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THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

S.C. Supreme Court

APPEAL FROM THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

Docket No. 2012-203-E
Appellate Case No. 2013-000529

South Carolina Energy Users Committee, Appellant-Respondent,

v.

South Carolina Electric and Gas, Office of Regulatory Staff, and
Pamela Greenlaw, Respondents,

and Sierra Club, Respondent-Appellant.

MOTION OF
SOUTH CAROLINA ELECTRIC & GAS COMPANY
FOR AN EXTENSION OF TIME

Respondent South Carolina Electric & Gas Company (“SCE&G” or “Company”), pursuant to Rules 240 and 263, SCACR, hereby moves the Supreme Court of South Carolina for an order extending the time by thirty (30) days within which to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal. In support of this motion, SCE&G would respectfully show this Court the following key facts and would request of and move the Court for the following relief.

By Order dated August 23, 2013, SCE&G's Initial Brief and Designation of Matter to be Included in the Record on Appeal must be served and filed by September 30, 2013. The Company is diligently working to meet the September 30, 2013 deadline but requires additional time to complete its work. In this appeal, Appellant-Respondent South Carolina Energy Users Committee and Respondent-Appellant Sierra Club have raised issues in their respective Initial Briefs which require SCE&G to carefully review and examine an extensive transcript of record. It is imperative that SCE&G be afforded sufficient time and opportunity within which to prepare its Initial Brief and Designation of Matter to be Included in the Record on Appeal because the issues raised in this appeal will have a lasting impact on the Company, its customers, and the State of South Carolina. Additionally, the press of counsel's other business is a contributing factor to the filing of this motion.

In advance of filing this motion, counsel for SCE&G has informed the other parties of the Company's intent to request additional time within which to serve and file SCE&G's Initial Brief and Designation of Matter to be Included in the Record on Appeal. Attached hereto as Exhibit A is a copy of the communications among counsel in which counsel for the other parties has consented to SCE&G's motion for an extension of time. Counsel for SCE&G has attempted to communicate with Respondent Pamela Greenlaw but has been unsuccessful in reaching her.

WHEREFORE, SCE&G respectfully requests that the Court grant the Company's motion and extend the deadline by thirty (30) days within which to serve and file its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,



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Attorneys for Respondent
South Carolina Electric & Gas Company

Cayce, South Carolina
September 16, 2013

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CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day a copy of
South Carolina Electric & Gas Company's **Motion for an Extension of
Time** to the persons named below via U.S. First-Class Mail at the addresses
set forth:

Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

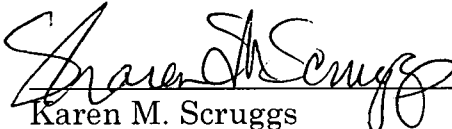
Shannon Bowyer Hudson, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Florence P. Belser, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Scott Elliott, Esquire
Elliott & Elliott, P.A.
1508 Lady Street
Columbia, SC 29201

Robert Guild, Esquire
314 Pall Mall
Columbia, SC 29201

Pamela Greenlaw
1001 Wotan Road
Columbia, SC, 29229


Karen M. Scruggs

Cayce, South Carolina
This 16th day of September 2013

From: Scott Elliott [mailto:selliott@elliottlaw.us]
Sent: Friday, September 13, 2013 11:52 AM
To: BURGESS, KENNETH CHAD; 'Robert Guild'; 'Belser, Florence'; pmlgrnlw@yahoo.com
Subject: RE: SCEUC v. SCE&G et al

I consent to your extension request. Please let me know how I can be of further help. Scott Elliott

From: BURGESS, KENNETH CHAD [mailto:chad.burgess@scana.com]
Sent: Friday, September 13, 2013 10:46 AM
To: Scott Elliott; Robert Guild; Belser, Florence; pmlgrnlw@yahoo.com
Subject: SCEUC v. SCE&G et al

Dear Parties –

SCE&G's Initial Brief and Designation of Matter of Record to be Included in the Record on Appeal must be filed with the Supreme Court by September 30, 2013.

While we are diligently working to meet this deadline, we are in need of additional time to complete our work. With that, we plan to file a motion with the Court early next week asking for a thirty day extension of time within which to complete our brief. The purpose of this email is to inquire as to whether you would be willing to consent to SCE&G's motion. Please reply to this email at your earliest convenience so that we may advise the Court accordingly.

Please know that we have discussed this matter with counsel for ORS and left each of you a voicemail message concerning our request.

If you have any questions or concerns, please do not hesitate to contact me. Thank you.

Chad

K. Chad Burgess, Esquire
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Telephone No. 803.217.8141
Mobile No. 803.807.1559
Facsimile No. 803.217.7810
E-mail address: chad.burgess@scana.com

From: Robert Guild [mailto:bguild@mindspring.com]
Sent: Friday, September 13, 2013 1:13 PM
To: BURGESS, KENNETH CHAD
Cc: Scott Elliott; Belser, Florence; pmlgrnlw@yahoo.com
Subject: Re: SCEUC v. SCE&G et al

Sierra Club consents to these extension requests.
Regards to all,
Bob Guild

Sent from my iPhone

On Sep 13, 2013, at 10:45 AM, "BURGESS, KENNETH CHAD" <chad.burgess@scana.com> wrote:

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Facsimile No. 803.217.7810
E-mail address: chad.burgess@scana.com

From: Belser, Florence [<mailto:fbelser@regstaff.sc.gov>]
Sent: Monday, September 16, 2013 10:03 AM
To: BURGESS, KENNETH CHAD
Subject: RE: SCEUC v. SCE&G et al

ORS consents to the request for extension.

Thank you.

Flo

Florence P. Belser
General Counsel
South Carolina Office of Regulatory Staff
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Columbia, SC 29201
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