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August 10, 2020

North Carolina Utilities Commission
c/o: Ms. Kim Campbell, Chief Clerk
Dobbs Building
430 North Salisbury Street
Raleigh, NC 27603-5918

Re: Bethel NC 11 Solar, LLC's Application For Certificate Of Public Convenience and Necessity – Merchant Plant
Docket No. EMP-102, Sub 1
Our File: 054943.09015

Dear Ms. Campbell:

By this letter we are submitting for public filing in the above-referenced matter, the following application and exhibits:

- (i) Bethel NC 11 Solar, LLC's Application For Certificate of Public Convenience and Necessity – Merchant Plant, submitted pursuant to N.C. Gen. Stat. § 62-110.1 and NCUC Rule R8-63 (the "Application"), which also includes the pre-filed direct testimony of Ms. Linda Nwadike, Director of Permitting and Community Relations for SunEnergy1 LLC, the parent and affiliate of the Applicant, Bethel NC 11 Solar, LLC, incorporating and supporting the Application (the "Supporting Testimony").

In accordance with NCUC Rule R8-63 (c), the attached public versions of the Application and Supporting Testimony reference but do not include certain exhibits that contain or reveal confidential information submitted in support of the Application or in connection with the Supporting Testimony, such as financial information relating to SunEnergy1 LLC, a private company, and estimates of the costs of construction of the proposed solar facility.

The Application, including the exhibits that contain or reveal Confidential Information, will be uploaded separately immediately after the electronic submission of the public filing listed above for submission under seal. Because the relevant exhibits are confidential in nature and contain proprietary trade secrets under N.C. Gen. Stat. § 132-2.1, they

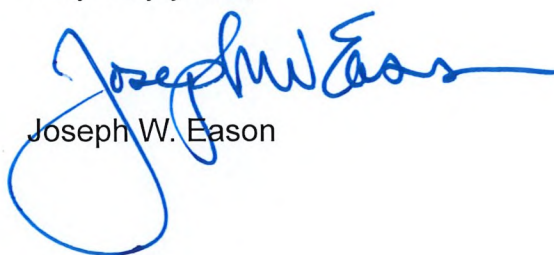
Page 2

accordingly are being submitted as sealed attachments to, and in support of, the public Application and Supporting Testimony.

Thank you in advance for your assistance with the filing of the public versions of the Application and Supporting Testimony, and with the subsequent filing under seal of the materials containing Confidential Information.

I remain,

Very truly yours,

A handwritten signature in blue ink, appearing to read "Joseph W. Eason". The signature is fluid and cursive, with a large loop at the end of the "Eason" part.

Joseph W. Eason

JWE:wg
Enclosures

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH, NORTH CAROLINA

DOCKET NO. EMP 102 Sub 1

In the Matter of the Application of Bethel)
NC 11 Solar, LLC for a Certificate of)
Public Convenience and Necessity for)
Merchant Plant Pursuant to N.C Gen. Stat.)
62-110.1 and Commission Rule R8-63)

BETHEL NC 11 SOLAR, LLC'S
APPLICATION FOR A CERTIFICATE OF
PUBLIC CONVENIENCE AND
NECESSITY FOR MERCHANT PLANT

Bethel NC 11 Solar, LLC (the "Applicant"), by and through its undersigned counsel, hereby applies to the North Carolina Utilities Commission (the "Commission") pursuant to N.C. Gen. Stat. § 62-110.1, and Commission Rule R8-63, for a Certificate of Public Convenience and Necessity for Merchant Plant authorizing the construction of a solar photovoltaic merchant plant facility with a capacity of 150 MW AC to be located in the Town of Bethel and Pitt County, North Carolina. In support of its application, the Applicant provides the Commission with the exhibits attached hereto as required by N.C.U.C. Rule R8-63, and also shows unto the Commission the following:

1. **Exhibit 1** attached hereto contains the required information about the Applicant.
2. All correspondence, documents and filings regarding this application should be sent to:

Joseph W. Eason
Nelson Mullins Riley & Scarborough LLP
GlenLake One, Suite 200
4140 Parklake Avenue
Raleigh, North Carolina 27612
Tel: (919) 329-3800
joe.eason@nelsonmullins.com
Attorney for the Applicant

And, with a copy also to the following corporate agent of Applicant:

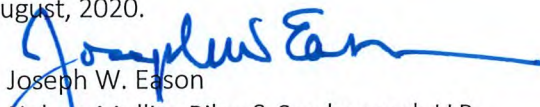
Bethel NC 11 Solar, LLC
Attn: Kenny Habul
192 Raceway Drive
 Mooresville, NC 28117
704-662-0375
project.development@sunenergy1.com

The Applicant and its Counsel consent to electronic service of filings related to this application.

3. Exhibit 2 attached hereto contains the required information about the proposed generation facility.
4. Exhibit 3 attached hereto provides a description of the need for the facility in the state and/or region, with supporting documentation.
5. This Application has been signed and verified by an individual duly authorized to act on behalf of the Applicant for that purpose.
6. This Application is submitted together with the pre-filed direct testimony of Linda Nwadike, Director of Permitting and Community Relations for SunEnergy1, which testimony incorporates and supports this application and is submitted on behalf of the Applicant in accordance with NCUC Rule R8-63 (b)(5).
7. Confidential Information has been designated as such and filed under seal with this Commission contemporaneously with the filing of this Application in accordance with Rule R8-63(c).

WHEREFORE, the Applicant respectfully prays that this Commission consider the foregoing information submitted in support of this application and issue the Applicant a Certificate of Public Convenience and Necessity for the construction of the merchant plant described herein in accordance with N.C. Gen. Stat. §62-110.1 and NCUC Rule R8-63.

Respectfully submitted this 10th day of August, 2020.



Joseph W. Eason
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4140 Parklake Avenue
Raleigh, North Carolina 27612

Tel: (919) 329-3800
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Attorneys for the Applicant

VERIFICATION

NOW COMES, Linda Nwadike, being first duly sworn, and deposes and says that I am duly authorized to act on behalf of Bethel NC 11 Solar, LLC as Director of Permitting and Community Relations for SunEnergy1, LLC, parent and affiliate of the Applicant; that I have read the foregoing Pre-Filed Direct Testimony and also Bethel NC 11 Solar, LLC's Application For A Certificate Of Public Convenience And Necessity For Merchant Plant incorporated therein, and that the statements and information therein is true and accurate to my personal knowledge and belief, except where otherwise indicated, and in those instances, I believe the statements and information to be true.

Signed this 7 day of August, 2020.



Linda Nwadike
Director of Permitting & Community
Relations
SunEnergy1, LLC

SIGNED AND SEALED BEFORE ME THIS 7 DAY OF AUGUST, 2020.

Sworn to and subscribed to before me
this 7 day of August, 2020.

