

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH, NORTH CAROLINA
DOCKET NO. EMP 117 Sub 0

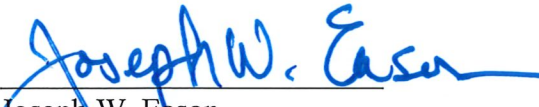
In the Matter of
Application of Shawboro East Ridge
Solar, LLC for a Certificate of Public
Convenience and Necessity to Construct
a 150-MW Solar Facility in Currituck
County, North Carolina

MOTION FOR LEAVE TO SUBMIT
SUPPLEMENTAL TESTIMONY
ON BEHALF OF APPLICANT

NOW COMES Shawboro East Ridge Solar, LLC, ("Shawboro" or the "Applicant"), by and through its undersigned counsel, and pursuant to the Order of the Commission entered in this docket on November 1, 2022, respectfully moves this Commission for leave to file additional supplemental testimony following the previous filing with the Commission of the 2022 System Impact Study prepared by Duke Energy Progress ("DEP") based on retooled 2022 PJM studies. The new DEP study, which was not released until December, 2022, represents the most recent study by DEP of its network upgrade costs associated with PJM interconnection queue group AE-1, which includes the proposed resource that is the subject of the application in this docket. Good cause exists to grant the Applicant leave to supplement the previously filed testimony.

WHEREFORE, the Applicant respectfully prays that the Commission grant the Applicant leave to file the additional supplemental testimony of Mr. Rob Price that is attached to this motion, and deem such additional testimony to have been filed and served on the date of said order allowing supplementation.

Respectfully submitted this 14th day of February, 2023.



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Attorneys for the Applicant

CERTIFICATE OF SERVICE

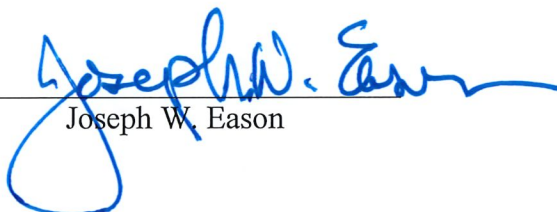
The undersigned certifies that the foregoing Motion for Leave to Submit Supplemental Testimony On Behalf Of Applicant, together with that testimony and two (2) exhibits attached thereto, was filed and served this day upon the following by electronic mail:

Christopher Ayers, Esq.
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This the 14th day of February, 2022.



Joseph W. Eason

BEFORE THE
NORTH CAROLINA UTILITIES COMMISSION
RALEIGH, NORTH CAROLINA

SHAWBORO EAST RIDGE SOLAR, LLC
DOCKET NO. EMP-117 Sub 0

SUPPLEMENTAL TESTIMONY
OF
ROB PRICE

FEBRUARY 8, 2023

INTRODUCTION

1

2 Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE RECORD.

3 A MY NAME IS ROB PRICE. MY BUSINESS ADDRESS IS 595 SUMMER STREET, STAMFORD,
4 CONNECTICUT 06901.

5

6 Q STATE YOUR CURRENT POSITION AND BRIEFLY SUMMARIZE YOUR PRIOR EMPLOYMENT
7 AND EDUCATIONAL BACKGROUND.

8 A CURRENTLY I AM EMPLOYED BY SUNENERGY1, LLC ("SUNENERGY1" OR "THE COMPANY")
9 AS VICE-PRESIDENT OF TRANSMISSION AND INTERCONNECTION. SUNENERGY1 IS THE
10 CONTROLLING MEMBER OF THE APPLICANT IN THIS DOCKET, SHAWBORO EAST RIDGE
11 SOLAR, LLC ("SHAWBORO SOLAR" OR "THE APPLICANT"). I HAVE HELD MY CURRENT
12 POSITION SINCE APPROXIMATELY APRIL, 2019. MY BACKGROUND IS SUMMARIZED IN
13 EXHIBIT A TO THIS TESTIMONY.

14

15 Q HAVE YOU PROVIDED TESTIMONY IN THIS DOCKET BEFORE?

16 A NO. ALL PRIOR TESTIMONY SUBMITTED IN THIS DOCKET ON BEHALF OF SUNENERGY1
17 AND/OR THE APPLICANT IN SUPPORT OF THE APPLICATION FOR A CERTIFICATE OF
18 PUBLIC CONVENIENCE AND NECESSITY ("CPCN") TO CONSTRUCT THE PROPOSED
19 SHAWBORO FACILITY HAS BEEN PROVIDED BY MS. LINDA NWADIKE, FORMERLY THE
20 DIRECTOR FOR PERMITTING AND COMMUNITY RELATIONS AT SUNENERGY1. ON BEHALF
21 OF THE APPLICANT AND THE COMPANY, I ADOPT AND REAFFIRM THE APPLICATION AND
22 THE TESTIMONY PREVIOUSLY SUBMITTED IN SUPPORT OF THE APPLICATION.

