁴ *National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review*, 89 Fed. Reg. 38,508 (May 7, 2024), available at <https://www.govinfo.gov/content/pkg/FR-2024-05-07/pdf/2024-09148.pdf>.

⁸⁵ *New Source Performance Standards for Greenhouse Gas Emissions From New, Modified, and Reconstructed Fossil Fuel-Fired Electric Generating Units; Emission Guidelines for Greenhouse Gas Emissions From Existing Fossil Fuel-Fired Electric Generating Units; and Repeal of the Affordable Clean Energy Rule*, 89 Fed. Reg. 39,798 (May 9, 2024), available at <https://www.govinfo.gov/content/pkg/FR-2024-05-09/pdf/2024-09233.pdf>.

⁸⁶ The 2024 ELG rule had an initial compliance deadline of December 31, 2029, however on December 31, 2025, the deadline was extended to December 31, 2034. *See Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category-Deadline Extensions*, 90 Fed. Reg. 61,328 (Dec. 31, 2025), available at <https://www.govinfo.gov/content/pkg/FR-2025-12-31/pdf/2025-24102.pdf>.

⁸⁷ DESC Response to Sierra Club Data Request No. 1-07 in the DESC 2025 IRP Update, S.C. Pub. Serv. Comm’n Docket No. 2025-9-E (attached as Exhibit LM-13).

1 including \$50 million in future expenditures for a ZLD system and other
2 measures.⁸⁸ At Winyah, Santee Cooper estimates that installing a ZLD system to
3 comply with the 2024 ELG Rule will cost \$250 million by 2029.⁸⁹ This does not
4 include the amount Santee Cooper has already spent to comply with the 2020
5 ELG Rule at Winyah.

6 Once constructed, these compliance retrofits also result in large operations and
7 maintenance costs. For example, DESC estimates that the operations and
8 maintenance costs at Williams will be \$4.5 to 5 million per year beginning in
9 2026 for the flue gas desulfurization unit only.⁹⁰ While data on the cost of annual
10 operations and maintenance costs for other compliance equipment at Williams
11 and for Winyah and Wateree is not available, it will likely fall within a similar
12 range, adding substantial costs each year that the plants continue to operate.

13 As these large expenditures illustrate, Santee Cooper and DESC should commit to
14 retiring Winyah, Wateree, and Williams as soon as the Canadys CC comes online
15 in mid-2033, to avoid locking in additional environmental compliance costs.

16 **Q How could ongoing capital expenditures increase the costs of continued**
17 **operation of the coal plants?**

18 **A** In addition to environmental compliance costs, Santee Cooper and DESC may
19 need to plan for both routine and unplanned capital expenditures to keep their

⁸⁸ DESC Response to Sierra Club Data Request No. 1-08 in DESC 2025 IRP Update, S.C. Pub. Serv. Comm'n Docket No. 2025-9-E (attached as Exhibit LM-14).

⁸⁹ Santee Cooper Response to Sierra Club Data Request No. 2-31c in Santee Cooper 2025 IRP Update, S.C. Pub. Serv. Comm'n Docket No. 2025-18-E (attached as Exhibit LM-15).

⁹⁰ DESC Response to Sierra Club Data Request No. 1-08 in DESC 2025 IRP Update, S.C. Pub. Serv. Comm'n Docket No. 2025-9-E (Exhibit LM-14).

1 aging coal plants operating as parts break. Replacement parts for coal plants
2 become more expensive and difficult to obtain as U.S. coal generation declines.
3 For example, when the boiler feed pump turbine failed at F.B. Culley Unit 3, a
4 coal unit in Indiana, the best option to replace it was to use a part from a retired
5 coal plant in Montana.⁹¹ The unit was offline from June 2022 to March 2023
6 while CenterPoint (the owner of the unit) was in the process of obtaining this
7 replacement part.^{92,93} Winyah, Wateree, and Williams are all aging plants, so the
8 availability of replacement parts is also a concern for these plants. Winyah came
9 online between 1975 and 1981, Wateree between 1970 and 1971, and Williams in
10 1973.⁹⁴ This means that the plants are currently between 48 and 56 years old and
11 nearing the end of their useful lives.

⁹¹ *Subdocket for Review of Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South (“CEI South”) 2021 Extended Forced Outage at Culley 3 Generating Unit and its Related Impact on Fuel Procurement and Fuel Costs*, Indiana Utility Regulatory Commission, Cause No. 38708 FAC 137, Direct Testimony of Wayne D. Games at 19 (Nov. 16, 2022), available at <https://iurc.portal.in.gov/entity/sharepointdocumentlocation/df488571-5893-ed11-aad1-001dd80726a4/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=38708%20FAC%20137%20Petitioner%20Exhibit%20No.%201.pdf>.

⁹² *Id.*

⁹³ *Subdocket for Review of Southern Indiana Gas and Electric Company d/b/a CenterPoint Energy Indiana South (“CEI South”) 2021 Extended Forced Outage at Culley 3 Generating Unit and its Related Impact on Fuel Procurement and Fuel Costs*, Indiana Utility Regulatory Commission, Cause No. 38708 FAC 137, Order of the Commission at 2 (Jan. 28, 2026), available at https://iurc.portal.in.gov/entity/sharepointdocumentlocation/4e186869-4939-ef11-8409-001dd80b3563/bb9c6bba-fd52-45ad-8e64-a444aef13c39?file=ord_38708FAC137S1_070324.pdf.

⁹⁴ U.S. Energy Information Administration. Form EIA 860, 2024 release, available at <https://www.eia.gov/electricity/data/eia860/>.

1 **iii. Batteries paired with renewables would protect ratepayers against the risks**
2 **posed by continued reliance on fossil resources**

3 **Q How can the Joint Applicants protect ratepayers from the risks posed by**
4 **continued reliance on fossil resources?**

5 **A To protect existing ratepayers from the risks described above, the Joint Applicants**
6 **should remove speculative load from the forecast they use for resource**
7 **procurement, and commit to retiring Winyah, Wateree, and Williams as soon as**
8 **the Canadys CC comes online. The Joint Applicants should also study whether**
9 **smaller firm resources, such as BESS or CTs paired with renewables, could**
10 **replace part of the capacity of the proposed Canadys CC at lower cost and risk to**
11 **ratepayers.**

12 **Q How would replacing a portion of the Canadys CC with paired BESS and**
13 **renewables protect ratepayers?**

14 **A BESS resources have shorter useful lives than CC resources (20 years for batteries**
15 **compared to 36 years for CCs).^{95,96} The 20-year lifetime of BESS aligns more**
16 **closely with the typical large-load contract length.⁹⁷ In contrast, CCs have useful**
17 **lives that are over twice as long as the typical length of a data center contract and**
18 **will lock ratepayers into 36 years of capital costs and fuel costs over the**
19 **resource’s lifetime. This makes batteries more appropriate resource additions for**

⁹⁵ Santee Cooper 2025 IRP Update at 52.

⁹⁶ DESC Response to ORS Data Request No. 1-30 (Exhibit LM-2).

⁹⁷ For example, Santee Cooper’s experimental large load tariff requires a contract length of 15 years. *See* South Carolina Public Service Authority (Santee Cooper) Large Light and Power Experimental Large Load Service Schedule L-25-LL at 10 [hereinafter “Santee Cooper Experimental Large Load Tariff”], available at <https://www.santeecooper.com/Rates/pdfs/Industrial-Wholesale/L-25-LL-FINAL.pdf>.

1 this time of uncertain future load growth, when it is unclear how quickly data
2 center load will materialize and how long it will last. Pairing BESS with
3 renewables also helps to shield ratepayers from fuel price volatility, because solar
4 and wind have no exposure to price volatility once constructed.

