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S.C. SUPREME COURT

ATTACHMENT A

(Affidavit of Rob Tanner)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF ROB TANNER

I, Rob Tanner, state and affirm the following:

1. I own Impeccable Development Management, LLC, and other affiliated entities, where I serve as Chief Executive Officer. In this role, I am responsible for the oversight and development of numerous properties in Horry County and the city of Conway.

2. The purpose of my Affidavit is to describe the impacts on Impeccable Development Management, LLC development plans if the Supreme Court (“Court”) continues to stay Dominion Energy South Carolina, Inc.’s (“Dominion”) ability to begin construction on the Project pending resolution of this appeal.

3. The Administrative Law Court (“ALC”) found that the Project is needed to serve

increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4. Indeed, “during cold weather events, Dominion must supplement its current system with compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served from [the existing system].” *Id.* During these cold weather events, which are also referred to as “peaking events,” supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n.4.

4. We are currently developing several projects, including but not limited to:

- 2875 US 501 Conway SC - Proposed 500K sq ft Power Retail Shopping Center, restaurant Row, 200 Key Hotel room and 700+ Multi Family Housing Units
- 2885 US 501 Conway SC - Popeyes & Freddy's Custard & Steakburger Restaurants
- 544 & Myrtle Ridge Road - Parker's Kitchen Gas Station, Mako Car wash & Popeyes & Freddy's Custard & Steakburger Restaurants
- 544 & Brisa Road Del Taco & Freddy's Custard & Steakburger Restaurants
- 2496 E Hwy 9 Little River SC Popeyes, Del Taco and Freddy's Custard & Steakburger Restaurants

5. This delay is causing us to slow down our projects and redesign them for propane or electrical use. We are issuing letters that are not being honored. This situation is not economically feasible for the larger projects and could ultimately prevent them from proceeding altogether.

6. We conducted an economic development feasibility study on our mixed-use project, which is projected to generate a \$1.3 billion economic impact on the local community. Additionally, the project will revitalize the main corridor on Route 501 in Conway by addressing and remediating legacy environmental issues.

7. For the foregoing reasons, I strongly support Dominion's Motion to Clarify and to Expedite the Appeal.

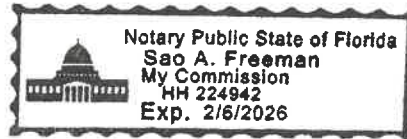
[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in and for _____, South Carolina this day personally appeared Rob Tanner and made oath and due form of law that he is the Chief Executive Officer at Impeccable Development Management, LLC and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 20th day of March, 2025



Rob Tanner
Chief Executive Officer
Impeccable Development Management, LLC



Sao A. Freeman
Notary Public (Print)

My Commission Expires: 02/06/26

ATTACHMENT B

(Affidavit of Charles H. Daniel)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF CHARLES H. DANIEL

I, Charles H. Daniel, state and affirm the following:

1. I am employed by Strand Capital Group, LLC as a Member/Manager where I am responsible for timeshare hotel construction and development.

2. The purpose of my Affidavit is to describe the impacts on Strand Capital Group, LLC if the Supreme Court (“Court”) continues to stay Dominion Energy South Carolina, Inc.’s (“Dominion”) ability to begin construction on the Project pending resolution of this appeal.

3. The Administrative Law Court (“ALC”) found that the Project is needed to serve increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4. Indeed, “during cold weather events, Dominion must supplement its current system with compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served from [the existing system].” *Id.* During these cold weather events, which are also referred to as “peaking events,”

supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n.4.

4. In July 2024, Strand Capital Group, LLC, through its affiliate company, SCG 2300, LLC, purchased oceanfront property at 2300 N. Ocean Boulevard in Myrtle Beach to develop a new 228-unit timeshare condominium project.

5. Construction of the project, which is estimated to begin in the Fall of 2025, will be delayed until Dominion is able to service the project with natural gas. All pools, commercial kitchen equipment and several of the building’s major mechanical systems are currently being designed for natural gas.

6. If Dominion is unable to service the project with natural gas and we must convert it to 100% electricity, construction costs will increase by approximately \$1,500,000 and annual operating costs will increase by approximately \$100,000. Over a 10-year period, this will be another \$1,000,000 in additional operating expenses, unadjusted for inflation.

7. The project is expected to employ over 200 seasonal and year-round workers and generate over \$3,000,000 in annual property and business tax revenue.

8. For the foregoing reasons, I strongly support Dominion’s Motion to Clarify and to Expedite the Appeal.

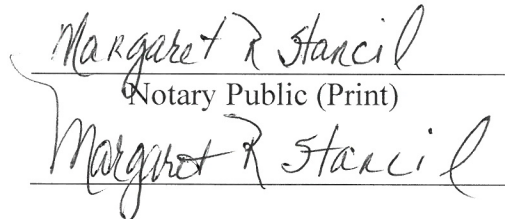
[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in and for Horry County, South Carolina this day personally appeared Charles H. Daniel and made oath and due form of law that he is the Member/Manager at Strand Capital Group, LLC and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 21st day of March, 2025

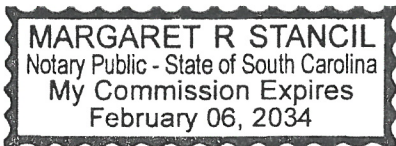


Charles H. Daniel
Member/Manager
Stand Capital Group, LLC



Margaret R Stancil
Notary Public (Print)
Margaret R Stancil

My Commission Expires: Feb 6, 2034



ATTACHMENT C

(Affidavit of C. Gregory Robinson)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF C. GREGORY ROBINSON

I, C. Gregory Robinson, state and affirm the following:

1. I am the CEO of the Florence County Economic Development Partnership (“FCEDP”), where I am responsible for overseeing and promoting the economic development of Florence County.

2. The purpose of my Affidavit is to describe the impacts on Florence County’s economic development if the Supreme Court (“Court”) continues to stay Dominion Energy South Carolina, Inc.’s (“Dominion”) ability to begin construction on the Project pending resolution of this appeal.

