

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**DOCKET NO. 2019-281-S**

IN RE: )  
)  
APPLICATION OF PALMETTO UTILITIES, )  
INC. FOR AN INCREASE OF RATES AND ) **PETITION TO INTERVENE**  
CHARGES FOR THE PROVISION OF )  
SEWER SERVICE AND MODIFICATIONS )  
TO CERTAIN TERMS AND CONDITIONS )  
OF THE PROVISION OF SEWER SERVICE )

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Carri Grube Lybarker, Consumer Advocate for the State of South Carolina and Administrator of the South Carolina Department of Consumer Affairs (“Petitioner”), respectfully petitions the South Carolina Public Service Commission (“Commission”) for permission to intervene in the above referenced Docket pursuant to R. 103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioner states as follows:

1. Palmetto Utilities, Inc. (the “Company”) has filed an application with the Commission requesting approval of adjustments to its monthly sewer service rates and the adoption of a charge for tampering with Company facilities and equipment. The Company also seeks modifications to certain terms and conditions of its rate schedule, including circumstances when the proposed tampering charge may be imposed and the adoption of language limiting the Company’s liability for interruption of, or failure to provide, service in certain circumstances.
2. The Commission has assigned Docket No. 2019-281-S to this matter.
3. Carri Grube Lybarker is the Consumer Advocate for the State of South Carolina. Pursuant to S.C. Code Ann. § 37-6-604 (2018), the Consumer Advocate has discretion to provide legal representation of the consumer interest before state and federal regulatory agencies when such agencies undertake to fix rates or prices for consumer products or services and

may intervene as a party to advocate for the interest of consumers before the South Carolina Public Service Commission in such matters as the Consumer Advocate deems necessary and appropriate. In that capacity the Consumer Advocate does hereby petition to intervene as a formal party of record in Docket No. 2019-281-S.

4. The Consumer Advocate actively participated in many matters before this Commission from 1978 until the responsibility to intervene in utility rate filings was removed by 2004 Act No. 175. Act 258 of 2018, effective July 12, 2018, restored this role to the Department.
5. The Consumer Advocate works to avoid excessive, inadequate, and unwarranted rate increases; however, the Consumer Advocate has not fully developed her position on this matter. Petitioner reserves the right to set forth her position more fully as necessary and appropriate as this proceeding moves forward.

**WHEREFORE**, Petitioner, in order to represent the consumer interest of the State of South Carolina, requests for the Commission to grant this Petition to Intervene and make Petitioner a formal party of record, allowing Petitioner to actively participate in this proceeding.

Carri Grube Lybarker, Esquire  
Administrator / Consumer Advocate

By: s/Carri Grube Lybarker

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Columbia, South Carolina