5 **Q How does the construction timeline of BESS compare to CC resources?**

6 **A** BESS resources typically have short construction lead times of one to two years,
7 compared to seven to eight years for a gas plant like the Canadys CC.⁹⁸ BESS is
8 also more modular than CC units, so the Joint Applicants can adjust the quantity
9 of BESS they procure in a given year based on current market conditions and can
10 procure resources incrementally to serve load growth as it materializes. In
11 contrast, constructing the Canadys CC will reduce the Joint Applicants' flexibility
12 in decision-making and lock ratepayers into a \$5 billion gas plant.

13 **7. THE JOINT APPLICANTS SHOULD PUT STRUCTURES IN PLACE TO ENSURE LARGE-**
14 **LOAD CUSTOMERS ARE PAYING THEIR FULL INCREMENTAL COST OF SERVICE,**
15 **INCLUDING A PORTION OF THE CANADYS CC COSTS**

16 **Q What risks do prospective large-load customers pose to the Joint Applicants'**
17 **existing ratepayers?**

18 **A** Load growth from large-load customers, and in particular data centers, poses
19 several risks to all other ratepayers—both in scenarios where the load
20 materializes, and in scenarios where it does not.

21 First, there is the risk that the Joint Applicants build resources and supporting
22 infrastructure for prospective customer load that may not materialize fully or at

⁹⁸ Settle Direct at 35.

1 all. If load does not materialize at the level the Joint Applicants currently project,
2 existing ratepayers may be left paying for unneeded assets. As discussed above,
3 this can be addressed by only building to meet load from customers with signed
4 contracts.

5 Second, even if the load does materialize, large generation additions and
6 transmission upgrades can increase system costs for all ratepayers under current
7 tariff structures and cost allocation methodologies. This can result from increases
8 in resource and bilateral contract costs, additional transmission and gas
9 infrastructure investments, and general cost-shifting if rates and tariffs are not
10 designed correctly to ensure data centers and other large-load customers cover
11 their full incremental cost of service.⁹⁹

12 **Q Why discuss these issues in this docket?**

13 **A** The Joint Applicants are seeking to construct the Canadys CC to meet load
14 growth, mainly from prospective large-load customers. While my
15 recommendation is that the Canadys CC be used mainly as replacement capacity
16 for retiring coal, to the extent that a portion of the plant is used to serve large-load
17 customers, it is important to ensure that these customers are covering their full
18 incremental cost of service. Large-load customers should pay their fair share for
19 electricity so that economic development is not pursued at the expense of existing
20 ratepayers' electricity costs.

⁹⁹ A new large load customer's incremental cost includes (1) the increase in variable costs as a result of serving the load, (2) the new customer's share of the existing system's fixed costs, and (3) any new system costs (e.g., investment in new generation assets) incurred to serve the load.

1 **Q Is Santee Cooper aware of the potential challenges and risks to existing**
2 **ratepayers from new data center load?**

3 **A** Yes. At Santee Cooper’s Board of Directors meeting on April 25, 2025, Mike
4 Smith, Director of Billing and Pricing, presented a new large-load tariff to the
5 Board. As part of his presentation, he cautioned the Board about the risks posed
6 by large-load customers if Santee Cooper did not act to put protections in place.
7 Specifically, he stated:

- 8 • Demand from large-load customers “is expected to create issues for non-Large
9 Load retail customers.”
- 10 • “Generation and transmission upgrades are long-lived and expensive assets
11 expected to provide upward rate pressure.”
- 12 • “If connected Large Load leaves the system after investments are made
13 remaining customers will be responsible for increased costs.”¹⁰⁰

14 **Q Has Santee Cooper taken any measures to protect existing ratepayers from**
15 **these risks posed by new large-load customers?**

16 **A** Yes. Santee Cooper currently has an experimental large-load service tariff that is
17 mandatory for all data centers and other high-load-factor customers with monthly
18 load over 50 MW, as well as cryptocurrency operations over 1 MW in size.¹⁰¹ The
19 Santee Cooper Board approved this rate at its April 25, 2025 Board meeting.

¹⁰⁰ Santee Cooper Board Meeting Livestream at 2:41 (Apr. 25, 2025) [hereinafter “Santee Cooper April 2025 Board Meeting”], available at <https://vimeo.com/1078404100>.

¹⁰¹ Santee Cooper Experimental Large Load Tariff, *supra* note 97.

1 As an experimental tariff, the rate is in effect for four years. The tariff has the
2 following provisions, which represent a good start toward protecting existing
3 customers from subsidizing data center load growth:

- 4 • A term of 15 years.
- 5 • New customers are required to ramp up to their full contracted power usage
6 within three years.
- 7 • Any customer leaving the contract early is responsible for paying the demand
8 for the remainder of the contract term.
- 9 • Non-coincident peak demand minimum bill is set at between 90 percent and
10 100 percent of contracted demand.
- 11 • Coincident Peak Demand Charge is incrementally priced to layer on top of
12 non-coincident peak minimum bill. This is set at between 50 percent and 80
13 percent of demand.¹⁰²

14 Santee Cooper also claims that this rate recovers the incremental cost of adding
15 the large load to the system,¹⁰³ and covers all associated transmission upgrades.¹⁰⁴
16 I have not verified the incremental cost claims, and the provision around
17 transmission upgrades is subject to Commission discretion, especially where
18 transmission upgrades can arguably provide benefits to more than just the large-
19 load customers (even if those upgrades were not necessary before the large load
20 was added). But overall, this tariff shows that Santee Cooper is making efforts to
21 protect existing ratepayers.

¹⁰² *Id.* at 9.

¹⁰³ Santee Cooper April 2025 Board Meeting at 2:44, *supra* note 100.

¹⁰⁴ Santee Cooper Experimental Large Load Tariff at 10, *supra* note 97.

1 **Q Does this tariff also cover the load served by Central?**

2 **A** No, this tariff only applies to data centers that directly purchase power from
3 Santee Cooper rather than from a co-op. Central does not have its own large-load
4 tariff. As a generation and transmission cooperative, Central is involved when a
5 new large-load customer requests to connect to any of Central's 19 member co-
6 ops, but Central does not directly serve the new data center customer.

7 This is concerning because Central projects over 800 MW of load growth between
8 now and 2030, much of which is composed of large-load customer additions.¹⁰⁵ In
9 addition, Central has indicated that it expects to have as much as 2 GW of data
10 center load on its system by the end of the decade.¹⁰⁶ Establishing a large-load
11 tariff that applies to the data centers within Central's service area will help to
12 identify which large-load customers are serious about locating within Central's
13 service area, reducing the risk of overbuilding resources to serve speculative load.

14 **Q Does Central's speculative load have any potential to impact Santee Cooper's**
15 **ratepayers?**

16 **A** It is unclear. Central accounts for a majority of Santee Cooper's firm demand and
17 energy sales.¹⁰⁷ Central contracts with Santee Cooper through a Coordination
18 Agreement for most (77 percent) of its power needs, with the remainder coming
19 from Duke Energy (21 percent), as well as a small amount of self-owned

¹⁰⁵ Santee Cooper Response to ORS 1-3, "1.3.16 ORS 12192025 LF25-02
EnCompass.xlsx." *Supra* note 14.

¹⁰⁶ The Rise of Data Centers, Central Electric Power Cooperative, Inc (Dec. 9, 2025),
available at <https://cepci.org/the-rise-of-data-centers/>.

