



3955 Faber Place Dr., Ste. 300 | P.O. Box 70909 | N. Charleston | SC | 29415 | (843) 720-2800 | (843) 722-1190 fax | www.steinberglawfirm.com

April 29, 2026

**VIA E-FILING AND U.S. MAIL:**

The Hon. Patricia A. Howard  
Clerk of the South Carolina Supreme Court  
South Carolina Supreme Court  
1231 Gervais Street  
Columbia, SC 29201

**RECEIVED**

**Apr 29 2026**

**S.C. SUPREME COURT**

Re: *Zito v. Strata Audubon, LLC*  
Appellate Case No.: 2026-000701

Dear Ms. Howard,

Pursuant to Rules 208(b)(7) and 242 of the South Carolina Rules of Appellate Procedure, please find here and enclosed a supplemental citation of new authority supporting the Petition for Writ of Certiorari. On April 22, 2026, in *In re Complaint of Ohio Power Co. v. Nationwide Energy Partners, L.L.C.*, Slip Op. No. 2026-Ohio-1406 (Ohio, April 22, 2026), the Supreme Court of Ohio issued a unanimous decision in a materially similar appeal including consideration of substantially the same statutory language providing that an entity that is “engaged in the business of supplying electricity” is a utility and holding a submeterer was supplying electricity and therefore was a public utility. The Supreme Court of Ohio’s decision essentially adopts the analysis presented by Petitioners here and rejects essentially the same analysis presented by the Public Service Commission and Respondents here. Thank you for your assistance, and please do not hesitate to contact me should you have any questions.

Sincerely,

Elliotte Quinn  
equinn@steinberglawfirm.com  
843-720-2800

Enclosures

1. *In re Complaint of Ohio Power Co. v. Nationwide Energy Partners, L.L.C.*, Slip Op. No. 2026-Ohio-1406 (Ohio, April 22, 2026).

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Cc: Kevin Hall  
Bryant Caldwell  
Womble Bond Dickinson (US) LLP  
1221 Main Street, Ste. 1600  
Columbia, SC 29000