3. The Administrative Law Court (“ALC”) found that the Project is needed to serve increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4. Indeed, “during

cold weather events, Dominion must supplement its current system with compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served from [the existing system].” *Id.* During these cold weather events, which are also referred to as “peaking events,” supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n. 4.

4. Completion of the Project is crucial for Florence County as it will enable us to recruit new businesses, expand existing ones, and construct new homes. This is essential for the economic development of our county.

5. The delay of the Project has significant impacts on Florence County. It hinders our ability to complete new business and housing developments and forces us to rely on alternative, more expensive forms of energy.

6. Florence County has experienced losses exceeding \$10 million in existing industry and potential projects at the new *Florence County South Industrial Park* in Scranton due to the unavailability of natural gas. This has also resulted in the loss of new ad valorem building improvements, potential employees, and payroll dollars that would have circulated within the community.

7. For the foregoing reasons, I strongly support Dominion’s Motion to Clarify and to Expedite the Appeal.

[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in and for FLORENCE County, South Carolina this day personally appeared C. Gregory Robinson and made oath and due form of law that he is the CEO of FCDEP and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 25th day of March, 2025



C. Gregory Robinson
Chief Executive Officer
Florence County Economic Development
Partnership

LYNN M. WILSON
Notary Public, State of South Carolina
My Commission Expires 9/6/2029



3-25-2025

Lynn M. Wilson
Notary Public (Print)

My Commission Expires: 9-6-2029

ATTACHMENT D

(Affidavit of Adrian Sawczuk)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF ADRIAN SAWCZUK

I, Adrian Sawczuk, state and affirm the following:

1. I am the CEO of Tidal Creek Brewhouse, where I oversee the company's overall financial and operational performance.

2. The purpose of my Affidavit is to describe the impacts on Tidal Creek Brewhouse if the Supreme Court ("Court") continues to stay Dominion Energy South Carolina, Inc.'s ("Dominion") ability to begin construction on the Project pending resolution of this appeal.

3. The Administrative Law Court ("ALC") found that the Project is needed to serve increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4. Indeed, "during cold weather events, Dominion must supplement its current system with compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served from [the

existing system].” *Id.* During these cold weather events, which are also referred to as “peaking events,” supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n. 4.

4. We are expanding our operations next door to our current property to build a pickleball complex.

5. Without the ability to run natural gas lines to the property we will have to install propane gas, at greater upfront costs and ongoing expense.

6. Natural gas is less expensive and faster to install than propane, and we do not run the risk of running out during operations.

7. The exact impact of the Dominion’s failure to complete the Project is unknown, but it will take longer and cost more to complete the expansion, if we were to rely on propane gas.

8. For the foregoing reasons, I strongly support Dominion’s Motion to Clarify and to Expedite the Appeal.

[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in and for Heary County, South Carolina this day personally appeared Adrian Sawczuk and made oath and due form of law that he is the CEO of Tidal Creek Brewhouse, and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 21st day of March, 2025

DocuSigned by:
Adrian Sawczuk
53BA6696D7184A7...

Adrian Sawczuk
Chief Executive Officer
Tidal Creek Brewhouse

Sherril D. Strout

Sherril D. Strout

Notary Public (Print)

My Commission Expires: May 17, 2028

ATTACHMENT E

(Affidavit of Paul Denning)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF PAUL DENNING

I, Paul Denning, state and affirm the following:

1. I am employed by Holiday Inn Club Vacations Incorporated (“HICV”) as the Senior Director of Acquisitions and Development. In this role, I am responsible for the design coordination and development of vacation ownership resorts.

2. The purpose of my Affidavit is to describe the impacts on our Holiday Inn Club Vacations Myrtle Beach Oceanfront Resort Phase II development plans if the Supreme Court (“Court”) continues to stay Dominion Energy South Carolina, Inc.’s (“Dominion”) ability to begin construction on the Project pending-resolution of this appeal.

3. The Administrative Law Court (“ALC”) found that the Project is needed to serve

increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4. Indeed, “during cold weather events, Dominion must supplement its current system with compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served from [the existing system].” *Id.* During these cold weather events, which are also referred to as “peaking events,” supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n.4.

4. In connection with our overall planned development project of 300 units at this site, HICV provided Dominion the necessary natural gas consumption requirements in 2022 for the entire 300-unit project and **paid Dominion to increase the size of its service infrastructure to the site to accommodate this consumption.** Phase I, including the first 150 units, was constructed and opened in April 2024. Phase I and Phase II were designed to operate together, including the use of natural gas for central hot water, HVAC heating, fire pit amenities, and heating of outdoor pools and hot tubs (the “Natural Gas Serviced Systems”). Completion of the Project is critical for Dominion to supply the natural gas needed for the systems established in Phase I, which are designed to connect with the Phase II Natural Gas Serviced Systems. Upon completion of Phase I, HICV started the Phase II final design by executing over \$1.2 million in design contracts to complete the remaining 150 units on the site and the Natural Gas Serviced Infrastructure. In reliance of Dominion providing natural gas, HICV expended significant sums for the Phase II design, and prior to completion of the Phase II final design, HICV learned that Dominion could not honor our agreement to supply the needed natural gas for the entire site due to this litigation.

5. Notwithstanding the sums already expended by HICV in the pre-final design

and the final design construction documents, HICV was forced to look at options other than natural gas to service the Natural Gas Serviced Systems, which used a total of 10.4 million BTU, consistent with our Phase I design. Two options were presented for consideration in place of the preferred natural gas as follows:

Electricity: The use of electricity to heat these traditionally gas-fired systems has a substantial performance cost and would increase our overall electrical service requirement from 1,600 amps to over 4,000 amps. In addition to requiring a significant increase in physical space in the building to support this equipment, the larger switchgear would have a considerable installation cost over simply connecting the existing natural gas line to the equipment as planned in Phase II. Moreover, the procurement lead time for electrical gear of this size poses a schedule threat to the construction timeline, would put a long-term burden on the property, and could potentially create an issue with the local electricity service provider for Phase II.