23

1 Q WHAT IS THE PURPOSE OF THE SUPPLEMENTAL TESTIMONY YOU ARE SUBMITTING
2 TODAY?

3 A THE PRIMARY PURPOSE OF THIS SUPPLEMENTAL TESTIMONY IS TO MAKE CLEAR TO THE
4 COMMISSION THAT THE APPLICATION IN THIS PROCEEDING IS NOW RIPE FOR
5 DISPOSITION AND SHOULD BE GRANTED PROMPTLY SUBJECT TO THE AGREED
6 CONDITIONS.

7 EVENTS OCCURRING DURING 2022 HAVE ADDRESSED THE CONCERNS IDENTIFIED IN THE
8 TESTIMONY FILED BY THE PUBLIC STAFF WITNESS DURING 2021 AND 2022.

9 FIRST, DURING 2021 AND 2022 THE PUBLIC STAFF RECOMMENDED THAT THE
10 COMMISSION HOLD THIS DOCKET OPEN PENDING THE COMPLETION AND FILING OF
11 RETOOLED STUDIES FROM PJM AND DUKE ENERGY PROGRESS (“DEP”). THE PUBLIC
12 STAFF BELIEVED THE APPLICATION SHOULD BE CONSIDERED BASED ON MORE RECENTLY
13 UPDATED INFORMATION PERTAINING TO PJM’S NETWORK UPGRADE COSTS AND DEP’S
14 AFFECTED SYSTEM COSTS FOR INTERCONNECTING THE PROPOSED SHAWBORO FACILITY
15 (AND OTHER GENERATORS) TO THE TRANSMISSION SYSTEM OPERATED BY PJM.

16 THE RECORD NOW CONTAINS THE RECENTLY COMPLETED 2022 STUDIES FROM PJM AND
17 DEP DISCUSSED IN THE TESTIMONY IN THIS DOCKET FILED IN FEBRUARY, 2022.

18 SECOND, AFTER THE 2022 TESTIMONY WAS FILED IN THIS DOCKET, ANOTHER SOLAR
19 DEVELOPER AGREED WITH DEP TO AN ACCEPTABLE AFFECTED SYSTEM OPERATING
20 AGREEMENT (“AOSA”) FOR THE CURRENT ESTIMATE OF THE RELEVANT UPGRADES TO
21 THE RELEVANT LINE ON THE DEP TRANSMISSION SYSTEM (\$150,000).

22 THE APPLICANT PREVIOUSLY AGREED TO CONDITIONS ON THE CPCN AS INITIALLY
23 REQUIRED BY THE PUBLIC STAFF. THE PREVIOUSLY IDENTIFIED CONCERNS OF THE

1 PUBLIC STAFF ABOUT STUDIES AND AFFECTED SYSTEM UPGRADE COSTS HAVE BEEN
2 ADDRESSED BY THE NEW 2022-VINTAGE STUDIES, AND THE FACT THAT A DEVELOPER
3 HAS AGREED TO PAY DEP FOR ITS UPGRADES PURSUANT TO AN ACCEPTABLE AOSA ON
4 FILE WITH THE FEDERAL ENERGY REGULATORY COMMISSION ("FERC") AND THIS
5 COMMISSION.

6 BECAUSE THE NEW AOSA AND UPDATED STUDIES OF RECORD ADDRESS THE CONCERNS
7 PREVIOUSLY RAISED BY THE PUBLIC STAFF, THE COMPANY AND APPLICANT
8 RESPECTFULLY URGE THIS COMMISSION TO CONCLUDE THAT ALL THE INFORMATION
9 NEEDED BY THE COMMISSION IS OF RECORD, AND TO CONSIDER AND GRANT THE
10 APPLICATION FOR A CPCN, SUBJECT TO CONDITIONS.

11
12 BACKGROUND SUMMARY

13 Q WERE YOU FAMILIAR WITH THE APPLICATION AND SUPPORTING TESTIMONY BEFORE
14 LAST YEAR?

15 A YES. THE APPLICATION OF SHAWBORO SOLAR WAS FILED ON JUNE 21, 2021. BEFORE
16 AND AFTER THAT DATE I HAVE BEEN RESPONSIBLE ON BEHALF OF THE COMPANY AND
17 ITS AFFILIATED PROJECT ENTITIES, INCLUDING SHAWBORO SOLAR, FOR APPLYING FOR
18 AND OBTAINING INTERCONNECTION AND TRANSMISSION SERVICES FROM
19 TRANSMISSION PROVIDERS IN THE REGION, INCLUDING PJM, DEP, AND DUKE ENERGY
20 CAROLINAS LLC ("DEC"). I ALSO HAVE BEEN RESPONSIBLE FOR OVERSEEING THE
21 COMPANY'S PARTICIPATION IN AND/OR RESPONSE TO PROCEEDINGS AND ORDERS OF
22 THE FEDERAL ENERGY REGULATORY COMMISSION ("FERC") THAT RELATE TO
23 TRANSMISSION AND/OR INTERCONNECTION ISSUES. AS A RESULT, I REVIEWED PARTS OF