Shelby F. Smithwick
Notary Public (Signature)

Shelby F. Smithwick
Notary Public (Printed)

My Commission Expires: 3/27/23



Bethel NC 11 Solar, LLC CPCN
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INFORMATION ABOUT THE APPLICANT
EXHIBIT 1

- i. *The full and correct name, business address, business telephone number and electronic mailing address of the Applicant;*

Bethel NC 11 Solar, LLC
192 Raceway Drive
 Mooresville, NC 28117
704-662-0375
project.development@sunenergyl.com

- ii. *A description of the Applicant, including the identities of its principal participant(s) and officers, and the name and business address of a person authorized to act as corporate agent or to whom correspondence should be directed;*

Bethel NC 11 Solar, LLC is a North Carolina limited liability company formed on August 17, 2016. Kenny Habul is duly authorized to act as a corporate agent of the Applicant for the purpose of this application. A copy of the Articles of Organization of the Applicant as filed with the North Carolina Secretary of State is attached as **Schedule 1-1**.

- iii. *A copy of the Applicant's most recent annual report to stockholders, which may be attached as an exhibit, or, if the Applicant is not publicly traded, its most recent balance sheet and income statement. If the Applicant is a newly formed entity with little history, this information should be provided for its parent company, equity partner, and/or the other participant(s) in the project;*

Bethel NC 11 Solar, LLC is an affiliate of SunEnergy1, LLC ("SunEnergy1"); SunEnergy1 is the direct parent of the Applicant.

SunEnergy1 is one of the largest solar developers and engineering, procurement and construction companies in the U.S. SunEnergy1 is not a publicly traded company; therefore, its most recent balance sheet and income statement are filed under seal as confidential information (See **Confidential Schedule 1-2** of the Confidential Documents submitted with this Application).

- iv. *Information about generating facilities in the Southeastern Electric Reliability Council region which the Applicant or an affiliate has any ownership interest in and/or the ability to control through leases, contracts, options, and/or other arrangements and information about certificates that have been granted for any such facilities not yet constructed.*

The Applicant does not have any generating facilities in the Southern Electric Reliability Council region. The Applicant is an individual project company formed to own the solar facility assets for the project that is the subject of this application.

The Applicant's parent-affiliate, SunEnergy1, has ownership interests in and/or the ability to control through leases or contracts numerous solar generating facilities in the Southeastern

**Bethel NC 11 Solar, LLC CPCN
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Electric Reliability Council ("SERC") region. A list of generating facilities that SunEnergy1 has constructed within the Southern Electric Reliability Council region is attached as **Schedule 1-3.** A list of generating facilities that SunEnergy1 has under development but that have not been completed sufficient to achieve commercial operation is attached as **Schedule 1-4.**

Bethel NC 11 Solar, LLC
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Schedule 1-1

Articles of Organization



NORTH CAROLINA

Department of the Secretary of State

To all whom these presents shall come, Greetings:

I, Elaine F. Marshall, Secretary of State of the State of North Carolina, do hereby certify the following and hereto attached to be a true copy of

ARTICLES OF ORGANIZATION

OF

BETHEL NC 11 SOLAR, LLC

the original of which was filed in this office on the 17th day of August, 2016.



Scan to verify online.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal at the City of Raleigh, this 17th day of August, 2016.

Elaine F. Marshall

Secretary of State

State of North Carolina
Department of the Secretary of State

Limited Liability Company
ARTICLES OF ORGANIZATION

Pursuant to §57D-2-20 of the General Statutes of North Carolina, the undersigned does hereby submit these Articles of Organization for the purpose of forming a limited liability company.

1. The name of the limited liability company is: Bethel NC 11 Solar, LLC
(See Item 1 of the Instructions for appropriate entity designation)
2. The name and address of each person executing these articles of organization is as follows: (State whether each person is executing these articles of organization in the capacity of a member, organizer or both. Note: This document must be signed by all persons listed.)
Lauren LaGrua, 192 Raceway Drive, Mooresville, NC 28117, Organizer

3. The name of the initial registered agent is: Kenny Habul
4. The street address and county of the initial registered agent office of the limited liability company is:
Number and Street 192 Raceway Drive
City Mooresville State: NC Zip Code: 28117 County: Iredell
5. The mailing address, if different from the street address, of the initial registered agent office is:
Number and Street _____
City _____ State: NC Zip Code: _____ County: _____
6. Principal office information: (Select either a or b.)
 - a. The limited liability company has a principal office.
The principal office telephone number: 704-662-0375
The street address and county of the principal office of the limited liability company is:
Number and Street 192 Raceway Drive
City Mooresville State: NC Zip Code: 28117 County: Iredell

The mailing address, if different from the street address, of the principal office of the company is:

Number and Street _____

City _____ State: _____ Zip Code: _____ County: _____

b. The limited liability company does not have a principal office.

7. Any other provisions which the limited liability company elects to include (e.g., the purpose of the entity) are attached.

8. (Optional): Please provide a business e-mail address: Privacy Redaction
The Secretary of State's Office will e-mail the business automatically at the address provided above at no cost when a document is filed. The e-mail provided will not be viewable on the website. For more information on why this service is offered, please see the instructions for this document.



9. These articles will be effective upon filing, unless a future date is specified:

This is the 16th day of August, 20 16.

Lauren LaGrúa
Signature

Lauren LaGrúa, Organizer
Type or Print Name and Title

The below space to be used if more than one organizer or member is listed in Item #2 above.

Signature

Type and Print Name and Title

Signature

Type and Print Name and Title

Signature

Type and Print Name and Title

Signature

Type and Print Name and Title

NOTES:

1. Filing fee is \$125. This document must be filed with the Secretary of State.

CORPORATIONS DIVISION
(Revised January 2014)

P.O. Box 29622
2

RALEIGH, NC 27626-0622
(Form L-01)

Bethel NC 11 Solar, LLC
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Schedule 1-2

CONFIDENTIAL

SEE CONFIDENTIAL EXHIBITS
SUBMITTED WITH APPLICATION

SunEnergy1, LLC Financial Statements

Bethel NC 11 Solar, LLC
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Schedule 1-3

Applicant's Affiliated Generating Facilities in SERC

Schedule 1-3

Applicant's other affiliated generating facilities in the Southeastern Electric Reliability Council Region

The Applicant's affiliate SunEnergy1 has completed numerous solar generating facilities in the Southeastern Electric Reliability Council (SERC) region as shown in the below table.