Propane: We also investigated the use of propane gas for this equipment but quickly determined that the volume of propane (10,000 to 15,000 gallons per week) would require two or more industrial-sized storage tanks be installed at the site. Aside from the aesthetic issues with large storage tanks, they present a significant challenge to all of our setback and code requirements, as well as requiring us to obtain new local Community Advisory Board approval. Furthermore, we have experienced difficulty in finding a local propane vendor who is capable, and/or willing, to provide these large-scale tanks due to the safety and stability of using these tanks on this beachfront site, in addition to the logistical challenges of coordinating with resort operations the filling of tanks of this size on a weekly basis.


6. Due to the unforeseen impact of this litigation, we have incurred ongoing design \costs to research possible alternatives to natural gas, none of which are economically or physically practical or desirable. Consequently, we will ultimately have to redesign all of the Natural Gas Serviced Systems that were planned to be connected to the natural gas service as contemplated and constructed in Phase I to support Phase II in our original programming for the site. This design change has not only increased our overall design cost but, more importantly, delayed our construction start date on the project by more than six months, assuming the potential options are viable. Due to the potential lack of a suitable replacement for natural gas, this project could ultimately be delayed indefinitely or terminated, having far-reaching cost impacts on the overall success of the Project. This includes the loss of potential employment opportunities, tax revenues, and other community benefits that the expanded resort size would generate. For reference, the current operating budget for Phase I includes over 50 team members and has an operating budget of over \$6 million per year. Phase II would have the same incremental increases in both staffing and operating revenues, thereby improving the local community tax base.

7. For the foregoing reasons, I strongly support Dominion's Motion to Clarify and to Expedite the Appeal.


[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in and for Orange County, Florida this day personally appeared Paul Denning and made oath and due form of law that he is the Sr. Director of Acquisitions and Development at Holiday Inn Club Vacations Incorporated and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 28th day of March, 2025

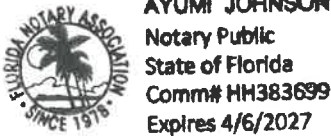


Paul Denning, Sr. Director of Acquisitions and Development at Holiday Inn Club Vacations Incorporated



Ayumi Johnson
Notary Public (Print)

My Commission Expires: 04/06/2027



ATTACHMENT F

(Affidavit of Glenn R. Marple, III)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF GLENN R. MARPLE, III

I, Glenn R. Marple, III, state and affirm the following:

1. I am employed by BEC Construction, Inc. as a President where I am responsible for general contracting commercial construction projects for clients throughout the Grand Strand.
2. The purpose of my Affidavit is to describe the impacts on BEC Construction, Inc. if the Supreme Court ("Court") continues to stay Dominion Energy South Carolina, Inc.'s ("Dominion") ability to begin construction on the Project pending resolution of this appeal.
3. The Administrative Law Court ("ALC") found that the Project is needed to serve increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4. Indeed, "during cold weather events, Dominion must supplement its current system with compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served from [the

existing system].” *Id.* During these cold weather events, which are also referred to as “peaking events,” supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n. 4.

4. Completion of the gas pipeline project would allow for continued growth in our area. Commercial projects rely heavily on gas fired equipment to supply hot water, HVAC, and especially cooking equipment for commercial kitchens. Electrical options for like-replacements are limited or in some cases nonexistent.

5. We have had several projects that have been halted or delayed by months to be re-designed due to the unavailability of gas service. These delays are costly to our clients and to us. When a project is halted, it can disrupt our business greatly by creating gaps in which our employees may not have a project to work on, and therefore are not able to produce income.

6. Other options such as electric and propane are not ideal solutions for commercial buildings. As stated above, there is not always an electric option to supply the scale necessary for a commercial building. Likewise, propane becomes very costly due to the volume needed and having to have possibly daily deliveries to keep up with demand. Not to mention the horrible possibility of running out of propane in the middle of a dinner service for a major restaurant, or nursing home.

7. For an average commercial project each month of delay equates to \$100,000-\$500,000 of lost revenue that our company is not able to recoup.

8. For the foregoing reasons, I strongly support Dominion’s Motion to Clarify and to Expedite the Appeal.

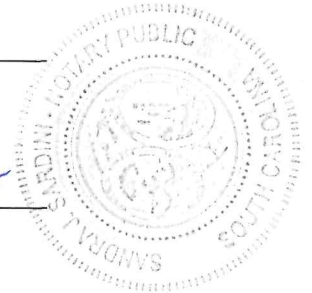
[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in and for _____, South Carolina this day personally appeared Glenn R. Marple, III and made oath and due form of law that he is the President at BEC Construction, Inc. and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

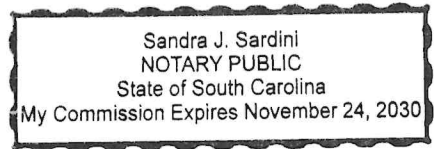
WITNESS my hand and Notarial Seal this 31 day of March, 2025

Glenn R. Marple, III
President
BEC Construction, Inc.

Sandra J. Sardini
Notary Public (Print)



My Commission Expires: 11/24/30



ATTACHMENT G
(Affidavit of Lane Norman)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF LANE NORMAN

I, Lane Norman, state and affirm the following:

1. I am employed by Warren Norman Company as an owner/developer where I am responsible for developing properties for ourselves and other ownership groups.
2. The purpose of my Affidavit is to describe the impacts on Myrtle CG Investments, LLC if the Supreme Court ("Court") continues to stay Dominion Energy South Carolina, Inc.'s ("Dominion") ability to begin construction on the Project pending resolution of this appeal.
3. The Administrative Law Court ("ALC") found that the Project is needed to serve increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4. Indeed, "during cold weather events, Dominion must supplement its current system with compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served from [the

existing system].” *Id.* During these cold weather events, which are also referred to as “peaking events,” supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n. 4.