1 THE APPLICATION BEFORE IT WAS FILED AND PROVIDED MS NWADIKE WITH
2 INFORMATION AND DOCUMENTS FOR USE IN THE APPLICATION AND IN HER PRE-FILED
3 DIRECT TESTIMONY RELATED TO INTERCONNECTION AND TRANSMISSION ISSUES. I ALSO
4 PROVIDED INFORMATION AND DOCUMENTS AFTERWARDS, WHEN HER REPLY
5 TESTIMONY WAS SUBMITTED IN NOVEMBER, 2021, AND ALSO WHEN HER
6 SUPPLEMENTAL TESTIMONY WAS FILED IN FEBRUARY, 2022. WHEN MS NWADIKE LEFT
7 THE COMPANY LAST YEAR FOR A NEW POSITION, I BECAME RESPONSIBLE FOR ALSO
8 OVERSEEING AND MANAGING THE PARTICIPATION OF SUNENERGY1 AND/OR ITS
9 AFFILIATED ENTITIES IN THIS AND OTHER CPCN APPLICATION PROCEEDINGS PENDING
10 BEFORE THIS COMMISSION.

11
12 Q BRIEFLY SUMMARIZE THE PLANS FOR INTERCONNECTION OF THE PROPOSED
13 SHAWBORO FACILITY AND THE STATUS OF THE APPLICANT'S INTERCONNECTION
14 REQUESTS AT THE TIME OF THE FILING OF THE APPLICATION AND MS NWADIKE'S PRE-
15 FLIED DIRECT TESTIMONY.

16 A IN JUNE 2021 THE PRIMARY POINT OF INTERCONNECTION PROPOSED FOR THE
17 SHAWBORO FACILITY WAS AN INTERCONNECTION ON THE PJM/DOMINION ENERGY
18 TRANSMISSION SYSTEM VIA A NEW THREE BREAKER RING BUS SWITCHING STATION
19 CONNECTED TO THE SHAWBORO TO SLIGO 230 KV LINE #269, AT A POINT WITHIN THE
20 NORTH CAROLINA RETAIL SERVICE TERRITORY OF DOMINION ENERGY NORTH CAROLINA
21 ("DENC").

22 BEFORE THAT DATE AN APPLICATION FOR INTERCONNECTON OF THE PROPOSED
23 SHAWBORO FACILITY PREVIOUSLY HAD BEEN SUBMITTED AND THE FACILITY HAD BEEN

1 ASSIGNED PJM QUEUE POSITION AE1-072. PJM COMPLETED A FEASIBILITY STUDY
2 REPORT FOR THE PROPOSED SHAWBORO FACILITY IN JANUARY, 2019, AND ALSO
3 COMPLETED A SYSTEM IMPACT STUDY REPORT IN AUGUST, 2019. I PROVIDED COPIES OF
4 BOTH REPORTS TO MS NWADIKE FOR ATTACHMENT AS EXHIBITS TO HER 2021 PREFILED
5 DIRECT TESTIMONY IN SUPPORT OF THE APPLICATION.

6 THE 2019 PJM SYSTEM IMPACT STUDY IDENTIFIED AN OVERLOAD ON DOMINION/DENCS'
7 EVERETTS TO GREENVILLE 115 KV LINE #218 THAT PJM ESTIMATED WOULD CAUSE
8 UPGRADES ON ITS NETWORK AND ALSO AFFECTED SYSTEM COSTS ON THE DEP SIDE OF
9 THAT LINE. IN 2019 PJM ESTIMATED RECONDUCTERING, UPGRADES AND ADDITIONS FOR
10 ITS NETWORK (\$30,750,000), AND ALSO FORECAST DEP'S COSTS FOR AFFECTED SYSTEM
11 UPGRADES (THEN APPROXIMATELY \$8,500,000 MILLION).

12 PJM'S 2019 STUDY FORECAST THAT ZERO AFFECTED SYSTEM COSTS WOULD BE
13 ATTRIBUTED TO THE SHAWBORO FACILITY BY DEP, HOWEVER, DUE TO THE EXPECTATION
14 THAT THE DEP UPGRADES WOULD BE MADE EARLIER AT THE REQUEST OF OTHER
15 DEVELOPERS. PJM ANTICIPATED DURING 2019 THAT DEP WOULD UNDERTAKE AND
16 COMPLETE THE REQUIRED UPGRADES BASED ON SOME EARLIER INTERCONNECTION
17 REQUESTS BY SOME OTHER NEARBY SOLAR PROJECTS IN THE PJM/DENC SERVICE AREA.
18 THESE INCLUDED SOLAR PROJECTS IN PJM'S GROUP AD1, SUCH AS THE PROJECT OF
19 SUMAC SOLAR, LLC (PJM QUEUES AD1-022/023)("SUMAC") AND THE PROJECT OF
20 SWEETLEAF SOLAR LLC (PJM QUEUES AD1-056/057)("SWEETLEAF").