¹⁰⁷ Energy Portfolio, Central Electric Power Cooperative, available at
<https://cepci.org/energy-portfolio/>.

1 generation.¹⁰⁸ Santee Cooper currently provides power to Central through long-
2 term Power Purchase Agreements (“PPA”). To the extent that the PPA terms lock
3 Central and its members into the PPA costs over the length of the contract, Santee
4 Cooper’s customers should be protected from covering the costs associated with
5 Central’s load. For any new generation resources that will be used to serve
6 Central’s load, Santee Cooper should continue to use long-term PPAs and ensure
7 that the terms are sufficient to lock Central into its share of resource costs for the
8 lifetime of new assets.

9 **Q More broadly, what are some measures the Commission could take to protect**
10 **existing ratepayers from cost increases associated with new large-load**
11 **customers?**

12 **A** The Commission should consider data center tariffs as one solution to protect
13 existing utility and co-op customers from the costs associated with new large-load
14 customers. For instance, DESC does not currently have a large-load tariff. It
15 should follow Santee Cooper’s lead in developing one, so that it can clearly
16 indicate to prospective large-load customers what their incremental cost of service
17 would be.

18 **Q Are there examples of large-load tariffs that have been successfully**
19 **implemented in other states?**

20 **A** As Central itself acknowledges in a recent newsletter, other generation and
21 transmission co-ops have developed special data center tariffs.¹⁰⁹ For example,
22 the East Kentucky Power Cooperative, a generation and transmission co-op with

¹⁰⁸ *Id.*

¹⁰⁹ The Rise of Data Centers, Central Electric Power Cooperative, Inc. December 9, 2025, available at <https://cepci.org/the-rise-of-data-centers/>.

1 16 owner-member electric cooperatives, proposed its own special data center
2 tariff that requires data centers to pay upfront cost for generation and transmission
3 upgrades and includes an interconnection cost study fee.¹¹⁰ The tariff applies to
4 data center loads above 15 MW, and requires the establishment of a special
5 contract between each eligible data center, the East Kentucky Power Cooperative,
6 and the local retail cooperative. There are also three pending cases in Virginia in
7 which co-ops are seeking approval for large-load tariffs.^{111,112,113}

8 Establishing a large-load tariff can improve certainty in utility load forecasts,
9 thereby reducing the potential for unnecessary generation buildout. One recent
10 example of this comes from AEP Ohio. After AEP Ohio established a large-load
11 tariff that included contract lengths, minimum billing requirements, and collateral,
12 the amount of large load in its customer pipeline decreased by more than half,

¹¹⁰ Kentucky utility regulators approve EKPC’s proposal for Data Center Power tariff, Kentucky Power Cooperative (Oct. 31, 2025), available at https://ekpc.coop/sites/default/files/PDFs/2025/2025-10-31_EKPC_Data_Center_tariff_approved_by_PSC2.pdf.

¹¹¹ *Rappahannock Electric Cooperative – For approval to implement a new large power dedicated facilities rate schedule*, Docket No. PUR-2025-0048, Virginia State Corporation Commission, available at <https://www.scc.virginia.gov/docketsearch#/caseDetails/146004>. The tariff applies to loads above 25MW.

¹¹² *Shenandoah Valley Electric Cooperative – Petition for approval to implement a large power dedicated facilities contract service rate schedule*, Docket No. PUR-2025-00190, Virginia State Corporation Commission, available at <https://www.scc.virginia.gov/docketsearch#/caseDetails/146559>. The tariff applies to loads over 40MW.

¹¹³ *Mecklenburg Electric Cooperative – For approval to implement a new large power service rate schedule, and request for expedited consideration of request for interim rate effectiveness*, Docket No. PUR-2025-00160, Virginia State Corporation Commission, available at <https://www.scc.virginia.gov/docketsearch#/caseDetails/146482>. The tariff applies to loads over 15MW.

1 from 30 GW to 13 GW.^{114,115} This illustrates that a large fraction of the load
2 initially in the pipeline was from speculative customers who were unwilling to
3 commit to tangible terms associated with receiving service from AEP Ohio. The
4 increased accuracy of the queue size is a good thing for AEP Ohio ratepayers.
5 With a more accurate load forecast, AEP Ohio can more accurately assess its
6 resource need and protect ratepayers from paying for unneeded assets.

7 **Q In conclusion, what are your recommendations regarding the Joint**
8 **Applicants' requests in this docket?**

9 **A** I recommend that the Joint Applicants procure resources only for large-load
10 customers that have signed contracts for electric service. This will allow Santee
11 Cooper and DESC to use the capacity of the Canadys CC to replace retiring coal
12 capacity. To this end, I recommend that the Commission make approval of the
13 CECPCN for the Canadys CC contingent on a firm commitment from Santee
14 Cooper to retire Winyah and a commitment from DESC to retire Wateree and
15 Williams as soon as the Canadys CC comes online.

16 Before approving the CECPCN, I recommend that the Commission instruct the
17 Joint Applicants to study whether an alternative resource portfolio, such as battery
18 storage or a CT paired with solar, could replace part of the Canadys CC at lower

¹¹⁴ In the Matter of the Application of Ohio Power Company for New Tariffs Related to Data Centers and Mobile Data Centers, Public Utilities Commission of Ohio, Case No. 24-508-EL-ATA, Application for Approval of New Tariffs by Ohio Power Company (May 13, 2024), available at <https://dis.puc.state.oh.us/ViewImage.aspx?CMID=A1001001A24E13B42822J00948>.

¹¹⁵ In the Matter of the Application of Ohio Power Company for New Tariffs Related to Data Centers and Mobile Data Centers, Public Utilities Commission of Ohio, Case No. 24-508-EL-ATA, Correspondence Status of Process for Signing Up New Schedule DCT [Data Center Tariff] Customers (Sept. 11, 2025), available at <https://dis.puc.state.oh.us/ViewImage.aspx?CMID=A1001001A25I11B15803D00410>.

1 cost and risk to ratepayers. I also recommend that the Commission cap the cost of
2 the Canadys CC at the amount the Joint Applicants currently estimate, to protect
3 ratepayers from future cost escalation. Finally, the Commission should
4 consider large load tariffs as a measure for DESC to protect existing
5 utility customers from the costs associated with new large load customers, and a
6 measure that co-ops such as Central can similarly use to protect existing co-op
7 customers.

8 **Q Does this conclude your testimony?**

9 **A** Yes.

Exhibit LM-1: Resume of Lucy Metz

Lucy Metz, Senior Associate

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lmetz@synapse-energy.com

PROFESSIONAL EXPERIENCE

Synapse Energy Economics Inc., Cambridge, MA. *Senior Associate* April 2025 – Present; *Associate* April 2023 – April 2025; *Research Associate*, July 2022 – April 2023.

- Provides expert research, analysis, and deliverables on energy-sector issues, including electric utility resource planning and power plant economics, building decarbonization, industrial sector emissions, and state and local climate policy
- Supports the development of testimony and comments in integrated resource planning dockets, rate cases, certificates of need, and environmental compliance investment dockets across the country
- Conducts analysis using Synapse’s Building Decarbonization Calculator (BDC), a stock turnover model that calculates the emissions and energy impacts of heat pump adoption
- Produces data visualization tools in R, including interactive webtool of U.S. industrial emitters
- Assists with power sector dispatch modeling using EnCompass

Laboratory of Dr. Alexander Barron, Department of Environmental Science and Policy, Smith College, Northampton, MA. *Research Assistant*, June 2020 – May 2022

- Co-authored paper on carbon neutrality initiatives in higher education
- Designed data visualization and analysis for USREP-ReEDS modeling of Clean Air Act policy
- Calculated CO₂ emissions reductions achievable under Massachusetts climate legislation and drafted white paper with results

Co-Equal, Washington, D.C. *Policy Intern*, February 2021 – March 2022.

