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A Note from the Executive Director

We cannot look back on Fiscal Year 2019-2020 without remembering the unprecedented challenges brought about by the COVID-19 pandemic. The swift nature in which the world as we knew it changed cast the ORS headlong into unknown territory. Like everyone else, we were faced with challenges that could not have been imagined just weeks before.



Despite the extraordinary circumstances, the ORS was successful in seamlessly carrying out the agency's mission. For consumers, there was little to no interruption in services the ORS provides. I am very proud of our dedicated staff who did not waver in their commitment to fulfilling the agency's mission during this historic time.

To keep consumers informed, we created a *Consumer Resources During COVID-19* page on the ORS website. This page included up-to-date information on consumer resources to help with utility bills and additional updates for consumers; updates on utilities' actions in response to COVID-19; correspondence between the Governor, the ORS, and the PSC and PSC orders related to COVID-19; state of emergency executive orders arising from COVID-19; and other relevant information. As of this writing, this page continues to be updated as new information is received.

Our Consumer Services staff offered technical assistance to several utilities with matters related to the companies' consumer-relations operations. Planning for a likely surge in calls when utilities resume collection processes, we are working with the SC Department of Administration and its technology division (DTO) to develop an overflow call center. As of this writing, implementation of the overflow plan is tentatively scheduled for September 2020 to align with the seasonal high bill call season, Dominion Energy SC's rate case application, and the regulated utilities' resumption of collection processes.

Despite adjustments driven by the COVID-19 situation, our preparation for and participation in cases before the PSC during the last third of the fiscal year continued without interruption. In addition, we were successful in making several filings with the PSC that had the intent and effect of protecting consumers' best interest during the pandemic.

Our Pipeline Safety, Rail Safety, and Transportation programs continued inspections while following all guidelines for safety and social distancing. Each of these areas consulted with federal and state counterparts on best practices for safe inspections during the COVID-19 crisis.

An online portal for Class C passenger carriers to pay semi-annual license decal fees using credit or debit cards became fully operational on the ORS website in early 2020. With implementation of the portal, passenger carriers no longer need to visit the ORS office or pay by mail. Instead, they can save time and effort by paying remotely — a benefit that was especially timely considering the COVID-19 pandemic.

The South Carolina Equipment Distribution Program (SCEDP), housed within the ORS, helps consumers who are deaf or have hearing or speech challenges by providing them with specialized telephone equipment. Staff continued to answer calls and emails while working remotely so clients would feel less isolated. Installation and troubleshooting help was available by phone, and staff dedicated at least one day a week in the office to ship equipment and process applications.

Although work continued unabated, the effects of COVID-19 on some agency performance numbers were unavoidable; for example, fewer Consumer Services brochures were sent to community action agencies because some agencies were closed. Assuming a return to normalcy in the coming fiscal year, certain measures that dipped may return or come near to pre-COVID-19 levels.

After going through this experience, I am prouder than ever of the ORS, the work we do, and our steadfast commitment to fulfilling our mission for consumers.

Nanette S. Edwards

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Executive Director



INTRODUCTION

The South Carolina Office of Regulatory Staff (ORS) was created with the enactment of Act 175 in 2004.

The ORS represents the public interest of South Carolina in utility regulation for the major utility industries — electric, natural gas, telecommunications, water/ wastewater, and transportation — before the Public Service Commission of South Carolina (PSC), the court system, the South Carolina General Assembly, and federal regulatory bodies.

PURC

The State Regulation of Public Utilities Review
Committee (PURC), also created by Act 175, is the
oversight body for the ORS. The ten-member PURC
includes three members from the SC Senate, three from
the SC House of Representatives, and four appointed by
the SC General Assembly from the general public.

Mission Change

With the passage of Act 258 in June of 2018, the SC

General Assembly revised the ORS' mission. Fiscal Year (FY) 19-20 was the second fiscal year under this new mission. Specifically, "public interest" as it applies to the ORS' mission no longer includes the financial integrity of public utilities nor does it include economic development, job creation, or job retention. The revised public interest definition shifted the ORS from balancing competing interests to a more concentrated focus on consumers.

MISSION: The Office of **Regulatory Staff represents** the public interest of South Carolina before the Public **Service Commission**; "public interest" is defined as the concerns of the using and consuming public with respect to public utility services, regardless of the class of customer, and preservation of continued investment in and maintenance of utility facilities so as to provide reliable and high-quality utility services.

About this Report

The PURC establishes goals for the ORS that form the agency's strategic plan and by which the PURC evaluates the ORS annually.

Under the ORS' revised mission, the following six strategic goals now form the basis for the agency's annual strategic planning and assessment of performance:

- 1. The ORS provides services to benefit the State of South Carolina.
- 2. The ORS promotes reliable and high-quality services.
- 3. The ORS is responsive to the public.
- The ORS anticipates and responds to policy developments that impact the ORS' mission.
- 5. The ORS Energy Office advances South Carolina's energy strategy and policy through education and outreach.
- 6. The ORS' operations are marked by professional excellence.

This report is organized into six sections by goal. Within each section are highlights of achievements in FY 19-20.

GOAL

The ORS provides services to benefit the State of South Carolina.

With the passage of Act 258, the mission of the ORS changed. FY 19-20 was the second year of operating under the revised mission. The revised public interest definition shifted the ORS from balancing competing interests to a more concentrated focus on consumers. Even though utility cases have become more challenging, the ORS continues to work with all parties, including utilities, to resolve as many issues as possible.



Notable Cases

Despite adjustments driven by the COVID-19 situation, the ORS' preparation for and participation in cases before the PSC during the last third of the fiscal year continued without interruption. Due to postponements, many cases that would have concluded in FY 19-20 will be carried over to FY 20-21.

Case Management During the Pandemic

Under the leadership of the Executive Director, the ORS initiated several actions to help consumers deal with the continuing COVID-19 crisis.

On March 14, 2020, the Executive Director received a letter from Governor McMaster requesting the ORS to communicate with all utilities and put into effect his request that all regulated utilities and cooperatives serving the State of South Carolina— including those not currently under the jurisdiction of the ORS— not suspend or disconnect essential services for nonpayment during the state of emergency. On March 16th, the ORS filed a letter with the PSC requesting 1) waivers of regulations related to late payment charges and procedures for termination of service for all utilities under the PSC's jurisdiction and 2) that utilities be allowed to waive reconnection fees. On March 18th, the PSC issued a directive granting the waiver requests.

In response to continuing hardships facing both consumers and utilities during the pandemic, the ORS made several filings within an administrative docket established by the PSC to deal with COVID-19 issues. Among these requests were 1) further extension of the 2019 deadline for annual reports and 2) waiver of PSC regulations for deferred payment plans (DPP). The PSC granted both of the aforementioned requests, extending the deadline for 2019 annual reports filing until June 5, 2020, and waiving certain DDP regulations "so that utilities can offer customers greater flexibility and terms longer than six months to pay arrearages on their utility bills."

The ORS also filed a two-part motion on May 8th requesting the PSC to 1) solicit comments from utilities and other interested stakeholders regarding measures that could be taken to mitigate impacts of COVID-19 on utility customers and 2) require utilities to keep records and report to the PSC on a quarterly basis the revenue impacts, incremental costs, and savings related to COVID-19.

