



**Fox Rothschild** LLP  
ATTORNEYS AT LAW

Tel (919) 755-8700  
Fax (919) 755-8800  
www.foxrothschild.com

BENJAMIN L. SNOWDEN  
Direct No: 919.719-1257  
Email: BSnowden@foxrothschild.com

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Aug 12 2022

August 12, 2022

Ms. A. Shonta Dunston  
Chief Clerk  
North Carolina Utilities Commission  
430 N. Salisbury Street, Room 5063  
Raleigh, NC 27603

**RE: In the matter of the Application of Sumac Solar, LLC  
For Certificate of Public Convenience and Necessity to Construct  
a 120-MW Solar Facility in Bertie County, NC  
EMP-110, Sub 0  
Second Supplemental Reply Testimony of Donna Robichaud**

Dear Ms. Dunston:

On behalf of Sumac Solar, LLC, in the above referenced matter and docket, I herewith provide the Second Supplemental Reply Testimony of Donna Robichaud in the above referenced matter and docket. Confidential Exhibits to the Testimony will be filed under separate cover.

Thank you for your assistance with this submittal. Should you have any questions concerning this filing, please do not hesitate to contact me.

Sincerely,

*/s/ Benjamin L. Snowden*

Benjamin L. Snowden

pbb

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota  
Nevada New Jersey New York North Carolina Pennsylvania South Carolina Texas Washington



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Ms. A. Shonta Dunston  
Chief Clerk  
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Copy to: Parties and Counsel of Record  
NC Public Staff

**SECOND SUPPLEMENTAL REPLY TESTIMONY OF  
DONNA ROBICHAUD  
ON BEHALF OF SUMAC SOLAR LLC**

**NCUC DOCKET NO. EMP-110, SUB 0**

**INTRODUCTION**

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

A. My name is Donna Robichaud. I am senior vice president of development strategy for Geenex Solar LLC (“Geenex Solar”) based in Charlotte, North Carolina. The company’s address is 1000 NC Music Factory Blvd, Suite – C3, Charlotte, NC 28206.

**Q. ARE YOU THE SAME DONNA ROBICHAUD THAT PROVIDED  
PREFILED TESTIMONY IN THIS DOCKET ON MAY 12, 2020, AUGUST 12,  
2020, AND JUNE 1, 2022?**

A. I am.

**Q. WHAT IS THE PURPOSE OF YOUR SECOND SUPPLEMENTAL  
REPLY TESTIMONY?**

A. The purposes of my testimony are to (1) inform the Commission of developments related to the negotiation of an Affected System Operating Agreement (“ASOA”) for the construction of upgrades to the Duke Energy Progress, LLC (“DEP”) portion of the Everetts-Greenville 230 kV tie-line between Dominion and DEP (“the DEP Upgrade”), which was discussed in my prior testimony; (2) provide updated LCOT calculations for the DEP Upgrade based on information recently received from DEP about the cost of that Upgrade; and (3) respond to the Second Supplemental Testimony of Evan D. Lawrence on behalf of the Public Staff, filed on July 29, 2022.

**Q. PLEASE DESCRIBE RECENT DEVELOPMENTS WITH REGARD  
TO THE DEP UPGRADE.**

A. As discussed in my June 1, 2022, Second Supplemental Testimony, Sumac is one of four projects identified by PJM as potentially contributing to an overload on DEP's Everetts-Greenville 230 kV line. On June 8, 2022, DEP issued a revised Affected System Study for PJM Cluster AD1 ("June 2022 Affected System Study"), which was attached as Exhibit 1 to Mr. Lawrence's June 29 testimony. As discussed in Mr. Lawrence's testimony, the study revised the cost of the DEP Upgrade to \$350,000, based on DEP's conclusion that the impacted section of the Everetts-Greenville 230 kV line needed to be replaced for reliability reasons, and not due to the interconnection of new generation.

**Q. IN YOUR JUNE 1, 2022 SECOND SUPPLEMENTAL TESTIMONY,  
YOU STATED THAT MACADAMIA SOLAR WAS SEEKING TO NEGOTIATE  
AN ASOA WITH DEP. IS THAT STILL THE CASE?**

A. Yes, it is. Macadamia Solar, which (like Sumac Solar) is under development by Geenex Solar and which is seeking a CPCN in NCUC docket no. EMP-119, Sub 0, is currently negotiating an ASOA with DEP for the construction of the DEP Upgrade. As discussed in my prior testimony, Macadamia Solar is seeking an ASOA that would require Macadamia Solar to fund that upgrade, but would **not** provide any reimbursement of those costs from DEP (and thus would not impose any costs on DEP ratepayers). Sumac may enter into a side agreement with Macadamia Solar to provide a portion of funding for the DEP Upgrade, but no such agreement has been reached at this time.

1 As stated in the June 2022 Affected System Study, DEP plans to rebuild the  
2 Everetts-Greenville 230 kV line for reliability reasons, due to the age and condition of the  
3 line. The incremental cost of using a larger conductor for that rebuild, as required to  
4 accommodate the interconnection of the Macadamia and the other projects in the AD1  
5 cluster (and potentially other projects in later clusters), as stated in the Study, would be  
6 \$350,000.<sup>1</sup> However, DEP has indicated that this work will not be completed until 2026  
7 or 2027 unless the Interconnection Customer pays to expedite it.

