

PUBLIC-REDACTED

**BEFORE THE  
NORTH CAROLINA UTILITIES COMMISSION  
RALEIGH, NORTH CAROLINA  
GASTON GREEN ACRES SOLAR, LLC  
DOCKET NO. EMP-112, SUB 0**

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

**October 19, 2020**

**OFFICIAL COPY**

**Oct 19 2020**

**INTRODUCTION**

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

A. My name is Linda Nwadike. I am the Director of Permitting and Community Relations for SunEnergy1, LLC (“SunEnergy1” or the “Company”), the parent and an affiliate of the Applicant Gaston Green Acres Solar, LLC (“Gaston Green Solar”). Gaston Green Solar is a North Carolina limited liability company that was formed on August 15, 2014. My business address is 192 Raceway Drive, Mooresville, North Carolina 28117.

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

A. PJM queue AB1-132 ISA forecasts network upgrades and relay setting changes at Dominion’s Thelma and Lakeview substations to accommodate this generator. The estimated cost of this work is [REDACTED].

PJM queue AC1-086 has six network upgrades for Dominion system reinforcements in Virginia and North Carolina, for which this generation project has been allocated a cost responsibility of [REDACTED].

The system reinforcements are as follows:

- i. Uprate/rebuild 1.28 miles of the Lakeview-Carolina 230kV line 2141

- 1 ii. Replace a wave trap at Chickahominy substation for Chickahominy-Elmont
- 2 500kV line #557
- 3 iii. Replace a wave trap at North Anna Substation for Midlothian-North Anna
- 4 500kV line #576
- 5 iv. Install a second, back to back breaker between existing line positions #241
- 6 and #2141 at the Lakeview substation
- 7 v. Replace the Elmont-Ladysmith 500kV line #574 wavetraps
- 8 vi. Replace Battleboro substation terminal equipment.

9 **Q2. If there are any required system upgrades does the Applicant have Levelized**  
10 **Cost of Transmission (LCOT) information for the system upgrades? If so,**  
11 **provide the LCOT information for any required transmission system**  
12 **upgrades or modifications.**

13 A. Please see Exhibit 1

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

18 A. The project is made up of two PJM queue's, AB1-132 and AC1-086.

19 The relevant PJM Studies are as follows:

- 20 • AB1-132 System Impact Study, Facilities Study and Feasibility Study are
- 21 attached as Exhibit 2, 3 & 4 respectively.
- 22 • AC1-086 System Impact Study, Facilities Study and Feasibility Study are
- 23 attached at Exhibit 5, 6 & 7 respectively.

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

3 A. PJM Queue AB1-132 for 120MW has an Interconnection Service Agreement  
4 (ISA) that was filed with FERC in May 2018. PJM did not require any affected  
5 system studies for this queue.

6  
7 PJM Queue AC1-086 for an additional 180MW's has completed the PJM study  
8 process and a PJM ISA has been tendered. PJM System Impact Study identified a  
9 contribution to a previously identified overload on the Battleboro – Rocky Mount  
10 115kV tie line. The PJM Facilities Study Agreement required Gaston Green  
11 Acres Solar to enter into an Affected System Facilities Study with DEP. PJM's  
12 ISA for the combined AB1-132 / AC1-086 queue's does not require Gaston Green  
13 Acres Solar to resolve this affected system overload. The ISA identifies that the  
14 AC1-086 generation output may be curtailed until this overload is resolved.

15  
16 DEP has issued a Generator Interconnection Affected System Study Report  
17 identifying five PJM AC1 queue projects as needing to resolve the overload on  
18 the Battleboro – Rocky Mount 115kV line. The AC1-086 queue is one of the five  
19 identified PJM queue projects. Although the AC1-086 project benefits from the  
20 resolution of the Battleboro – Rocky Mount 115kV line rebuild the AC1-086  
21 project does not trigger the need for this work. PJM System Impact restudies  
22 identify this overload as existing prior to the AC1-034 queue which was the first  
23 project identified in the DEP report. The DEP report does not identify the loading

1 on the Battleboro – Rocky Mount 115kV line prior to the PJM AC1 queue. See  
2 Exhibit 8

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

7 A. No

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

13 A. No

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

20 A. No

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

1 **contracts for compensation for environmental attributes for the output of the**  
2 **facility.**

3 A. The Applicant has a PPA agreement. The Applicant effected a change-of-name to  
4 Oak Solar, LLC (“Oak Solar”) on or about September 25, 2020, at the request of  
5 the off-taker counterparty, and the PPA used the new name. A copy of the body  
6 of that PPA agreement is attached as Exhibit 9. The name of the off-taker has  
7 been redacted temporarily; the off-taker has a non-disclosure agreement with the  
8 Applicant and has not authorized disclosure of its name. Therefore, we are  
9 producing the contract with the name redacted for the time being. The Applicant  
10 will be requesting name changes from the NCUC in the coming days to match the  
11 names on the contract documents (See Exhibit 10).

12 Additionally, the off-taker required that the proposed project, which  
13 originally had two phases, be divided into two projects to match the COD dates  
14 and PJM queue numbers for each of the originally proposed phases. A new North  
15 Carolina limited liability company, Cherry Solar, LLC (“Cherry Solar”), was  
16 organized on or about September 24, 2020, as shown by Exhibit 10A attached  
17 hereto. That new entity has a PPA agreement with the same off-taker but separate  
18 from the one made by Oak Solar. A copy of the body of the Cherry Solar PPA is  
19 attached as Exhibit 9A. Please note that the name of the off-taker has also been  
20 redacted temporarily from the PPA that is attached as Exhibit 9A; the off-taker  
21 has a non-disclosure agreement with the Applicant and has not authorized  
22 disclosure of its name. Therefore, we are producing the contract with the name  
23 redacted for the time being.