Sites developed by SunEnergy1 with ownership interest through leases or contracts

Project	MW	County/State	Completion Date
Bethel	7	Pitt, NC	May 2016
Elizabeth City	28	Pasquotank, NC	April 2015
Everetts	7	Martin, NC	April 2015
Scotland Neck	28	Halifax, NC	March 2014
Battleboro	7	Edgecombe, NC	June 2015
Conetoe II	112	Edgecombe, NC	April 2016
Creswell	19.95	Washington, NC	June 2015
Kelford	30.10	Bertie, NC	February 2016
Sunbury	7	Gates, NC	March 2016
Whitakers	16.8	Whitakers, NC	February 2016
Whitepost I	14.99	Beaufort, NC	February 2013
Whitepost II	6.4	Beaufort, NC	May 2014
Windsor	7	Bertie, NC	April 2014
River Road	7	Hertford, NC	December 2016
Leggett	7	Whitakers, NC	July 2017
Barnhill	4	Pasquotank, NC	December 2016
Aulander Hwy 42	7	Hertford, NC	July 2017
Summit	84	Currituck, NC	February 2017
Shiloh Hwy 1108	7	Camden, NC.	March 2018
Sandy Solar	7	Camden, NC	April 2018
Chowan Jehu	7	Chowan, NC	March 2018
Scotland Neck 3	4	Halifax, NC	January 2015
Elk Park	0.197	Avery, NC	March 2012
SE1-Asheville	0.25	Buncombe, NC	May 2010
Plymouth Solar	6.5	Plymouth, NC	December 2014
Pamlico Solar	6.6	Beaufort, NC	February 2014
Choco Solar	7	Beaufort, NC	March 2015
Sugar Run Solar	6.6	Gates, NC	December 2015

Project	MW	County/State	Completion Date
Albertson Solar	7	Duplin, NC	December 2014
Conetoe Solar	6.6	Edgecombe, NC	January 2016
Williamston Speight	20.84	Martin, NC	December 2016
Ranchland	84	Currituck, NC	January 2018
Mill Pond	7	Martin, NC	September 2019
Jamesville	7	Martin, NC	October 2019
Aulander Holloman	112	Hertford, NC	June 2019

Bethel NC 11 Solar, LLC
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Schedule 1-4

Projects in SERC Region in Development

Schedule 1-4

Projects in SERC region in development

Project	MW	County/State	Completion Date
Gliden	7	Chowan, NC	
Camden Dam	7	Camden, NC	
Windsor Hwy 17	7	Bertie, NC	
Ryland Road	7	Chowan, NC	
Mechanicsville	28	Hanover, VA	
Albemarle Beach	112	Washington, NC	
Bethel NC 11	112	Pitt, NC	
Wildcat Road	7	Martin, NC	
Williamston Hwy 125	7	Martin, NC	
Shawboro Ridge	80	Currituck, NC	
Colice Hall	7	Hertford, NC	
Creswell Hwy 64	20	Tyrrell & Washington, NC	
Manning	7	Edgecombe, NC	

Bethel NC 11 Solar, LLC
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INFORMATION ABOUT THE PROPOSED FACILITY
EXHIBIT 2

- I. *The nature of the proposed generating facility, including its type, fuel, expected service life, and the gross, net, and nameplate generating capacity of each generating unit and the entire facility, as well as the facility's total projected dependable capacity, in megawatts (alternating current); the anticipated beginning date for construction; the expected commercial operation date; and estimated construction costs;*

The Applicant is proposing to construct a 150MW AC solar facility in Pitt County, based on the nameplate capacity of the panels. The gross and net capacity of the resource is equal to its nameplate capacity. The expected service life of the facility is approximately 50 years.

The Applicant anticipates beginning construction of the site during the 2Q of 2022. The Applicant expects that commercial operation of the facility will be achieved in phases, with the first phase operational by the 4Q of 2022, and the last phase operational by the 4Q of 2023. The estimated construction cost of the facility is filed under seal as confidential information (See **Confidential Schedule 2-1** of the Confidential documents submitted with this Application.)

- II. *A color map or aerial photo (a U.S. Geological Survey map or aerial photo map prepared via the State's geographic information system is preferred) showing the proposed site boundary and layout, with all major equipment, including the generator, fuel handling equipment, plant distribution system, startup equipment, planned and existing pipelines, planned and existing roads, planned and existing water supplies, and planned and existing electric facilities;*

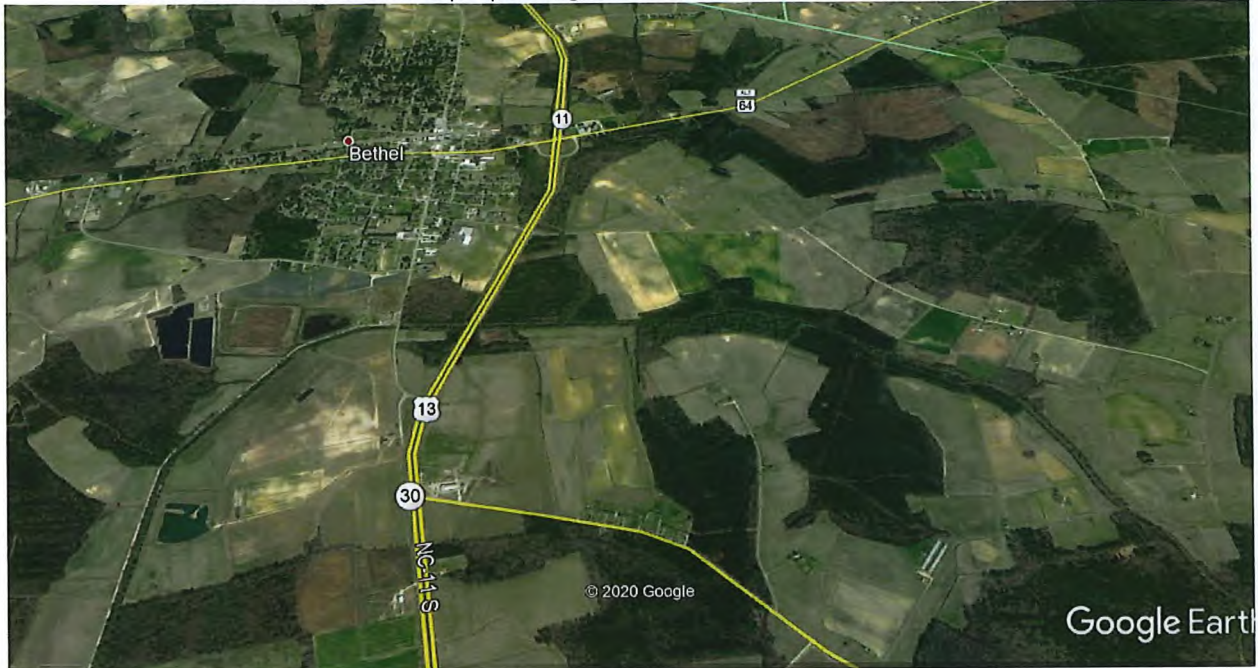
A site map of Bethel NC 11 Solar, LLC showing the equipment layout is attached as **Schedule 2-2**.

An aerial view showing the relationship of the site to nearby highways and state boundaries and county lines in its vicinity is reproduced below as **Image 2-1**.

Bethel NC 11 Solar, LLC
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IMAGE 2-1

General location of site of proposed generation resource of Bethel NC 11 Solar, LLC



- iii. *The E911 street address, and county in which the proposed facility would be located, and GPS coordinates of the approximate center of the proposed facility site to the nearest second or one thousandth of a degree is set out below.*

E911 address(es) have not been obtained for the proposed facility; however, the facility is located at GPS coordinates 35.790974, -77.366634.

- iv. *In the case of natural gas-fired facilities, a map showing the proximity of the facility to existing natural gas facilities; a description of dedicated facilities to be constructed to serve the facility; and any filed agreements, service contracts, or tariffs for interstate pipeline capacity;*

The facility is not a natural gas fired facility.