4. The completion of the Cherry Grove Hampton Inn and Suites project not only delays/limits the revenue in tax dollars to the area but also delays the new jobs associated with the staff needed to operate a hotel. The delay in the hotel also limits the new potential tourist revenue by limiting the number of hotel rooms in the area.

5. The lack of ability to tie into natural gas has created a significant impact to our start date. We had to postpone the project due to the inability to open or operate a hotel without natural gas to determine what our new direction would be. This caused a significant redesign and new ideas and configurations to be able to understand a potential path forward.

6. Due to the hotel already being designed and ready to start last year, we were not able to utilize propane on our property without fully changing the design. We are limited on real estate and, due to laws associated with propane tanks, we are not able to utilize such tanks within our property. At the recommendation of design consultants, an all-electric hotel is not ideal from an operational cost and logistics perspective.

7. The total costs associated with this issue are not fully realized at this time. Not only do we have the delay costs by missing one or more operating summers, but we also have incurred unresolved redesign costs, construction costs to make all adjustments to the design, holding costs, and additional operating costs in the future.

8. For the foregoing reasons, I strongly support Dominion’s Motion to Clarify and to Expedite the Appeal.

[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in and for _____, South Carolina this day personally appeared Lane Norman and made oath and due form of law that he is an owner at Warren Norman Company and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 15th day of ~~March~~ ^{April}, 2025



Lane Norman
Owner
Warren Norman Company



Notary Public (Print)

My Commission Expires: 1/25/27



ATTACHMENT H
(Affidavit of Brice Harry)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF BRICE HARRY

I, Brice Harry, state and affirm the following:

1. I am employed by Dargan Construction Company, LLC ("Dargan") as EVP/COO where I am responsible for the construction operations of the company.

2. The purpose of my Affidavit is to describe the impacts on Dargan if the Supreme Court ("Court") continues to stay Dominion Energy South Carolina, Inc.'s ("Dominion") ability to begin construction on the Project pending resolution of this appeal.

3. The Administrative Law Court ("ALC") found that the Project is needed to serve increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4. Indeed, "during cold weather events, Dominion must supplement its current system with compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served from [the

existing system].” *Id.* During these cold weather events, which are also referred to as “peaking events,” supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n. 4.

4. A large sector of our work is ocean front hotel/hospitality projects. The projects support the area's tourism industry and, as a result, provide numerous jobs and tax revenue for our community. These projects rely heavily on natural gas (“NG”) as a source of energy. Water heating, building heat, laundry operations, food and beverage, and other amenities have traditionally been fueled by NG. NG has proven to be the most economical source of energy for the above applications.

5. The denial of NG support to a permitted project forced the project to be significantly delayed in its start, resulting in extensive cost increases. The Myrtle Beach tourism industry remains very seasonal, the timely completion and opening of a project is very critical. This issue and the search for an alternative energy solution forced the project to delay its start a full year, resulting in: exposure to increases in construction cost, loss of revenue to the development/project, loss of revenue to the contractor and its subcontractors and suppliers, loss of tax revenue, delay in adding significant jobs to the community, and loss of community improvements.

6. Ocean front property is in high demand and developers design to utilize every square inch. The interim alternative to the NG issue is propane, but locating buried propane tanks on these ocean front sites is difficult if not impossible. Revising the design for an all-electric building significantly increases the initial construction cost, but more impactful is all the electric infrastructure and equipment not easily undone/converted when NG becomes available, causing the cost of energy over the lifetime of the building to be significantly higher. A lesser, but still

concerning impact is forcing the kitchen staff to adapt to an electric kitchen. This is highly undesirable in the food and beverage industry.

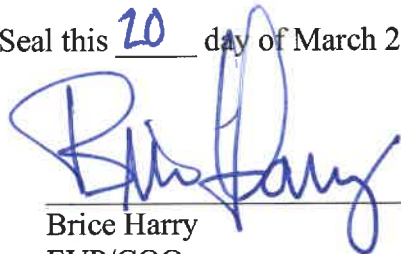
7. Quantifying the impact of no access to NG in dollars is a challenging task. As the general contractor speaking for a single impacted project, the increase could easily reach seven figures.

8. For the foregoing reasons, I strongly support Dominion's Motion to Clarify and to Expedite the Appeal.

[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in and for Myrtle Beach, South Carolina this day personally appeared Brice Harry and made oath and due form of law that he is the EVP/COO at Dargan Construction Company, LLC and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 20 day of March 2025



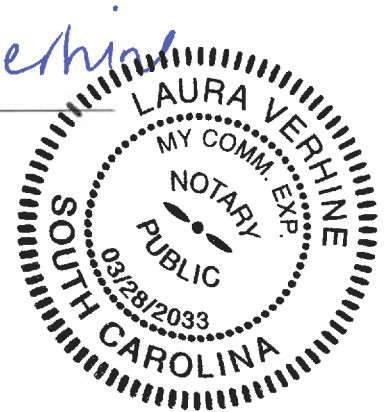
Brice Harry
EVP/COO
Dargan Construction Company, LLC



Laura Verhine

Notary Public (Print)

My Commission Expires: 3/28/33



ATTACHMENT I

(Affidavit of James M. Wooten, P.E.)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF JAMES M. WOOTEN, PE

I, James M. Wooten, state and affirm the following:

1. I am employed by Bolton and Menk, Inc as a Principal, managing our Myrtle Beach, SC office, where I am responsible for all surveying, planning and civil engineering from our office.

2. The purpose of my Affidavit is to describe the impacts on our development industry clients if the Supreme Court ("Court") continues to stay Dominion Energy South Carolina, Inc.'s ("Dominion") ability to begin construction on the Project pending resolution of this appeal.