21 THE COMMISSION GRANTED A CPCN TO SUMAC FOR ITS PROJECT ON JANUARY 31, 2023,
22 IN DOCKET EMP-110, SUB 0. SUMAC IS THE SOLAR DEVELOPER THAT SIGNED THE AOSA

1 WITH DEP TO PAY DEP \$150,000 TO COMPLETE THE REQUIRED UPGRADES TO THE
2 RELEVANT LINE OF DEP THAT THE FERC HAS ACCEPTED.

3 Q TURNING TO DEP, DURING 2021 DID DEP ASSIGN COST RESPONSIBILITY TO THE
4 PROPOSED SHAWBORO FACILITY FOR DEP'S ESTIMATE OF ITS COSTS FOR UPGRADING
5 THE RELEVANT LINE?

6 A. NO. THIS WAS CONFIRMED ON PAGE 6 OF THE DIRECT TESTIMONY OF PUBLIC STAFF
7 WITNESS LUCAS FILED OCTOBER 19, 2021. DEP CONFIRMED THAT NO RESPONSIBILITY
8 FOR ITS THEN-ESTIMATE OF \$10 MILLION OF AFFECTED SYSTEM COSTS FOR UPGRADING
9 THE RELEVANT DEP LINE HAD BEEN ATTRIBUTED TO THE SHAWBORO PROJECT. DEP ALSO
10 REPORTEDLY ADVISED THE PUBLIC STAFF THAT PJM WAS CONDUCTING "RETOOLED"
11 SYSTEM IMPACT STUDIES FOR EACH OF THE PROJECTS IN PJM'S AE1 GROUP, AND THAT
12 ONCE THOSE HAD BEEN RECEIVED, DEP INTENDED TO RESTUDY THE SYSTEM IMPACT OF
13 ALL THE ACTIVE PROJECTS IN PJM'S AE1 GROUP BASED ON THE RETOOLED PJM STUDIES.
14 MOREOVER, AS NOTED ON PAGES 1 AND 2 OF THE REPLY TESTIMONY OF MS NWADIKE
15 FILED ON NOVEMBER 4, 2021, THERE WERE TWO (2) ADDITIONAL PROJECTS IN EARLIER
16 PJM QUEUE POSITIONS THAN THE SHAWBORO FACILITY TO WHICH COST RESPONSIBILITY
17 COULD BE ATTRIBUTED. SO EVEN IF SUMAC AND SWEETLEAF ELECTED TO ABANDON
18 THEIR PROJECTS AND DROP OUT OF THE PJM AD1 QUEUE, COST RESPONSIBILITY FOR
19 THE UPGRADES TO DEP'S EVERRETTS TO GREENVILLE LINE WOULD NOT BE ATTRIBUTED
20 TO THE SHAWBORO FACILITY. ONE OF THESE OTHER TWO PROJECTS WAS THE
21 PREVIOUSLY MENTIONED SUMAC PROJECT, AND THE OTHER WAS A PROJECT BEING
22 DEVELOPED BY MACADAMIA SOLAR, LLC, THE APPLICANT IN THIS COMMISSION'S
23 DOCKET EMP-119, SUB 0 (PJM QUEUES AD1-074/075/076)("MACADAMIA"). THE

1 COMMISSION GRANTED A CPCN FOR THIS PROJECT TO MACADAMIA ON JANUARY 5,
2 2023.

3
4 Q DID PJM COMPLETE A RETOOLED STUDY OF THE PROPOSED SHAWBORO FACILITY AFTER
5 OCTOBER, 2021?

6 A YES. THAT "RETOOLED" PJM SYSTEM IMPACT STUDY FOR THE PROPOSED SHAWBORO
7 FACILITY WAS ATTACHED AS AN EXHIBIT TO THE SUPPLEMENTAL TESTIMONY OF MS.
8 NWADIKE FILED FEBRUARY 3, 2022. THAT STUDY WAS ENTITLED "AE1-072 SHAWBORO-
9 SYSTEM IMPACT STUDY, REVISION 1, DATED JANUARY 2022" (THE "RETOOLED PJM 2022
10 STUDY"). THAT FACILITY-SPECIFIC PJM STUDY FOR THE PROPOSED SHAWBORO FACILITY
11 STATES AT PARAGRAPH 3 ON PAGE 4 THAT THE "...REVISION IS BEING ISSUED TO
12 INCORPORATE RESULTS OF A RE-TOOL THAT WAS PERFORMED."

