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September 9, 2019

Ms. Janice Fulmore
Interim Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27603

**RE: *EXHIBIT 1 TO PRE-HEARING REPLY BRIEF OF FRIESIAN HOLDINGS, LLC
In the matter of the Application of Friesian Holdings, LLC for a Certificate of
Convenience and Necessity to Construct a 70-MW Solar Facility in Scotland County,
NC; Docket No. EMP-105, Sub 0***

Dear Ms. Fulmore:

On behalf of Friesian Holdings, LLC, in the above referenced matter and docket, I herewith provide Exhibit 1 to the Pre-Hearing Reply Brief that was filed earlier this afternoon.

Should you have any questions concerning this exhibit, please do not hesitate to contact me.

Sincerely,

/s/ Karen M. Kemerait

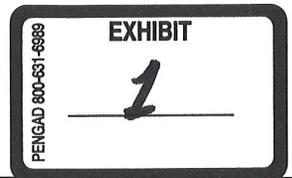
Karen M. Kemerait

pbb

Enclosures

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



OFFICIAL COPY

Sep 10 2019

Brown, Sherry

From: Gisele Rankin <glr.tarheel@gmail.com>
Sent: Wednesday, July 31, 2019 12:49 PM
To: Dodge, Tim R
Subject: Re: [External] Re: Time to talk about FERC issue?

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4:15 works. Will you call me? My number is 919-302-5131.

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From: Dodge, Tim R <tim.dodge@psncuc.nc.gov>
Sent: Wednesday, July 31, 2019 12:20:10 PM
To: Gisele Rankin <glr.tarheel@gmail.com>
Subject: RE: [External] Re: Time to talk about FERC issue?

How about 4:15pm? I'd prefer to talk today, if that works. I can call you at whatever number is convenient. The issue in question is a 70 MW merchant solar facility (EMP-105, Sub 0) that is planning to be located in DEP's service territory and sell its power to NCEMC, and is facing a very substantial (>\$220 million) network upgrade charge. The key question is to what extent can the Commission consider the FERC-jurisdictional interconnection costs in the CPCN proceeding.

Thanks! -- Tim

From: Gisele Rankin [mailto:glr.tarheel@gmail.com]
Sent: Wednesday, July 31, 2019 12:15 PM
To: Dodge, Tim R <tim.dodge@psncuc.nc.gov>
Subject: Re: [External] Re: Time to talk about FERC issue?

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I can talk any time the rest of today. I can also talk any time tomorrow after about 11:00, if that would suit your schedule better.

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From: Dodge, Tim R <tim.dodge@psncuc.nc.gov>
Sent: Wednesday, July 31, 2019 9:37:42 AM
To: Gisele Rankin <glr.tarheel@gmail.com>
Subject: RE: [External] Re: Time to talk about FERC issue?

Welcome back stateside! If you have time today, I would love to chat with you a bit. James may also join us for the discussion. I have a 10-11 and a 2-4 meeting today, but I am otherwise available on your schedule. Thanks! -- Tim

From: Dodge, Tim R
Sent: Thursday, July 25, 2019 8:01 PM
To: Gisele Rankin <glr.tarheel@gmail.com>
Subject: Re: [External] Re: Time to talk about FERC issue?

Have a great time in Scotland! If you have a chance on Tuesday afternoon or Wednesday, I would love to talk with you (about Scotland and merchant plants). Thanks! -- Tim

From: Gisele Rankin <glr.tarheel@gmail.com>
Sent: Thursday, July 25, 2019 6:09:38 PM
To: Dodge, Tim R <tim.dodge@psncuc.nc.gov>
Subject: [External] Re: Time to talk about FERC issue?

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I am on Scotland, but will be home Monday evening. Transmission for a non-QF selling at wholesale is FERC jurisdictional, as you know, and the FERC's cost allocation/recovery rules would apply. We were never thrilled with those rules as we thought they were tilted toward the generator. I'm rusty on those rules but I'll be glad to try to help.

The wind generators in the Pasquotank County area that are operational might provide useful information. The project changed names and owners several times, and I don't remember what it was finally called. PJM's rules applied but I think DNCP had to build the transmission.

I don't know what your timeline is but with jet lag I'm not sure how helpful I can be on Tuesday. If you can wait until Wednesday, I'll probably be more coherent!

Hope you're doing well and aren't working too hard.

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From: Dodge, Tim R <tim.dodge@psncuc.nc.gov>
Sent: Thursday, July 25, 2019 8:17:20 PM
To: glr.tarheel@gmail.com <glr.tarheel@gmail.com>
Subject: Time to talk about FERC issue?

Hey Gisele – I hope you are well! I wanted to see if you might have a few moments to talk about a FERC jurisdictional issue resulting from a merchant plant (EMP-105, Sub 0) seeking to be constructed in NC that is going to trigger very substantial transmission upgrade costs. If you have a minute to talk, I'd love to pick your brain a bit. Thanks! – Tim

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