

Santee Cooper IRP Stakeholder Process 2024-2026

Stakeholder Working Group Meeting #8 – Meeting Summary

Date: September 10, 2025

Time: 3:33 pm – 5:01 pm EDT

Location: Virtual Meeting via Zoom, Vanry Associates facilitating

Meeting: Santee Cooper Stakeholder Working Group Session #8

This summary includes meeting logistics, presentations, and discussions.

It is organized into the following sections:

- Meeting Information & Materials
- Session Participation
- Topics, Presenters, and Discussion
- Commitments and Next Steps
- Appendix - List of External Stakeholder Working Group Members & June Meeting Attendees

Meeting Information & Materials

The Santee Cooper Resource Planning team held its eighth IRP Stakeholder Working Group meeting on Wednesday, September 10, 2025. The IRP Stakeholder Working Group is integral to Santee Cooper's commitment to engage stakeholders in its ongoing integrated resource planning process. The meeting covered Santee Cooper's 2025 Integrated Resource Plan (IRP) update, which included load forecasting, fuel and resource assumptions, renewable and thermal resource costs, updates on battery storage projects, and potential modeling strategies for future energy resource planning. The presentation shared during the meeting is posted to the Stakeholder Working Group section of the [Santee Cooper 2024-2026 IRP Stakeholder Process webpage](#), along with summaries from the first seven working group meetings.

Session Participation

The Stakeholder Working Group includes a set membership of organizations representing diverse interests and perspectives, including government, regulatory agencies, and environmental, social, and customer groups. The Santee Cooper Resource Planning team invited each organization to join the working group and assign a primary and secondary member.

Appendix A lists the working group member organizations and the members who attended the September 10th meeting.

Topics, Presenters, and Discussion

The presentation, which included the meeting agenda and associated timing, was emailed to members on September 5, 2025.

Welcome and Agenda

– Stewart Ramsay, Meeting Facilitator, Vanry Associates

Stewart Ramsay opened by welcoming attendees and framing the session as an opportunity to hear from Clay Settle on updates to the utility's planning strategy and assumptions, a preview of the upcoming IRP Update, and a review of developments around the Certificate of Environmental Compatibility and Public Convenience and Necessity (CECPCN) application process, with time for questions and discussion. Stewart then handed the session over to Clay.

Clay began by emphasizing that a great deal has shifted at the federal level since the group last met in June to review planning assumptions and strategies. He explained that the slides had been sent out by email in advance and that much of the content may already be familiar. He described how he and his team had just briefed the Santee Cooper Board the previous week, outlining the trajectory of the 2025 IRP Update and seeking its approval to file a CECPCN for new combustion turbines, specifically LM6000 units at the Winyah site. Clay underscored that his goal in this meeting was not a formal presentation but a candid discussion, giving participants insight into how Santee Cooper is responding to shifting policy dynamics and aligning internal planning accordingly, similar to the follow-up session they had held with stakeholders after last year's board meeting.

Updated Strategy & Assumptions

– Clay Settle, Manager, Resource Planning, Santee Cooper

Clay provided members with key updates on the revised strategy, including resource pathways and trade-offs in the IRP Update that will be filed later in September. Building on what was presented in June, the current approach factors in the potential effects of the Environmental Protection Agency's (EPA) draft greenhouse gas rule and includes a new 2025 Greenhouse Gas (GHG) case to evaluate its impact on planning. It also reflects recent changes in federal policy, where renewable tax incentives for solar and wind are rolled back in the 2020s while battery incentives phase out in the mid-2030s, effectively raising renewable costs. To account for this, the team reintroduced a thermal capital cost sensitivity, similar to the 2023 IRP, and broadened portfolio testing. They also responded to stakeholder feedback by adjusting the model so that joint combined cycle units are no longer treated as a committed resource but instead are modeled as a resource option, allowing the model to select the resource along with other candidate resources in the portfolio optimization analysis. Additional portfolio work examined scenarios such as continuing solar additions even when the model does not select them early and evaluating the impacts of extending operations of existing units through 2034.