13
14 Q. PLEASE BRIEFLY SUMMARIZE YOUR UNDERSTANDING OF THE IMPORT TO THE
15 APPLICANT OF THE RETOOLED PJM 2022 STUDY ATTACHED TO MS NWADIKE'S
16 SUPPLEMENTAL TESTIMONY FILED FEBRUARY 3, 2022.

17 A. THE RETOOLED PJM 2022 STUDY DRAMATICALLY REDUCED THE ESTIMATED COST OF
18 PJM'S NETWORK UPGRADES FROM \$30,812,444 TO \$2,328,614, WHICH IN TURN
19 REDUCED THE PROJECTED LEVELIZED COST OF TRANSMISSION FOR THE PROPOSED
20 SHAWBORO FACILITY FROM [REDACTED] TO [REDACTED], AS SHOWN ON EXHIBIT B TO THE
21 CONFIDENTIAL VERSION OF THE SUPPLEMENTAL TESTIMONY OF MS. NWADIKE FILED
22 FEBRUARY 3, 2022.

23

1

2 Q. WERE THE NETWORK COSTS FOR PJM AMONG THE CONCERNS OF THE PUBLIC STAFF
3 RAISED IN THE SUPPLEMENTAL TESTIMONY OF WITNESS LUCAS FILED FEBRUARY 25,
4 2022?

5 A. NO. THE PUBLIC STAFF WAS NOT CONCERNED ABOUT PJM'S NETWORK UPGRADE COSTS.
6 THE PUBLIC STAFF WAS CONCERNED ABOUT POTENTIAL AFFECTED SYSTEM COSTS ON
7 THE DEP SYSTEM. PUBLIC STAFF WITNESS LUCAS STATED THAT "...[T]HE PUBLIC STAFF IS
8 NOT CONCERNED ABOUT DENC'S PORTION OF THE EVERETTS-GREENVILLE LINE, THE
9 COSTS OF WHICH SHAWBORO WILL PAY. RATHER, THE PUBLIC STAFF IS CONCERNED
10 ABOUT THE AFFECTED SYSTEM UPGRADES ON DEP'S PORTION OF THIS LINE THAT COULD
11 ULTIMATELY BE PAID FOR BY DEP'S CUSTOMERS." SUPPLEMENTAL TESTIMONY OF JAY B.
12 LUCAS, FEBRUARY 25, 2022, P. 6.

13 THE PUBLIC STAFF APPEARED PRIMARILY CONCERNED THAT A NEW SYSTEM STUDY
14 BEING DEVELOPED BY DEP OF THE PJM AE1 STUDY GROUP COULD IDENTIFY AND ASSIGN
15 TO THE PROPOSED SHAWBORO FACILITY AFFECTED SYSTEM COSTS FOR UPGRADES TO
16 THE EVERETTS-GREENVILLE LINE ON DEP'S TRANSMISSION SYSEM. ACCORDING TO
17 WITNESS LUCAS, AT THAT TIME PJM ESTIMATED THAT DEP'S UPGRADE COSTS WOULD BE
18 ABOUT \$8,500,000, AND DEP ESTIMATED THAT ITS AFFECTED SYSTEM COSTS WOULD BE
19 ABOUT \$10,000,000.

20 DUE TO THEN ON-GOING PROCEEDNGS AT THE FERC, HOWEVER, THE PUBLIC STAFF
21 BELIEVED AT THAT TIME THAT THERE WAS AN UNACCEPTABLE RISK THAT DEP'S
22 UPGRADE COSTS, EVEN IF PAID INITIALLY BY THE APPLICANT OR ANOTHER MERCHANT
23 PLANT PROJECT DEVELOPER, COULD BECOME SUBJECT TO REIMBURSEMENT, SUCH THAT

1 COST RESPONSIBILITY WOULD OR COULD SHIFT TO DEP'S NORTH CAROLINA RETAIL
2 RATEPAYERS. BASED ON SUCH CONCERNS, THE PUBLIC STAFF ASKED ON PAGES 7 & 8 OF
3 THAT TESTIMONY THAT THE COMMISSION HOLD OPEN THIS DOCKET UNTIL DUKE AND
4 PJM COMPLETED NEW SYSTEM STUDIES OF THE PROJECTS IN THE AE1 GROUP, AND
5 AFTER BOTH NEW STUDIES WERE FILED WITH THE COMMISSION.