1           At the present time, the Applicant still owns all of the project related to the two  
2           PPAs attached as Exhibits 9 and 9A. The Applicant at this time continues to seek  
3           authority to start construction of all of the proposed project, including the portion  
4           that ultimately will be conveyed to Cherry Solar with the prior approval of this  
5           Commission.

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

7   A.    Yes.

8

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 Gaston Green Acres Solar, LLC as Director of Permitting  
10 and 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 19<sup>th</sup> day of October, 2020.

15 

16  
17 Linda Nwadike  
18 SunEnergy1, LLC

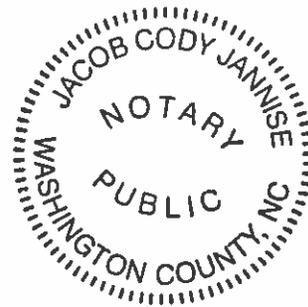
19  
20 Sworn to and subscribed to before me  
21 this 19 day of October, 2020.

22   
23 \_\_\_\_\_  
24 Notary Public (Signature)

25 Jacob Cody Jannise  
26 \_\_\_\_\_  
27 Notary Public (Printed)

28 My Commission Expires: 3/16/24

(Seal)



# EXHIBIT 1

# **EXHIBIT 2**

# EXHIBIT 3

# EXHIBIT 4

# EXHIBIT 5

# EXHIBIT 6

# EXHIBIT 7

# EXHIBIT 8

# EXHIBIT 9

# EXHIBIT 9A

# **EXHIBIT 10**

State of North Carolina  
Department of the Secretary of State

SOSID: 1400866  
Date Filed: 9/25/2020 2:24:00 PM  
Elaine F. Marshall  
North Carolina Secretary of State  
C2020 268 00601

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: Gaston Green Acres Solar, LLC

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

Gaston Green Acres Solar, LLC

Name of Limited Liability Company



Signature

Kenny Habul, Company Official

Type or Print Name and Title

NOTES:

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

# **EXHIBIT 10A**

State of North Carolina  
Department of the Secretary of State

SOSID: 2055389  
Date Filed: 9/24/2020 3:15:00 PM  
Elaine F. Marshall  
North Carolina Secretary of State  
C2020 268 00616

Limited Liability Company  
ARTICLES OF ORGANIZATION

Pursuant to §57D-2-20 of the General Statutes of North Carolina, the undersigned does hereby submit these Articles of Organization for the purpose of forming a limited liability company.

1. The name of the limited liability company is: Cherry Solar, LLC  
(See Item 1 of the Instructions for appropriate entity designation)
2. The name and address of each person executing these articles of organization is as follows: (State whether each person is executing these articles of organization in the capacity of a member, organizer or both by checking all applicable boxes.) **Note: This document must be signed by all persons listed.**

Name	Business Address	Capacity
<u>Kenny Habul</u>	<u>192 Raceway Dr., Mooresville, NC 28117</u>	<input checked="" type="checkbox"/> Member <input type="checkbox"/> Organizer
_____	_____	<input type="checkbox"/> Member <input type="checkbox"/> Organizer
_____	_____	<input type="checkbox"/> Member <input type="checkbox"/> Organizer

3. The name of the initial registered agent is: Kenny Habul

4. The street address and county of the initial registered agent office of the limited liability company is:

Number and Street 192 Raceway Dr.  
City Mooresville State: NC Zip Code: 28117 County: Iredell

5. The mailing address, if different from the street address, of the initial registered agent office is:

Number and Street \_\_\_\_\_  
City \_\_\_\_\_ State: NC Zip Code: \_\_\_\_\_ County: \_\_\_\_\_

6. Principal office information: (Select either a or b.)

a.  The limited liability company has a principal office.

The principal office telephone number: \_\_\_\_\_

The street address and county of the principal office of the limited liability company is:

Number and Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_ County: \_\_\_\_\_

The mailing address, if different from the street address, of the principal office of the company is:

Number and Street: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_ County: \_\_\_\_\_

b.  The limited liability company does not have a principal office.

7. Any other provisions which the limited liability company elects to include (c.g., the purpose of the entity) are attached.

8. **(Optional):** Listing of Company Officials (See instructions on the importance of listing the company officials in the creation document.

Name	Title	Business Address

**Privacy Redaction**

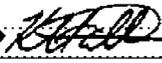
9. **(Optional):** Please provide a business e-mail address \_\_\_\_\_  
The Secretary of State's Office will e-mail the business automatically at the address provided above at no cost when a document is filed. The e-mail provided will not be viewable on the website. For more information on why this service is offered, please see the instructions for this document.

10. These articles will be effective upon filing, unless a future date is specified:

\_\_\_\_\_

This is the 24 day of September, 2020.

Cherry Solar, LLC



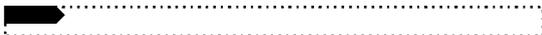
Signature

*Mr/Org*

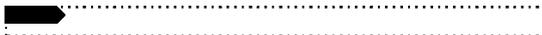
Kenny Habul - Manager

Type or Print Name and Title

The below space to be used if more than one organizer or member is listed in Item #2 above.



Signature



Signature

Type and Print Name and Title

Type and Print Name and Title

**NOTE:**

1. Filing fee is \$125. This document must be filed with the Secretary of State.