The PSC granted both requests. Utilities and other interested stakeholders were to file comments on or before noon on May 22, 2020. Findings from utilities' recordkeeping were to be filed as soon as possible but no later than the end of the second quarter of 2020. The PSC held a virtual forum on May 27, 2020 and discussed with utilities and stakeholders the comments that were filed.

On May 13, 2020, the ORS filed a letter with the PSC sharing a letter received from Governor McMaster on that same date. In his letter, the Governor asked, "that ORS work with the PSC and providers of utility services to take similar steps to allow for a return to normal business operations, while continuing to provide flexibility and assistance to customers and ratepayers." On May 14, 2020, the PSC issued Order 2020-374 acknowledging the Governor's letter and rescinding portions of Commission Order No. 2020-228, which required a temporary suspension of utility disconnections. In Order 2020-374, disconnections are conditioned upon utilities 1) working with customers on arranging payment plans and 2) referring customers to community organizations that may be able to help.

Blue Granite Water Company. 2019-290-WS

On September 30, 2019, Blue Granite Water Company (BGWC or the Company) filed a rate case with the PSC. BGWC has over 17,000 water customers and over 13,000 sewer customers in 16 South Carolina counties.

The Company's last rate request was made in November 2017, with rates that went into effect in June 2018. In that case, the PSC awarded the Company a \$2.9 million increase out of \$4.5 million requested and a 10.5% Return on Equity (ROE).

In the 2019 filing, the proposed increase to customers totaled approximately \$11.7 million.

ORS staff spent countless hours preparing for the case and conducted site visits of the Company's operations throughout the state.

The case drew considerable public attention. The ORS Consumer Services Department noted an increase in calls regarding the case and advised consumers on how to file a protestant letter. Staff attended all night hearings; posted hearing dates, including information on night hearings, on the ORS website; and provided consumer-oriented information about the case on the website. ORS Consumer Services staff members were available to assist consumers with questions and any complaint issues.

The merits hearing began on February 26, 2020 and concluded on March 2, 2020. On April 9th, the PSC issued its final order setting the new rates that BGWC customers will pay beginning September 1, 2020. In Order 2020-306, the PSC generally ruled in favor of the ORS' and Consumer Advocate's positions on most issues. The ROE awarded by the PSC is 7.46% based on the evidence provided by the Consumer Advocate. The Company originally requested an ROE within a range of 10.2 to 10.7% (later revised downward to a range of 9.75% to 10.25%).

Following petitions for reconsideration of Order No. 2020-306, the Commission made several adjustments to Order No. 2020-306 through a Directive on May 28, 2020. A formal written order on the adjustments is pending. As a result of the May 28, 2020 Directive, the total revenue awarded to the Company was 18% lower than that sought by the Company in its application. The total savings to customers is **\$6,731,714**.

Rate Stabilization Act (RSA) Annual Reviews.

The ORS filed its reports with the PSC on August 30, 2019 for both the Piedmont Natural Gas (PNG) 2019 RSA and the Dominion Energy SC (DESC) 2019 RSA; both reports covered the 12-month period ending March 31, 2019.

PNG. 2019-007-G

PNG's calculation of an increase in revenue requirement totaled \$16,964,048. The ORS reached a settlement with PNG resulting in annual savings to rate payers of **\$6,845,620**.

DESC. 2019-6-G

DESC's calculation of an increase in revenue requirement totaled \$7,106,649. The ORS' review determined the additional retail revenue target is \$6,273,054. No settlement was reached. Savings to customers is \$833,595.

CUC, Inc. 2019-64-WS

CUC, Inc. (CUC or the Company) filed an application for a rate increase for water and wastewater services on July 23, 2019. In addition to the ORS, the Callawassie Island Property Owners Association intervened in the case. The merits hearing was held on December 16, 2019. Major issues disputed between the ORS and CUC included the appropriate operating margin for the Company and excess revenues collected due to the 2017 Tax Cuts and Jobs Act. After consideration of the issues by the Commission, Order No. 2020-94 on January 30, 2020 resulted in a total savings of **\$108,867** to customers.

Palmetto Utilities, Incorporated (PUI). 2019-281-S

PUI filed an application for a rate increase late last fall seeking, among other things, to increase customers' monthly sewer bills from \$52.10 to \$66.62, an almost 28% increase.

The day before the merits hearing was to begin, PUI entered into a comprehensive stipulation with the ORS that resolved all issues between the two parties. The stipulations contain many provisions that greatly benefit PUI's customers, with a three-year rate freeze, a return to customers of \$2,032,146 related to the Tax Cuts and Jobs Act, and a rate increase that is a fraction of what PUI originally requested. For the first year, the rate is \$54.93 and thereafter \$59.87. The parties submitted proposed orders to the PSC on July 29, 2020. In its final order issued on August 20, 2020, the PSC approved the stipulation.

Avoided Cost Cases.

The SC Energy Freedom Act, or Act 62, directs the PSC to consider and promote South Carolina's policy of encouraging renewable energy and ensuring the promotion of the public interest while ensuring that no costs or expenses incurred by a utility in compliance with Act 62 are then borne by the utility's ratepayers, unless expressly authorized by the PSC. Pursuant to Act 62, the ORS participated in cases involving the three largest investor-owned utilities in South Carolina to determine their avoided costs.

DESC. 2019-184-E

In this docket, in which the PSC considered DESC's avoided costs, the PSC approved the standard offer, avoided cost methodologies, form contract power purchase agreements, and commitment to sell forms of DESC in accordance with Act 62. While the solar and environmental intervenors initially filed petitions for limited rehearing regarding contracts with terms of over 10 years and the associated terms and conditions, those parties subsequently withdrew their petitions and asserted that it would be appropriate for the PSC to consider the issue of contract length and appropriate terms and conditions in the next avoided cost docket.

At the time of this writing, the only outstanding area of review is the proposed opt-in mitigation protocols submitted by DESC to the PSC on June 1, 2020. DESC asserts that the proposed mitigation protocols could reduce or eliminate the integration charges incurred by solar projects on the DESC system that reduce the variability of their generation. The proposed mitigation protocols were reviewed by the ORS and other stakeholders, and any applicable comments were filed July 20, 2020. Accordingly, this docket is now substantially concluded.

Duke Energy Carolinas and Duke Energy Progress. 2019-185-E, 2019-185-E

In these dockets, in which the PSC considered the avoided costs of Duke Energy Progress, LLC (DEP), and Duke Energy Carolinas, LLC (DEC), the PSC adopted most of the recommendations of DEP, DEC, and the ORS with respect to avoided costs. Interested parties submitted petitions for reconsideration on January 13, 2020. In their petitions for reconsideration, the solar developers and conservation groups asked the PSC to reconsider, among other things, energy pricing periods, avoided energy rates for large Qualifying Facilities, and the PSC's adopted seasonal allocation of capacity values. Solar developers and conservation groups also requested reconsideration or limited rehearing on power purchase agreements with a duration of longer than 10 years.

Subsequently, the solar developers and conservation groups notified the PSC that they were working on settlement discussions with DEC and DEP. Accordingly, the solar developers and conservation groups requested that the DEC and DEP avoided costs dockets be held in abeyance. On June 24, 2020, the PSC granted the request.