- Performed analysis on a wide range of policy topics requested by members of Congress
- Finalized economic modeling study for public release and presented results
- Coordinated with research team at MIT and Co-Equal to meet policy-relevant deadlines

EDUCATION

Smith College, Northampton, MA

Bachelor of Science in Engineering Science, *Magna Cum Laude with Highest Honors*, 2022

SKILLS

Computer: Excel, R, EnCompass, MATLAB, Mathematica, ENERGY STAR Portfolio Manager

Languages: Spanish (proficient)

TESTIMONY

Georgia Public Service Commission (Docket Nos. 56298 and 56310): Direct testimony of Lucy Metz in the matter of Georgia Power Company's Application for Certification of the 2029–2031 All-Source Capacity RFP and Georgia Power Company's Application for the Certification of Supplemental Resources for 2028–2031 Capacity. On behalf of the Sierra Club and the Southern Alliance for Clean Energy (SACE). November 12, 2025

North Carolina Utilities Commission (Docket Nos. E-2, Sub 1349 and EC-67, Sub 57): Direct testimony of Lucy Metz in the matter of the Joint Application of Duke Energy Progress, LLC, and North Carolina Electric Membership Corporation for a Certificate of Public Convenience and Necessity to Construct a 1,360 MW Natural Gas-Fired Combined Cycle Electric Generating Facility in Person County, North Carolina. On behalf of the Southern Alliance for Clean Energy (SACE). June 9, 2025.

Kansas Corporation Commission (Docket No. 25-EKCE-207-PRE): Settlement testimony of Lucy Metz in Support of Unanimous Partial Settlement on Solar Facility and Testimony in Opposition to Non-Unanimous Partial Settlement on Natural Gas Facilities. On behalf of Citizens' Utility Ratepayer Board (CURB). April 17, 2025.

Kansas Corporation Commission (Docket No. 25-EKCE-207-PRE): Direct testimony of Lucy Metz in the matter of the Petition of Evergy Kansas Central, Inc., Evergy Kansas South, Inc., and Evergy Metro, Inc. for Determination of the Ratemaking Principles and Treatment that Will Apply to the Recovery in Rates of the Costs to Be Incurred for Certain Electric Generation Facilities under K.S.A. 66-1239. On behalf of Citizens' Utility Ratepayer Board (CURB). March 14, 2025.

Public Service Commission of Wisconsin (Docket No. 6690-UR-128): Surrebuttal testimony of Lucy Metz in the matter of the Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates. On behalf of Sierra Club. September 18, 2024.

Public Service Commission of Wisconsin (Docket No. 6690-UR-128): Direct testimony of Lucy Metz in the matter of the Application of Wisconsin Public Service Corporation for Authority to Adjust Electric and Natural Gas Rates. On behalf of Sierra Club. August 19, 2024.

Georgia Public Service Commission (Docket No. 55378): Direct Testimony of Devi Glick and Lucy Metz in re: Georgia Power Company's 2023 Integrated Resource Plan Update. On behalf of Sierra Club. February 15, 2024.

PUBLICATIONS

Eash-Gates, P., S. Koester, L. Metz, J. Hittinger, A. Hopkins, I. Weiss. 2025. *Recasting the Future: Policy Approaches to Drive Cement Decarbonization*. Synapse Energy Economics for Clean Air Task Force.

Glick, D., T. Gyalmo, D. Karabakal, L. Metz, C. Resor. 2024. *Review of Tennessee Valley Authority's Draft 2025 Integrated Resource Plan*. Synapse Energy Economics for Sierra Club.

DeLeon, S., K. Takahashi, E. Carlson, A. S. Hopkins, S. Kwok, J. Litynski, C. Mattioda, L. Metz. 2024. *Minnesota Building Decarbonization Analysis: Equitable and cost-effective pathways toward net-zero emissions for homes and businesses*. Synapse Energy Economics for Clean Heat Minnesota.

Shenstone-Harris, S., A. Zeng, L. Metz, M. Whited. 2024. *On the Road to Fleet Electrification: A Framework for Estimating Distribution System Impacts of Medium- and Heavy-Duty Vehicle Electrification*. Synapse Energy Economics for Advanced Energy United.

Eash-Gates, P., L. Metz, K. Schultz, S. Kwok, A. Hopkins. *Connecticut Comprehensive Energy Strategy: Buildings White Paper*. Prepared by Synapse Energy Economics for Connecticut Department of Energy and Environmental Protection. Forthcoming.

Eash-Gates, P., L. Metz, S. Kwok, K. Schultz, K. Takahashi. *Pathways for Connecticut Building Decarbonization: Analysis of Thermal Decarbonization Scenarios Aligned to the Global Warming Solutions Act*. Prepared by Synapse Energy Economics for Connecticut Department of Energy and Environmental Protection. Forthcoming.

Metz, L., A. Napoleon, P. Eash-Gates. *Memo: Equity Metrics for Building Thermal Decarbonization in Connecticut*. Prepared by Synapse Energy Economics for Connecticut Department of Energy and Environmental Protection. Forthcoming.

Metz, L., E. Carlson, O. Griot. 2023. *Methane Waste and Pollution State Factsheets*. Synapse Energy Economics for the Environmental Defense Fund.

Eash-Gates, P., O. Griot, A. Hopkins, L. Metz, E. Sinclair, J. Smith. 2023. *Coming Clean on Industrial Emissions: Challenges, Inequities, and Opportunities in U.S. Steel, Aluminum, Cement, and Coke*. Prepared by Synapse Energy Economics for Sierra Club.

Frost, J., P. Knight, S. Sharaf, L. Metz, and S. Kwok. 2023. *RGGI's Economic Benefits for Pennsylvania: Exploring the benefits of the Regional Greenhouse Gas Initiative*. Prepared by Synapse Energy Economics for Evergreen Collaborative.

Metz, L., M. Whited, P. Rhodes, E. Carlson. 2023. *Distribution System Investments to Enable Medium- and Heavy-Duty Vehicle Electrification*. Synapse Energy Economics for the Environmental Defense Fund.

Knight, P., J. Frost, T. Fitch, E. Sinclair, J. Taberner, O. Griot, B. Havumaki, J. Smith, L. Metz, S. Chavin. 2023. *TVA's Clean Energy Future: Charting a course to decarbonization in the Tennessee Valley*. Synapse Energy Economics for GridLab and Center for Biological Diversity.

Yuan, M., A. Barron, N. Selin, P. Picciano, L. Metz, J. Reilly, and H. Jacoby. 2022. "Meeting U.S. greenhouse gas emissions goals with the international air pollution provision of the Clean Air Act." *Environmental Research Letters* 17 (5): 054019.

Barron, A., M. Domeshek, L. Metz, L. Draucker, and A. Strong. 2021. "Carbon neutrality should not be the end goal: Lessons for institutional climate action from U.S. higher education." *One Earth* 4 (9): 1248–1258.

Longnecker, E., L. Metz, R. Miller, and A. Berke. 2021. "Probing Liquid–Liquid Phase Separation in Secondary Organic Aerosol Mimicking Solutions Using Articulated Straws." *ACS Omega* 6 (49): 33436–33442.

Figuroa, L., M. Blinder, C. Grincavitch, A. Jelinek, E. Mann, L. Merva, L. Metz, A. Zhao, R. Irwin, S. McArt, and L. Adler. 2019. "Bee pathogen transmission dynamics: Deposition, persistence and acquisition on flowers." *Proceedings of the Royal Society B*, 286: 20190603.