3. The Administrative Law Court ("ALC") found that the Project is needed to serve increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4. Indeed, "during

cold weather events, Dominion must supplement its current system with compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served from [the existing system].” *Id.* During these cold weather events, which are also referred to as “peaking events,” supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n. 4.

4. Currently, Dominion is not able to supply natural gas to new subdivisions and, in some cases, new businesses, forcing them to utilize propane or only electric power. Obviously, this removes a valuable option from purchasers and creates a higher monthly cost for them. Supply to commercial businesses such as restaurants is also of great concern.

5. Delay of approval of this Project continues to eliminate the ability of homeowners to utilize cost savings devices in their homes such as tankless hot water heaters, ovens/stoves operated by natural gas, back-up generators operated by natural gas and other items. As an example, a back-up generator utilizing natural gas as the energy source can continue to provide energy to the home in the event of a power loss due to a storm or other natural disaster. Without the availability of natural gas, the only viable alternative is propane. Propane must be replenished, causing the need for delivery every three (3) to five (5) days, depending on the size of the tank.

6. As discussed above, all alternatives to natural gas are less efficient and more costly.

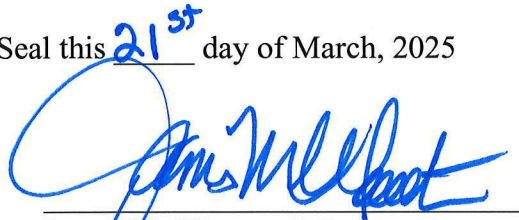
7. Unfortunately, I cannot quantify the cost associated with the loss of this energy source. However, I am greatly concerned that the wishes/concerns of a few misguided individuals outweigh the needs of the general public.

8. For the foregoing reasons, I strongly support Dominion’s Motion to Clarify and to Expedite the Appeal.

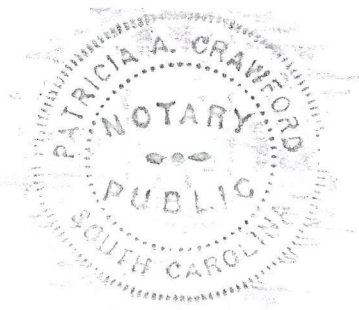
[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in Horry County, South Carolina this day personally appeared James M. Wooten and made oath and due form of law that he is the Principal at Bolton and Menk, Myrtle Beach, and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 21st day of March, 2025



James M. Wooten, PE
Principal
Bolton and Menk, Inc.



Patricia A. Crawford
Notary Public (Print)

My Commission Expires: 7/12/27

ATTACHMENT J

(Affidavit of Emory McCrea)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF Emory McCrea

I, Emory McCrea, state and affirm the following:

1. I am employed by Nan Ya Plastics Corporation America as a Senior Utility Manager where I am responsible for the Daily operations and maintenance of the Utility section.

2. The purpose of my Affidavit is to describe the impacts on Nan Ya Plastics if the Supreme Court (“Court”) continues to stay Dominion Energy South Carolina, Inc’s (“Dominion”) ability to begin construction on the Project pending resolution of this appeal.

3. The Administrative Law Court (“ALC”) found that the Project is needed to serve increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4. Indeed, “during cold weather events, Dominion must supplement its current system with compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served

from [the existing system].” *Id.* During these cold weather events, which are also referred to as “peaking events,” supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n.4.

4. Our company has the desire to expand our business here at our location in Lake City, SC. But the lack of natural gas capacity has limited this possibility.

5. Not having the natural gas capacity to operate our facility during curtailment season has caused us to reduce production during these time periods. Using #2 fuel to operate during curtailments increases our energy cost by 250%, at an additional \$100,000/day. It also increases our carbon foot print.

6. Alternative fuel sources like (CNG) compressed natural gas or (LNG) liquified natural gas are more expensive than #2 fuel oil because of the lack of infrastructure associated with using them at the volumes we require.

7. By not having this piping project completed we are curtailed 50% more than the rest of the state. This has created an unfair business climate for us against our competitors.

8. For the foregoing reasons, I strongly support Dominion’s Motion to Clarify and Expedite the Appeal.

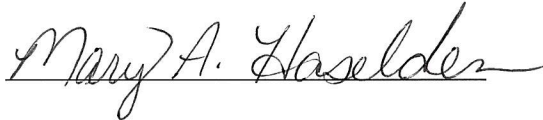
[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in and for Florence County, South Carolina this day personally appeared Emory McCrea and made oath and due form of law that he is the Senior Utility Manager at Nanya Plastics Corporation America and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 9th day of April, 2025

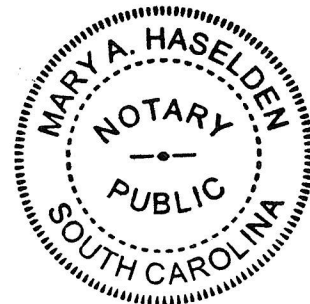


Emory McCrea
Senior Utility Manager
Nan Ya Plastics Corporation America



Mary A. Haselden
Notary Public (Print)

My Commission Expires: Dec. 07, 2031



ATTACHMENT K

(Affidavit of Christopher Evans)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF CHRISTOPHER EVANS

I, Christopher Evans, state and affirm the following:

1. I am the Owner of South Coast Beer Project, where I am responsible for the daily operations and project oversight.
2. The purpose of my Affidavit is to describe the impacts on South Coast Beer Project if the Supreme Court (“Court”) continues to stay Dominion Energy South Carolina, Inc.’s (“Dominion”) ability to begin construction on the Project pending resolution of this appeal.
3. The Administrative Law Court (“ALC”) found that the Project is needed to serve increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R.

p. 4. Indeed, “during cold weather events, Dominion must supplement its current system with compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served from [the existing system].” *Id.* During these cold weather events, which are also referred to as “peaking events,” supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n. 4.

4. South Coast Beer Project operates a commercial kitchen, and natural gas is essential for its daily operations. Without natural gas the ability to operate the restaurant inside the brewery becomes unfeasible, and without the restaurant we cannot obtain the proper licensing for the brewery.