DESC Code of Conduct, 2019-386-E

The primary issue is protection of consumer information. The ORS proposed that consumers should have to opt-in (give permission) before DESC can share their information with third parties. DESC proposed that the burden be on consumers to opt-out; otherwise, their information can be shared with third parties. The PSC adopted the ORS' recommendations for the Code of Conduct.

DESC - HomeServe. 2019-363-E

Customers of DESC received marketing solicitations for appliance and non-appliance repair plans offered by HomeServe USA Repair Management Company in November 2019. In response to the solicitations, the PSC requested the ORS to investigate "the matter concerning Dominion Energy's sale of its customers' personal information to a third party." The ORS concluded no state law, PSC regulation, or PSC order prohibited the type of customer information sharing that occurred.

In its report to the PSC, in part, the ORS recommended:

- DESC's privacy policies be revised to clearly disclose this type of information sharing occurs and how customers can opt out of it
- 2. Approval of a regulation on sharing of customer information consistent with that proposed in Docket Nos. 2019-367-A and 2019-387-A

- 3. DESC's Code of Conduct include clarified language regarding marketing disclaimers
- 4. DESC include disclaimers on its marketing materials

The parties are still awaiting a final order from the PSC.

Rulemaking Proceeding to Create a Regulation. 2019-367-A and 2019-387-A

The ORS petitioned the PSC to open a docket for a rulemaking proceeding to determine appropriate parameters and standards regarding a utility's use of customer data.

Numerous parties have intervened and filed comments. The rulemaking proceeding to create a regulation is currently pending before the PSC.

DEP and DEC – Appeals in Rate Cases. 2018-318-E and 2018-319-E

DEP and DEC filed notices of appeal in their respective rate cases with the SC Supreme Court (Court) in November 2019. The Court consolidated the appeals, and DEP and DEC filed their initial brief on April 21, 2020. The ORS will submit its initial brief by July 6, 2020, with oral argument expected for the fall.

The most significant dispute relates to coal ash costs that DEP and DEC incurred in North Carolina as a result of that state's Coal Ash Management Act. The ORS argued, and the PSC agreed, that these costs should not be borne by South Carolina customers because these costs were caused by a North Carolina-specific law and that law was passed in response to a major coal ash spill that resulted from criminal negligence by DEP and DEC in North Carolina. At stake are over \$800 million in coal ash-related costs that should not come from the pockets of South Carolina customers. The Court's decision is also likely to establish important precedent for the recovery of future coal ash-related expenses.

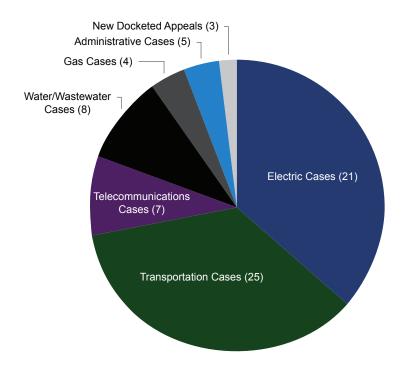
Solar Leasing Consumer Protection Regulations

The ORS began the process of promulgating solar leasing consumer protection regulations. South Carolina Code Section 58-27-2660 directed the ORS, along with the SC Department of Consumer Affairs (DCA), to develop consumer protection regulations regarding the sale or lease of renewable energy generation facilities that include the appropriate disclosures to be made by sellers and lessors, as well as an enforcement provision for violations of these regulations. The DCA and the ORS are working to develop regulations for passage in 2021.

New Cases

The ORS participated in 73 newly docketed cases in FY 19-20. Close to two thirds (63%) were electric and transportation cases.

New Docketed Cases FY 19-20



Consumer Savings from FY 19-20 Cases

Of the 73 docketed cases, these rate-impacting cases generated savings to consumers of **\$14,519,796**.

FY 19-20 Savings to Consumers

TOTAL	\$14,519,796
Blue Granite Water Company	\$6,731,714
CUC, Inc.	\$108,867
Dominion Energy SC RSA	\$833,595
Piedmont Natural Gas RSA	\$6,845,620

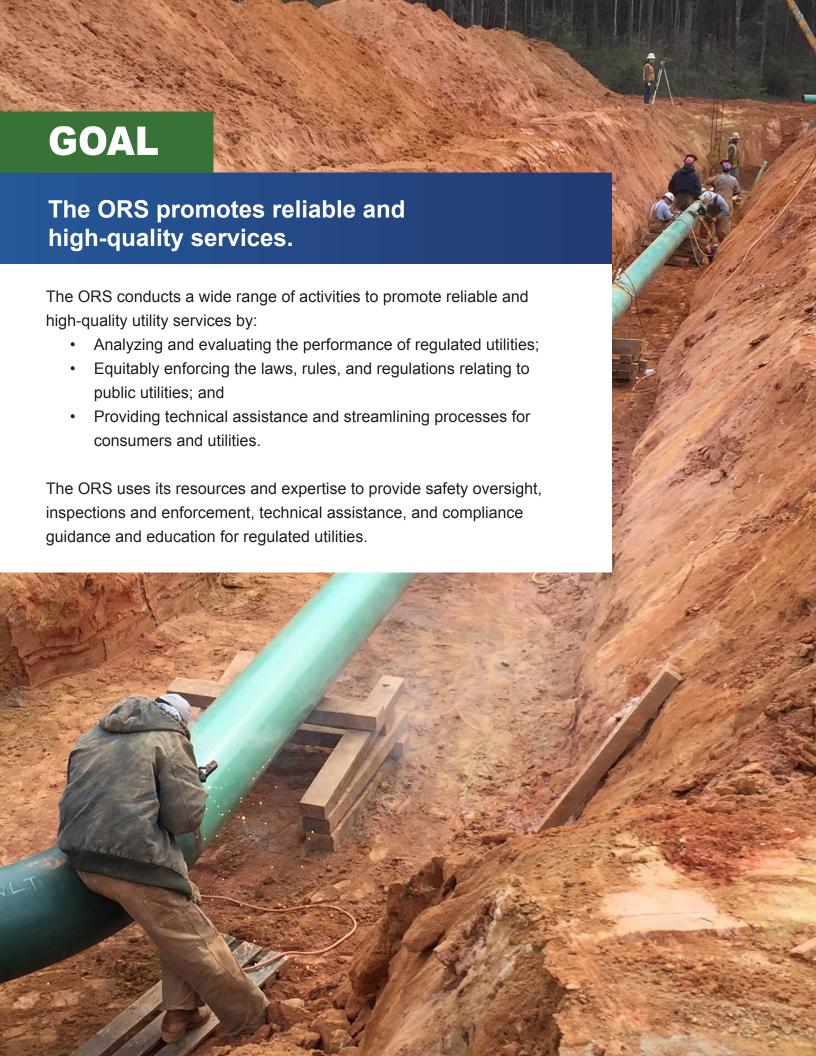
Consumer Savings by Fiscal Year

From the agency's inception through June 30, 2020, ORS efforts have resulted in 497 settlements, agreements, and contested cases that generated savings to consumers of \$1.9 billion.

