STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. EMP-102, SUB 1

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of

Application of Pitt Solar, LLC for a Certificate of Public Convenience and Necessity to Construct an 80 MW Solar Facility in Pitt County, North Carolina REVISED ANNUAL PROGRESS REPORT

Pitt Solar LLC ("Pitt Solar") hereby provides the following information required by the Order Requiring Filing of Additional Information issued in this docket on April 4, 2024 ("April 11 Order"). The information provided herein relates to: (1) the estimated cost of the generating plant, interconnection facilities, upgrades, and affected system upgrades required for the facility; (2) LCOT calculations for affected system upgrades; and (3) the date on which the Facility was placed into service or is anticipated to be placed in service.

1. Cost of Generating Plant

The estimated cost of constructing the Pitt Solar facility is approximately

Cost of Interconnection Facilities

The estimated cost of Interconnection Facilities required for Pitt Solar is

Cost of Network Upgrades

The estimated cost of Upgrades required for Pitt Solar is

not receive reimbursement for any Upgrade costs.

Pitt Solar will

CONFIDENTIAL

4. Cost of Affected System Upgrades

No Affected System Upgrade costs have been allocated to Pitt.

5. Updated LCOT Calculation for Affected System Upgrades

The April 4 Order directs Pitt Solar to:

provide an updated LCOT calculation assuming that the Facility is responsible for all affected system costs necessitated by the facilities in its cluster, regardless of whether any of those costs presently are assigned or allocated to the Facility or to any other facility in the cluster, or whether any facility has a signed ASOA, and using the expected annual generator output in MWh of only the Facility;

Although Pitt Solar can provide an LCOT calculation based on the estimated cost the one Affected System Upgrade on the Duke Energy Progress ("DEP") system that has been assigned to projects in the AC1 cluster (below), Pitt Solar respectfully submits that it is not possible to generate an LCOT calculation for *all* affected system costs necessitated by the facilities in its cluster, because that cluster includes approximately 99 projects with active interconnection requests in the AC1 cluster, spread across twelve states. Pitt Solar has no information about what affected system upgrades might be triggered for the vast majority of those projects.

To the best of Pitt Solar's knowledge, the only affected system impacts triggered by AC1 projects that might impact North Carolina ratepayers are reflected in a May 6, 2020 Affected System Study ("2020 Affected System Study") submitted by Pitt Solar as Exhibit 6 to Ms. Nwadike's October 15, 2020 Supplemental Testimony, and discussed at length there and in subsequent testimony. That study indicated that DEP would be required to rebuild a section of its Rocky Mount – Battleboro 115kV line ("the DEP Upgrade"), at an estimated cost (at the time) of \$23,204,593

CONFIDENTIAL

Pitt Solar is not party to any agreement with DEP regarding the DEP Upgrade, nor does DEP keep Pitt Solar updated on the cost or status of that upgrade. The only information Pitt Solar possesses about the cost of the DEP Upgrade comes from publicly available sources.

Until recently the most up-to-date source Pitt Solar had been able to find, the North Carolina Transmission Planning Collaborative's February 2024 report on the status of Duke's local transmission plan, stated that the estimated cost of the DEP Upgrade was 30 million dollars. However, on April 29, 2024, Edgecombe Solar filed a Revised Annual Progress Report in docket no. EMP-101, Sub 0, in which it reported that the DEP has provided a Class III estimated cost for the DEP upgrade of \$16,104,173. Based on this cost figure and considering *only* the expected annual output of Pitt Solar, Pitt Solar has calculated an LCOT of

6. When the Facility May Be Placed in Service

At this time, Pitt Solar expects to be placed into service on or around September 12, 2025.

¹ Report on the NCTPC 2023–2033 Collaborative Transmission Plan (February 22, 2024) ("NCTPC Report") at 148, at http://www.nctpc.org/nctpc/document/REF/2024-02-22/2023 NCTPC Collaborative Transmission Plan Report 02222024 FINAL.pdf.

CONFIDENTIAL

Respectfully submitted, this the 6th day of May, 2024.

FOX ROTHSCHILD LLP

Benjamin L. Snowden

North Carolina State Bar No. 51745

Beyanni L. Surude

434 Fayetteville Street

Suite 2800

Raleigh, NC 27601

Telephone: 919-719-1257

E-mail: BSnowden@foxrothschild.com