Resume updated December 2025

Exhibit LM-2: DESC Response to ORS Data
Request No. 1-30

**DOMINION ENERGY SOUTH CAROLINA, INC.
SOUTH CAROLINA OFFICE OF REGULATORY STAFF'S
FIRST AND CONTINUING REQUEST FOR BOOKS,
RECORDS, AND OTHER INFORMATION
DOCKET NO. 2025-323-E**

REQUEST NO. 1-30:

Identify the expected life of the Proposed Facilities.

RESPONSE NO. 1-30:

The natural gas combined cycle electric generating plant portion of the Proposed Facilities are being designed for and have been modeled as having a technical and economic life of approximately 36 years.

Associated facilities (*e.g.*, the Edisto River Switchyard and Colleton County Substation electric transmission assets) were modeled separately by the Company for this proceeding with a technical economic and economic life of approximately 44 years.

PERSON RESPONSIBLE: James W. Neely, Andrew R. Walker

Exhibit LM-3: DESC Response to ORS Data
Request No. 1-31, “CONFIDENTIAL JOA
Schedule 3.02 - Project Budget
(CONFIDENTIAL).pdf.”

This exhibit has been redacted in its entirety.

Exhibit LM-4: DESC Response to Sierra Club
Data Request No. 1-15

**SIERRA CLUB
FIRST SET OF DATA REQUESTS TO
SOUTH CAROLINA PUBLIC SERVICE AUTHORITY (SANTEE COOPER) &
DOMINION ENERGY SOUTH CAROLINA, INC.
DOCKET NO. 2025-323-E**

REQUEST NO. 1-15:

Please refer to page 15 of DESC Witness R. Scott Parker's testimony, where he states that the \$202 million estimate from the 2024 Transmission Impact Assessment ("TIA") has been increased to account for uncertainty in the Joint Resource's costs, and is now considered to be "\$315 million in 2024 dollars."

- a. Does this \$315 million cost estimate include the costs of constructing the 230 kV transmission facilities discussed in Request No. 1-14 above?
- b. Does this \$315 million cost estimate include the cost of building the Edisto River Switchyard, which is estimated to be \$96 million?
- c. Does this \$315 million cost estimate include the costs of any "offsite Network Upgrades," as described on page 28 of Witness Parker's testimony?
- d. Please refer to Witness Parker's statement on pages 15-16 of his testimony: "When escalated to the assumed in-service date for the Canadys Joint Resource in 2033, this amount is approximately \$376 million."
 - i. Does this mean that the \$376 million figure is the \$315 million estimate, but converted to 2033 dollars?
- e. What is the value of the \$315 million estimate in 2026 dollars, as opposed to 2024 dollars?
- f. Please refer to DESC Witness Andrew Walker's statement on page 29 of his testimony: "The overall cost for the generating plant and all on-site electric transmission facilities at the Canadys Station site is currently estimated at approximately \$5 billion" (emphasis added).
 - i. Please confirm whether the \$5 billion estimate for constructing the Joint Resource includes the \$315 million in transmission costs referenced in part (a)-(c).
 - ii. If not, explain what distinguishes the \$315 million in transmission costs from the other transmission costs that are included in the \$5 billion cost estimate.
- g. Given that the 2024 TIA was based on an estimated 2,000 MW project at the Canadys site, and the Joint Resource is now estimated to be 2,180 MW, please confirm whether the total cost of transmission upgrades now exceeds the \$315 million estimate.
 - i. If so, by how much do the Joint Applicants project the total cost of transmission upgrades will increase due to the unit's larger size?

DESC RESPONSE NO. 1-15:

- a. The \$315 million is an estimate of the costs of constructing the 230 kV electric transmission Network Upgrades for the Canadys Joint Resource as discussed in the Company's Response to Sierra Club Request No. 1-14.
- b. No. This facility, and associated cost is included in the Joint Application.

**SIERRA CLUB
FIRST SET OF DATA REQUESTS TO
SOUTH CAROLINA PUBLIC SERVICE AUTHORITY (SANTEE COOPER) &
DOMINION ENERGY SOUTH CAROLINA, INC.
DOCKET NO. 2025-323-E**

- c. Yes. See DESC's Response to Sierra Club Request No. 1-15 (a) above.
- d. Yes.
- e. Approximately \$328 million.
- f.
 - i. It does not.
 - ii. As referenced in DESC witness Andrew R. Walker's pre-filed direct testimony in this proceeding, the \$5 billion figure includes all on-site electric transmission costs (*i.e.*, Interconnection Facilities). This includes the jointly-owned Edisto River 230 kV switchyard, the DESC-owned Colleton County 230/115 kV substation, and associated electric transmission lines and work to reterminate transmission lines currently connected to the Canadys 230/115 kV substation to these two new switchyards/substations on site. The electric transmission Network Upgrade cost estimate of approximately \$315 million for DESC reflects projected upgrades to existing transmission lines and/or new electric transmission lines needed to support the Canadys Joint Resource. Those upgrades are not a part of the Joint Application.
- g. There is not a linear relationship between the size of the Joint Resource and the associated scope, schedule, and cost of electric transmission Network Upgrades. Electric transmission Network Upgrades such as transmission lines and transformers come in specific standard capacities. The Network Upgrades required for a generating resource are not always directly proportional to the size/capacity of the generating resource. The ultimate costs for electric transmission Network Upgrades associated with the Canadys Joint Resource will be determined by the DISIS cluster study process and Affected System studies.

Exhibit LM-5: DESC Response to Sierra Club
Data Request No. 1-08

**SIERRA CLUB
FIRST SET OF DATA REQUESTS TO
SOUTH CAROLINA PUBLIC SERVICE AUTHORITY (SANTEE COOPER) &
DOMINION ENERGY SOUTH CAROLINA, INC.
DOCKET NO. 2025-323-E**

REQUEST NO. 1-08:

State whether each Company allowed the PLEXOS or EnCompass model to optimize / select a retirement date for any of its coal-fired power plants.

a. Looking at Santee Cooper's EnCompass model, please confirm whether Santee allowed the models to select an earlier retirement date for Winyah than 2035, under any portfolios.

DESC RESPONSE NO. 1-08:

PLEXOS was not allowed to optimize retirement dates for any coal-fired power plants. The retirement assumptions utilized in the modeling for this proceeding are consistent with those used in DESC's 2025 IRP Update and the Canadys Joint Resource is foundational in supporting potential future coal plant retirements.

**Exhibit LM-6: Santee Cooper Response to
CCL/SACE Data Request No. 2-4**

IN RE: JOINT APPLICATION OF SOUTH CAROLINA PUBLIC SERVICE AUTHORITY (SANTEE COOPER) AND DOMINION ENERGY SOUTH CAROLINA, INC. FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC CONVENIENCE AND NECESSITY FOR THE CONSTRUCTION AND OPERATION OF AN ADVANCED CLASS COMBINED CYCLE GENERATING PLANT AND ASSOCIATED FACILITIES IN COLLETON COUNTY, SOUTH CAROLINA PURSUANT TO S.C. CODE ANN. § 58-33-10 ET SEQ.

DOCKET NO. 2025-323-E

Before the Public Service Commission of South Carolina
South Carolina Coastal Conservation League and Southern Alliance for Clean Energy’s Second
Data Request to South Carolina Public Service Authority (Santee Cooper) and Dominion Energy
South Carolina, Inc.