Savings by Fiscal Year since the ORS Began

(Rounded to the nearest thousand)

FY 04-05	\$63,356,000
FY 05-06	\$95,475,000
FY 06-07	\$59,794,000
FY 07-08	\$114,662,000
FY 08-09	\$147,692,000
FY 09-10	\$198,992,000
FY 10-11	\$233,461,000
FY 11-12	\$405,436,000
FY 12-13	\$83,097,000
FY 13-14	\$175,000,000
FY 14-15	\$45,983,000
FY 15-16	\$30,816,000
FY 16-17	\$69,388,000
FY 17-18	\$28,736,000
FY 18-19	\$158,850,000
FY 19-20	\$14,520,000
TOTAL	\$1,925,258,000



Regulatory Reviews and Audits

The Audit Department supports the ORS' evaluation of the accuracy of financial data provided by the utilities supporting their filings for rate increases. The Audit Department conducted a total of 351 regulatory reviews and audits in FY 19-20.

The Audit Department is also charged with the responsibility of examining 460 telecommunications companies doing business in South Carolina. These companies are examined on a triannual basis, averaging 150 to 160 examinations each year. In FY 19-20, 151 companies were reviewed.

Recent legislation has added to the scope of work for the Audit Department. Implementation of Act 56, which passed in May 2019 and became effective in January 2020, requires the ORS to determine compliance with bylaws for the 22 electric cooperatives that provide electric service in South Carolina.

Pipeline Safety and Railroad Safety

During the COVID-19 pandemic, the Pipeline Safety and Rail Safety programs continued inspections while following all guidelines for safety and social distancing. Each of these areas consulted with federal and state counterparts on best practices for safe inspections during the COVID-19 crisis.

Pipeline Safety Inspections

In partnership with the Pipeline and Hazardous Materials Safety Administration (PHMSA), the ORS Pipeline Safety Program maintained responsibility for 23,152 miles of natural gas pipeline serving 868,504 customers.

ORS Pipeline Safety inspectors conducted a total of 203 inspections in FY 19-20 and responded to 304 technical gas pipeline safety-related inquiries from the public, operators, and contractors. The primary focus of Pipeline Safety inspections this year was right-of-way, regulator, and drug and alcohol abuse inspections, all of which could be conducted while maintaining social distancing safety practices. In addition, staff assisted in securing masks for pipeline companies through the PHMSA.

Pipeline Safety Program Rating

The Calendar Year 2018 inspection of the ORS Pipeline Safety program was conducted by the PHMSA in June 2019, and scores were received in late July 2019. The ORS scored 48 out of a possible 50 points on its Progress Report (96%) and 110 out of 112 possible points on its Program Evaluation (98%). The Progress Report score remained constant from last year because South Carolina's maximum civil penalty for violations of regulations does not match the federal penalty amount. The Program Evaluation score increased over two full percentage points from the previous year.

Rail Safety

In partnership with the Federal Railroad Administration (FRA), the ORS Rail Safety Program continued inspections of South Carolina's infrastructure to maximize the safety of the state's railroad system. Inspectors conducted both track and operating practices (OP) inspections around the state. For the track and OP disciplines combined, ORS inspectors conducted 266 rail safety inspections and issued 713 rail safety defect citations. Staff responded to 418 technical railroad safety-related inquiries from railroads, industry, and the general public, a sizable increase from 333 in the prior fiscal year.

Transportation

During the pandemic, Transportation staff continued to issue, suspend, and reinstate certificates. Staff conducted calls with Uber and Lyft to advise them on safety precautions to include proper hygiene practices and as much social distancing as possible. Inspections continued while following social distancing and safety guidelines.

Household Goods Carriers Enforcement

The household goods (HHG) movers market continues to expand. In FY 19-20, the ORS continued to manage multiple requests for rate increases and Certificates of Public Convenience and Necessity (CPCN) for new HHG applicants.

The ORS inspected 31 HHG movers mostly in response to newly filed CPCN applications (and a few tariff amendment applications). ORS inspectors conducted routine inspections, focused inspections, and complaint inspections for HHG movers across the state.

Inspections, Investigations, and Compliance Audits

ORS Transportation inspectors conducted 4,434 vehicle inspections and 124 compliance audits, both planned and random, of regulated transportation carriers.

Transportation inspectors continued to focus on education and public relations efforts with carriers. As a likely result of this effort, the number of complaints regarding motor carriers investigated by the ORS dropped slightly from 93 last fiscal year to 87 in FY 19-20.

In FY 19-20, the ORS conducted driver file audits of the three Transportation Network Carriers (TNC) currently operating in SC— Uber, Lyft, and Uzurv 360. The ORS examines driver files to ensure compliance with requirements of the TNC Act. The driver files are required to have copies of driver's licenses, current insurance information, vehicle inspection reports, DMV motor vehicle reports, and criminal background reports. All three TNCs were found to be in compliance with the TNC Act requirements.

Online License Decal Portal

The online portal for Class C passenger carriers (taxis, limousines and certain types of non-emergency medical transportation) to pay semi-annual license decal fees using credit or debit cards became fully operational on the ORS website in early 2020. With implementation of the portal, passenger carriers no longer need to visit the ORS office or pay by mail. Instead, they can save time and effort by paying remotely— a benefit that was especially timely considering the COVID-19 pandemic. In FY 19-20, the ORS issued 6,303 license decals.

Outreach

The Transportation Department logged 22,979 technical assistance (in person, phone, and email) responses to transportation inquiries from prospective and regulated transportation carriers and the public. In addition, staff conducted two transportation forums this year to provide carriers with updated information on regulations.

Water, Telecommunications, and Solar Leasing

Water/Wastewater Technical Assistance and Compliance Efforts

The ORS provided technical assistance in response to 110 inquiries from new and existing water and wastewater companies. The technical assistance numbers are down from 445 in FY 18-19, primarily due to a change in the departmental management team and due to office closures of some of the smaller water/wastewater utilities during the COVID-19 pandemic.

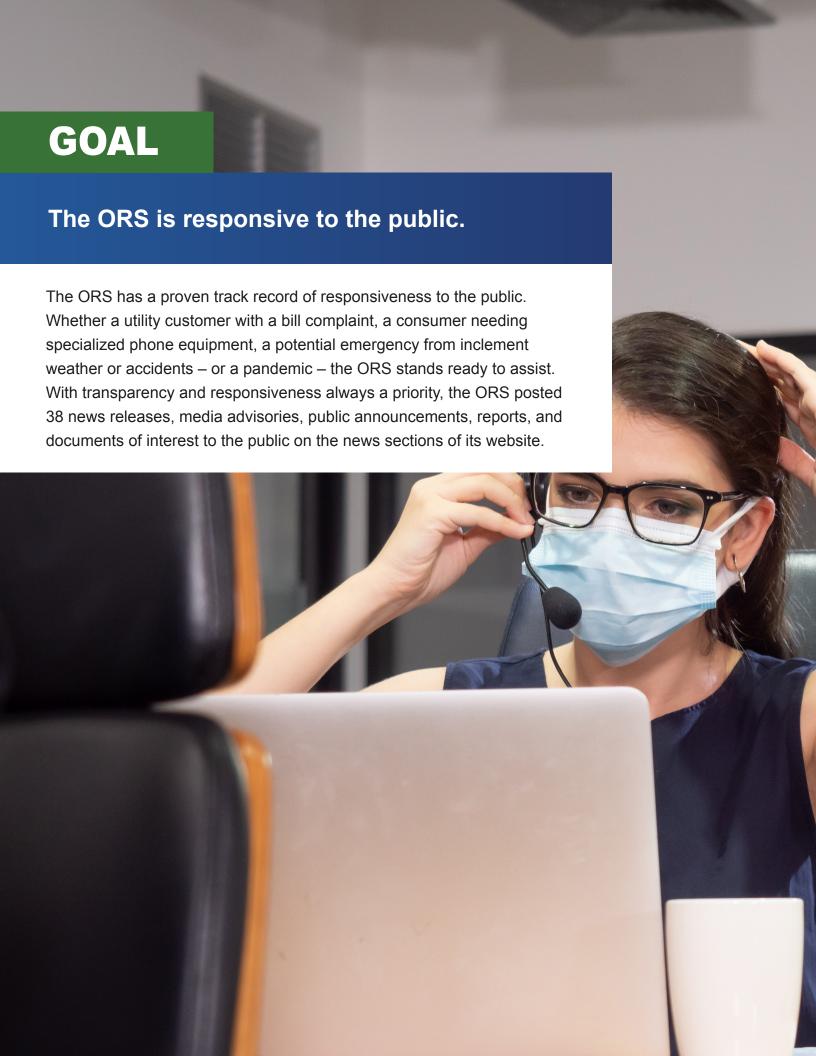
Through inspections and educational efforts with regulated companies, the ORS assisted companies in achieving a 90% annual report compliance level. The reduction in compliance level (down from 99% the previous fiscal year) is primarily due to the extension of annual report submittal dates due to COVID-19.