5. The use of propane as a substitute is not an option due to the volume required to operate a commercial kitchen.

6. Without a reliable supply of natural gas, the entire business will be rendered inoperative. This would result in the loss of projected annual sales of \$4,000,000 and the forfeiture of 100 local jobs. Consequently, all associated plans, tax revenue, and employment opportunities would be lost.

7. For the foregoing reasons, I strongly support Dominion’s Motion to Clarify and to Expedite the Appeal.

[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in and for Horry County, South Carolina this day personally appeared Christopher Evans and made oath and due form of law that he is the Owner of the South Coast Beer Project, and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 1 day of ^{April}~~March~~, 2025



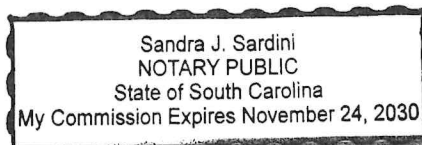
Christopher Evans
Owner
South Coast Beer Project



Sandra J Sardini

Notary Public (Print)

My Commission Expires: 11/24/30



ATTACHMENT L
(Affidavit of Barry Spivey)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF BARRY SPIVEY

I, Barry Spivey, state and affirm the following:


1. I am the County Administrator for Horry County.
2. The purpose of my Affidavit is to describe the impacts on Horry County if the Supreme Court ("Court") continues to stay Dominion Energy South Carolina, Inc.'s ("Dominion") ability to begin construction on the Project pending resolution of this appeal.
3. The Administrative Law Court ("ALC") found that the Project is needed to serve increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4. Indeed, "during cold weather events, Dominion must supplement its current system with compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served from [the existing system]." *Id.* During these cold weather events, which are also referred to as "peaking

events,” supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n. 4.

4. Currently, Dominion has placed a hold on all new service in Horry County. Our economic development team has been unable to submit for six separate projects because of the lack of natural gas. Three of those projects have a combined investment of \$825,000,000 and 850 employees. The lack of natural gas hinders our ability to attract industry to Horry County and the State of South Carolina.

5. Horry County also permitted 5,759 single family residential homes last year. Approximately 75% of housing in major residential subdivisions are serviced by natural gas. These homes are now having to rely on more electric generation for their power needs and there are no electric generation facilities within Horry County.


6. For the foregoing reasons, I strongly support Dominion's Motion to Clarify and to Expedite the Appeal.



Barry Spivey
County Administrator for Horry County
Conway, SC

SWORN to before me this

20 day of March 2025



Notary Public of South Carolina

My Commission Expires: 2-7-2029

ATTACHMENT M

(Affidavit of Felipe Saes – DSM Firmenich Kingstree Plant)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF DSM-Firmenich Kingstree Plant

I, Felipe Saes state and affirm the following:

1. I am employed by DSM-Firmenich as a Site Director/VP where I am responsible for the DSM-Firmenich Kingstree Plant.
2. The purpose of my Affidavit is to describe the impacts on DSM-Firmenich if the Court of Appeals (“Court”) continues to stay Dominion Energy South Carolina, Inc’s (“Dominion”) ability to begin construction on the Project pending resolution of this appeal.
3. The Administrative Law Court (“ALC”) found that the Project is needed to serve increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4. Indeed, “during cold weather events, Dominion must supplement its current system with

compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served from [the existing system].” *Id.* During these cold weather events, which are also referred to as “peaking events,” supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n.4.

4. This project would be a significant step forward for our site, both in terms of cost efficiency and environmental impact. By transitioning to a more reliable natural gas supply, we would not only reduce the need for more expensive and carbon-intensive fuel oil but also directly contribute to lowering emissions and aligning with our sustainability goals. Here's how this pipeline can benefit the Kingstree site:

Economic Impact:

- **Avoided curtailments:** With fewer curtailments, we prevent the \$19,000 per day additional cost associated with fuel oil use. This could add up to significant savings over time, helping improve our bottom line.

Environmental Benefits:

- **Reduced CO2 emissions:** Natural gas produces significantly fewer emissions than fuel oil. By minimizing the curtailments and using more natural gas, we would effectively eliminate the 100 metric tons of CO2 emitted per day during curtailment. Over time, this could result in a substantial decrease in our carbon footprint, contributing to our sustainability goals.

Sustainability Alignment:

- **Commitment to DSM-Firmenich’s goals:** This pipeline aligns with our broader environmental responsibility goals, supporting efforts to reduce greenhouse gas

emissions. It's a proactive approach that benefits both operational efficiency and environmental stewardship, ensuring we are positioned for long-term success as regulations around emissions and sustainability continue to tighten.

5. The ongoing curtailments are having a significant impact on the Kingstree site's ability to maintain its competitive edge in terms of energy costs. With the additional \$300,000 in costs from increased curtailments over just one winter season, this is a critical issue that needs to be addressed swiftly to avoid further financial strain. Key points to highlight:

Increased Energy Costs:

- \$300,000 increase in energy costs due to 17 additional days of curtailment is substantial. This represents an 11% increase in fuel costs for 2024, which directly erodes the site's cost advantage in energy—one of its key competitive strengths.
- As curtailments become more frequent, this burden will only continue to grow, leading to escalating costs and impacting the site's financial performance.

Competitive Disadvantage:

- Energy cost increases and the uncertainty of curtailments make the site less attractive for new product manufacturing decisions. Since DSM-Firmenich must consider various factors when deciding on manufacturing locations, including energy costs, the growing curtailments could discourage the company from choosing Kingstree for new product lines.

Reputational Impact:

- Frequent curtailments and energy cost fluctuations can negatively affect the site's reputation with customers and investors. Maintaining a consistent and affordable energy supply is essential to sustaining both internal and external relationships, and

curtailments disrupt that.

