

July 21, 2017

M. Lynn Jarvis
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

RE: Johannes Gutenberg Solar LLC - Docket No. SP-5434 Sub 0

Dear Ms. Jarvis,

This letter is in reply to the Public Staff's request for additional information regarding our application for an amended Certificate of Public Convenience and Necessity ("**CPCN**") in the above-referenced docket. On behalf of the Applicant, Johannes Gutenberg Solar LLC, a North Carolina limited liability company ("**Gutenberg Solar**" or the "**Applicant**"), I am providing further responses to the items outlined in Commission Rule R8-64(b)(6) as follows:

6(i)a: A statement detailing the experience and expertise of the persons who will develop, design, construct, and operate the project to the extent such persons are known at the time of the application.

Reply: Gutenberg Solar is an indirect, wholly owned subsidiary of EDF Renewable Energy, Inc., a Delaware corporation ("**EDF RE**"). EDF RE is a 100% wholly-owned subsidiary of EDF Energies Nouvelles S.A. ("**EDF EN**"), and EDF EN is in turn a 100% owned subsidiary of Électricité de France S.A. (together with its subsidiaries, the "**EDF Group**").

EDF RE is primarily involved in developing, owning and operating wind and solar power project in North America. With 1,031 employees, EDF RE has experts in all areas of project development, procurement, construction, operations and management. EDF RE has developed 9 GW of renewable energy projects deployed across Canada, the United States and Mexico and manages 4.5 GW of projects that are owned and operated by EDF RE. In 2016 alone, the EDF RE development and implementation teams placed 809 MW into service.

During the development phase of the Project, the effort will be led by Doug Copeland and Venkatesh Inti. Both team members have over 10 years of experience in renewable energy project development, including permitting, environmental review, land leasing, panel selection and financial modelling. Their efforts will be supported and supplemented by the full EDF RE team including the in-house implementation group as the Project progresses through the design and construction phase.

During the operations phase of the Project, EDF RE will provide operations and maintenance ("**O&M**") services through its subsidiary, EDF Renewable Services, Inc. ("**EDF RS**") which currently supplies O&M services to more than 100 wind and solar projects in North America, with a capacity of more than 10 GW. The scope of EDF RS' business includes:

- More than 6,000 wind turbines from 20 Original Equipment Manufacturers
- More than 1,300 solar inverters
- 450+ technicians and supervisors
- 30 years in the industry

- Excellent safety track record, with a 1.47 Total Recordable Incident Rate (TRIR) and 0.92 Days away, restrictions and transfers (DART) in 2016
- NERC-compliant, San Diego-based Operations and Control Center (OCC), which provides round-the-clock remote monitoring, diagnostics and troubleshooting.

6(i)b: Information specifically identifying the extent to which any regulated utility will be involved in the actual operation of the project.

Reply: EDF RE is currently the 100% indirect owner of Gutenberg Solar and, at this time, it is anticipated that EDF RS will perform 100% of the O&M for the project.

6(i)c: A statement obtained by the applicant from the electric utility to which the applicant plans to sell the electricity to be generated setting forth an assessment of the impact of such purchased power on the utility's capacity, reserves, generation mix, capacity expansion plan, and avoided costs.

Reply: In its Order Issuing Certificate entered on July 8, 2015, the Commission granted Gutenberg Solar a waiver of the requirements of Commission Rule R8-64(b)(6)(i)(c), which would have required the Applicant to submit a statement from the electric utility to which Gutenberg Solar plans to sell the electricity to be generated. As a condition of the waiver, the Commission directed Gutenberg Solar to make a supplemental filing providing this information upon determining the entity or entities to which the output of the Facility will be sold. The Applicant is currently engaged in confidential negotiations with potential buyers of the output of the Facility and will update the Commission in accordance with the Order once it has identified a buyer.

6(ii)a: The most current available balance sheet of the applicant.

6(ii)b: The most current available income statement of the applicant.

Reply: The balance sheet and income statement for Gutenberg Solar, along with a Certificate issued by the Chief Financial Officer of EDF RE, are filed under seal as Confidential Exhibit 7 hereto. This information has been designated "Confidential" because it constitutes confidential and proprietary information within the scope of N.C.G.S. § 132-1.2.

6(ii)c: An economic feasibility study of the project.

Reply: Please reference the original study that was submitted with the initial application for a Certificate of Public Convenience and Necessity filed on March 30, 2015 in this docket, with following qualifier. Since the date of the original study, solar panel pricing and efficiencies have been rapidly changing, with the prices of power also dropping significantly. Final project numbers will not be known until the Project is closer to construction.

6(ii)d: A statement of the actual financing arrangements entered into in connection with the project to the extent known at the time of the application.

Reply: Based on nearly three decades of developing, financing, constructing, owning and operating renewable energy projects in North America, EDF RE will finalize the financing arrangements later this year. At this time, nothing formal is in place.

6(iii)a: A detailed explanation of the anticipated kilowatt and kilowatt-hour outputs, on-peak and off-peak, for each month of the year. The explanation shall include a statement of the specific on-peak and off-peak hours underlying the applicant's quantification of anticipated kilowatt and kilowatt-hour outputs.

Reply: A 12x24 simulation reflecting the anticipated kilowatt and kilowatt-hour outputs, on-peak and off-peak, for each month of the year, including a statement of the specific on-peak and off-peak hours underlying the quantification, is filed under seal as Confidential Exhibit 8. This information has been designated "Confidential" because it constitutes confidential and proprietary information within the scope of N.C.G.S. § 132-1.2.

6(iii)b: A detailed explanation of all energy inputs and outputs, of whatever form, for the project, including the amount of energy and the form of energy to be sold to each purchaser.

Reply: The Facility is a solar photovoltaic array and the energy input is solar. The output of the electrical generation will be sold in deregulated states that allow for such sales or wholesale customers or will be sold into the PJM market.

6(iii)c: A detailed explanation of arrangements for fuel supply, including the length of time covered by the arrangements, to the extent known at the time of the application.

Reply: No fuel supply arrangements are required for the Facility.

Thank you for your attention to this matter. If you have any questions or need anything further, please let me know.

Sincerely,



Doug Copeland

cc: Jay Lucas, Utilities Engineer
Electric Division - Public Staff - NC Utilities Commission

Enclosures