

PRE-FILED REBUTTAL TESTIMONY OF  
AMANDA CORLL  
ON BEHALF OF MACADAMIA SOLAR LLC  
NCUC DOCKET NO. EMP-119, SUB 0  
NCUC DOCKET NO. EMP-119, SUB 1

OFFICIAL COPY

Dec 10 2021

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

2           A.     My name is Amanda Corll. I am a Manager of GIS and Permitting for  
3           Geenex Solar LLC (“Geenex Solar”) based in Charlotte, North Carolina. The company’s  
4           address is 1930 Abbott Street, Suite 402, Charlotte, NC 28203.

5           **Q.     ARE YOU THE SAME AMANDA CORLL WHO PROVIDED**  
6           **PREFILED DIRECT TESTIMONY IN DOCKET NO. EMP-119, SUB 1 ON**  
7           **SEPTEMBER 13, 2021?**

8           A.     I am.

9           **Q.     WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

10          A.     The purpose of my rebuttal testimony is to respond to the testimony of the  
11          Public Staff’s witness, Jay B. Lucas, which was filed in these dockets on November 23,  
12          2021, on issues related to Macadamia Solar’s application for a Certificate of Environmental  
13          Compatibility, Public Convenience and Necessity (“CECPCN”).

14          **Q.     WHAT IS THE PUBLIC STAFF’S POSITION ON MACADAMIA’S**  
15          **CECPCN APPLICATION?**

16          A.     Mr. Lucas does not take a position on the CECPCN application, except to  
17          recommend that the Commission require the Applicant to revise its CECPCN application  
18          and file supplemental testimony after it acquires all necessary easements and finalizes the  
19          route for the Transmission Line.

20          **Q.     DO YOU AGREE WITH THIS RECOMMENDATION?**

1           A.       I do not. In the first instance, the Commission has never required that an  
2 applicant obtain complete site control for a proposed transmission line before filing an  
3 application, and has previously approved CECPCN applications where complete site  
4 control had not been achieved when the application was filed. *See, e.g.*, E-2, Sub 796; E-  
5 2, Sub 749. And indeed, it would be unduly burdensome to require an Applicant to obtain  
6 complete site control before even filing an application. Macadamia has continued to  
7 negotiate easements since filing its Application and has now obtained site control for 94%  
8 of the proposed corridor. The last remaining landowners do not object to providing  
9 easements and are in active negotiation with Macadamia regarding the terms of such  
10 easements. As a result of Macadamia's continued efforts to solidify site control, there is  
11 now very little uncertainty about the final route of the transmission line. The current site  
12 map, which shows the limited areas in which there is still optionality regarding the  
13 transmission line route, is included as **Exhibit A**.

14           The Applicant has a goal of reaching full land control on the Transmission Corridor  
15 by the end of the first quarter of 2022. With this goal in mind, we have reached out to the  
16 landowners who have not signed yet. In the event these landowners do not sign an  
17 agreement within our timeframe, we are looking into alternate pathways that will keep us  
18 close to our Near Final Route and previously proposed Options A and B. These new  
19 options are deemed Option A Alternate and Option B Alternate. These new route Options  
20 should not change the impacts of the Transmission Corridor on the surrounding  
21 environment significantly as they are located with 700 feet from previously proposed  
22 options. The new route Options may reduce impacts slightly by moving the Transmission  
23 Corridor farther away from several residential structures and could reduce impacts to

1 wetland features and streams. The ultimate final route also could be shortened by several  
2 pole spans.

3 It should be noted that neither the Public Staff nor any other party or person has  
4 objected to any of the proposed routes for the transmission line. In response to data  
5 requests, the Public Staff has also confirmed that it agrees that if the CPCN for the  
6 Macadamia generating facility were to be granted, the proposed transmission line would  
7 meet all the required criteria for a CECPCN application (see **Exhibit B**), and that  
8 environmental compatibility, the public convenience, and necessity would require the  
9 transmission line.

10 **Q. WILL THE APPLICANT NOTIFY THE COMMISSION**  
11 **PROMPTLY ONCE COMPLETE SITE CONTROL HAS BEEN OBTAINED, AND**  
12 **ONCE THE FINAL ROUTE HAS BEEN ESTABLISHED?**

13 A. Yes.

14 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

15 A. Yes.