- v. *A list of all needed federal, state and local approvals related to the facility and site, identified by title and the nature of the needed approval is listed in **Schedule 2-3** attached hereto. The same exhibit includes a copy of such approvals as has been obtained, or a report on the current status of the approvals. There will be **no** application related to an application for eligible facility status or exempt wholesale generator status pursuant to Section 32 of the Public Utility Holding Company Act of 1935*

Bethel NC 11 Solar, LLC
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(PUHCA), as amended by the Energy Policy Act of 1992, including attachments and subsequent amendments as necessary.

The proposed facility will interconnect with the Dominion Transmission system via a new three breaker ring bus switching station connecting to the Elmont-Greenwood DP 115 KV line #59. This new switching station will be adjacent to the Dominion transmission line on land Bethel NC 11 Solar has acquired for this generating facility. The generator collector substation will be adjacent to the new Dominion switching station.

Bethel NC 11 Solar, LLC
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Schedule 2-1

CONFIDENTIAL

SEE CONFIDENTIAL EXHIBITS
SUBMITTED WITH APPLICATION

Estimated Construction Costs

Bethel NC 11 Solar, LLC
CPCN Application – Merchant Plant
NCUC EMP-102, Sub 1

Schedule 2-2

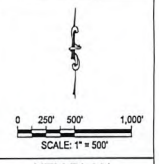
Bethel Site Map

X:\AB2-035_Bethel NC 11 Solar\01_DWG_Preliminary\X_AB2E-101.dwg Plotfile: 1/29/2020 3:29:25 PM Layout: cpen



LEGEND

PROPERTY BOUNDARY	
PV ARRAY	
FENCE	
VEGETATIVE BUFFER	
JURISDICTIONAL BOUNDARY	
PROJECT OVERHEAD LINES	
INVERTER LOCATIONS	
SITE ACCESS POINTS	



KEY PLAN



192 Raceway Dr.
Moorestville, NC 28117
(T) 704-682-0375
(F) 704-682-0352

DRAWING LOG	
NO.	DESCRIPTION

BETHEL NC 11 SOLAR, LLC	
PV POWER PLANT	
IN BETHEL, NC	
PROJECT NO.	AB2-035
DATE	LN
DRAWN BY	CJM

DRAWING TITLE	PRELIMINARY LAYOUT OVERVIEW
DRAWING NO.	SL1.0
DATE	26 MAR 2020

Bethel NC 11 Solar, LLC
CPCN Application – Merchant Plant
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Schedule 2-3

Required List of Permits or Certificates

	Title	Status	Copy
Federal			
USACOE	Wetland Delineation	In Process	
FERC	Market Base Rate Authorization	Forthcoming	
FERC	EQR	Forthcoming	
State			
CPCN	Generation CPCN-NCUC	Application	
NC-DOT	Driveway Permits	Forthcoming	
NCDEQ	Erosion and Sedimentation Control Permit	In Process	
Local			
	Zoning Compliance	Obtained	Y
	Conditional Use Permit	Forthcoming	
	Building/Electrical Permit	Forthcoming	

TOWN OF BETHEL
CERTIFICATE OF COMPLIANCE WITH
MUNICIPAL ZONING AND LAND DEVELOPMENT REGULATIONS

This Zoning Compliance is being sought for the purpose of: Construction of Bethel NC 11, Solar facility.

Date: 2/3/20 Time: 12:00pm Application #: _____ Parcel #: Please see the attached document
Location: Please see the attached document

Subdivision: N/A Lot: N/A Block #: N/A

City Limits: Inside of: _____ Outside of: _____ Zoning designation: Please see that attached documents

Owner/agent: Bethel NC 11 Solar, LLC Address: 192 Raceway Drive Mooresville, NC 28117

Builder: SunEnergy1, LLC Address: 192 Raceway Drive Mooresville, NC 28117

Contractor Lic. #: 71359 Telephone: 704-662-0375

Utility Suppliers: Water: N/A Gas: N/A

Sewer: N/A Electricity: N/A

Health Dept. Permit No.: N/A

Is the property located in a Flood Plain? no If yes, a map or an elevation certificate, signed and sealed by a Professional Engineer or Land Surveyor, showing the proposed finished floor elevation about the 100 year flood level, must accompany this application.

Fire District: Bethel Rural Fire Rescue District: _____

Are there municipal easements affecting the property? No If yes, describe them: _____

Setbacks from the property line: _____ 100 FT setback from all adjoining residential properties
Front: 50 ft Rear: 50 ft Side: 50 ft Other: _____

NOTE: If no setbacks are specified, the Pitt County Inspection Ordinance shall govern.

Are there other municipal regulations governing the use of this property? yes If yes, describe them: Some portions of the parcels are in Pitt County Jurisdiction. Please see the attached documents

A copy of the plans for the structure (plan and elevation view) are submitted: (REQUIRED) Please see the attached documents

A plot plan showing the lot perimeter, existing structures, and the proposed structure along with setbacks is hereby submitted: (REQUIRED) Please see the attached documents

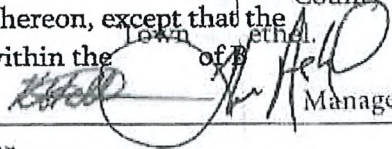
Based on the information presented, a building permit: _____ IS REQUIRED, a plumbing permit _____ IS REQUIRED, a electrical permit X IS REQUIRED

I hereby attest that I have been provided with a copy of Bethel's Zoning Ordinance, I further attest that I have read this and that I know of no feature of the proposed construction that will conflict with its content. I have been informed that if this certification is made based on omission of distortion of fact regarding the nature of the proposed construction, that this certificate shall be deemed void and all permits resulting from it shall be revoked or considered null and void.

Signature: [Signature] Date: 2/3/20

Witness: [Signature] Date: 2/3/20

I hereby certify that all the municipal regulations governing the use of the property affected by this application have been set out in this certificate and that the Town of Bethel relieves the County of Pitt of all responsibility for enforcing regulations unless set out hereon, except that the County shall enforce the North Carolina State Building Code within the Town of Bethel.


Manager

Signature
& Title


~~2/3/20~~ 3-4-20
Date

The undersigned hereby acknowledges by his signature below that the undersigned has been informed of the following:

- (1) That any building or structure built within the Town of Bethel or within its one mile extraterritorial jurisdiction must be located upon the property and constructed in compliance with the Zoning Ordinance of the Town of Bethel, in addition to any requirements or regulations of the County Inspection Department; and
- (2) That no foundation for any building or structure shall be poured, dug or otherwise prepared until the location of the proposed foundation has been marked on the ground, inspected and approved by the Zoning Enforcement Officer of the Town of Bethel for compliance with the Bethel Zoning Ordinance, and the undersigned has received a certificate of zoning compliance for foundation construction signed by the zoning enforcement officer or his designated agent; and
- (3) That no construction of any building or structure shall commence until the completed foundation for the same shall have been inspected and approved by the Zoning Enforcement Officer of the Town of Bethel for the compliance with the Bethel Zoning Ordinance and the undersigned has received a certificate of zoning compliance for completed foundation from the Zoning Enforcement Officer or his designated agent; and
- (4) It shall be the responsibility of the undersigned or his contractor to contact the Zoning Enforcement Officer, show the Officer the correct location of the owner's property lines on the ground which are consistent with the description of said property as set forth in owner's deed or other title instrument, and request inspection and zoning approval by the Zoning Enforcement Officer of the proposed foundation marked upon the ground and also the subsequent completed foundation prior to commencing the construction of any building or structure upon said property. The accuracy of the location of the aforesaid property lines, foundation, and building or structure shall be the sole responsibility of the owner.