- Jeffrey Gordon (South Carolina Office of the Regulatory Staff) asked if the Cross plant would retire under the 2025 GHG case; Clay Settle replied no, because the draft rule does not impose CO₂ limits on coal, though Cross would still retire under the 2024 GHG case.
- Anna Sommer (Energy Futures Group on behalf of Southern Environmental Law Centre), referencing a prior request, asked whether the model was given flexibility to choose resource sizes between the smaller units and the larger joint combined cycle resource, noting a gap in capacity options. Clay confirmed that it does, explaining that the model can select one 1x1, two 1x1s, or half the joint build, spanning roughly 650 MW to 1300 MW.

Clay went on to discuss in more detail the major shifts driven by two key developments: the EPA's 2025 draft greenhouse gas (GHG) rule and the recently passed "One Big Beautiful Bill" (OBBB). The new draft rule creates two possible regulatory pathways. Pathway one would fully repeal the 2024 GHG rule by removing CO₂ as a regulated pollutant, eliminating emissions limits and allowing fossil plants to run without restriction.

Pathway two keeps emission limits but weakens them significantly as it removes carbon sequestration as a required control technology, eliminates CO₂ limits on existing coal plants, and loosens standards on new gas units, meaning Santee Cooper could continue operating Cross Station and build combined cycles as baseload resources. The OBBB accelerates the phase-out of federal tax credits, wiping out incentives for new wind and solar by the late 2020s and phasing out battery incentives after the mid-2030s. The 2025 IRP Update assumes wind and solar costs without tax credits and uses a new cost curve for batteries that reflects the phaseout of incentives between 2035 and 2038.

Bob Davis (nFront Consulting) added that while current rules allow solar or wind projects to qualify for incentives if online by 2027, no projects are far enough along to meet that deadline. As a result, the assumption is to exclude ITC/PTC benefits for new solar resources. Consistent with prior planning, new solar additions aren't modeled until 2028, a decision made before the bill was introduced.

- Hamilton Davis (Carolinas Clean Energy Business Association) raised the question of whether safe harboring could allow projects to qualify for tax credits through 2030. Bob and David Millar (Santee Cooper Resource Planning) both acknowledged the possibility but said it's hard to plan for without projects already underway and would require initiating a competitive procurement (CPRE) process. The timing of future solicitations is still under discussion.
- Nina Peluso (Energy Futures Group on behalf of Southern Environmental Law Centre and Coastal Conservation League) pressed for including safe harbor assumptions in the IRP model through 2029, noting other utilities do and arguing that excluding these inflates costs and misrepresents market reality. Clay and Bob explained that current IRP assumptions exclude solar and wind tax credits but include phased battery credits, reflecting what was known during analysis. They emphasized that these are modeling assumptions only, that actual market costs will guide procurements. Clay committed to reviewing any references Nina could share. *[Addendum post-member review from EFG: Accurately modeling these costs could influence the non-solar resource choices and therefore the issue cannot be fixed by merely conducting procurement exercises.]*

Bob continued to detail major factors affecting the fuel price forecast, comparing the 2025 IRP Update against the 2024 Update. Responding to a prior stakeholder query about really driving the change in the underlying forecast, the team took a harder look and is providing more detail. Resource Planning is now using the U.S. EIA's 2025 Annual Energy Outlook (AEO), which shows notably higher fuel costs than the 2023 AEO: natural gas about 17% higher overall (10% higher by the 2030s, 23% by the 2040s) and coal 38% higher on average, driven largely by more expensive low-sulfur eastern coal and diesel-driven increases in rail delivery costs.