Date Received: 12/23/2025

Request No.: 2-4

Question/Data Request:

Please refer to page 12 of Clay Settle’s Direct Testimony where he states that “several potential new large loads amounting to over 400 MW signed service agreements and were moved into the ‘base’ load forecast as committed load (and therefore not considered in the stochastic analysis of the 2025 Load Forecast).”

- a. Please provide a breakout of the potential new large loads “over 400 MW” by the MW number for each customer.
- b. Please confirm if the customers with the service agreements have connected to the Santee Cooper or Central system.

Response to Question/Data Request:

The loads referenced are exclusively Central loads and therefore Santee Cooper does not have a precise breakout of customer loads or contracts.

Reference Documents:

N/A

Provided by:

Full Name	Greg McCormack
Business Title	Senior Director of Financial Planning
Address	1 Riverwood Drive, Moncks Corner, SC 29461

IN RE: JOINT APPLICATION OF SOUTH CAROLINA PUBLIC SERVICE AUTHORITY (SANTEE COOPER) AND DOMINION ENERGY SOUTH CAROLINA, INC. FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC CONVENIENCE AND NECESSITY FOR THE CONSTRUCTION AND OPERATION OF AN ADVANCED CLASS COMBINED CYCLE GENERATING PLANT AND ASSOCIATED FACILITIES IN COLLETON COUNTY, SOUTH CAROLINA PURSUANT TO S.C. CODE ANN. § 58-33-10 ET SEQ.

DOCKET NO. 2025-323-E

Telephone Number	843-761-8000 ex. 4814
Email	Greg.McCormack@santecooper.com

ATTESTATION: I, Greg McCormack, attest that the information given in response to the above question is full and accurate.


A rectangular box containing a handwritten signature in cursive script that reads "Greg McCormack".

Exhibit LM-7: DESC Response to CCL/SACE
Data Request No. 1-65

**SOUTH CAROLINA COASTAL CONSERVATION LEAGUE
AND SOUTHERN ALLIANCE FOR CLEAN ENERGY'S
FIRST DATA REQUEST TO
DOMINION ENERGY SOUTH CAROLINA, INC.
DOCKET NO. 2025-323-E**

REQUEST NO. 1-65:

Regarding new large load customers, please answer the following. If the question pertains to confidential customer information, please anonymize identifiable customer information to the extent possible in your response:

- a. Please explain how DESC tracks large load interconnection requests.
- b. Please explain when DESC starts tracking information on prospective customers.
- c. Please explain if DESC tracks the reason why a potential customer leaves its load interconnection queue, and provide such data collected over the past two years.
- d. If DESC does not track the information requested in subpart (c), please provide the number and associated MWs of prospective customers that have left the load interconnection queue and the reason for leaving.
- e. For any potential new customers, please detail the conversations, if any, that DESC has had with those potential new customers about arrangements for curtailable load, standby on-site generation, behind-the-meter generation, participation in energy efficiency programs, or any other approaches to offset the capacity need of each potential new customer.
- f. Please explain if any of the large load customers included in DESC's load forecast for the period from 2025–2035 have made requests to modify their initial service request (i.e., modifications to the load ramp or delays to date of service). If such requests have been made by any such customers, please identify the reason for the request and the timeline of each delay, if known.
- g. Please provide any electric service agreements and/or special contracts that DESC has signed with the large load customers included in DESC's load forecast for the period from 2025–2035.
- h. If any new, large load customers have not signed an electric service agreement, please provide the customer's stage in the interconnection process.
- i. For each new, large load customer in DESC's load forecast, please provide the following:
 1. Peak demand
 2. Ramp schedule
 3. Annual energy requirements
 4. Load factor
 5. Hourly shape
 6. Anticipated date of service
 7. Commercial activity of the customer (e.g., data center, cryptocurrency, manufacturing, etc.)
- j. Please provide the following information for each new, large load customer:
 1. Whether the prospective customer has site control.
 2. The construction progress for the location.

**SOUTH CAROLINA COASTAL CONSERVATION LEAGUE
AND SOUTHERN ALLIANCE FOR CLEAN ENERGY'S
FIRST DATA REQUEST TO
DOMINION ENERGY SOUTH CAROLINA, INC.
DOCKET NO. 2025-323-E**

3. For data center customers, the type of data center (e.g., hyperscaler, collocator with tenants, developers, or real estate developers). If the data center is a collocator, state whether the prospective customer has a committed tenant(s).
4. Whether the prospective customer has secured the necessary permits for the site.
5. Whether the prospective customer has an engineered site plan.
6. The experience of the prospective customer and the number of projects that have been developed.
7. Whether the prospective customer is pursuing alternative site locations in another utility service territory.

RESPONSE NO. 1-65:

DESC's reference load forecast does not include any customers that have not signed binding electric service agreements and all have been included in prior load forecasts in IRP updates.

a.

"Interconnection" requests generally mean a generator interconnecting to the DESC system. The below response refer to the requests of prospective customers – typically industrial or large commercial.

There are five options for "Activity" entry on the Project Activity Report noted above:

1. Project Update: Any update of activity such as "site is one of two being considered in SC" "Project asked for further clarification on electric service."
2. RFI Response: Initial project request for information such as electric or natural gas load capacity, time to serve and/or cost to serve.
3. Site Visit: Project has visited the site.
4. Project Inactive: A project with no activity within 6 months.
5. Project Announced: Project has announced its intention to locate in DESC electric or natural gas territory.

b.

DESC tracks projects that request information on the ability to serve electric service at a specific location in the DESC service area. These projects originate from SC Department of Commerce, regional alliances or counties.

c.

The Company does not track why a project leaves its service area.

**SOUTH CAROLINA COASTAL CONSERVATION LEAGUE
AND SOUTHERN ALLIANCE FOR CLEAN ENERGY'S
FIRST DATA REQUEST TO
DOMINION ENERGY SOUTH CAROLINA, INC.
DOCKET NO. 2025-323-E**

- d. The Company does not track the projects that leave the DESC load interconnection, nor does it track the reason.
- e. All customer program options are discussed with company representatives. The Company does not track or record any specific conversations.
- f. No material changes in the customer load forecasts.
- g. All large load customers included in DESC's load forecast have electric service agreements and represent hundreds of individual customers. Therefore, DESC objects to this request on the grounds that it is overly broad, not calculated to lead to the production of relevant evidence beyond the needs of the case and is unduly burdensome for DESC to compile the information requested.
- h. All large load customers have signed electric service agreements.
- i. All large load customers included in DESC's reference load forecast are committed customers who have signed binding electric service agreements and have been included in DESC's load forecasts in prior IRPs or IRP updates.
- j. All large load customers included in DESC's reference load forecast are committed customers who have signed binding electric service agreements and have been included in DESC's load forecasts in prior IRPs or IRP updates.

Exhibit LM-8: DESC Response to Sierra Club
Data Request No. 1-34, “DESC Response to
Sierra Club 1-34.xlsx”

**SIERRA CLUB
FIRST SET OF DATA REQUESTS TO
SOUTH CAROLINA PUBLIC SERVICE AUTHORITY (SANTEE COOPER) &
DOMINION ENERGY SOUTH CAROLINA, INC.
DOCKET NO. 2025-323-E**

REQUEST NO. 1-34:

How many megawatts of DESC's forecasted load growth is from large load users?

a. Please provide any documentation of any analyses on this question.

DESC RESPONSE NO. 1-34:

See attached spreadsheet "DESC Response to Sierra Club 1-34.xlsx".

Please note that the specific customers identified in this spreadsheet have been previously publicly identified by DESC in other proceedings.