6 2022-VINTAGE STUDIES FROM BOTH PJM AND DEP ARE NOW OF RECORD. SUNENERGY1
7 AND SHAWBORO SOLAR DO NOT BELIEVE THAT THE COMMISSION SHOULD FURTHER
8 DELAY DISPOSITION OF THE APPLICATION IN THIS DOCKET UNTIL SOME INDEFINITE DATE
9 IN THE FUTURE WHEN PJM POSSIBLY MAY ISSUE A 2ND REVISION OF THE INITIAL 2019
10 SYSTEM IMPACT STUDY RELATED TO THE SHAWBORO FACILITY.

11
12 DEVELOPMENTS SINCE FEBRUARY, 2022

13 Q HAS DEP COMPLETED ITS NEW SYSTEM STUDY OF THE IMPACT OF PROPOSED PROJECTS
14 IN PJM'S AE1 QUEUE GROUP?

15 A. YES. THE DEP TRANSMISSION DEPARTMENT ISSUED A REPORT ENTITLED "GENERATOR
16 INTERCONNECTION SYSTEM STUDY REPORT- PJM INTERCONNECTION CLUSTER AE1"
17 DATED DECEMBER 27, 2022. A COPY OF THAT REPORT WAS FILED WITH THIS
18 COMMISSION ON JANUARY 20, 2023, PURSUANT TO THE COMMISSION'S ORDER IN THIS
19 DOCKET DATED NOVEMBER 1, 2022 ("THE DECEMBER 2022 DEP SYSTEM IMPACT
20 STUDY"). THAT REPORT ASSIGNED ZERO COSTS TO THE SHAWBORO FACILITY FOR
21 AFFECTED SYSTEM OR CONTINGENT UPGRADES ON THE DEP SYSTEM. BASED ON THE
22 REDUCTION OF DEP'S COSTS IN DEP'S NEW 2022 STUDY, THE LCOT FOR THE PROPOSED

1 SHAWBORO FACILITY DECREASED FROM [REDACTED] TO [REDACTED], AS SHOWN IN THE ATTACHED
2 CONFIDENTIAL EXHIBIT B.

3 Q THE SECOND PAGE OF THAT COMMISSION ORDER FROM LAST NOVEMBER REFERS TO A
4 RECOMMENDATION OF THE PUBLIC STAFF ABOUT "PJM ... RETOOLING CLUSTERS AE1
5 AND AE2...", AND DIRECTS THE PARTIES HERE TO "FILE ALL FINAL REPORTS FROM "THE
6 RETOOLING OF THE PJM AE1 CLUSTER...". DOES SUNENERGY1 OR THE APPLICANT
7 UNDERSTAND THAT PJM INTENDS TO PREPARE A SINGLE SYSTEM STUDY REPORT THAT
8 INCLUDES ALL ACTIVE PROJECTS IN PJM'S AE1 QUEUE GROUP?

9 A. NO. MY UNDERSTANDING IS THAT PJM'S PRACTICE FOR ISSUING STUDIES OF PROPOSED
10 PROJECTS OF THIS VINTAGE IS LIMITED TO PROJECT-SPECIFIC REPORTS. THE PHRASING
11 USED MAKES IT SOUND LIKE PJM INTENDED TO CONDUCT DURING 2022 A SINGLE STUDY
12 THAT INCLUDED ALL OF THE PROPOSED PROJECTS THAT PJM HAD INCLUDED IN ITS AE1
13 STUDY GROUP. ALTHOUGH DEP INCLUDES A "CLUSTER" OR GROUP OF PROJECTS IN ITS
14 AFFECTED SYSTEM STUDIES FOR PJM'S AE1 STUDY GROUP, PJM DID NOT CONDUCT
15 STUDIES OF GROUPS OR CLUSTERS FOR THE PROJECTS IN THESE EARLIER QUEUE
16 GROUPS.

17 IT WAS AND IS THE UNDERSTANDING OF SUNENERGY1 AND SHAWBORO SOLAR THAT
18 PJM, INSTEAD, INTENDED DURING 2022 TO "RETOOL" SEPARATELY FOR EACH OF THE
19 AE1 PROJECTS A SINGLE PROJECT-SPECIFIC SYSTEM IMPACT STUDY. AFTER PJM
20 DELIVERED ALL OF THOSE COMPLETED PROJECT-SPECIFIC SYSTEM IMPACT STUDIES FOR
21 EACH OF THE PROJECTS IN THE PJM AE1 STUDY GROUP TO DEP, DEP INTENDED TO
22 PRODUCE A SINGLE 2022 STUDY THAT INCLUDED ALL OF THE ACTIVE PROJECTS IN PJM'S
23 AE1 STUDY GROUP.

1 THIS UNDERSTANDING OF PJM'S PRACTICES IS CONSISTENT WITH THE STATEMENT ON
2 PAGE 2 OF THE DECEMBER 2022 DEP SYSTEM IMPACT STUDY THAT "[T]HIS REPORT IS
3 BASED ON THE PJM AE1 RETOOLING WORK AND REPORTS 5 THROUGH MAY 2022."
4 (EMPHASIS ADDED).