8 Because an in-service date in 2026 or later would have an adverse impact on the  
9 economics of the AD1 projects dependent on the DEP Upgrade, Macadamia is seeking to  
10 negotiate an ASOA with Duke that would expedite the work to 2025. According to DEP,  
11 the cost to expedite the work under the ASOA to 2025 would be approximately \$1.6 million  
12 (in addition to the cost of the reconductoring).<sup>2</sup> Macadamia (as discussed in my prior  
13 testimony) has also requested that the ASOA **not** provide for reimbursement of affected  
14 system upgrade costs. Such an ASOA would not impose any cost on Duke ratepayers.

15 On August 9, DEP provided Macadamia an executable ASOA (**confidential**  
16 **Exhibit A**) ("draft ASOA") that provides for the completion of the DEP Upgrade by  
17 December 31, 2025. The draft ASOA estimates an incremental cost of \$150,000 for the  
18 reconductoring of the Everetts-Greenville 230 kV line, and expediting costs of \$1,615,000,  
19 for a total cost of \$1,765,000. Draft ASOA at 33. The draft ASOA does not provide for

<sup>1</sup> As discussed below, DEP has recently provided an updated estimate of \$150,000.

<sup>2</sup> DEP has stated that this represents the cost to expedite the work on the DEP Upgrade by one year. DEP has not yet provided a detailed explanation of how it calculated this figure, but it has indicated that such an explanation will be forthcoming. The Applicant will provide this information to the Commission when it has been received from DEP (unless DEP provides that information directly to the Commission).



1 any reimbursement of those costs by ratepayers. Although Macadamia and DEP are still  
2 negotiating the final terms of an ASOA, it is not expected that the final ASOA would  
3 deviate from the draft with respect to cost estimates or reimbursability.

4 DEP has indicated that it will file the final ASOA with FERC for acceptance or  
5 approval once the parties have executed it, and Geenex Solar (on behalf of Macadamia)  
6 intends to make filing in support. Given recent rulings from FERC on other affected system  
7 operating agreements, Geenex Solar representatives have also met with FERC staff to  
8 discuss the non-reimbursability provisions of the draft ASOA. Geenex Solar is optimistic  
9 that FERC will find an ASOA not providing for reimbursement just and reasonable under  
10 the circumstances.

11 **Q. HAVE YOU PREPARED UPDATED LCOT CALCULATIONS**  
12 **BASED ON THE DRAFT ASOA?**

13 A. I have. With respect to the DEP Upgrade, and based on the cost estimates  
14 provided in the draft ASOA, I have calculated revised LCOT values of \$0.05/MWh if all  
15 projects in the AD1 cluster benefitting from the proposed DEP Upgrade are considered,  
16 and \$0.41/MWh if only Sumac is considered. These LCOT figures are extremely favorable  
17 compared to the benchmark LCOT figures cited by the Public Staff and relied on by the  
18 Commission in prior proceedings. My revised LCOT calculations are included in  
19 Confidential **Exhibit B**.

20 **Q. WHAT RECOMMENDATION DOES MR. LAWRENCE MAKE**  
21 **WITH RESPECT TO THE CPCN APPLICATION?**

22 A. Mr. Lawrence recommends that the Commission approve Sumac's  
23 application for a CPCN, subject to certain conditions.

1           **Q.    DOES THE APPLICANT ACCEPT THE PUBLIC STAFF'S**  
2 **PROPOSED CONDITIONS?**

3           A.    Yes.

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

5           A.    Yes.

**CERTIFICATE OF SERVICE**

This is to certify that the undersigned has this day served the foregoing **SECOND SUPPLEMENTAL PREFILED TESTIMONY OF DONNA ROBICHAUD** upon the following by electronic mail as follows:

Christopher Ayers, Esq.  
Executive Director - NC Public Staff  
Chris.Ayers@psncuc.nc.gov

Nadia Luhr  
NC Public Staff - Legal Division  
nadia.luhr@psncuc.nc.gov

Robert Josey  
NC Public Staff - Legal Division  
robert.josey@psncuc.nc.gov

NC Public Staff - Legal Division  
4326 Mail Service Center  
Raleigh, NC 27599

This the 12<sup>th</sup> day of August, 2022.

/s/ Benjamin L. Snowden  
Benjamin L. Snowden



NCUC DOCKET NO. EMP-110, SUB 0

SECOND SUPPLEMENTAL PRE-FILED TESTIMONY OF  
DONNA ROBICHAUD  
ON BEHALF OF SUMAC SOLAR LLC

EXHIBITS

A	Affected System Operating Agreement Between Duke Energy Progress, LLC and Macadamia Solar LLC, Service Agreement No. 406 (Draft) <b>**CONFIDENTIAL**</b>
B	LCOT Analysis for Network Upgrades potentially required for Macadamia Solar Project and for Potential DEP Affected System Upgrades <b>**CONFIDENTIAL**</b>

**NCUC DOCKET NO. EMP-110, SUB 0**  
**SECOND SUPPLEMENTAL PRE-FILED TESTIMONY OF**  
**DONNA ROBICHAUD**  
**ON BEHALF OF SUMAC SOLAR LLC**

**EXHIBIT A**

**\*\* CONFIDENTIAL \*\***

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**Aug 12 2022**

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**SECOND SUPPLEMENTAL PRE-FILED TESTIMONY OF**  
**DONNA ROBICHAUD**  
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**EXHIBIT B**

**\*\* CONFIDENTIAL \*\***

**REVISED LCOT CALCULATIONS**

**OFFICIAL COPY**

**Aug 12 2022**