- Eddy Moore (Southern Alliance for Clean Energy) asked for a comment on the National Renewable Energy Laboratory (NREL) Annual Technology Baseline (ATB) conservative case. Bob confirmed the team is using it as the most representative of market pricing, especially for solar, borrowing its capital cost trend while using Sargent & Lundy projections for starting values.
- John Burns (Carolinas Clean Energy Business Association) queried why costs rise post-2038, noting the trend line is opposite to what the trend line shows in actual costs. Bob reinforced that the data represented nominal, not real, dollars and said it reflects inflation and the phase-out of tax credits, pipeline delivery costs.
- Taylor Allred (Coastal Conservation League) asked whether the pipeline delivery charges in the natural gas forecast are based on a national projection or if they account for Santee Cooper-specific factors like new pipeline construction. Bob explained that pipeline delivery charges are based on existing variable tariffs for each pipeline serving a site, adjusted for specific conditions. Firm reservation fees are modeled separately. He reminded members that the detailed site-specific cost data is available in the IRP work papers.

- Shelley Robbins (Southern Environmental Law Center) asked to clarify that firm transportation assumptions were based on work Dominion and Santee Cooper have done with pipelines and precedent agreements, rather than generic estimates. Bob confirmed, yes, it was based on agreements.
- Eddy and Shelley went on to inquire whether these were fixed transportation costs and could anything more could be said about variable costs. Bob acknowledged the best way he could respond in the moment was to confirm the information was shared under a protective order for discovery. He did confirm that it is treated as a fixed cost for selection, similar to capital or other fixed dominant charges.
- Jeffrey inquired whether the 2025 AEO natural gas prices were higher or lower than the 2023 prices. Bob confirmed the prices are generally higher. Commodity (Henry Hub) prices are about 10% higher in the '30s through '40s and around 23% higher in the early '40s through '50s, assuming delivery charges are only slightly higher (about 2%). This increase significantly drives overall price growth.
- Anna wanted to know what AEO Henry HUB prices were translated to the prices modeled for Dominion's areas, considering basis differentials. Bob responded that the model starts with Henry Hub prices, then incorporates basis variations using S&P forecast data to capture monthly hub-to-hub differences. On top of that, variable transportation costs for all pipelines to each plant or generating asset are added. For Transco Zone 4, the difference from Henry Hub is minimal, while Zone 5 sees some winter price increases that tend to moderate over time as new gas supply comes online.
- Findlay Salter (Office of Regulatory Staff) asked about 2023–2025 trends; Davis said they are roughly 7% higher, driven by diesel prices. Bob responded that fuel oil costs are driven mostly by rail delivery contracts and diesel price adders, using AEO Southeast diesel forecasts as the base. While a 7% increase is noted, other factors also affect the forecast, and detailed year-to-year metrics are available in the database and RFP.
- A final question came from John regarding turbine costs. Clay responded that for turbine costs, the team used the updated Sergeant & Lundy capital costs and aligned thermal resource costs with Dominion's joint-build assumptions. The capital cost sensitivity was tested, and increasing the capital cost by 50% for only thermal resource options didn't change the model decision, so the sensitivity captures potential impacts on any decisions.

2025 IRP Update

– Clay Settle, Manager, Resource Planning, Santee Cooper

Clay reviewed the IRP slides that had been presented to the Santee Cooper Board. He outlined Santee Cooper's planning obligations, explaining how statutory requirements under Act 90 Commission orders fit together with the coordination agreement with Central. The IRP sets the overall direction, while the coordination agreement governs specific joint resource decisions. Clay recapped recent milestones: the Commission's approval of the 2024 IRP Update in April, the Joint Planning Committee's approval of new load forecasts in May, and its approval of joint generation expansion planning in July. All of this work supports the forthcoming 2025 IRP Update, which draws similar conclusions to past IRPs: a large combined-cycle plant at Canadys in partnership with Dominion, new combustion turbines and battery storage for peak needs, and ongoing solar additions as economic conditions permit.

Clay said the IRP Update will include portfolios reflecting the 2024 GHG rule, the draft 2025 GHG rule, and the elimination of the IRA tax credit under the One Big Beautiful Bill Act, noting that these policy shifts do not change near-term resource choices. He confirmed the solar build constraint remains 300 MW per year. He described key planned additions: roughly 1,000 MW of combined-cycle capacity at Canadys coming online in

phases between winter 2032 and 2033, two LM6000 combustion turbines at Winyah by 2028, and about 300 MW of battery capacity by 2029, split between Jeffreys and Central. In the mid-2030s, the plan shows additional combined cycles, CTs, or PPAs, with continued evaluation of solar's value for hedging fuel costs and environmental risks.