5
6 Q WHAT DO YOU UNDERSTAND WAS THE PJM-ISSUED REPORT THAT DEP USED AS THE
7 "RETOOLED" PJM REPORT FOR THE SHAWBORO PROJECT IN ORDER TO COMPLETE THE
8 DECEMBER 2022 DEP SYSTEM IMPACT STUDY?

9 IT REMAINS THE UNDERSTANDING OF THE COMPANY AND THE APPLICANT THAT DEP
10 USED THE 2022 REVISION 1 OF PJM'S ORIGINAL SYSTEM IMPACT REPORT FOR THE
11 SHAWBORO FACILITY. THAT IS, TO COMPLETE THE 2022 SYSTEM STUDY THAT INCLUDED
12 THE SHAWBORO FACILITY, DEP USED THE RETOOLED PJM 2022 STUDY THAT PREVIOUSLY
13 WAS FILED OF RECORD WITH THIS COMMISSION ON FEBRUARY 3, 2022.

14
15 Q IS THE RETOOLED PJM 2002 STUDY LIKELY TO BE THE LAST RETOOLING BY PJM OF ITS
16 PROJECT-SPECIFIC REPORTS RELATED TO THE PROPOSED SHAWBORO FACILITY?

17 A. NO. BUT THE COMPANY AND SHAWBORO SOLAR RESPECTFULLY SUBMIT THAT THE
18 STUDIES ALREADY OF RECORD ARE SUFFICIENT FOR THE COMMISSION TO PROCEED
19 IMMEDIATELY TO DISPOSITOIN AND TO FIND AND CONCLUDE THAT THE REQUESTED
20 CPCN SHOULD BE ISSUED TO THE APPLICANT, SUBJECT TO THE PREVIOUSLY AGREED
21 UPON CONDITIONS.

22 AS WAS EXPLAINED IN MS NWADIKE'S 2021 REPLY TESTIMONY, THE STUDY PROCESS IS
23 ITERATIVE AND ON-GOING BY NATURE. HOWEVER, ONCE ENOUGH INFORMATION AND

1 FORECASTS BECOME AVAILABLE TO MAKE A DECISION, THE COMMISSION CAN PROCEED
2 TO DISPOSITION. THE COMMISSION RECENTLY HAS ISSUED CPCNS FOR PROJECTS OF
3 OTHER SOLAR DEVELOPERS WITH PROJECTS IN THE REGION WHO HAVE A PROJECT
4 INCLUDED WITHIN THE PJM STUDY GROUP AD1. AT SOME FUTURE TIME PJM WILL LIKELY
5 ISSUE RETOOLED PROJECT-SPECIFIC REPORTS FOR ANY UNCOMPLETED PROJECTS IN
6 PJM'S QUEUE AD1, BUT THAT LIKELIHOOD DID NOT PRECLUDE DISPOSTION OF THE CPCN
7 APPLICATIONS FOR SUMAC OR MACADAMIA.

8 THE COMPANY AND THE APPLICANT BELIEVE THAT THE COMMISSION LIKEWISE SHOULD
9 PROCEED TO DISPOSITION IN THIS DOCKET AND ISSUE THE REQUESTED CPCN. UNDER
10 THE COMMISSION'S RULES, FOLLOWING ISSUANCE OF A CPCN THE APPLICANT WILL
11 HAVE TO PROVIDE CONSTRUCTION REPORTS, AND ALSO MUST PROVIDE UPDATES FOR
12 CHANGES IN MATERIAL INFORMATION IN ITS APPLICATION. SUNENERGY1 AND THE
13 APPLICANT RESPECTFULLY SUBMIT THAT THE APPLICATION OF SHAWBORO SOLAR
14 SHOULD BE GRANTED, AND A CPCN, WITH CONDITIONS, SHOULD BE ISSUED.

15
16 **Q. ARE THERE ANY OTHER FACTORS THAT SUNERGY1 OR THE APPLICANT WOULD ASK THAT**
17 **THE COMMISSION CONSIDER?**

18 **A.** YES. THE APPLICANT HAS EXPENDED SUBSTANTIAL TIME AND RESOURCES AND
19 INCURRED OBLIGATIONS TO DEVELOP THE PROPOSED SHAWBORO FACILITY TO ITS
20 PRESENT STATUS. THE APPLICATION HAS BEEN PENDING SINCE 2021. OTHER
21 DEVELOPERS WITH NEARBY PROJECTS ARE BEING GRANTED CPCNS TO COMMENCE
22 CONSTRUCTION. IT WOULD ADVERSELY AFFECT AND PREJUDICE THE APPLICANT, THE
23 PROJECT AND THE LOCAL COMMUNITY, TO FURTHER DELAY THE COMMENCEMENT OF

