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August 5, 2022

Ms. A. Shonta Dunston  
Chief Clerk  
N.C. Utilities Commission  
430 N. Salisbury Street  
Room 5063  
Raleigh, NC 27603-5919

**Re: In the Matter of Application of American Beech Solar LLC for a Certificate of Public Convenience and Necessity to Construct a 110-MW Solar Facility in Halifax County, North Carolina, NCUC Docket No. EMP-108, Sub 0**  
***Additional Comments regarding Supplemental LCOT Calculations***

Dear Ms. Dunston:

On behalf of applicant American Beech Solar LLC (“American Beech”), attached please find a confidential exhibit providing supplemental calculations of the Levelized Cost of Transmission (“LCOT”) for certain upgrades associated with the American Beech solar project, as required in the Commission’s July 29, 2022, Order Granting Motion to Cancel Expert Witness Hearing and Requiring Filing of Additional Evidence (“Order”). The Applicant has shared its draft calculations with the Public Staff, which does not take issue with American Beech’s methodology or the results of the calculations.

In compliance with the Order, American Beech has performed the following LCOT calculations:

- A. Costs for Affected System Upgrades on the Duke Energy Progress (DEP) system under the following scenarios:
- (1) American Beech is the only party in the AC1/AC2 PJM clusters funding the Affected Systems Costs;
  - (2) American Beech and Edgecombe Solar LLC both participate in funding the DEP Affected Systems Costs; and

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- (3) American Beech and all projects in the AC1/AC2 clusters that show in their interconnection studies that they require the DEP Affected System Upgrades prior to commencing operation participate in funding the DEP Affected System Costs.
- B. Upgrade costs assigned to the Facility by PJM Interconnection LLC in its Interconnection Construction Service Agreement, based on the capacity of the American Beech project (140 MW).
- C. Upgrade costs and Attachment Facilities costs assigned to the Facility by PJM Interconnection LLC in its Interconnection Construction Service Agreement, based on the capacity of the American Beech project (140 MW).

As further detailed in Confidential Attachment A, the results of these calculations are as follows:

Scenario	Upgrades	Projects	Total MW	LCOT (\$/MWh)
A.1	DEP Affected System Upgrades	American Beech	140	6.28
A.2	DEP Affected System Upgrades	American Beech, Edgecombe	215	4.09
A.3	DEP Affected System Upgrades	American Beech, Edgecombe, Halifax County, SunEnergy1	555	1.58
B	PJM Upgrades (ICSA)	American Beech	140	1.34
	PJM Upgrades & Attachment			
C	Facilities (ICSA)	American Beech	140	1.46

Please feel free to contact me if you have any questions.

Sincerely,

*/s/ Benjamin L. Snowden*

Benjamin L. Snowden

pbb  
Attachment



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Copy to: Counsel and Parties of Record  
NC Public Staff

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