I, the undersigned, do hereby acknowledge that I have read, understand, and will fully comply with the aforesaid requirements.

Dated this 3 day of February, 20 20


Signature

Bethel NC 11 Solar, LLC
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DESCRIPTION OF THE NEED FOR THE FACILITY
EXHIBIT 3

Forecasts of the quantities of renewable power to be purchased within the PJM market over the next several years, and elsewhere in the southeastern United States, reflect a strong public need for additional utility-scale solar power production. The proposed facility will interconnect with Dominion’s transmission grid, providing direct access to all load-serving suppliers participating in PJM, a Regional Transmission Organization (“RTO”) in which Dominion participates. PJM coordinates the movement of electricity through all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia, and the District of Columbia.

The Applicant believes strong market conditions in the PJM market will create sustainable off-take for its renewable power production and the associated Renewable Energy Certificates (“RECs”). Demand for renewable energy is expected to increase in the southeast over the expected lifetime of the proposed facility. For example, Schedule 3-1 discusses a Request For Proposals demonstrating that Dominion Energy has committed to increasing its use of renewable power, and seeking proposals that would permit it to generate or purchase 5,000 MW of renewable electricity by 2028. Dominion’s commitment to renewable power is consistent with state-level policy set by the Virginia Assembly, which affirmed the importance of renewable energy generation in passing the Grid Transformation and Security Act of 2018 (“GTSA”), signed into law on March 9, 2018. The GTSA finds that up to an additional 5,000 MW of utility-scale electric generating facilities powered by solar and wind energy is in the public interest, along with up to an additional 500 MW of non-utility scale solar or wind generating facilities, including rooftop solar installations.

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CPCN Application – Merchant Plant
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Bethel NC 11 Solar anticipates contracting for the sale of its energy, capacity, and RECs through PJM. Load growth for the PJM RTO as a whole, and more specifically for the Dominion Virginia power zone, which serves parts of Eastern North Carolina and Virginia, is expected to increase over the next ten to fifteen years as described both for winter and summer months. Summer peak load is expected to grow by 0.4% per year over the next ten years, and by 0.4% over the next fifteen years. (2018 PJM Load Forecast Report (Jan. 2018), available at <https://www.pjm.com/-/media/library/reports-notices/load-forecast/2019-rpm-load-forecast.ashx?la=en>) For the Dominion Virginia Power zone, summer peak load growth is expected to grow by 0.8% per year over the next ten years, and 0.8% per year over the next fifteen years. *Id.* at 59-60. The anticipated ten-year summer peak load growth in the Dominion Virginia Power zone represents 2.6% growth over the equivalent forecasts from the January 2017 load forecast report. *Id.* at 54.

Wind peak load growth in PJM is expected to average 0.4% per year over the next ten-year period, and 0.4% over the next fifteen years. *Id.* at 2. Winter peak load growth in the Dominion Virginia Power zone is expected to grow by 0.9% per year over the next ten years, and 0.9% per year over the next nine to fifteen years. *Id.* at 63-64. The anticipated ten-year winter peak load growth in the Dominion Virginia Power zone represents 3.9% growth over the January 2017 load forecast report. *Id.* at 54.

The area of North Carolina within the footprint of the transmission operated by Dominion Virginia Power has a slightly higher projected load growth than Virginia. North Carolina is expected to average between 0.8% and 0.9% per year over the next ten years, in contrast to the PJM RTO load growth projections of 0.4% over the next ten years.

Bethel NC 11 Solar, LLC
CPCN Application – Merchant Plant
NCUC EMP – 102, Sub 1

Finally, the Applicant is currently negotiating with a load-serving entity about the prospect of entering into a long-term purchase power agreement (“PPA”) with that entity for the output of the proposed facility and the associated RECs. If those negotiations lead to consummation of a PPA before commercial operation of the proposed facility, the Applicant will advise the Commission through amendments of this testimony or its construction progress reports.

Bethel NC 11 Solar, LLC
CPCN Application – Merchant Plant
NCUC EMP-102, Sub 1

Schedule 3-1

Dominion RFP
Solar and Wind

Solar, Onshore Wind and Energy Storage Proposals



Dominion Energy Virginia is seeking bids for up to 1,000 megawatts (MW) of solar and onshore wind generation and up to 250 MW of energy storage in the Commonwealth. This is the largest solicitation in the Company's history for renewable energy in a calendar year and will promote its efforts toward a clean energy future.

The RFP is soliciting bids for development assets for new solar or onshore wind power generation facilities or mechanically complete solar facilities under asset purchase agreements. The RFP is also seeking power purchase agreement bids where the Company will enter into an agreement for the energy, capacity, ancillary services, and environmental attributes including Renewable Energy Certificates from the facility. Additionally, the Company is seeking bids for new energy storage projects that may be paired with new solar or onshore wind facilities or that will be connected to the power grid as a stand-alone facility. The new facilities must be at least 5 MW (ac) in size, located in Virginia and commercially operational by the end of 2023 to be considered.

The RFP outlines the exact proposal requirements, including the power and asset purchase agreement terms as well as the price and non-price evaluation criteria. Among several criteria, the Company will favorably consider each proposal's use of labor, materials and other resources within Virginia and from Virginia businesses.

Notices of Intent to Bid and Confidentiality Agreements are due by May 18, 2020 with final asset purchase and power purchase proposals due September 1, 2020 and March 1, 2021, respectively.

Customers and developers interested in learning more about the company's renewable energy expansion plans may contact us via email: 2020SolarWindRFP@dominionenergy.com

RFPs for Solar, Onshore Wind and Energy Storage

ANNOUNCEMENTS

- [RFP Press Release](#)

INTENT TO BID DOCUMENTS

- [Intent to Bid Form](#)
- [Confidentiality Agreement](#) - Revised May 6, 2020

RFP BID DOCUMENTS

- [2020 Solar and Onshore Wind RFP Document](#)
- [2020 Solar and Onshore Wind RFP Information Form](#)
- [2020 RFP Checklist – Acquisition- Solar](#)
- [2020 RFP Checklist – Acquisition – Onshore Wind](#)
- [2020 RFP Checklist – Acquisition - Solar Mechanical Completion](#)
- [2020 RFP Checklist – Acquisition – Solar Plus Energy Storage](#)
- [2020 RFP Checklist – Acquisition – Stand-Alone Energy Storage](#)
- [2020 RFP Checklist – Acquisition – Wind Plus Energy Storage](#)
- [2020 RFP Checklist – Power Purchase Agreement - Solar](#)
- [2020 RFP Checklist – Power Purchase Agreement – Onshore Wind](#)
- [2020 RFP Checklist – Power Purchase Agreement – Solar Plus Energy Storage](#)
- [2020 RFP Checklist – Power Purchase Agreement – Stand-Alone Energy Storage](#)
- [2020 RFP Checklist – Power Purchase Agreement – Wind Plus Energy Storage](#)