Clay showed load forecasts with continued strong growth and explained how the resulting capacity shortfall starts around winter 2027 and grows beyond 2,000 MW in the mid-2030s. He noted that earlier portfolios assumed Winyah's retirement in 2032, but updated analysis shifted that to 2034 to allow a more reasonable build schedule. He closed by describing the stakeholder engagement process, which has included five working group meetings, a general notice meeting, and three technical sessions. In reviewing next steps, Clay indicated that following next week's IRP Update on Tuesday, the team will continue coordinating with Central, advance the filed certificate application for the Winyah combustion turbines, collaborate with Dominion on developing the Canadys Joint NGCC GCC projects, and finalize both the battery configurations and developer selection for the Jeffreys battery RFP.

Questions during the discussion focused mainly on assumptions, portfolio details, and timing.

- Findlay asked whether any provisions of Act 41 would change the IRP Update; Clay said its main effect is on transmission planning and how that interacts with triannual IRPs.
- Jeffrey asked if the solar build constraints were the same as last year; Clay confirmed that they remain 300 MW annually.
- Nina questioned whether the IRP would publish scenarios showing that recent federal policy changes have no effect on near-term resource decisions, or if such scenarios would only be available within the modeling files. Clay Settle replied that the IRP Update will include the resource portfolios and additions under each scenario, and stakeholders who sign an NDA will get access to the full modeling inputs, outputs, and results in the data room once the IRP is filed.
- Nina clarified that she was asking specifically whether there would be a scenario that excludes the new EPA and OBBB policy changes. Clay explained that the modeling will include a scenario without the greenhouse gas rule, a scenario with the 2024 rule, and a scenario assessing the draft 2025 rule. Still, none that exclude the One Big Beautiful Bill Act because it is already law, and its removal of IRA tax incentives is built into the base case. He said that those policy shifts do not materially affect near-term decisions as they are still planning to add combined cycles, batteries, combustion turbines, and solar when economics, essentially the same mix seen in previous IRPs.
- Nina noted that the only meaningful comparison to gauge the effect of the OBBB Act would be the 2024 update modeling run, which is not included in the 2025 IRP data room. Clay responded that while 2024 results are publicly available in that report's appendix, the data room will only contain the new 2025 analysis because key assumptions have changed since 2024.
- Nina closed by emphasizing that without a scenario explicitly excluding those policy shifts, it is difficult to credibly claim there is "no impact" on near-term resource decisions. She said she agreed that the new policies should be treated as base-case assumptions. Still, she suggested the team reconsider how that bullet point is framed, as the current statement could be misleading without a valid comparison.
- Stewart relayed a question from Shelley asking if the combined-cycle build had grown to 2,200 MW; Clay clarified it is about 1,000 MW, representing Santee Cooper's 50% share of three 1x1 units.

- Findlay asked about two new solar PPAs and whether they appear in the reference plan; Clay said they are still under negotiation and not yet modeled, although 1,500 MW of solar is being tested in 2023 Re-Optimized Portfolio.
- Findlay also asked about a 150 MW Central battery project; Clay confirmed it is a non-shared Central resource planned for 2029.
- Shelley asked whether having 71% of the portfolio as gas in 2040 creates price risk; Clay said Santee Cooper hedges gas purchases. Bob Davis added that coal could be dispatched more if gas prices spike. Shelly noted that hedging carries costs.
- Findlay asked whether the team could review the impact of retiring Winyah in 2032 versus 2034. Clay explained that the original IRP Update assumed a 2032 retirement, which drove the addition of several combined-cycle units in 2033. However, this created an unrealistic cluster of new builds. The team tested scenarios that kept adding solar while delaying Winyah's retirement to 2034, which spread out the additions—pushing two of the combined-cycle units from 2033 to 2035. This led them to favor the 2034 retirement date as it supports a more practical, phased resource implementation plan.
- Finally, Findlay asked about the status of the onshore wind study and whether it would be complete by October; Clay said it is still underway and expected to finish later this year. Clay said we can follow up on whether it will be ready for the October stakeholder meeting.

