

PRE-FILED DIRECT TESTIMONY OF
DONNA ROBICHAUD
ON BEHALF OF MACADAMIA SOLAR LLC
NCUC DOCKET NO. EMP-119, SUB 1

INTRODUCTION

1
2 **Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS**
3 **ADDRESS.**

4 A. My name is Donna Robichaud. I am senior vice president of development
5 strategy for Geenex Solar LLC (“Geenex Solar”) based in Charlotte, North Carolina. The
6 company’s address is 1930 Abbott Street, Suite 402, Charlotte, NC 28203.

7 **Q. PLEASE DESCRIBE YOUR EDUCATION AND PROFESSIONAL**
8 **EXPERIENCE.**

9 A. I have a B.S. in Math, Physics, and Mechanical Engineering and a Masters’
10 degree in Business Administration. From May 1990 to September 2012, I worked for Duke
11 Energy and its predecessors in various capacities. Between 1990 and 1997, I was the lead
12 mechanical project engineer for various capital projects in power plants, including a new
13 combustion turbine plant. From 1997 to 2010, I developed, managed, and provided
14 strategic direction for district energy, cogeneration, renewable energy, and carbon offset
15 projects in the non-regulated division of the company, currently identified as Duke Energy
16 Sustainable Solutions. In my last two and a half years at Duke Energy, I led Duke Energy
17 Carolinas LLC’s development and ownership of renewable energy projects, administration
18 of other third-party renewable power purchase agreements, and management of the
19 interconnection queue.

1 After leaving Duke, I established my own consulting firm, QF Solutions LLC, later
2 renamed QF Holding Corp. (“QF Holding”). QF Holding has been under contract to
3 provide consulting services to Geenex Solar since 2013.

4 **Q. PLEASE DESCRIBE YOUR RELATIONSHIP WITH THE**
5 **APPLICANT IN THIS DOCKET AND YOUR EMPLOYMENT**
6 **RESPONSIBILITIES.**

7 A. Geenex Solar is the owner and developer of Macadamia Solar LLC
8 (“Macadamia Solar” or “Applicant”) for the Macadamia Solar Facility (hereinafter, the
9 “Facility” or “Macadamia Solar Facility”). Since 2013, I have been advising Geenex Solar
10 in a consulting role on their growth strategy, including where to build solar plants, size of
11 solar plants and what markets/states to enter. This work began with Geenex Solar’s first
12 distribution-interconnected Qualifying Facilities (“QFs”) projects in the Dominion service
13 territory, and later included larger merchant transmission interconnected projects
14 throughout PJM and in other investor-owned utility service territories. My primary duties
15 for Geenex Solar include administering the PJM interconnection process for Geenex Solar
16 projects, conducting contingency analysis and leading the efforts of obtaining state permits
17 for certain projects. Other duties include providing public policy support, PJM policy
18 advocacy, energy market analysis, and related regulatory work.

19 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS**
20 **COMMISSION?**

21 A. I have previously offered testimony by affidavit before the North Carolina
22 Utilities Commission on behalf of Fresh Air Energy – X, LLC and Fresh Air Energy – II,
23 LLC in NCUC Docket No. E-22, Sub 150. I provided prefiled Supplemental Testimony

1 on behalf Sumac Solar LLC and Sweetleaf Solar LLC (two other projects under
2 development by Geenex Solar) in support of their applications for merchant plant CPCNs
3 in docket no. EMP-110 Sub 0 and EMP-111 Sub 0, respectively. I also provided direct
4 testimony in support of the Application for a Certificated of Public Convenience and
5 Necessity to construct the Facility (“CPCN Application”), filed by Macadamia in docket
6 EMP-119, Sub 0.

7 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

8 A. The purpose of my testimony is to support the Application for a Certificate
9 of Environmental Compatibility and Public Convenience and Necessity (“CECPCN”) to
10 construct an approximately 6.53 mile 230 kV transmission line (“Transmission Line”)
11 necessary to interconnect the Facility to the existing Trowbridge Substation owned by
12 Virginia Electric and Power Company d/b/a/ Dominion Energy North Carolina (“DENC”).

13 **Q. WERE YOU INVOLVED IN THE PREPARATION OF**
14 **MACADAMIA SOLAR’S CECPCN APPLICATION?**

15 A. Yes. I collaborated in preparing the Application on behalf of Macadamia
16 Solar, both by providing information from my personal knowledge and also by gathering
17 information from other members of the Geenex Solar team. I am familiar with the contents
18 of the application, which are hereby incorporated by reference.

19 **Q. WHY IS MACADAMIA SOLAR REQUESTING THE**
20 **COMMISSION GRANT THIS CERTIFICATE?**

21 A. The Transmission Line is needed in order to interconnect the Facility, which
22 is subject of the CPCN Application, to the existing DENC electrical grid.

1 **Q. WILL MACADAMIA SOLAR FILE AND PROVIDE ALL**
2 **INFORMATION, PUBLISH PUBLIC NOTICE AS REQUIRED BY THIS**
3 **COMMISSION AND GEN. STAT. CH. 62 ART. 5A, AND OBTAIN ALL FEDERAL**
4 **AND STATE LICENSES, PERMITS, AND EXEMPTION REQUIRED UNDER**
5 **APPLICABLE LAW FOR CONSTRUCTION AND OPERATION OF THIS**
6 **TRANSMISSION LINE?**

7 A. Yes.

8 **Q. PLEASE DESCRIBE THE PROCESS UTILIZED TO SITE THE**
9 **TRANSMISSION LINE.**

10 A. In 2018, Geenex Solar began approaching landowners to a secure a
11 transmission path from the Facility to the Trowbridge Substation which was parallel to a
12 new DENC 115 kV transmission line between the Trowbridge Substation and Pantego
13 Substation. This was the most direct route between the Facility and the Trowbridge
14 Substation. A few of the landowners that hosted DENC's transmission line were not
15 interested in second easement agreement for another transmission line. As a result, an
16 evaluation of alternate paths was initiated. Geenex Solar approached multiple landowners
17 to the east of DENC's new transmission line to find willing landowners. At the same time,
18 Macadamia Solar was conducting diligence to understand land use and environmental
19 constraints along potential routes. As an independent power producer, Macadamia does
20 not have eminent domain authority. The final route for the Transmission Line will be sited
21 with easement agreements and purchase options or easement agreements and purchase
22 options that are in the process of being obtained through good faith negotiations with

1 willing landowners and rights to acquire the real estate interests. Site control for the
2 Transmission line is approximately 90% completed.

3 **Q. DESCRIBE THE PERMITS AND APPROVALS ANTICIPATED TO**
4 **BE NECESSARY TO COMMENCE CONSTRUCTION OF THE TRANSMISSION**
5 **LINE.**

6 A. The anticipated local, state and federal permits required for construction of
7 the Transmission Line are set forth in Table 1 of the CECPCN Application.

8 **Q. WHICH PERMITS HAVE BEEN OBTAINED TO DATE FOR THE**
9 **TRANSMISSION LINE?**

10 A. None of the required approvals for the Transmission Line have been
11 obtained at this time. When required approvals are obtained, they will be filed with the
12 Commission as required by Rule R8-62.

13 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

14 A. Yes.