

**BEFORE THE  
NORTH CAROLINA UTILITIES COMMISSION  
RALEIGH, NORTH CAROLINA**

**BETHEL NC 11 SOLAR, LLC  
DOCKET NO. EMP-102, SUB 1**

**PRE-FILED SUPPLEMENTAL TESTIMONY  
OF  
LINDA NWADIKE**

**October 15, 2020**

1

**INTRODUCTION**2 **Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.**

3 A. My name is Linda Nwadike. I am the Director of Permitting and Community  
4 Relations for SunEnergy1, LLC (“SunEnergy1” or the “Company”), the parent  
5 and an affiliate of the Applicant Bethel NC 11 Solar, LLC (“Bethel NC 11 Solar”  
6 or “Applicant”). Bethel NC 11 Solar is a North Carolina limited liability  
7 company that was formed on August 17, 2016. My business address is 192  
8 Raceway Drive, Mooresville, North Carolina 28117.

9 **Q1. Are there any network upgrades to DENC’s or any affected system’s**  
10 **transmission system required to accommodate the operation of the**  
11 **Applicant’s proposed facility? If so, provide the amount of network upgrades**  
12 **on DENC’s or any affected system’s transmission system, if any, required to**  
13 **accommodate the operation of the Applicant’s proposed facility.**

14 A. PJM Facility Study for Queue AC1-189 for 80MW ac has DENC network  
15 upgrades of estimated cost of [REDACTED] and DE Virginia network upgrades of  
16 estimated cost of [REDACTED]. DEP has issued a Generator Interconnection Affected  
17 System Study Report identifying [REDACTED] projects as needing to  
18 resolve an overload on the Battleboro – Rocky Mount 115kV line with an  
19 estimated cost of [REDACTED].

20 PJM Feasibility Study for Queue AF2-080 for an additional 70MW ac has an  
21 estimated cost of network upgrades of [REDACTED]. These upgrades are in  
22 Dominion’s Virginia and North Carolina territory as well as in AEP. There are

1 potential impacts to DEP but these will not be evaluated until the System Impact  
2 Study phase.

3 **Q2. If there are any required system upgrades does the Applicant have Levelized**  
4 **Cost of Transmission (LCOT) information for the system upgrades? If so,**  
5 **provide the LCOT information for any required transmission system**  
6 **upgrades or modifications.**

7 A. Please see Exhibits 1 & 2 for the LCOT. Exhibit 1 shows the LCOT for queue  
8 AC1-189 for 80MW ac, and Exhibit 2 shows the LCOT for queue AC1-189 and  
9 AF2-080 for a total of 150MW ac.

10 Queue AF2-080 Feasibility Study identified potential network upgrades of an  
11 estimated cost of [REDACTED]; we forecast that this cost will be reduced  
12 tremendously once the system impact and facility studies are completed.

13 **Q3. Is there any interconnection study available for the proposed facility? If so,**  
14 **provide any interconnection study received for the proposed facility. If the**  
15 **Applicant has not received a study, provide a date by when the study is**  
16 **expected to be completed.**

17 A. PJM Queue AC1-189 for 80MW ac has received all PJM studies. Please see  
18 Exhibit 3, 4 & 5, respectively, for PJM Queue AC1-189 Feasibility, System  
19 Impact and Facilities Studies. DEP has issued a Generator Interconnection  
20 Affected System Study Report please see Exhibit 6, for DEP's Generator  
21 Interconnection Affected System Study Report.

1 PJM Queue AF2-080 for an additional 70MW ac has received a Feasibility Study  
2 and the System Impact Study is targeted for February 2021. After completion of  
3 the System Impact Study, PJM will determine the scope of duration of the  
4 Facilities Study as well as the need for any DEP studies. PJM Queue AF2-080  
5 Feasibility Study is attached as Exhibit 7.

6 **Q4. Is the Applicant aware of any system other than the studied system that is or**  
7 **will be affected by the interconnection? If yes, explain the impact and basis.**

8 A. DEP has issued a Generator Interconnection Affected System Study Report  
9 identifying five PJM AC1 queue projects as needing to resolve the overload on  
10 the Battleboro – Rocky Mount 115kV line. The AC1-189 queue is one of the five  
11 identified PJM queue projects. Although the AC1-191 project benefits from the  
12 resolution of the Battleboro – Rocky Mount 115kV line rebuild, the AC1-191  
13 project does not trigger the need for this work. PJM System Impact restudies  
14 identify this overload as existing prior to the AC1-034 queue, which was the first  
15 project identified in the DEP report. The DEP report does not identify the loading  
16 on the Battleboro – Rocky Mount 115kV line prior to the PJM AC1 queue.

17 **Q5. Is the Applicant proposing to sell energy and capacity from the facility to a**  
18 **distribution utility regulated by the Commission? If so, provide a discussion**  
19 **of how the facility’s output conforms to or varies from the regulated utility’s**  
20 **most recent IRP.**

21 A. N/A; the project currently has a PPA offtaker which is a Fortune 100  
22 company that is not related to a regulated nor non-regulated utility.