Winyah CEPCN

– Clay Settle, Manager, Resource Planning, Santee Cooper

Clay began by summarizing the background and rationale for Santee Cooper's recent filing of a Certificate of Environmental Compatibility and Public Convenience and Necessity (CEPCN) to build new LM6000 combustion turbine units at the Winyah Generating Station. He shared that the initiative forms part of a broader push to add near-term generation capacity in response to rising load growth. Alongside the Winyah proposal, the utility is also advancing combined cycle upgrades at the Rainey Station, expected to add about 250 megawatts, developing battery storage at the Jeffreys site and continuing collaborative work with Dominion on additional natural gas combined cycle and combustion turbine projects.

Clay noted that the Winyah site choice is rooted in its existing infrastructure advantages. There is already substantial transmission capacity on-site, including a 230 kV line crossing the property, and a Carolina Gas Transmission (CGT) natural gas pipeline that runs directly through the station property. These features make Winyah a low-risk location for rapid deployment of new capacity. The LM6000 turbines are fast-starting, jet engine-derived peaking units capable of reaching full output in under ten minutes, making them ideal for providing operating reserves and supporting reliability in the Georgetown-area load center. The project will make use of about 20 acres of the decommissioned ash pond at the south end of the property, which is being backfilled and compacted to provide a suitable foundation. The targeted commercial in-service date is winter 2028, which would make this one of the fastest available paths to new firm capacity among the options Santee Cooper considered in its recent RFP process.

- Taylor asked for clarification on fueling plans for the new facility, noting the application suggested initial reliance on diesel despite proximity to a gas pipeline. Clay explained that while the long-term plan is to secure natural gas through the CGT connection, permitting is being pursued for fuel oil to ensure operation until gas supply is available, with the permit later modified for dual-fuel use. He emphasized the project's advantages: fast-start, reliable LM6000 units providing valuable operating reserves; location benefits for transmission reliability; and timely capacity addition by winter 2028, which compared favorably to alternatives considered through the RFP process.

- Shelley questioned whether the gas pipeline truly crosses the property and raised concerns that without firm transportation capacity, the CTs might not meet continuous-operation criteria, likening them to batteries if reliant on fuel oil. Shelley also queried why firm transportation was assumed in the study and whether options like looping or compression were considered. Clay clarified that the pipeline is indeed on the Winyah property and shared that the team is pursuing both interruptible and firm opportunities on the CGT system. He emphasized that, unlike batteries, the units would have five days of on-site fuel storage plus refueling capability, allowing reliable operation through extended peak or extreme weather events.
- Anna asked whether “find gas” referred to fuel commodity or transport rights, or both. Clay reiterated that the team is seeking opportunities within the CGT system, whatever that may be for the project
- Taylor wanted to know when the CGT metering would be in place. Clay could not speak definitively to the schedule, and confirmed metering was part of the project, so the intent is to install the connection in sync with the building of the units.
- Eddy noted the application mentions expansion to up to six CTs and asked whether further pipeline upgrades be needed to fuel six? Clay was unsure exactly what upgrades would be required for six CTs, but emphasized the plant was intentionally designed to allow future expansion relatively easily beyond the two CTs that Santee Cooper is currently seeking approval for as Winyah retires and transmission capacity becomes available on the site.
- Jeffrey asked how many hours per year the units are expected to run. Clay did not have the specific number and confirmed they are dispatching similar to peaking units on the system.

Clay then walked members through a map of the Winyah site, identifying site locations for where the CTs will be installed with a switchyard tied directly into the existing 230 kV line and the intended CGT pipeline connection and metering station. He emphasized that the Winyah location offers strong advantages with transmission and gas access already in place, allowing for efficient development. Construction is expected to take about three years, with completion targeted for winter 2028, making it a relatively quick implementation.

