

THE SUPREME COURT of SOUTH CAROLINA

APPEAL FROM  
THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA.

South Carolina Energy Users Committee,  
Appellant/Respondent,

V.

South Carolina Electric and Gas, South Carolina Office  
of Regulatory Staff and Pamela Greenlaw, Respondents,  
and Sierra Club is Respondent/Appellant.

Appellate Case No. 2013-000529

**RECEIVED**

FEB 21 2014

S.C. SUPREME COURT

MOTION FOR RECONSIDERATION THE ORDER DATED FEBRUARY 11, 2014

1. The Order is anonymous – has no name[s] of the author[s] and any facts that might be confronted with truth and necessity to fairness in such high level of Appeals that can be compared to famous XXI Century Enron scandal.
2. The blockade the rights to active participation with newly revealed False Claim of BLRA by Respondent, i.e. de facto SCANA extended legal team fulfills the definition of Obstruction of Justice ([http://en.wikipedia.org/wiki/Obstruction\\_of\\_justice](http://en.wikipedia.org/wiki/Obstruction_of_justice) and more).
3. The effect of blockade creates also Breach of Trust (as Defined). There is no logical explanation for “processing with BLRA” when it is invalid as a ground.
4. No oppositions from other parties, including Appellants SC Energy Users Committee and Sierra Club are present.
5. Respondent’s request to deny my Petition was without merit because the new key fact of FCA of BLRA is reported [late] after following / next PSC orders (last in September 2013) and its impact shall not be ignored now. This one is very serious questioning necessity of all discussions on Appeals. Furthermore other cited time limitations do not apply because blocked Wojcicki was not an intervenor as e.g. Ms. Greenlaw was. Note that PSC verdicts / orders still apply BLRA to allow father illegal overcharge hundreds of thousands of SCE&G customers. Therefore none time limitations exist and are not cited in the Order

6. The number of erroneous PSC orders with BLRA application as well as denials of Wojcicki's Petitions, his "personality" then and now, shall not balance his finding of FCA of BLRA after his very detailed / scrupulous investigation / research edited in his Engineering Analysis mentioned in his letter dated January 12, 2013
7. As still Pro se I am following US Supreme Court Sonia Sotomayor's true justice value cannon "**We apply law to facts. We don't apply feelings to facts.**"
8. The Order seems to be a kind of "killing a messenger action".


The true message is simply "Here is the breach of SC Base Load Review Act (BLRA) because its definition was not met and checked / verified from the beginning". To be Base Load Nuclear Plant, here is the necessity to have available [legally and naturally] **292 days of uninterrupted the reactor cooling water from the Broad River.**

Any outcome from the discussion made on this [BLRA] ground may only historically embarrass creators. Today still are available Government and Federal Reserve funds that can keep project alive, save SC economy and employees of SCE&G to prevent Enron type bankruptcy. All realistic solutions should be presented personally by me or by my lawyer, if I could afford one before end of March 2014.

## CONCLUSION

For behalf of SC people, economy, I do ask for reverse this denying decision and allow the truth to win in this court. I hope that my, Petitioner's MOTION FOR EMERGENCY HEARING REGARDING DISCOVERED FCA of BLRA will not be needed after this Order annulment.

Respectfully submitted,



Joseph Wojcicki

820 East Steele Road

West Columbia, SC 29170-1125      February 20, 2014

~~Enclosed is a Copy of the Order dated February 11, 2014~~

Cc:

Scott A. Elliott, Esquire	Jeffrey M. Nelson, Esquire	Florence P. Belser, Esquire
Jocelyn Danett Boyd, Esquire	Shannon Bowyer Hudson, Esquire	Nanette Solveig Edwards, Esquire
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