1 **Q6. Is the Applicant proposing to sell energy and capacity from the proposed**  
2 **facility to a distribution utility not regulated by the Commission but serving**  
3 **retail customers in North Carolina (e.g., a co-op or muni)? If so, discuss how**  
4 **the facility's output conforms to or varies from the purchasing distribution**  
5 **utility's long-range resource plan.**

6 A. N/A; the project currently has a PPA offtaker which is a Fortune 100  
7 company that is not related to a regulated nor non-regulated utility.

8 **Q7. Is the Applicant proposing to sell energy and capacity from the proposed**  
9 **facility to a purchaser who is subject to a statutory or regulatory mandate**  
10 **with respect to its energy sourcing (e.g., a REPS requirement or Virginia's**  
11 **new statutory mandate for renewables)? If so, explain how, if at all, the**  
12 **proposed facility will assist or enable compliance with the mandate. In**  
13 **addition, provide any contracts that support that compliance.**

14 A. N/A. The Applicant has obtained a PPA from a Fortune 100 company that  
15 is not related to a Utility. The PPA offtaker will utilize the RECs associated  
16 with the output from the facility to meet its sustainability goals.

17 **Q8. Does the Applicant have an PPA agreements, REC sale contracts, or**  
18 **contracts for compensation for environmental attributes for the output of the**  
19 **proposed facility? If so, provide any PPA agreements, REC sale contracts, or**  
20 **contracts for compensation for environmental attributes for the output of the**  
21 **facility.**

1 A. The Applicant has a PPA agreement. Please see Exhibit 8. The name of the off-  
2 taker has been redacted; the off-taker has a non-disclosure agreement with the  
3 Applicant. Therefore, we are producing the contract with the name redacted.  
4 Additionally, the off-taker has requested a name change to the project therefore  
5 the Applicant will be requesting a name change from NCUC in the coming days  
6 to match the name on the contract documents.

7

8 **Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL TESTIMONY?**

9 A. Yes.


10

1  
2 STATE OF NORTH CAROLINA  
3  
4 COUNTY OF IREDELL

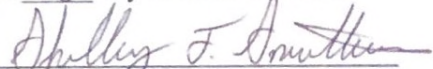
5  
6 VERIFICATION  
7

8 I, Linda Nwadike, being first duly sworn, depose and say that I am duly  
9 authorized to act on behalf of Bethel NC 11 Solar, LLC as Director of Permitting and  
10 Community Relations for SunEnergy1, LLC, the parent and an affiliate of the  
11 Petitioner; that I have read the foregoing Pre-Filed Supplemental Testimony and that the  
12 same is true and accurate to my personal knowledge and belief except where otherwise  
13 indicated, and in those instances, I believe my answers to be true.

14 This 15 day of October, 2020.  
15

16  
17   
18 \_\_\_\_\_  
19 Linda Nwadike  
20 SunEnergy1, LLC

21 Sworn to and subscribed to before me  
22 this 15 day of October, 2020.

23   
24 \_\_\_\_\_  
25 Notary Public (Signature)

26  
27 Shelby F. Smithwick  
28 Notary Public (Printed)



29  
30 My Commission Expires: 3/27/23  
31  
32

# EXHIBIT 1



# EXHIBIT 2

# EXHIBIT 3

# EXHIBIT 4

# EXHIBIT 5

# EXHIBIT 6

# EXHIBIT 7

# EXHIBIT 8

# **EXHIBIT 9**



State of North Carolina  
Department of the Secretary of State

SOSID: 1537553  
Date Filed: 9/25/2020 2:21:00 PM  
Elaine F. Marshall  
North Carolina Secretary of State  
C2020 268 00678

Limited Liability Company  
AMENDMENT OF ARTICLES OF ORGANIZATION

Pursuant to §57D-2-22 of the General Statutes of North Carolina, the undersigned limited liability company hereby submits the following Articles of Amendment for the purpose of amending its Articles of Organization.

1. The name of the limited liability company is: Bethel NC 11 Solar, LLC

2. The text of each amendment adopted is as follows (attach additional pages if necessary):  
Bethel NC 11 Solar, LLC would hereby like to change the entity name of the limited liability company to "Pitt Solar, LLC".

3. (Check either a or b, whichever is applicable)

A.  The amendment(s) was (were) duly adopted by the majority vote of the organizers of the limited liability company prior to the identification of initial members of the limited liability company.

B.  The amendment(s) was (were) duly adopted by the unanimous vote of the members of the limited liability company or was (were) adopted as otherwise provided in the limited liability company's Articles of Organization or a written operating agreement.

4. These articles will be effective upon filing, unless a date and/or time is specified: \_\_\_\_\_

This the 25 day of September, 2020.

Bethel NC 11 Solar, LLC

Name of Limited Liability Company



Signature

Kenny Habul

Type or Print Name and Title

, Company Official

NOTES:

1. Filing fee is \$50. This document must be filed with the Secretary of State.