- Taylor inquired about anticipated engineering challenges to make sure the ground is stable enough on the ash pond. Clay confirmed this was being taken care of as the project team backfills the pond with appropriate compaction, foundation design and all else required to ensure so.

Meeting Closeout

– Stewart Ramsay, Meeting Facilitator, Vanry Associates

Stewart and Clay expressed their appreciation for the involvement, participation, and contribution of the Stakeholder Working Group members in this meeting.

Commitments and Next Steps

ACTION ITEM – noted during the meeting discussion

By **WHOM**

- | | |
|--|----------------------|
| 1. Request to share relevant information regarding ITC modeling for Santee Cooper to consider | Nina Peluso
(All) |
| 2. Commitment to update members on the solar wind study progress, specifically whether results likely to be available for the October 14 th meeting | Resource Planning |

Next Steps:

- The next Working Group meeting is scheduled for October 14, 2025
- The next general notice meeting is targeted for November 2025
- Members wishing to present a topic at a future meeting may contact Ellie Gallagher or Clay Settle

APPENDIX A

List of Stakeholder Working Group Members and Attendees

ORGANIZATION	MEMBER / ALTERNATE	September 10 th ATTENDEES
Office of Regulatory Staff	Findlay Salter Jeffery Gordon Julian McElhaney Shane Hyatt	Findlay Salter Jeffery Gordon Julian McElhaney
SC Dept of Consumer Affairs	Jake Edwards Roger Hall	
SC Dept of Natural Resources	Elizabeth Miller Lorianne Riffin	
SC Dept of Environmental Services	Rhonda Thompson Robert Brown	Robert Brown
Central	Caleb Bryant Leslie Maley	Caleb Bryant
J. Pollock	Jeffery C. Pollock Jonathan Ly	
Century Aluminum	Michael Early Stephen Thomas	Stephen Thomas
Nucor	Bradley Powell Karl Winkler	
Messer	Michael Peters Steven Castracane	
Google	Katie Ottenweller Will Cleveland	
SC Association of Municipal Power Systems	Adam Hedden Eric Budds	
Individual	Charles Hucks	Charles Hucks
Individual	Richard Berry	
Individual	Diane Bell	Diane Bell
Individual	Dennis Boyd	Dennis Boyd
Carolinas Clean Energy Business Association	Hamilton Davis John Burns	Hamilton Davis John Burns
Conservation Voters of South Carolina	Erin Siebert Jalen Brooks-Knepfle John Brooker	Jalen Brooks-Knepfle
Coastal Conservation League	Kennedy Bennett Taylor Allred	Taylor Allred
Energy Justice Coalition	Shayne Kinloch Zakiya Esper	
South Carolina Appleseed Legal Justice Center	Sue Berkowitz	
South Carolina Research Authority	Greg Wilcox	
Southern Alliance for Clean Energy	Eddy Moore Maggie Shober	Eddy Moore Maggie Shober

Southern Environmental Law Center	Anna Sommer Chelsea Hotaling Kate Mixson Nina Peluso Thomas Gooding	Anna Sommer Kate Mixson Nina Peluso
Sierra Club	David Rogers Dori Jaffe Mikaela Curry Sari Amiel	Sari Amiel
Vote Solar	Jake Duncan	
Santee Cooper Resource Planning	Clay Settle David Millar Rahul Dembla Ellie Gallagher	Clay Settle David Millar Ellie Gallagher
nFront Consulting	Bob Davis Jonathan Nunes	Bob Davis Jonathan Nunes
Vanry Associates	Peter Claghorn Stewart Ramsay Yvette Smith	Peter Claghorn Stewart Ramsay Yvette Smith

**Members listed in alpha order by first name*

Also in Attendance

Southern Environmental Law Center	Shelley Robbins
Office of the Regulatory Staff	Brad Heath