Telecommunications

The Telecommunications Department provides administrative oversight for several funds and programs including the SC Universal Service Fund— which includes the Lifeline program— and the SC Dual Party Relay Fund— which includes the Telecommunications Relay Service, the SC Equipment Distribution Program, and Real-Time Closed Captioning for local news and for the SC General Assembly. The department provided technical assistance to 300 existing companies and 10 new applicants, consultants, and regulated companies. The ORS worked closely with regulated companies, resulting in 94% coming into compliance with annual report requirements.

Solar Leasing

FY 19-20 marked the fifth fiscal year of the ORS administering the third-party solar leasing program. Total installations in FY 19-20 were 246 (down from 1,576 the prior fiscal year) bringing the total since inception to 8,081. Fewer new companies are entering the market as the program is now more established; four applications were received, and two certificates were approved in this fiscal year. Staff continued to assist customers with complaints or questions.



Consumer Services

The ORS Consumer Services Department is the agency's first line of contact with consumers. Consumer Services supports consumers to arrange installment payments, extensions to payment due dates, manageable security deposits, and access to community financial assistance resources. Staff works with consumers to recover funds due to erroneous charges, refunds of deposits, unauthorized charges, incorrect rates being charged, or disputes about charges.

In FY 19-20, Consumer Services fielded over 1,800 consumer complaints and inquiries. The traditional concerns of high-bill complaints, bill-payment issues, and deposits still account for most calls received. However, as the utilities have developed and offered more products and services to their customers, Consumer Services has received more complex inquiries and complaints such as those associated with Advanced Metering Infrastructure (smart meters), net metering, or the business practices of certain solar lessors.

During the COVID-19 pandemic, Consumer Services staff offered technical assistance to several utilities with matters related to the companies' consumer-relations operations. Planning ahead for a likely surge in calls when utilities resume collection processes, the ORS is working with the SC Department of Administration and its technology division (DTO) to develop an overflow call center. This center would assist the Consumer Services Department so that utility consumers can continue to be served in a timely fashion. As of this writing, implementation of the overflow plan is tentatively scheduled for September 2020 to align with the seasonal high bill call season, Dominion Energy SC's rate case application, and the regulated utilities' resumption of collection processes.

As part of its consumer outreach, Consumer Services typically distributes between 30,000 and 40,000 brochures annually on a variety of consumer-education topics to community-action agencies around the state. Due to restrictions and closures of community-action agencies driven by the COVID-19 pandemic, the FY 19-20 total was approximately 20,000.

By serving as the mediator between consumers and regulated utilities, Consumer Services resolves a vast majority of complaints through an informal investigation process, thereby avoiding the more costly avenue of a formal hearing at the PSC.

Dollars Recovered for Consumers

Investigations of complaints by Consumer Services staff saved customers over \$186,000. Annually recurring recoveries account for approximately \$127,000 of this total.

Safety

ESF 12

COVID-19

Unlike a response to a tornado, ice storm, or hurricane, the ORS' ESF 12 response to COVID-19 is a prolonged effort that is still underway. From March 10 through June 30, ESF 12 coordinated with utilities to ensure they obtained and maintained adequate supplies of personal protective equipment (PPE); shared and interpreted public health information and executive orders with utilities; and stood ready to assist utilities in restoration of service in the event of severe weather and to facilitate recovery of damaged energy systems by providing relevant Federal Emergency Management Agency (FEMA) information to utilities.

From March 16 through May 9, the Executive Director and a member of her management team (representing ESF 12) participated in a daily conference call with the Governor, his staff, and all other agency heads to brief him on the impacts of COVID-19 on the citizens and economy of South Carolina. From May 11 through May 29, the calls transitioned to Monday, Wednesday and Friday updates. On June 3, the updates transitioned to weekly conference calls, and they continue to this day.

As of this writing, ESF 12 continues to provide information to ORS partners and utilities and to participate in weekly calls with the Governor, the counties, and the National Association of State Energy Officials, as well as periodic logistics calls with the SC Emergency Management Division (SCEMD).

Examples of tasks accomplished by the ESF 12 team from March through May, under the direction of the Executive Director, include:

- Coordinated with ESF 18, which handles donated goods, to facilitate the donation by Dominion Energy SC of 9,000 N-95 masks to the SC Hospital Association
- Coordinated with the Nuclear Regulatory Commission (NRC) and the utilities that
 have nuclear plants to ensure that NRC inspectors have access to the plants in case
 a county or municipality decides to shelter in place or issue a stay-at-home order
- Coordinated with Amtrak and local authorities to ensure that passengers would have free access when embarking and disembarking along Amtrak routes
- Worked with the SC Department of Health and Environmental Control (SCDHEC) to get priority testing for critical-infrastructure workers who have symptoms of COVID-19

- Helped to secure 30,000 KN95 masks for the SC Truckers Association
- Coordinated with Dixie Pipeline to distribute 75 Tyvek suits to Richland and Chesterfield County EMS
- Assisted with purchases/delivery of PPE
- Worked to obtain quarantine exemptions for essential specialized utility personnel coming to South Carolina from the Tri-State area or New Orleans
- Coordinated with the SC Department of Agriculture on issuing a second fuel waiver that modified the original fuel waiver (issued in March) to be more consistent with one recently issued by the US Environmental Protection Agency
- Participated in daily calls with SCEMD and the Governor's Office
- Helped to procure over 24,000 masks for electric utilities through FEMA
- Assisted truck drivers and others with commercial driver's licenses with best practices guidance during COVID-19 published by the Federal Motor Carrier Safety Administration
- Shared funding opportunities from the CARES Act with all partners
- Directed partners to the SC Department of Commerce for assistance with questions regarding appropriate business operations during COVID-19

Tornadoes During COVID-19

In April, during the COVID-19 pandemic, 27 confirmed tornadoes swept over many portions of South Carolina. Over 290,000 power outages occurred; about 85% were restored within 24 hours. In the hardest hit areas in and near Seneca, almost 2,000 homes and businesses (customers of Seneca Light & Water) were without power for almost two weeks. The ORS, through its responsibilities with the SCEMD, monitored the restoration of power by Seneca Light & Water. The ORS also assisted the SC Department of Social Services to help residents who had been without power for more than four hours recover their benefits under the Supplemental Nutrition Assistance Program.