2019 RFP Documents and Information >**ANNOUNCEMENTS**

- [RFP Press Release](#)

INTENT TO BID DOCUMENTS

- [Intent to Bid Form](#)
- [Confidentiality Agreement \(Revised August 8, 2019\)](#)

RFP BID DOCUMENTS

- [Questions & Answers](#)
- [2019 Solar and Onshore Wind RFP Document](#)
- [2019 Solar and Onshore Wind RFP Information Form](#)
- [2019 RFP Checklist – Acquisition, Solar](#)
- [2019 RFP Checklist – Acquisition, Wind](#)
- [2019 RFP Checklist – Power Purchase Agreement, Solar](#)
- [2019 RFP Checklist – Power Purchase Agreement, Wind](#)

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BEFORE THE
NORTH CAROLINA UTILITIES COMMISSION
RALEIGH, NORTH CAROLINA

BETHEL NC 11 SOLAR, LLC
DOCKET NO. EMP-102, SUB 1

PRE-FILED DIRECT TESTIMONY
OF
LINDA NWADIKE

August, 2020

1 INTRODUCTION

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

3 A. My name is Linda Nwadike. I am the Director of Permitting and Community Relations for
4 SunEnergy1, LLC ("SunEnergy1" or the "Company"), the parent and an affiliate of the
5 Applicant Bethel NC 11 Solar, LLC ("Bethel NC 11 Solar" or "Applicant"). Bethel NC 11
6 Solar is a North Carolina limited liability company that was formed on August 17, 2016.
7 My business address is 192 Raceway Drive, Mooresville, North Carolina 28117.

8 Q. PLEASE DESCRIBE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

9 A. I obtained a Bachelor of Science degree in Chemical Engineering with a concentration in
10 Biological Technology, and I am a licensed project manager professional.

11 Prior to joining SunEnergy1, I worked in the nuclear energy industry as a project
12 manager and an instrumentation and controls engineer. I worked with many large-scale
13 utility providers, including Duke Energy Progress, LLC, Duke Energy Carolinas, LLC, Virginia
14 Electric and Power Company d/b/a Dominion Energy North Carolina ("Dominion"), Florida
15 Power & Light Company, and NextEra Energy, Inc. on various projects. I have also
16 conducted or overseen material procurement and logistics on various oil and gas
17 projects.

18 At SunEnergy1, I conduct project development and oversee permitting activities
19 for utility-scale solar renewable energy facilities. I often am the liaison between
20 SunEnergy1 and local community and government officials. I present information about
21 projects to local government officials at quasi-judicial public hearings and to adjacent
22 property owners at community meetings. I obtain federal, state, and local permits

1 necessary for the solar facilities, and I coordinate and lead the SunEnergy1's project
2 development team and sub-contractors in relation to achieving project goals.

3 Q. PLEASE SUMMARIZE YOUR CURRENT RESPONSIBILITIES WITH SUNENERGY1.

4 A. My current employment responsibilities are as follows:

- 5
- 6 • Conduct and oversee project development and permitting activities on utility-scale
 - 7 solar renewable energy facilities.
 - 8 • Lobby and act as the liaison between SunEnergy1 and local community and
 - 9 government officials.
 - 10 • Present SunEnergy1 projects at quasi-judicial public hearings and community
 - 11 meetings.
 - 12 • Communicate and perform required activities needed to obtain federal, state, and
 - 13 local permits.
 - 14 • Work with federal, state, and local governmental agencies, including mayors, county
 - 15 managers, boards of commissioners, and planning boards on solar projects.
 - 16 • Coordinate and lead internal project development team and sub-contractors across
 - 17 broad technical, financial, and business disciplines to achieve project goals.
 - 18 • Focus team on project objectives, and track progress against objectives to ensure
 - 19 project milestones are completed on time, on budget, and with the desired outcome.
 - 20 • Anticipate and manage changes effectively in a rapidly evolving business
 - 21 environment.
 - 22 • Report and escalate issues to upper management and stakeholders as needed.

23 Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

24 A. Yes, I provided testimony in support of the application for a Certificate of Public
25 Convenience and Necessity ("CPCN") for Merchant Plant and filed construction Progress
26 Reports for the applicant for that project, Albemarle Beach Solar, LLC (NCUC Docket EMP-
27 103).

28 Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY IN THIS PROCEEDING?

29 A. To satisfy the requirements of Commission Rule R8-63 under which this Application for a
30 Certificate of Public Convenience and Necessity ("CPCN") for a proposed merchant plant
31 is being requested.

1 Q. PLEASE IDENTIFY THE PARENT COMPANY OF THE APPLICANT.

2 A. SunEnergy1 is the parent company of the Applicant, Bethel NC 11 Solar, LLC.

3 COMPANY BACKGROUND AND PROJECT FINANCE

4 Q. PLEASE DESCRIBE THE COMPANY'S PERSONNEL, TECHNICAL EXPERIENCE, AND
5 FINANCIAL CAPABILITY TO OWN AND OPERATE THE PROJECT.

6 A. SunEnergy1 is a top five U.S. solar developer, owner, and operator of utility-scale solar
7 projects, with over 1 GW of installed solar power. SunEnergy1 has pioneered large-scale
8 solar power on the East Coast for nearly a decade and has developed numerous record-
9 breaking solar projects in the Southeast region. SunEnergy1 is vertically integrated and
10 controls all stages of development in-house.

11 SunEnergy1's professional team works closely with manufacturers, utilities, and
12 industry groups to ensure the safety, performance, and cost efficiency of its projects.
13 The Company's employees work closely with sponsors of the National Electric Code
14 (NEC), members of the National Fire Protection Association (NFPA) 70E, and with
15 pertinent government agencies to ensure that safety standards and compliance activities
16 used in the solar industry continue to improve.

17 Kenny Habul, SunEnergy1's CEO and President, has been involved in the
18 development of photovoltaic ("PV") solar and solar thermal technology since 1996, and
19 has established himself as a leader in the field of sustainable construction technologies.
20 Prior to forming SunEnergy1, Mr. Habul was a partner in Habul Brothers Luxury Home
21 Construction, one of the most prominent and innovative builders in Queensland,
22 Australia. Mr. Habul has vast experience in commercial and residential construction and

1 has a passion for sustainable construction practices and solar energy. He holds a
2 Bachelor of Laws degree from Bond University in Australia.

3 Bradley Fite is SunEnergy1's Chief Operations Officer. He holds an
4 Unlimited/Master Electrical License in multiple states. He is certified through the
5 Underwriter's Laboratory (UL) as a professional PV installer and holds several
6 certifications through the North American Board of Certified Energy Practitioners
7 (NABCEP). He is an active member of the Institute of Electrical and Electronics Engineers
8 Association (IEEE) and NFPA, and he works closely with utilities and manufacturers to stay
9 on the leading edge of the PV industry. Mr. Fite is directly involved with all aspects of the
10 Company and oversees projects from the initial development through construction,
11 operations and maintenance. He has over 20 years of construction experience and has
12 built more than 500 MW AC of solar PV projects.