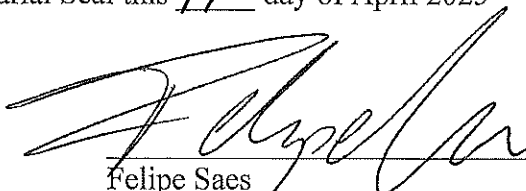
Impact on Local Employment:

- If DSM-Firmenich decides against expanding operations at Kingstree due to ongoing challenges like curtailments, Williamsburg County could miss out on the potential for new job opportunities and economic growth. This could be a setback for the local community, which relies on these job opportunities for economic stability.
6. We belong to the Category 7 service level which means we are an interruptible customer. In the past, our service has been curtailed during cold snaps due to limits on the interstate pipeline system. Our Alternate Fuel source during curtailment is fuel oil. Using fuel oil as compared to Natural Gas costs our plant approximately \$19,000 per day.
 7. Historically, Dominion Energy has curtailed all customers in South Carolina in Category 7 at the same time. However, due to the intrastate supply limitations for customers South of the River Neck Road, our plant in Kingstree has been curtailed an additional 17 days this winter to date. The cost to us so far this season is > \$300k.
 8. For the foregoing reasons, I strongly support Dominion's Motion to Lift the Stay and/or Expedite the Appeal.


[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in and for Williamsburg County, South Carolina this day personally appeared Felipe Saes and made oath and due form of law that he is the Vice President at Kingtree Site of DSM-Firmenich and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 14th day of April 2025

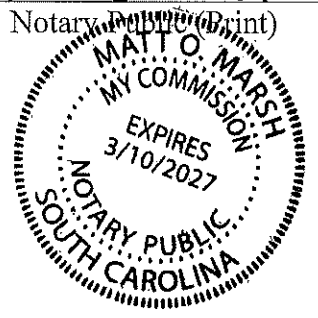


Felipe Saes
VP – Site Kingtree, HNC
DSM-Firmenich



Notary Public (Print)

My Commission Expires: 3/10/2027



ATTACHMENT N
(Affidavit of Dustin Hoey)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF DUSTIN HOEY

I, Dustin Hoey, state and affirm the following:

1. I am employed by Dominion Energy South Carolina, Inc. (“Dominion”) as Director – Engineering and Construction and I am responsible for the planning, engineering, and construction of natural gas pipeline systems for Dominion. I have worked in various engineering and leadership roles for Dominion and its predecessor (South Carolina Electric & Gas Company) in South Carolina since 2006. I graduated from the University of South Carolina with a Bachelor of Science in Engineering and a Master’s degree in Business Administration. I am licensed as a Professional Engineer in South Carolina.

2. The purpose of my Affidavit is to describe the reasons why Dominion cannot accept additional gas customers on its current system and further explain how Dominion will restore the affected area if Blue Ridge Environmental Defense League (“BREDL”) succeeds on its appeal.

3. The Administrative Law Court (“ALC”) found that the Project is needed to serve increasing demand for natural gas in eastern South Carolina to accommodate projected residential and commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4. Indeed, “during cold weather events, Dominion must supplement its current system with compressed natural gas and/or liquefied natural gas to maintain reliable service for customers that are served from [the existing system].” *Id.* During these cold weather events, which are also referred to as “peaking events,” supplemental liquefied natural gas (“LNG”) is transported by truck to a storage location where it is vaporized and injected into the existing system. *Id.* at 4, n.4.

4. Dominion’s existing pipeline system serving this area of South Carolina is beyond its capacity. During the winter period from November 2024 through March 2025, approximately thirty five percent of the design day peak hour demands must be supplied by supplemental LNG to maintain service to all firm customers. This deficit is expected to grow as Dominion fulfills previously contracted residential development over the next few years. While supplemental LNG support is currently being utilized on peak days, its scalability is limited and increases the system’s overall reliability risk. Compared to pipeline infrastructure, supplemental LNG support is significantly less reliable due to the nature of the process which includes mechanical and inclement weather failure points with over the road transportation, specialized equipment, onsite storage limitations, transfer and handling failure points, and other increased mechanical failure points (*e.g.*, mobile LNG pumps, valves, heaters, vaporizers). With the continued addition of demand from previously contracted residential development, a pipeline system already beyond its capacity, and significant supplemental LNG use, not only is Dominion not able to add additional customers to the system, the current system and customers are at an elevated reliability risk. Even without new customers, Dominion would still need to construct additional pipelines to cover current demand

that is beyond the system capacity. Until additional pipelines can be constructed to increase the capacity of the system, Dominion cannot accept additional customer commitments.

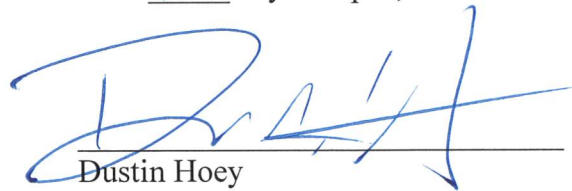
5. Furthermore, if Dominion begins construction of the Project, and BREDL prevails on its appeal, Dominion can abandon the installed segments of the Project and restore any affected areas. Dominion will adhere to all restoration requirements outlined in permits for the Project, including the U.S. Army Corps of Engineers Nationwide Permit 12, Oil or Natural Gas Pipeline Activities, South Carolina Department of Environmental Services Section 401 Water Quality Certification, Florence County Floodplain Permit, and the Florence County South Carolina Department of Transportation Encroachment Permit. These requirements include:

- Restoring the affected construction area(s) to the pre-construction contours to the greatest extent possible and in conformance with agency directed, or approved, methods.
- Re-seeding the limits of disturbance with permit-approved seeds for each location.
- Achieving final stabilization for the areas that underwent land disturbance during construction, within the project's permitted Limits of Disturbance, as monitored by a SCDES credentialed Certified Erosion Prevention and Sediment Control Inspector.
- Following final stabilization, removal of erosion control devices.

[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in and for LEXINGTON, South Carolina this day personally appeared Dustin Hoey and made oath and due form of law that he is the Director – Engineering and Construction at Dominion Energy South Carolina, Inc. and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 11 day of April, 2025



Dustin Hoey
Director – Engineering and Construction
Dominion Energy South Carolina, Inc.