Emergency Management during Hurricane Dorian

The ORS' initial role in the storm preparations was twofold. First, the ORS provided the evacuation routes and timing with fuel partners to provide them with the opportunity to fully stock their fuel stops with gas, water, and groceries. Second, the ORS communicated with electric providers, railroads, and pipeline operators to monitor their preparations for staging, supply acquisition, and enactment of their mutual assistance agreements.

On Thursday, September 5, 2019, electric providers reported a peak of 252,000 outages, mostly on the Dominion Energy SC system. By Friday, the utilities had restored over 80% of all customers and by Sunday evening (September 8), nearly 100% of customers had their service restored.

During the response effort, the ORS assisted utilities in obtaining access to reentry passes, access to airspace for damage assessment, national guard liaison officers for the electric cooperatives, and curfew information.

Pipeline Safety

Pipeline Safety and SC PERI

Through its Pipeline Strikes damage-prevention initiative, ORS Pipeline Safety makes educating third-party contractors and other excavators on safe-digging practices a top priority.

In addition, ORS Pipeline Safety is a leader in the SC Pipeline Emergency Response Initiative (SC PERI) that trains firefighters to respond to natural gas-related incidents. These efforts will continue in FY 20-21.

Protection and Assistance for At-Risk Consumers

Warning Consumers of Possible Scams

The ORS takes action to alert the public to potential scams. This year the ORS completed a campaign to warn consumers of potentially misleading sales practices by certain solar companies.

In FY 18-19 (May 2019), the ORS received a file containing a recorded solar sales training session. The recording was transcribed by the ORS and distributed internally to key personnel. The ORS contacted the SC Attorney General's office and the SC Department of Consumer Affairs to make them aware of the sales tactics described therein. The ORS then embarked on a strategy to educate the public that included 1) an op-ed to distribute to papers across South Carolina and 2) a Public Service Announcement (PSA) for television and radio stations. The op-ed was released in June 2019, and details of its success were covered in the FY 18-19 report.

The PSA began running around July 1, 2019. It was the result of cooperation among the ORS, SCDHEC (providing studio production at no cost), the US Department of Energy (providing \$8,000 in grant funding through its Office of Energy Efficiency and Renewable Energy), and the SC Broadcasters Association (providing access to every radio and television market in the state).

In September 2019, the ORS received a report from the Broadcasters Association regarding the impact of its PSA campaign. For an \$8,000 investment, the total confirmed value of the radio and TV airtime the ad received was \$137,126, a 17:1 return on investment. The radio and television ads had a statewide reach, with 2,835 plays across the Midlands, Greenville/ Spartanburg, Charleston, Hilton Head, Rock Hill/Charlotte, Florence/Myrtle Beach, and Aiken/ Augusta markets on radio and 517 airings on television. The social media effort that coincided with it was successful as well, picking up traction through retweets and postings by the SC Department of Consumer Affairs, AARP, the Appleseed Legal Justice Center, and the PSC.

South Carolina Equipment Distribution Program (SCEDP)

The South Carolina Equipment Distribution Program (SCEDP), housed within the ORS, helps consumers who are deaf or have hearing or speech challenges by providing them with specialized telephone equipment. In FY 19-20, SCEDP expanded outreach around the state including distribution of over 125,000 publications and printed materials, up more than threefold from over 36,000 last fiscal year. The program received and reviewed 703 applications, approved 638 applications, coordinated and shipped 1,524 pieces of equipment, and coordinated equipment installation for 94 clients.

During the COVID-19 pandemic, the SCEDP kept its commitment to clients. Staff continued to answer calls and emails while working remotely so clients would feel less isolated. Installation and troubleshooting help was available by phone. The program dedicated at least one day a week in the office to ship equipment and process applications. The SCEDP Facebook page remained updated with information so that individuals could have resources at their fingertips.

Domestic Violence Victims

The ORS began the domestic violence victim deposit waiver program several years ago. It was the result of an innovative agreement facilitated by the ORS with each of the investor-owned electric and gas utilities and women's shelters to waive the initial credit and deposit requirements for domestic violence victims. Through the years, this effort has expanded to law enforcement agencies who certify domestic violence victims. In FY 19-20, the program benefited 29 individuals who were victims of domestic violence. Since its inception several years ago, the program has benefited 525 individuals.



On the horizon for FY 20-21 is implementation of the Broadband portion of Act 142, as well as continued implementation of Act 135, Section 11, requiring a monthly review by the ORS of certain Santee Cooper operations. These are in addition to continued implementation of the Electric Co-op Act (Act 56) and the SC Energy Freedom Act (Act 62). The ORS is preparing for additional responsibilities mandated by these laws as well as monitoring other potential changes that may affect the regulatory landscape.

The ORS consults with and/or retains recognized experts to assess emerging trends or specific issues. In beginning to implement Act 142 in June 2020, the ORS contracted an outside expert, Revolution D, Inc., to identify areas of South Carolina that are unserved, impacted by COVID-19, and that – if broadband were available – would support distance learning, telehealth, and/or teleworking.

The ORS also contracted an outside expert to assist in the development of streamlined communications to better reflect the agency's consumer-focused mission. This individual serves as a consultant to the ORS Marketing and Communications Committee that was formed in FY 19-20.

Other experts used during the fiscal year included:

- E3 Consulting Group E3 provided expert assistance regarding many facets of the newly passed South Carolina Energy Freedom Act, or Act 62. Among other work performed for ORS, E3 ran analyses and developed recommendations regarding avoided cost methodologies and net energy metering.
- David Parcell The ORS retained the highly regarded David Parcell of Technical Associates, Inc. to conduct the necessary research, analysis, and calculations to verify and make recommendations regarding a utility's economic and regulatory principles for utility ratemaking.
- J. Kennedy and Associates The ORS retained a team of experts from J.
 Kennedy and Associates to conduct analyses, review modeling, and develop recommendations regarding utilities' Integrated Resource Plans.
- George Evans The ORS retained George Evans as an expert to review and verify utilities' Demand Side Management filings, including the utilities' methodologies and calculations.

ORS staff attends industry-specific workshops and meetings both regionally and on the national level to discuss trends and emerging issues that could affect South Carolina's utility customers and to share best practices with counterparts in other states.

Act 62: SC Energy Freedom Act

The ORS launched implementation activities for the SC Energy Freedom Act (Act 62) after its passage in May 2019. This legislation covers a wide range of topics including avoided cost and power purchase agreements (PPA), voluntary and community solar, net metering, integrated resource plan (IRP), integration study, interconnection, and consumer protection.

The *Notable Cases* section of this report details some of the ORS' activities under Act 62 during FY 19-20.

