



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

December 2, 2021

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

Re: Docket No. EMP-116, Sub 0 – Application of Juno Solar, LLC, for a
Certificate of Public Convenience and Necessity to Construct a
275-MW Solar Facility in Richmond County, North Carolina

Dear Ms. Dunston:

At the November 30, 2021 evidentiary hearing in the above captioned docket, Public Staff witness Dustin Metz answered a series of questions from the Applicant's counsel regarding the potential revenues from wheeling charges the utility would collect from the Facility should the output be sold to an offtaker in PJM. In testimony, witness Metz indicated that he had performed an analysis and offered to file a workpaper supporting that analysis as a late-filed exhibit. Public Staff Late-Filed Exhibit No. 1 is attached and is a summary of the results of this analysis. With service of this letter and Public Staff Late-Filed Exhibit No. 1, the Public Staff will also send an excel sheet with working formulas to the Commission and the parties of record.

Also at the evidentiary hearing, in response to a question from Chair Mitchell, witness Metz stated that it was not clear to the Public Staff whether the upgrades the Applicant assumed in their power flow study were interdependent on the upgrades identified to construct the Friesian facility, a separate merchant generator facility the Commission considered in Docket No. EMP-105, Sub 0. Witness Metz indicated that the Public Staff did not have access to the inputs of the Juno power flow study, but had asked a similar question in discovery and offered to file the Applicant's response to that discovery question as a late-filed exhibit. The response to that request is already in the record as Public Staff Miller Cross-Exhibit No. 2, which is the Applicant's responses to Public Staff Data Request No. 2. The responses witness Metz referred to are to questions numbers 1 and 2(e)(ii) of the data response.

Executive Director
(919) 733-2435

Accounting
(919) 733-4279

Consumer Services
(919) 733-9277

Economic Research
(919) 733-2267

Energy
(919) 733-2267

Legal
(919) 733-6110

Transportation
(919) 733-7766

Water/Telephone
(919) 733-5610



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By copy of this letter, I am forwarding a copy of the filing to all parties of record by electronic delivery.

Sincerely,

Electronically submitted
s/ Layla Cummings
Staff Attorney
layla.cummings@psncuc.nc.gov

Attachment

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PUBLIC STAFF LATE-FILED EXHIBIT NO. 1

Amount of MWs Wheeled	175			
Firm Point to Point Service Rate				
Net Present Value Calculation, assuming no system upgrade costs	Years of Wheeling			
	15 years	20 years	30 years	40 years
Total Revenue not adjusted	\$ 76,260,026	\$ 115,797,991	\$ 193,087,115	\$ 286,445,211
Net Present Value	\$ 49,476,167	\$ 60,484,353	\$ 77,059,529	\$ 88,263,326
Amount of MWs Wheeled	175			
Firm Point to Point Service Rate				
Net Present Value Calculation, Assuming of \$4/MWh LCOT, ~\$51M in upgrade costs	Years of Wheeling			
	15 years	20 years	30 years	40 years
Total Revenue adjusted	\$ 84,143,239	\$ 117,948,916	\$ 196,309,040	\$ 290,729,211
Net Present Value	\$ 50,465,890	\$ 61,651,668	\$ 78,458,716	\$ 89,791,170
Firm Point to Point Service Rate	Years of Wheeling			
Incremental Amount of Contribution	15 years	20 years	30 years	40 years
	\$ 989,723	\$ 1,167,315	\$ 1,399,187	\$ 1,527,845
	1.94%	2.29%	2.74%	3.00%
Amount of MWs Wheeled	175			
Non-Firm Point to Point Service Rate				
Net Present Value Calculation, assuming no system upgrade costs	Years of Wheeling			
	15 years	20 years	30 years	40 years
Total Revenue adjusted	37698865.45	52967165.44	88436574.84	131673587
Net Present Value	23893184.52	29248156.69	37311210.69	42799571.23
Please See Public Staff Notes on the previous tab (Calculations)				