MICHAEL S. RANDALL
Notary Public (Print)



My Commission Expires: 12/15/2031

ATTACHMENT O
(Affidavit of Seth McCoy)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Law Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services
and Dominion Energy,

Respondents.

AFFIDAVIT OF Seth McCoy

I, Seth McCoy, state and affirm the following:

1. I am employed by Burroughs & Chapin Company, Inc as a Senior Vice President where I am responsible for oversight of new development and renovation of existing properties.
2. The purpose of my Affidavit is to describe the impacts on Burroughs & Chapin Company, Inc if the Supreme Court (“Court”) continues to stay Dominion Energy South Carolina, Inc’s (“Dominion”) ability to begin construction on the Project pending resolution of this appeal.
3. The completion of the project is extremely important to the continued use and expansion of commercial real estate in Horry County. The availability of natural gas that serves over \$700,000,000.00 in commercial development is needed for daily operation such as heating, cooking, and production of products for residents and visitors alike. The continuation in gas service and the ability to expand service is vital to the community and existing businesses.

4. The project delay is currently impacting existing renovation projects that began prior to the moratorium in a significant way by having to find alternate energy sources at increased cost as outlined below. In addition, restaurant tenants, accommodation projects, and housing developments prefer gas over other energy sources. When natural gas is not available this has an impact on new developments. With over \$200,000,000.00 in leasable land the delay or discontinuance in natural gas services will have a devastating impact on future development and economic stability of the community.

5. Alternate energy sources are having to be implemented at increased infrastructure and use cost. Propane as an alternate source requires large tanks, additional land, continuous delivery coordination, additional screening, and higher fuel cost. If propane is not a viable option then an all-electric option is required which requires new MDP (Main Distribution Panels) that are expensive and have significant lead times impaction project schedules. Electric cost are also rising and with peak demand charges being applied by some providers the cost of energy is continuing to rise.

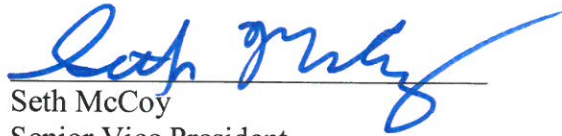
6. The elimination of new natural gas services will have an impact on development. As one of the fastest growing MSA's in the Country, the inability to provide natural gas will have significant impact to the economy. If development slows jobs, land values, and tax revenues will be impacted.

7. For the foregoing reasons, I strongly support Dominion's Motion to Clarify and Expedite the Appeal.

[Notarized Signature on Following Page]

Before me, the subscriber, a Notary Public, in and for _____, South Carolina this day personally appeared Seth McCoy and made oath and due form of law that he is the Senior Vice President at Burroughs & Chapin Company, Inc and the matters and facts set forth in the foregoing Affidavit are true and correct to the best of his information, knowledge, and belief.

WITNESS my hand and Notarial Seal this 20th day of March, 2025



Seth McCoy
Senior Vice President
Burroughs & Chapin Company, Inc



Melissa Allen-Felix
Notary Public (Print)

My Commission Expires: 7-7-2030



ATTACHMENT P
(Affidavit of Hixon Copp)

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III
Chief Administrative Judge

Appellate Case No. 2025-000181

Blue Ridge Environmental Defense League,

Appellant,

v.

South Carolina Department of Environmental Services and
Dominion Energy,

Respondents.

Affidavit of Hixon Copp

I, Hixon Copp, having been duly sworn, state and affirm the following:

1. I am the Director of Economic Development for Williamsburg County, South Carolina, where I am responsible for overseeing and promoting the economic development of Williamsburg County.

2. The purpose of my Affidavit is to describe the impact on Williamsburg County's economic development if the Supreme Court continues to stay Dominion Energy South Carolina, Inc.'s ability to begin construction on the Project pending resolution of this appeal.

3. The Administrative Law Court found that the Project is needed to serve increasing demand for natural gas in eastern South Carolina to accommodate projected residential and


commercial growth and current seasonal demand issues. Final Order at 4, R. p. 4.

4. Completion of the Project is crucial for continued growth and development in Williamsburg County as it will enable us to recruit new businesses, expand existing ones, and construct new homes. This is essential for the economic development within our County.

5. The delay of the Project has already caused significant adverse impacts on Williamsburg County. It has caused curtailments for a number of our largest employers leading to increased energy costs and environmental impacts. Williamsburg County has also experienced significant difficulty in attracting new development, job opportunities, and capital investments in the County because of this delay.

6. Since my tenure began in September of 2024, Williamsburg County has received requests for proposal from seven (7) potential economic development projects where natural gas has been required. Due to delays in Dominion's pipeline construction, the County has had to inform investors that it could not meet their natural gas requirements. These proposed projects and investments represented a potential 2,300 new jobs and \$2.71 billion in new capital investments. These totals do not include three of the seven projects where the potential job and capital investment totals were not disclosed.

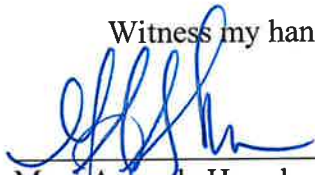
7. For the foregoing reasons, I strongly support Dominion's Motion to Clarify and to Expedite the Appeal.



Hixon Copp
Director of Economic Development
Williamsburg County, South Carolina

I, Mary Amanda Harrelson Shuler, a Notary Public in and for South Carolina, hereby certify that Hixon Copp, Director of Economic Development for Williamsburg County South Carolina, personally known to me to be the affiant in the foregoing affidavit, personally appeared before me on this 11 day of April, 2025 and made oath and having been by me duly sworn deposes and says that the facts set forth in the above affidavit are true and correct.

Witness my hand and official seal this 11th day of April, 2025.



Mary Amanda Harrelson Shuler
Notary Public of South Carolina
My Commission Expires: 03/02/2028