Exhibit LM-9: DESC Response to CCL/SACE
Data Request No. 1-86

**SOUTH CAROLINA COASTAL CONSERVATION LEAGUE
AND SOUTHERN ALLIANCE FOR CLEAN ENERGY'S
FIRST DATA REQUEST TO
DOMINION ENERGY SOUTH CAROLINA, INC.
DOCKET NO. 2025-323-E**

REQUEST NO. 1-86:

For the new customers included in DESC's load forecast:

- a. Please provide the supporting workbooks, with all formulas and links intact, used to develop the energy and peak demand assumptions modeled for each new customer included in the forecast.
- b. For each new customer included in the load forecast, please provide the peak demand, annual energy requirements, load factor, anticipated date the customer expects to receive service, the commercial activity of the customer (i.e. data center, cryptocurrency, or EV manufacturing), and whether the customer has entered into any agreements or contracts with DESC.
 1. For each new customer that has executed an agreement indicating an intention to obtain service from DESC, please provide the date of the agreement.
 2. If agreements have not been executed, please explain if any of the new customers are considering locating their facility outside of DESC's service territory or in another state.
- c. Please explain if any of the new customers have commenced site construction activities.
- d. Please explain if DESC has had any conversations with new customers about arrangements for curtailable load, standby on-site generation, participation in energy efficiency programs, or any other approaches to offset the capacity need of the new customers.

RESPONSE NO. 1-86:

No new economic development customers have been added DESC's Reference Load Forecast since the Company's 2024 IRP Update.

Exhibit LM-10: DESC Response to CCL/SACE
Data Request No. 2-24

This exhibit has been redacted in its entirety.

Exhibit LM-11: DESC Response to ORS Data
Request No. 1-35; Santee Cooper Response to
ORS Data Request No. 1-35

**DOMINION ENERGY SOUTH CAROLINA, INC.
SOUTH CAROLINA OFFICE OF REGULATORY STAFF'S
FIRST AND CONTINUING REQUEST FOR BOOKS,
RECORDS, AND OTHER INFORMATION
DOCKET NO. 2025-323-E**

REQUEST NO. 1-35:

Provide the estimated cost of any network upgrades on the Company's or any other entity's transmission system that will be required to accommodate the interconnection and operation of the Proposed Facilities.

RESPONSE NO. 1-35:

The scope, schedule, and costs for Network Upgrades that will be required to accommodate the interconnection and operation of the Proposed Facilities are subject to the results of the on-going Definitive Interconnection System Impact Study ("DISIS") cluster study process and future Affected System studies.

Notwithstanding the foregoing, as discussed in the pre-filed direct testimony of DESC witness R. Scott Parker (p. 15), the estimated cost of DESC Network Upgrades identified in the Company's 2024 Transmission Impact Analysis ("TIA") was \$202 million (in 2024 dollars).

For the most recent modeling performed by DESC Resource Planning in this proceeding and for modeling purposes in the Company's forthcoming 2026 Integrated Resource Plan, an estimated cost of \$315 million (in 2024 dollars) was used to account for increasing/escalating costs of electric transmission equipment and construction.

The network upgrades on other entities' transmission systems must be determined by those entities. DESC is not responsible for those upgrade costs.

PERSON RESPONSIBLE: R. Scott Parker, James W. Neely

IN RE: JOINT APPLICATION OF SOUTH CAROLINA PUBLIC SERVICE AUTHORITY (SANTEE COOPER) AND DOMINION ENERGY SOUTH CAROLINA, INC. FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC CONVENIENCE AND NECESSITY FOR THE CONSTRUCTION AND OPERATION OF AN ADVANCED CLASS COMBINED CYCLE GENERATING PLANT AND ASSOCIATED FACILITIES IN COLLETON COUNTY, SOUTH CAROLINA PURSUANT TO S.C. CODE ANN. § 58-33-10 ET SEQ.

DOCKET NO. 2025-323-E

Before the Public Service Commission of South Carolina
South Carolina Office of Regulatory Staff's First and Continuing Request for Production of Books, Records, and Other Information
Date Received: 12/19/2025
Request No.: 1-35

Question/Data Request:

Provide the estimated cost of any network upgrades on Santee Cooper's or any other entity's transmission system that will be required to accommodate the interconnection and operation of the Proposed Facilities.

Response to Question/Data Request:

In 2024, Santee Cooper completed a Transmission Impact Analysis evaluating the retirement of the Winyah Generating Station, which included scenarios with replacement generation sited at Canadys (see Reference Document below). Note that these scenarios differ from what is being proposed in this filing, although Scenario 2 (outlined in the Reference Document) is similar in overall scope to the Canadys Joint Resource but lower in total output. While Santee Cooper continues to evaluate and identify specific transmission projects necessary for the Canadys Joint Resource through the DISIS process, at this time, we anticipate total network upgrade costs for the Santee Cooper system to be consistent with costs identified in the 2024 Transmission Impact Analysis, when appropriately adjusted for escalation and contingency.

Reference Documents:

1.35 ORS 12192025 DESC-SC Generation Retirement Transmission Impact Analysis CONFIDENTIAL.pdf

Provided by:

Full Name	Christopher M. Wagner
-----------	-----------------------

IN RE: JOINT APPLICATION OF SOUTH CAROLINA PUBLIC SERVICE AUTHORITY (SANTEE COOPER) AND DOMINION ENERGY SOUTH CAROLINA, INC. FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC CONVENIENCE AND NECESSITY FOR THE CONSTRUCTION AND OPERATION OF AN ADVANCED CLASS COMBINED CYCLE GENERATING PLANT AND ASSOCIATED FACILITIES IN COLLETON COUNTY, SOUTH CAROLINA PURSUANT TO S.C. CODE ANN. § 58-33-10 ET SEQ.

DOCKET NO. 2025-323-E

Business Title	Director Transmission Planning
Address	One Riverwood Drive Moncks Corner, SC 29461
Telephone Number	843-761-8000 x4947
Email	Chris.Wagner@santecooper.com

ATTESTATION: I, Christopher M. Wagner, attest that the information given in response to the above question is full and accurate.



Exhibit LM-12: Santee Cooper Response to
Sierra Club Data Request No. 1-16

IN RE: JOINT APPLICATION OF SOUTH CAROLINA PUBLIC SERVICE AUTHORITY (SANTEE COOPER) AND DOMINION ENERGY SOUTH CAROLINA, INC. FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC CONVENIENCE AND NECESSITY FOR THE CONSTRUCTION AND OPERATION OF AN ADVANCED CLASS COMBINED CYCLE GENERATING PLANT AND ASSOCIATED FACILITIES IN COLLETON COUNTY, SOUTH CAROLINA PURSUANT TO S.C. CODE ANN. § 58-33-10 ET SEQ.

DOCKET NO. 2025-323-E

Before the Public Service Commission of South Carolina
Sierra Club's First Set of Data Requests
Date Received: 01/15/2026
Request No.: 1-16

Question/Data Request:

Please refer to page 15 of Santee Cooper Witness Christopher Wagner's testimony, which states that if "necessary transmission upgrades" are not in made in time for the Joint Resource's commercial operation date, Santee Cooper can use an "operating procedure that would be implemented under certain specific contingency conditions" to operate the Joint Resource.

- b. Please explain what this "operating procedure" refers to, and how the Joint Applicants would operate the plant before the necessary transmission upgrades have been completed.
- c. Would operating the Joint Resource pursuant to such measures increase the Joint Resource's total operation and maintenance costs?
 - i. If so, by how much are those costs projected to increase?
- d. Would this "operating procedure" only be available for a certain period of time, or could it be employed indefinitely?
 - i. If the former, what is the longest duration this "operating procedure" can be used?

