

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. EMP-111, SUB 0

BEFORE THE NORTH CAROLINA UTILITIES Commission

In the Matter of Application of)
Sweetleaf Solar LLC for a Certificate)
of Public Convenience and Necessity) MOTION FOR EXTENSION OF TIME
to Construct a 94-MW Solar Facility in)
Halifax County, North Carolina)

NOW COMES Sweetleaf Solar, LLC (“Sweetleaf Solar” or the “Applicant”), by and through counsel, and pursuant to Commission Rule R1-7, moves the North Carolina Utilities Commission for an extension of time to file supplemental testimony and exhibits as directed by the Commission in its July 8, 2020, *Order Requiring Filing of Testimony, Establishing Procedural Guidelines, and Requiring Public Notice*. Applicant also seeks an extension of deadlines for responsive and rebuttal testimony.

In support of its motion, Applicant shows the following:

1. On June 2, 2020, Sweetleaf Solar filed an application in accordance with N.C. Gen. Stat. § 62-20.1 and Commission Rule R8-63 for a certificate of public convenience and necessity to construct a 94-MW solar photovoltaic electric generating facility to be located in Halifax County, North Carolina, operated as a merchant generating facility (the “Project”).
2. On June 15, 2020, the Public Staff filed a Notice of Completeness stating that the Public Staff had reviewed the application and considered the application to be complete.
3. On July 8, 2020, the Commission issued an *Order Requiring Filing of Testimony, Establishing Procedural Guidelines, and Requiring Public Notice* (“Procedural Order”),

establishing a procedural schedule for this matter and directing the Applicant to file additional testimony and exhibits addressing a number of questions posed by the Commission. The Procedural Order established a deadline of July 21, 2020, for Applicant's supplemental testimony and exhibits; August 10, 2020, for direct testimony and exhibits by the Public Staff and intervenors; and August 25, 2020, for rebuttal testimony and exhibits by Applicant.

4. The Applicant is diligently working to prepare testimony and exhibits as required by the Commission. However, given the complexity of the underlying issues related to the PJM interconnection process, Applicant requires additional time beyond the 13 days provided for in the Procedural Order.¹

5. The Commission has scheduled an expert witness hearing in this case for October 5, 2020. Applicant submits that granted the requested extension would not interfere with the Parties' ability to conduct a hearing on that date.

6. The Public Staff has been consulted and does not oppose Applicant's request for an extension, so long as other deadlines for testimony are similarly extended.

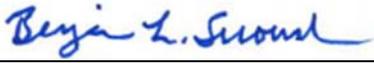
WHEREFORE, Sweetleaf Solar, LLC, respectfully requests that the Commission grant its Motion for a three-week extension of time of the deadlines for supplemental testimony, Public Staff and intervenor testimony, and rebuttal testimony in this matter, as follows:

- Applicant's supplemental testimony and exhibits: August 11, 2020
- Public Staff and Intervenors' testimony and exhibits: August 31, 2020
- Applicant's rebuttal testimony and exhibits: September 15, 2020.

¹ In addition, the same personnel at Applicant's parent company, Geenex Solar LLC, are simultaneously preparing supplemental testimony as ordered by the Commission in Docket No. EMP-110 Sub 0.

Respectfully submitted, this the 21st day of July, 2020.

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By: 

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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day served the foregoing **APPLICATION FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR A MERCHANT PLANT** upon the following by electronic mail as follows:

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This the 20th day of July 2020.

/s/ _____
Benjamin L. Snowden