1 CONSTRUCTION OF THE SHAWBORO FACILITY DURING 2023 IN ORDER TO RECEIVE
2 ANOTEHR STUDY FROM PJM.

3 Q. DOES THIS CONCLUDE YOUR SUPPLEMENTAL TESTIMONY?

4 A. YES.

5

6 [END OF SUPPLEMENTAL TESTIMONY]

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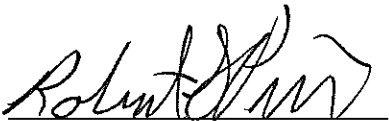
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STATE OF CONNECTICUT
COUNTY OF FAIRFIELD

VERIFICATION

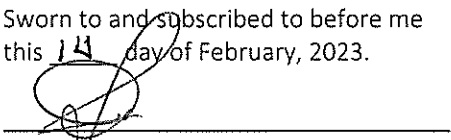
I, ROB PRICE, being first duly sworn, depose and say that I am duly authorized to act on behalf of the Applicant, Shawboro East Ridge Solar, LLC, as Vice President Of Transmission And Interconnection for SunEnergy1, LLC, the controlling member and affiliate of that Applicant; that I have read the foregoing Supplemental 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 14 day of February, 2023.



Rob Price
SunEnergy1, LLC

Sworn to and subscribed to before me
this 14 day of February, 2023.



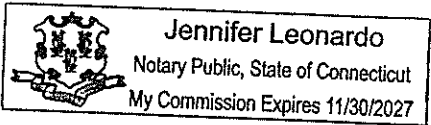
Notary Public (Signature)

(Seal)



Notary Public (Printed)

My Commission Expires: 11/30/2027





QUALIFICATIONS AND EXPERIENCE

Rob Price

I graduated from Queen's University in 1988, earning a Bachelor of Applied Science in Electrical Engineering. Afterwards, I spent 10 years working as an engineer and project manager for electrical equipment manufacturers. I then completed my Master's in Business Administration at Villanova University in 1999. After completing my graduate degree, I worked as an engineer and project manager in the transmission and distribution division of Exelon for 5 years. In 2005, I moved to PJM and held different positions in the Planning Division related to generation interconnection and new transmission infrastructure projects for the next 14 years. I joined SunEnergy1 in 2019 as VP of Transmission and Interconnection where I lead the interconnection team which guides projects from inception through interconnection studies and construction coordination with Utilities and RTO's. My responsibilities include the coordination of land acquisition, engineering, and environmental and regulatory activities for all projects.

LCOT - Shawboro			All of AE1	Facility Only	
		Year	MWh output	MWh output	
Discount Rate 4.40%	4.40%	1	-	365,423	
Transmission Asset Life 60 years	60	2	-	363,596	
Annual Degradation 0.50%*	0.50%	3	-	361,778	
		4	-	359,969	
Original LCOT Calculation for AE1 Cluster*		5	-	358,170	
Nameplate MWAC)	150	6	-	356,379	
First Year Capacity Factor		7	-	354,597	
Degradation (%/yr)		8	-	352,824	
Facility Life (yrs)		9	-	351,060	
Transmission Asset Life (yrs)		10	-	349,304	
Year 1 generation (MWh)	-	11	-	347,558	
Total generation (MWh)	-	12	-	345,820	
Network Upgrades		13	-	344,091	
\$/MWh	#DIV/0!	14	-	342,371	
\$/kW	0.00	15	-	340,659	
		16	-	338,955	
LCOT (\$/MWh)	#DIV/0!	17	-	337,261	
		18	-	335,574	
LCOT Calculation for Facility only		19	-	333,896	
Nameplate MWAC)	150	20	-	332,227	
First Year Capacity Factor	27.81%	21	-	330,566	
Degradation (%/yr)	0.50%	22	-	328,913	
Facility Life (yrs)	40	23	-	327,268	
Transmission Asset Life (yrs)	60	24	-	325,632	
Annual generation (MWh)	730,810	25	-	324,004	
Total generation (MWh)	13,278,016	26	-	322,384	
PJM Network Upgrades	38,112,444	27	-	320,772	
DEP Affected System Network Upgrades	8,500,000	28	-	319,168	
Total Network Upgrades	46,612,444	29	-	317,572	
\$/MWh	3.51	30	-	315,984	
\$/kW	310.75	31	-	314,405	
		32	-	312,832	
LCOT (\$/MWh)		33	-	311,268	
		34	-	309,712	
		35	-	308,163	
		36	-	306,623	
		37	-	305,089	
		38	-	303,564	
		39	-	302,046	
		40	-	300,536	
			-	13,278,016	

*If expected annual degradation is not 0.5%, enter the degradation averaged over the life of the facility, even if degradation is not expected to be linear

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