13 Kevin Chen is SunEnergy1's Chief Commercial Officer. Prior to joining
14 SunEnergy1, he had several leadership positions in the power industry. He has worked in
15 the business leading global technology and equipment supply provision, large utility
16 transmission and distribution operations, and generation project development. His solar
17 development experience has grown from 250 MW of DG portfolio, to community solar
18 projects and utility-scale projects. Mr. Chen received his master's degree in electric
19 power from Iowa State University and his MBA from the University of California at Los
20 Angeles.

21 Brian Kennedy is SunEnergy1's Chief Development Officer. He brings over 25
22 years of energy industry experience to SunEnergy1. Prior to joining the Company, Mr.
23 Kennedy initiated and established the solar enterprise for the largest utility company in

1 the country. As such, he was directly responsible for the development of dozens of
2 utility-scale solar projects across the country, totaling nearly 1 GW of installed capacity,
3 and representing over \$1 billion worth of investment. Mr. Kennedy holds an MBA from
4 Xavier University.

5
6 SITE AND FACILITY DESCRIPTION

7 Q. WHERE IS THE PROJECT THAT IS THE SUBJECT OF THE APPLICATION LOCATED?

8 A. The project is located East of NC 11 South and North of NC 30 in the Town of Bethel, Pitt
9 County, North Carolina. I herewith reference and incorporate the Application and its
10 exhibits, as well as all other materials supplied by Applicant, in support of the Application
11 for a CPCN for a merchant plant.

12 Q. WHAT IS THE CURRENT LAND USE AND ANTICIPATED USE?

13 A. The project will be located on several parcels in Pitt County and Town of Bethel, North
14 Carolina as shown on layout map attached to the Application as Schedule 2-2. The site is
15 comprised of rural land, some of which is utilized for agricultural purposes. SunEnergy1's
16 affiliate, Group Three Holdings, LLC, owns a portion of the site; additionally, Christopher
17 & Georgia James, Country Farms, LLC, The Bunting Farms, Inc., Charlie & Elizabeth
18 Manning, Patsy White & Carrie Gurganus and Wallace & Jeffrey James, each own or claim
19 to own some or all of the other portions of the site for the project. The above-mentioned
20 landowners have provided Bethel NC 11 Solar with the right to develop and use the
21 property for solar energy purposes, including the installation of solar panels, inverters,
22 transformers, and other elements of the facility described in the Application.

23 Q. WHAT IS THE FACILITY'S ANTICIPATED ELECTRICITY PRODUCTION CAPACITY?

1 A. The maximum gross power production capacity of the facility will be 150 MW.

2 Q. PLEASE DESCRIBE THE BASIC COMPONENTS OF THE FACILITY.

3 A. Bethel NC 11 is a 150-MW PV array, and the sole source of its power is solar energy. The
4 facility will be a single-axis tracking, ground-mounted solar PV system, and the facility will
5 be comprised of solar arrays, inverters, generator step-up (“GSU”) transformers, racking,
6 posts, wiring, utility poles, communication poles, security camera, collector station, and
7 accessories. A color map showing the proposed site boundary, layout with all major
8 equipment, roads, and, and electric facilities is attached to Exhibit 2 of the Application as
9 Schedule 2-2.

10 Q. PLEASE DESCRIBE THE TRANSMISSION FACILITIES TO WHICH THE FACILITY WILL
11 INTERCONNECT AND HOW THE PROJECT WILL BE INTERCONNECTED TO THE GRID?

12 A. The Bethel NC 11 Solar facility will interconnect with the Dominion Transmission system
13 via a new three breaker ring bus switching station connecting to the Elmont-Greenwood
14 DP 115 KV line #59. This new switching station will be adjacent to the Dominion
15 transmission line on land Bethel NC 11 Solar has acquired for this generating facility. The
16 generator collector substation will be adjacent to the new Dominion switching station.
17 A diagram showing the point of interconnection and the location of the collector station
18 is attached to the application as Schedule 2-2.

19

20

21

NEED FOR THE FACILITY

22 Q. PLEASE EXPLAIN THE NEED FOR THE FACILITY.

1 A. Bethel NC 11 Solar will interconnect with the Dominion Energy transmission grid,
2 providing the merchant plant with direct access to PJM, a Regional Transmission
3 Organization (“RTO”) in which Dominion participates. PJM coordinates the movement of
4 electricity through all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland,
5 Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West
6 Virginia, and the District of Columbia.

7 Bethel NC 11 Solar believes that there are strong market conditions in the PJM
8 market that will create sustainable off-take for its power production. Demand for
9 renewable energy is expected to increase in the southeast over the expected lifetime of
10 the project. Also, Dominion Energy has committed to increasing its use of renewable
11 power to generate 5,000 MW of electricity by 2028. Dominion’s commitment to
12 renewable power is consistent with state-level policy set by the Virginia Assembly, which
13 affirmed the importance of renewable energy generation in passing the Grid
14 Transformation and Security Act of 2018 (“GTSA”), signed into law on March 9, 2018.
15 The GTSA finds that up to an additional 5,000 MW of utility-scale electric generating
16 facilities powered by solar and wind energy is in the public interest, along with up to an
17 additional 500 MW of non-utility scale solar or wind generating facilities, including
18 rooftop solar installations.

19 Bethel NC 11 Solar anticipates contracting for the sale of its energy, capacity, and
20 Renewable Energy Credits (“RECs”) through PJM. Load growth for the PJM RTO as a
21 whole, and more specifically for the Dominion Virginia power zone, which serves parts of
22 Eastern North Carolina and Virginia, is expected to increase over the next ten to fifteen
23 years as described both for winter and summer months. Summer peak load is expected

1 to grow by 0.4% per year over the next ten years, and by 0.4% over the next fifteen years.
2 (2018 PJM Load Forecast Report (Jan. 2018), available at [https://www.pjm.com/-](https://www.pjm.com/-/media/library/reports-notice/load-forecast/2019-rpm-load-forecast.ashx?la=en)
3 [/media/library/reports-notice/load-forecast/2019-rpm-load-forecast.ashx?la=en](https://www.pjm.com/-/media/library/reports-notice/load-forecast/2019-rpm-load-forecast.ashx?la=en)) For
4 the Dominion Virginia Power zone, summer peak load growth is expected to grow by
5 0.8% per year over the next ten years, and 0.8% per year over the next fifteen years. *Id.*
6 at 59-60. The anticipated ten-year summer peak load growth in the Dominion Virginia
7 Power zone represents 2.6% growth over the January 2017 load forecast report. *Id.* at 54.

