



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

February 19, 2021

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

Re: Docket No. EMP-92, Sub 0 – Petition for Certificate for 500MW
Natural Gas Fired Electric Generating Facility Located @ the
Reidsville Energy Center in Rockingham Co.

Dear Ms. Campbell:

In connection with the above-referenced docket, I transmit herewith for filing on behalf of the Public Staff the supplemental testimony of Dustin R. Metz, Utilities Engineer, Electric Section, Energy Division.

By copy of this letter, I am forwarding a copy of the above to all parties of record.

Sincerely,

Electronically submitted
/s/ John D. Little
Staff Attorney
john.little@psncuc.nc.gov

Attachment

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(919) 733-2435

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NTE CAROLINAS II, LLC
DOCKET NO. EMP-92, SUB 0

SUPPLEMENTAL TESTIMONY OF DUSTIN R. METZ
ON BEHALF OF THE PUBLIC STAFF
NORTH CAROLINA UTILITIES COMMISSION

February 19, 2020

1 **Q. PLEASE STATE YOUR NAME AND ADDRESS FOR THE**
2 **RECORD.**

3 A. My name is Dustin R. Metz. My business address is 430 North
4 Salisbury Street, Raleigh, North Carolina.

5 **Q. WHAT IS YOUR POSITION WITH THE PUBLIC STAFF?**

6 A. I am an engineer with the Energy Division of the Public Staff
7 representing the using and consuming public.

8 **Q. WOULD YOU BRIEFLY DISCUSS YOUR EDUCATION AND**
9 **EXPERIENCE?**

10 A. A summary of my education and experience was provided in
11 previous testimony in this docket.

12 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
13 **PROCEEDING?**

14 A. The purpose of my testimony is to respond to the additional
15 information provided by Duke Energy Carolinas, LLC (DEC) witness

1 Edgar A. Bell III. In its January 14, 2021 *Order Requiring Additional*
2 *Testimony* (Order), the Commission directed DEC to answer specific
3 questions. This Order also directed the Public Staff to respond to the
4 additional information provided by DEC.

5 **Q. IS IT YOUR OPINION THAT DEC ANSWERED THE**
6 **COMMISSION'S QUESTIONS IN A COMPLETE AND**
7 **SATISFACTORY MANNER?**

8 A. Yes, in his testimony, witness Bell answered the Commission's
9 questions listed in the Order:

10 *1) Explain whether the Applicant has been restored to*
11 *its original queue position, and the date on which it was*
12 *restored;*

13 *2) Explain whether any new interconnection studies*
14 *have been conducted for the Rockingham facility after*
15 *2016. If new studies have been conducted since 2016,*
16 *file the new interconnection studies; and*

17 *3) Explain if DEC identified the Rockingham facility as*
18 *triggering affected system upgrades in any neighboring*
19 *system, including Duke Energy Progress, LLC (DEP).*
20 *If DEC has identified the Rockingham facility as*
21 *triggering affected system upgrades, please provide*
22 *any associated Affected System Studies, or provide*
23 *any information as to when any such Affected System*
24 *Studies are expected to be completed.*

25 According to witness Bell, the Applicant was restored to its original
26 queue position. However, the Applicant's interconnection request
27 has been suspended at the Applicant's request. No new studies have

1 been completed for this project since 2017. The project has not
2 triggered any affected system upgrades.¹

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

4 **A. Yes.**

¹ It is unclear as to the when or what study was used to determine that the project has not triggered any affected system upgrades.