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E-2 Sub 1150

19 Jun. 2018

FILED

From: Oliver L. Canaday, 713 Camellia Ave., Panama City, FL., 32404
(pertains to farm on 909 Parker Town Road, Four Oaks, N.C.)

JUN 22 REC'D

Clerk's Office
N.C. Utilities Commission

→ To: N.C. Utility Commission, 430 N. Salisbury Street, Dobbs Building,
Raleigh, N.C. 27699 – 9001

Lawrence B. Somers, NCRH 20 / PO Box 1551, Raleigh, N.C. 27602

Ref: (a) Commission Scheduling Hearing...Public Notice of 18 Jul. 2017, (page 2, Paragraph 9.)

Subj: Motions to Compel Duke Energy Progress (DEP) for Needed Information/Documents Pertaining
to Docket No. E-2, Sub 1150 and Commission "Order" to Grant Certificate for Route 31;
Below are Motions:

1. These Motions are not frivolous. Intervener is aware 1., 2. and 3. are similar, but are different
General Statutes requiring on/about same information. Reply from all three will be compared to
Hearing Transcript of 31 Oct. 2017, as this is benchmark for Uncontroverted Evidence.

2. In accordance with (IAW) reference (a), Motions to Compel are submitted:

a. Motion to Compel DEP furnish compliance with G.S. 62-2(4a) for the "Cost Comparison of the
Four Best-Scored Alternative Routes"; "as pertains to, in accordance with (IAW), "lower cost of new
facilities and lower rates over the operating lives of such new facilities"... (I refer to this cost as
Life-Cycle Cost; CT. gives 40 years as a Life-Cycle Cost. DEP may give a 230kV transmission line
a Life-Cycle Cost in years such as, example: 40, 50, 60, 75 years, etc.; what is requested: Cost of
construction all four lines, (submitted as suspect new evidence) and the Cost of Operation and
Maintenance of all four lines for a comparison via Life-Cycle Cost for comparison.)

b. Motion to Compel DEP furnish Compliance with G.S. 62-102(a), (4), c. "Alternatives to proposed
action." --to include Cost of Construction, Operation, and Maintenance.

c. Motion to Compel DEP furnish Compliance with G.S. 62-105. Burden of Proof, decision.

(a)"...-The Commission shall Grant a certificate for the construction, operation, and maintenance of the

1/2

proposed transmission line if it finds: (3) That the cost associated with the proposed transmission line are reasonable;”

d. Motion to Compel DEP furnish the authorization document, (written or spoken by whom) to enter into Record, the “Cost Comparison of the Four Best Scored Alternative Routes” as a Late-Filed Exhibit No. 2 under the cover letter by DEP of 13 Nov. 2017; signed by Lawrence B. Somers. (This looks like New Evidence unauthorized, entered into Record. Per the Hearing Transcript of 31 Oct. 2017, this cost comparison information was not in DEP’s application 14 Jul. 2017 or update of 24 Jul. 2017, nor it was not authorized during the Hearing via the Transcript.) -Therefore, this must be investigated for the record, to establish place in Record.

e. Motion to Compel DEP furnish a scaled map of the area concerning four best-scored alternative routes: Route 31, Route 4, Route 32, and Route 1; with names of roads, creeks, branches, landmarks for reference points so I can drive to the places. (DEP furnished a fairly good map for the Clayton area shown in DEP Application, page -104/179, shows on/about (o/a) 35 roads and reference points so you could follow proposed routes.) The map for area requested is very poor for finding/known where a location of a route goes; reason for request. I still do not know exact (want to be close) where Route 31 and Route 4 runs, and I plan to drive both routes in N.C. in late June and July 2018. Roads, creeks, branches, landmarks requested are below:

I-95	Parker Rd.	Hwy 301	Rail/Road	Old School Rd.
Elevation Rd.	King Mill Rd.	Hwy 210	Polena Rd.	Cleveland School
Hwy 1010	Hwy 42	Hwy 50	I 40	Raleigh Rd.
Lassiter Rd.	Black Creek Rd.	Macklemore Rd.	Matthews Rd.	Two Claud Rd.
Honeycutt Rd.	Hillcrest Rd.	Mt. Pleasant Rd.	Sanders Rd.	Pinwood Rd.
Pleasant Rd.	Johnsons CrossRd.	Melane Rd.	Jackson King Rd.	Victory Rd.

Steve Rd.

Worth Rd.

Linville Rd.

October Rd.

Page Rd.

Landmark Rd.

Black Creek (the creek)

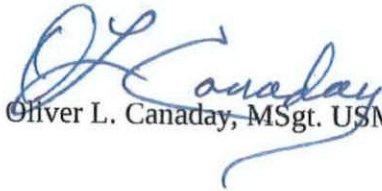
Little Creek (the creek)

Middle Creek (the creek)

Little Black Creek (the creek)

And any other road or landmark to show where the tapline would be for Route 4 on the Erwin-Milburnie 230kV Line and Route 4 route to DEP sub station on Matthews Rd.

Sincerely,



Oliver L. Canaday, MSgt. USMC Ret. 0441/0331H, CACw/3bzn-stars, PH, CAR, NUCw/2bzn-stars
MUC, RVNSw/sil-star, BC, AWC, C&S