8 Wind peak load growth in PJM is expected to average 0.4% per year over the
9 next ten-year period, and 0.4% over the next fifteen years. *Id.* at 2. Winter peak load
10 growth in the Dominion Virginia Power zone is expected to grow by 0.9% per year over
11 the next ten years, and 0.9% per year over the next nine to fifteen years. *Id.* at 63-64.
12 The anticipated ten-year winter peak load growth in the Dominion Virginia Power zone
13 represents 3.9% growth over the January 2017 load forecast report. *Id.* at 54.

14 North Carolina is expected to average between 0.8% and 0.9% per year over the
15 next ten years, in contrast to the PJM RTO load growth projections of 0.4% over the next
16 ten years.

17 Q. DESCRIBE THE OFF-TAKE PLANS FOR THE PROJECT.

18 A. As mentioned above, the expectations of SunEnergy1 with respect to forecasts of the
19 purchases of renewable power within the PJM market and elsewhere in the southeastern
20 United States are strong. Furthermore, Bethel NC 11 Solar, is currently negotiating to
21 enter into a long-term purchase power agreement ("PPA") with an entity.

22 REGULATORY APPROVALS AND PERMITS

23 Q. DOES PITT COUNTY OR THE TOWN OF BETHEL HAVE A SOLAR ENERGY ORDINANCE?

1 A. Yes. Pitt County has a Solar Energy facility portion (Section EEEE) of its planning &
2 development services ordinance No. 14. The Solar Development Ordinance was adopted
3 by the Pitt County Board of Commissioners pursuant to the authority and provisions of
4 N.C. Gen. Stat. § 153A-121 (general ordinance-making power), N.C. Gen. Stat. § 153A-340
5 (grant of power), and other applicable law, provided nothing shall be interpreted to
6 conflict with or supersede any provision of N.C. Gen. Stat. § 153A-144 (limitations on
7 regulating solar collectors).

8 Q. DESCRIBE THE PERMITS AND APPROVALS YOU ANTICIPATE WILL BE NECESSARY TO
9 COMMENCE CONSTRUCTION OF THE FACILITY.

10 A. Bethel NC 11 Solar has obtained the Zoning Compliance from the Town of Bethel and is
11 working towards obtaining the Conditional Use Permit from Pitt County as required by
12 the Town of Bethel and Pitt County zoning requirements. The Town of Bethel and Pitt
13 County Board of Commissioners have final authority to approve Zoning Permit and
14 Conditional Use Permit respectively. A copy of the approved Zoning Compliance from the
15 Town of Bethel is attached and included in Schedule 2-3. In addition to the Conditional
16 Use Permit, Bethel NC 11 Solar will also have to obtain a Building Permit from Pitt
17 County.

18 From the State of North Carolina, the facility will require driveway permit(s) from
19 the North Carolina Department of Transportation, and approval of an erosion and
20 sedimentation control plan from the NC Department of Environmental Quality
21 (“NCDEQ”). The project also will require a Certificate of Public Convenience and Necessity
22 for its construction.

1 In regard to federal permits and approvals, a wetland delineation for the entire
2 site will be submitted to the US Army Corps of Engineers ("USACE"). Additionally, Bethel
3 NC 11 Solar may apply for a Market-Based Rate Authorization from the Federal Energy
4 Regulatory Commission ("FERC"), pursuant to Sections 205 and 206 of the Federal Power
5 Act. The facility will also be registered as a Generator-Owner with the North American
6 Electric Reliability Corporation ("NERC").

7 COMMUNITY

8 Q. PLEASE DESCRIBE THE ANTICIPATED BENEFITS OF THE FACILITY TO THE LOCAL
9 COMMUNITY.

10 A. The Bethel NC 11 Solar facility brings a variety of financial benefits to Pitt County and the
11 Town of Bethel. Bethel NC 11 Solar anticipates that the County will realize property and
12 real estate tax revenues from the project. Aside from these financial benefits, Bethel NC
13 11 Solar will also create community benefits. Bethel NC 11 Solar will enhance the
14 County's reputation as an attractive and friendly environment for advance
15 manufacturing, technology, and related jobs. Local contractors and businesses engaged
16 in installation, fencing, landscaping, and machine rental companies, will receive sales
17 opportunities during the facility's construction, and also during its post-construction
18 operations. During the approximately year-long construction process, the facility will
19 offer full-time construction jobs. Bethel NC 11 Solar expects to hire up to 1,000 workers
20 for the duration of the construction phases. Increased economic activity in the area is
21 expected to increase revenue for local hotels, restaurants, service stores, and other
22 vendors.

23 Q. WHAT ARE THE EXPECTED ENVIRONMENTAL IMPACTS OF THE FACILITY?

1 A. By design and by its nature as a solar PV facility, the facility will provide clean renewable
2 power with minimal environmental impacts. The facility will create no air or water
3 emissions and no environmental contamination. There will be no noise impact outside of
4 the fence line. At the end of the facility's useful life, materials can be recycled or sold for
5 scrap, and the land can be returned to agricultural use.

6 OFF-TAKE PLANS

7 Q. WHAT ARE THE LONG-TERM PLANS FOR OWNERSHIP OF THE PROJECT?

8 A. Currently, Bethel NC 11 Solar is expected to own 100% of the power from this merchant
9 plant. It intends to sell the output into the PJM market. In the event of any change in
10 ownership interests or intended changes in uses of the output, the Applicant will notify
11 the Commission.

12

13 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

14 A. Yes.

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STATE OF NORTH CAROLINA

COUNTY OF IREDELL

VERIFICATION

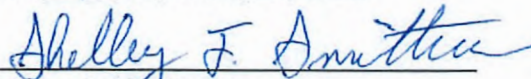
I, Linda Nwadike, being first duly sworn, depose and say that I am duly authorized to act on behalf of Bethel NC 11 Solar, LLC as Director of Permitting and Community Relations for SunEnergy1, LLC, the parent and an affiliate of the Petitioner; that I have read the foregoing Pre-Filed Direct Testimony and that the same is true and accurate to my personal knowledge and belief except where otherwise indicated, and in those instances, I believe my answers to be true.

This 7 day of August, 2020.



Linda Nwadike
SunEnergy1, LLC

Sworn to and subscribed to before me
this 7 day of August, 2020.


Notary Public (Signature)

Shelby F. Smithwick
Notary Public (Printed)

My Commission Expires: 3/27/23



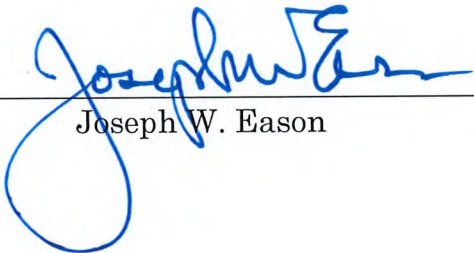
CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Bethel NC 11 Solar, LLC's Application For a Certificate of Public Convenience and Necessity For Merchant Plant was served upon the following by electronic mail:

Christopher Ayers, Esq.
Executive Director-NC Public Staff
430 N. Salisbury Street
4326 Mail Service Center
Raleigh, NC 27699-4300
chris.ayers@psncuc.nc.gov

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Public Staff - N.C. Utilities Commission
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dianna.downey@psncuc.nc.gov

This the 10th day of August, 2020.



Joseph W. Eason