Act 56: Electric Co-op Act

The Electric Co-op Act (Act 56), which passed in May 2019 and became effective January 1, 2020, assigns authority and jurisdiction to the ORS to conduct audits to determine compliance with bylaws for the 22 electric cooperatives serving the state. It also requires the ORS to investigate co-op customer complaints relating to disconnect procedures. As of this writing, the ORS has completed its examination for all electric cooperatives for Section 7 – Compensation, which addresses disclosure of trustee compensation and benefits.

Act 135, Section 11: Santee Cooper

Act 135 passed in May 2020. It requires a monthly review by the ORS of certain Santee Cooper operations.

In June, the ORS completed Santee Cooper's compliance review plan and submitted the first set of information request questions to the Company. Responses were due by July 1, 2020. This review will be ongoing and conducted on a monthly basis.

Act 142: Broadband

Act 142 became law in June 2020. As of this writing, ORS staff has worked tirelessly on initial implementation of the Online Learning Initiative that includes mobile hotspots or wired broadband service, mapping of detailed information on where broadband is lacking in the state, and broadband infrastructure. This work will continue in FY 20-21.

GOAL

The ORS Energy Office advances South Carolina's energy strategy and policy through education and outreach.

South Carolina's Energy Office has been housed within the ORS since July of 2015. The role of the Energy Office is to advance South Carolina's energy strategy and policy through education and outreach. Through the development of the State Energy Plan, the Energy Office works to present a cohesive and collaborative approach to energy planning for the SC General Assembly.

The Energy Office serves as an informational, technical, and educational resource on energy matters for the state. In addition to hosting a wide array of energy-related data on its website, staff reviews energy consumption data, provides training opportunities, and conducts energy assessments for public facilities to identify opportunities for potential energy efficiency improvements.

The Energy Office also promotes renewable energy development, is active in several renewable-focused organizations, and has developed several guides, toolkits, and resources to help consumers and businesses make informed decisions regarding renewables.

Through the administration of Palmetto Clean Fuels and other programs, the Energy Office is also active in promoting clean transportation and alternative fuels throughout the state with the goal of increasing efficiency, encouraging adoption of advanced vehicle technologies, reducing vehicle miles traveled, and improving air quality.



State Energy Plan

During FY 19-20, the ORS continued to work toward addressing top-tier State Energy Plan recommendations as part of the Phase III implementation efforts. The ORS will continue to further develop the State Energy Plan in the coming fiscal year.

Energy Efficiency Roadmap

The Energy Office launched the South Carolina Energy Efficiency Roadmap initiative in October 2019 to seize energy efficiency opportunities in the state. Facilitated by the Duke University Nicholas Institute, this stakeholder process reviewed and reassessed remaining energy efficiency recommendations from the 2016 State Energy Plan according to current priorities, identified new opportunities, and developed next steps.

Several broad stakeholder workshops were held, each with over 50 participants from a diverse range of organizations. Guided by an advisory committee, individual working groups were formed to focus on efficiency in buildings, energy equity/energy burden, utility programs, financing mechanisms, nonprofits and public entities, and workforce and education. This process culminated in the development of 20 recommendations, which will be outlined in the final Energy Efficiency Roadmap report by October 2020.

Transportation: Lead by Example

A key component of the 2016 State Energy Plan was to lead by example to advance clean transportation. After conducting an extensive review of the full spectrum of vehicles — based on cost, emissions, safety, reliability, maintenance, and numerous other factors — and months of close collaboration with State Fleet Management and the State Fiscal Accountability Authority, the Energy Office procured a 2020 Chevrolet Bolt electric vehicle (EV) in March of 2020.

The Energy Office is developing training materials for staff on the Bolt that can be replicated and provided to other agencies. The Energy Office also intends to use this as a case study for further adoption of EVs in the state's fleet and to help other state agencies navigate the procurement process.

Education and Outreach

The Energy Office promotes energy efficiency, renewable energy, and clean transportation through its education and outreach efforts. A few examples of outreach from FY 19-20 are:

- Gave 64 presentations at public forums, community events, K-12 schools, science, technology, engineering, and mathematics (STEM) festivals, and conferences
- Published marketing and informational materials, including two monthly email newsletters, Success Stories, and Energy Spotlights
- Responded to 1,300 email and phone inquiries, ranging from questions related to tax incentives and utility programs to requests for renewable energy data and building code compliance.
- Managed three websites (ENERGY.SC.GOV, SOLAR.SC.GOV, and PalmettoCleanFuels.org) with 39,196 unique users and 123,017 individual page views
- Updated and published South Carolina-specific energy data on ENERGY.SC.GOV

Energy Saver Tool and Website

In FY 19-20, the Energy Office, in collaboration with NIC South Carolina, worked to create EnergySaver.SC.GOV, an online tool that consolidates all energy assistance programs and incentives in one database. Visitors can answer a few simple questions to generate a customized list of energy-saving and financing programs for which they may be qualified, or they can browse all available programs. This website will launch in July 2020.

Financial Support

The Energy Office promotes energy efficiency, renewable energy, and clean transportation among public and private entities and nonprofits through four low-interest loan/grant programs: ConserFund, ConserFund Plus, mini-grants, and the Energy Efficiency Revolving Loan (EERL) program. The Energy Office has provided financial support in a variety of ways:

- Through Energy Office efforts, the public is projected to save more than \$20.9 million over the life of various energy initiatives.
- Provided public and private entities and nonprofits with low-interest loans totaling \$1.8 million. Projects completed this year will result in projected lifetime monetary savings to borrowers of over \$2 million.
- Awarded public entities and nonprofits five mini-grants totaling \$27,800 to spur innovation and save over \$244,000 over the useful life of projects.

- Approved approximately \$862,000 in renewable energy, energy efficiency, and transportation tax credits and incentives.
- Collaborated with the SC Department of Parks, Recreation, and Tourism to install EV charging stations at three state parks.

Technical Assistance and Training

The Energy Office continues to work with state agencies, colleges, and school districts with benchmarking energy use and costs to meet the mandatory energy consumption reduction goal by 2020. Staff also conducted energy assessments to identify opportunities for potential energy efficiency improvements, as well as fleet analyses to assist public and private fleet managers and decision makers when considering the acquisition of alternative fuel vehicles.

During FY 19-20, the Energy Office provided numerous training opportunities:

- Held or sponsored 18 technical workshops/training reaching 970 people
- Continued to coordinate the annual Accredited Commercial Energy Manager training, resulting in 14 attendees receiving certification this year

GOAL

The ORS' operations are marked by professional excellence.

Operating largely behind the scenes, the administrative side of the ORS is critical to the agency's success. Budgeting, staffing, training, and other core functions take place within the Administration and Human Resources Departments.

The Information Services Department manages the ORS website, provides information to the media, creates and edits reports and newsletters for a variety of stakeholders, assists the Executive Director in keeping the PURC informed of the agency's activities, generates the annual reports for the PURC, assists with the agency's annual Accountability Report, and supports communication needs at all levels of the agency. In FY 19-20, the ORS had 176 contacts with the media and addressed 183 requests from state lawmakers. Information Services created, contributed to, or edited 100 reports, newsletters, brochures, articles, presentations, scripts, and other communications pieces that ultimately inform the public and key stakeholders.