Response to Question/Data Request:

A resource may be allowed to operate prior to network upgrades being fully completed if the network upgrades were identified as being necessary to mitigate certain contingency scenarios. In these cases, an operating procedure may be developed to take necessary steps to maintain reliability in the event the contingency scenario initiating the need for the network upgrade occurs in real-time and the limiting element is expected to exceed its rating based on the system conditions at the time. This would not be expected to result in additional operating or maintenance costs. The operating procedure would be available until the network upgrades identified as being necessary to mitigate the exceedance of the identified facility rating are placed in-service.

IN RE: JOINT APPLICATION OF SOUTH CAROLINA PUBLIC SERVICE AUTHORITY (SANTEE COOPER) AND DOMINION ENERGY SOUTH CAROLINA, INC. FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC CONVENIENCE AND NECESSITY FOR THE CONSTRUCTION AND OPERATION OF AN ADVANCED CLASS COMBINED CYCLE GENERATING PLANT AND ASSOCIATED FACILITIES IN COLLETON COUNTY, SOUTH CAROLINA PURSUANT TO S.C. CODE ANN. § 58-33-10 ET SEQ.

DOCKET NO. 2025-323-E

Reference Documents:

N/A

Provided by:

Full Name	Christopher M. Wagner
Business Title	Director Transmission Planning
Address	One Riverwood Drive Moncks Corner, SC 29461
Telephone Number	843-761-8000 x4947
Email	Chris.Wagner@santecooper.com

ATTESTATION: I, Christopher M. Wagner, attest that the information given in response to the above question is full and accurate.



Exhibit LM-13: DESC Response to Sierra Club
Data Request No. 1-07 in DESC 2025 IRP
Update

**DOMINION ENERGY SOUTH CAROLINA, INC.
SIERRA CLUB'S
FIRST SET OF DATA REQUESTS
DOCKET NO. 2025-9-E**

REQUEST NO. 1-07:

Please refer to page 8 of DESC's 2025 IRP Update, which states: "The cost of Wateree ELG compliance is modest compared to the annual value of the 684 MW of firm, dispatchable capacity that the plant provides. DESC anticipates its ELG upgrades to be completed at Wateree by the end of 2028 and at Williams by the end of 2025."

- b. What are the total expected capital costs associated with ELG compliance at Wateree (including all prior, current, and future ELG capital costs)?
 - a. Please provide all documentation showing an itemized breakdown of the ELG-related capital costs at Wateree, and DESC's timeline for incurring those costs.
- c. What are the total expected operations & maintenance ("O&M") costs associated with ELG compliance at Wateree (including all prior, current, and future ELG O&M costs)?
 - a. Please provide all documentation showing an itemized breakdown of the ELG-related O&M costs at Wateree, and DESC's timeline for incurring those costs.
- d. Please provide any cost-benefit analyses that quantitatively compares the costs of ELG compliance at Wateree to the "value of the 684 MW of firm, dispatchable capacity" from the plant.

RESPONSE NO. 1-07:

7.b

Total Expected Costs for Wateree ELG compliance \$250M

2012 – ELG Bottom Ash Remote Submerged Flight Conveyor \$25M

2015 – 2028 – ELG FGD WW Compliance \$200M

2029 – ZLD Compliance \$25M

7.c

Expected O&M costs

The final technology for ELG FGD WW treatment has not been finalized. O&M cost estimates have not been developed for Wateree.

7d. When the energy provided by Wateree is valued at the DESC avoided cost of \$38.05/MWh, Wateree provides \$91.2M of value to customers per year. (40%

**DOMINION ENERGY SOUTH CAROLINA, INC.
SIERRA CLUB'S
FIRST SET OF DATA REQUESTS
DOCKET NO. 2025-9-E**

Avg Capacity Factor x 8760 hrs x 684 MW x \$38.05). Total ELG costs at \$250M will cost customers \$32.65M/yr ($\$250\text{M} \times 13.06\%$ fixed charge rate). $\$91.2\text{M} - \$32.65\text{M} = \$58.55\text{M}$ net value per year. In addition, the plant provides extremely valuable reliability, transmission, operational flexibility and ancillary service values.

Exhibit LM-14: DESC Response to Sierra Club
Data Request No. 1-08 in DESC 2025 IRP
Update

**DOMINION ENERGY SOUTH CAROLINA, INC.
SIERRA CLUB'S
FIRST SET OF DATA REQUESTS
DOCKET NO. 2025-9-E**

REQUEST NO. 1-08:

Please refer to Dominion's 2021 NPDES permit renewal application (Permit No. SC0003883) for Williams, which describes Effluent Guidelines in Attachment A.

- a. What are the total expected capital costs associated with ELG compliance at Williams (including all prior, current, and future ELG capital costs)?
 - i. Please provide all documentation showing an itemized breakdown of the ELG-related capital costs at Williams, and DESC's timeline for incurring those costs.
- b. What are the total expected operations & maintenance ("O&M") costs associated with ELG compliance at Williams (including all prior, current, and future ELG O&M costs)?
 - i. Please provide all documentation showing an itemized breakdown of the ELG-related O&M costs at Williams, and DESC's timeline for incurring those costs.

RESPONSE NO. 1-08:

- a. \$230M for ELG compliance prior, current, future
2025 - \$165M for ELG FGD
2025 - \$15M for ELG BATW
Future - \$50M for BATW, Leachate, ZLD
- b. Expected annual O&M for ELG FGD \$4.5 - \$5M starting 2026
Technologies for BATW, Leachate, ZLD not determined, no O&M estimate developed

Exhibit LM-15: Santee Cooper Response to
Sierra Club Data Request No. 2-31c in Santee
Cooper 2025 IRP Update

IN RE: SOUTH CAROLINA PUBLIC SERVICE AUTHORITY’S (SANTEE COOPER) 2025 INTEGRATED RESOURCE PLAN (IRP) UPDATE

DOCKET NO. 2025-18-E

Before the Public Service Commission of South Carolina
South Carolina Office of Regulatory Staff’s Second and Continuing Request for Production of Books, Records, and Other Information
Date Received: 10/23/2025
Request No.: 2-31c

Question/Data Request:

Refer to Santee Cooper’s response to ORS Request No. 1-43.

- c) Describe any additional costs Santee Cooper would incur if Winyah were to operate beyond 2035.

Response to Question/Data Request:

In order for Santee Cooper to operate Winyah beyond 2035, Santee Cooper would have to comply with the EPA Effluent Limitation Guidelines (“ELG Rule”). Operating Winyah beyond 2035 under the 2024 ELG Rule would require Santee Cooper to invest in Zero Liquid Discharge (“ZLD”) facilities by 2029. The latest budgetary estimate for Zero Liquid Discharge at Winyah is \$250M with spend starting as soon as 2026 for pilot evaluations that would be necessary to determine the Zero Liquid Discharge design feasibility.

The EPA has issued draft ELG Rule modifications that would extend the compliance deadline to 2034 as opposed to 2029 under the current rule. However, the draft ELG Rule modifications would still require ZLD investment in order to operate beyond 2034. Additionally, the current 2024 ELG Rule provides a provision for possible extension to the cessation subcategory under 40 CFR 423.18 for grid stability if in the event operation beyond 2035 was deemed necessary to preserve grid stability.

Any other cost that would be necessary to operate beyond 2035 are not known at this point in time. Additional cost estimates beyond normal operating and maintenance cost would require engineering assessments to develop capital and maintenance cost estimates for continued operation in and beyond 2035.

Reference Documents:

N/A