To keep consumers informed during the pandemic, Information Services created a *Consumer Resources During COVID-19* page on the ORS website. This page included upto-date information on consumer resources to help with utility bills and additional updates for consumers; updates on utilities' actions in response to COVID-19; correspondence between the Governor, the ORS, and the PSC and PSC orders related to COVID-19; state of emergency executive orders arising from COVID-19; and other relevant information. As of this writing, this page continues to be updated as new information is received.



Budget

ORS leadership successfully managed the ORS budget through careful monitoring of expenses on a regular basis. During the review period, the agency underwent the FY 2019 Agreed Upon Procedures engagement conducted by the State Auditor's Office and received satisfactory audit results.

Agency Staffing

ORS executive leadership continues to make organizational changes that better position the ORS for the future. At the beginning of FY 19-20, a Chief Financial Officer was hired to oversee the administrative functions of the agency (auditing, general administration, financial reporting, human resources, information technology, and so forth). This new position quickly became key in consolidating resources, streamlining processes, and generally making an already very efficient agency even more so. In addition, the Executive Assistant position was expanded to encompass the role of Legislative Liaison. This change proved particularly valuable as several new pieces of legislation, passed between May 2019 and June 2020, created new responsibilities for the ORS.

To better support the agency's mission and to incorporate additional responsibilities arising from the SC Energy Freedom Act (Act 62), the Utility Rates and Services Department was reorganized; several staff members were promoted or hired within that reorganization.

Recognizing the need for a consistent approach to marketing and outreach efforts that are in sync with the agency's consumer-oriented mission, the Executive Director created an ORS Marketing and Communications Committee. With the help of a consultant, the Committee has developed communications policies and recommendations and created an inventory of foundational communications pieces on which to build in the future. This work will continue in FY 20-21.

In the last quarter of the fiscal year, a Community Outreach and Communications Manager was hired from within the agency to expand the Information Services Department. This position provides a means to more fully support the customer-focused mission and the additional areas in which the ORS now has a presence.

ORS management, along with Human Resources, continues to assess the agency's core functions, particularly considering new responsibilities the agency now has, and plans career development and career paths for employees.

Staff Development and Training

ORS staff maintained and enhanced their knowledge through participation in classes, seminars, conferences, site visits, and special meetings. As mandated by Act 175, all ORS employees participate in 6 hours of ethics training yearly.

The ORS joined the National Association of State Utility Consumer Advocates (NASUCA) in July 2019 on a one-year trial basis and, thus far, has found it to be very relevant to the revised mission of the ORS. The ORS will continue to engage with NASUCA, such as sending representatives to mid-year and annual conferences when feasible.

The ORS will also continue developing joint training opportunities with the North Carolina Public Staff. A joint training program held in December of 2019 resulted in cost-efficient training for ORS employees and had the added benefit of maintaining dialogue between the two agencies.

Implementation of Technology

During the COVID-19 pandemic, ORS staff embraced the technology that allowed the agency to conduct almost every aspect of its work virtually. The ORS continued to meet the needs of consumers by harnessing the power of technology and using phone conferences, web-based meetings, and website updates.

The ORS is upgrading and expanding its existing database of information, which is used throughout the organization to accomplish its mission. The database is used to record and track data supporting core agency functions such as consumer complaints, gross receipts, certificate holder data, and data for the Transportation, Telecommunications, and Equipment Distribution Programs.

The upgrade will significantly enhance agency efficiency and control over key information. The project is underway with an anticipated completion date near the end of 2020.

Information Technology

The ORS Information Technology staff supports the agency through computer management, maintenance, and help desk roles. They interact with the State Division of Technology, Division of IT Security, and the Program Management Office for support and compliance. They conduct an annual cybersecurity awareness campaign for ORS staff as well as providing training and information.

Collaboration with Other Agencies

The ORS worked collaboratively with a wide array of federal, state, and local agencies and organizations. Coordination of services among these organizations is a priority to effectively carry out the mission and to efficiently utilize agency funding. See Appendix for a list of agencies and organizations.



State and local agencies and organizations include, but are not limited to, the following:

- Governor's Office
- SC General Assembly
- State Regulation of Public Utilities Review Committee (PURC)
- Public Service Commission of South Carolina
- SC Emergency Management Division
- SC Department of Administration
- SC Department of Health and Environmental Control
- SC Department of Social Services
- SC Department of Consumer Affairs
- SC Department of Health and Human Services
- SC Department of Public Safety
- SC Attorney General
- SC Insurance Reserve Fund
- SC Department of Insurance
- SC Department of Parks, Recreation, and Tourism
- SC Department of Natural Resources
- SC Department of Commerce
- SC Department of Revenue
- SC Tariff Bureau
- SC Department of Transportation
- SC Office of The State Auditor
- SC Public Service Authority Santee Cooper
- State Climatology Office
- SCETV
- State Transport Police
- SC Energy Users Committee
- SC Solar Council
- SC Telecommunications and Broadband Association
- SC Trucking Association
- SC Association of Municipal Power Systems
- Electric Cooperatives of SC
- Community Action Agencies
- Community Development Corporation
- SC 811

- Medical Transportation Advisory Committee
- Midlands Utility Coordinating Committee (gas pipeline)
- Operation Lifesaver
- SC Thrive
- Sistercare, Inc.
- Pee Dee Coalition Against Domestic Violence
- Safe Harbor, Inc.
- SC Clean Energy Business Alliance
- Municipal Association of South Carolina
- SC Regional Transmission Planning Stakeholder Group
- DSM/EE Advisory Council for Dominion Energy and Duke Energy
- SC Small Business Chamber of Commerce
- SC Appleseed Legal Justice Center
- Southern Environmental Law Center
- Transportation Association of South Carolina
- SC Assistive Technology Program
- Coastal Conservation League
- Conservation Voters of South Carolina
- Southern Alliance for Clean Energy
- Solar Energy Industries Association
- Vote Solar
- SC Solar Business Alliance
- SC Farm Bureau
- Sustainable Energy Solutions, LLC
- Sierra Club
- SC Manufacturers Alliance
- Upstate Forever
- Savannah River National Laboratory
- York County
- League of Women Voters of South Carolina
- AARP South Carolina
- Distributed Energy Resource Program Collaboratives Dominion Energy and Duke Energy
- City of Orangeburg
- Together SC
- · SC Association of Licensed Trades

Regulatory organizations, federal agencies, and related groups include, but are not limited to, the following:

- National Association of State Utility Consumer Advocates (NASUCA)
- National Association of Regulatory Utility Commissioners (NARUC)
- National Regulatory Research Institute (NRRI)
- Federal Energy Regulatory Commission (FERC)
- Nuclear Regulatory Commission (NRC)
- Federal Communications Commission (FCC)
- Pipeline and Hazardous Materials Safety Administration (US DOT PHMSA)
- Federal Railroad Administration (FRA)
- Federal Motor Carrier Safety Administration
- Universal Service Administrative Company (USAC)
- US Department of Energy
- US Environmental Protection Agency
- US Department of Defense and all other federal executive agencies
- Society of Utility and Regulatory Financial Analysts (SURFA)
- Atlantic Compact Commission
- American Council for an Energy Efficient Economy (ACEEE)
- Association of Energy Engineers
- National Association of Pipeline Safety Representatives
- North Carolina Public Staff
- Low-Level Radioactive Waste Forum
- Georgia Public Service Commission

ORS.SC.GOV

Office of Regulatory Staff

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