

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH, NORTH CAROLINA
DOCKET NO. EMP 102 Sub 1

In the Matter of Application of Pitt Solar,)
LLC, for a Certificate of Public Convenience) APPLICANT’S MOTION FOR
and Necessity to Construct a 80-MW Solar) LEAVE TO AMEND
Facility in Pitt County,) REPLY TESTIMONY
North Carolina)

NOW COMES Pitt Solar, LLC, (the “Applicant”), by and through its undersigned counsel, and respectfully moves this Commission for leave to amend the response to one question in the reply testimony of Ms. Linda Nwadike filed in this proceeding on October 25, 2021. The proposed amendment would remove factually erroneous references to a CPCN having been issued by this Commission to American Beech Solar, LLC. As shown by the pages 3 and 4 of a “red-lined” comparison of the original and new pages attached hereto as Exhibit 1 and incorporated here by reference, the change to the Reply Testimony corrects that error for the record. The Applicant by this motion asks that the Commission accept and deem as timely filed in this docket as of October 25, 2021, the corrected version of the Reply Testimony appended here as Exhibit 2. In support of this motion for leave, the Applicant shows unto the Commission the following:

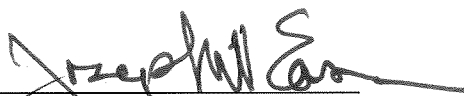
1. On October 25, 2021, the Applicant caused to be filed in this docket the reply testimony of Ms. Linda Nwadike, which testimony responded to the Second Supplemental Testimony of Dustin R. Metz, filed on behalf of the Public Staff on October 19, 2021.
2. At pages 3 and 4 of the aforesaid testimony filed on October 25, a response to a question twice erroneously states that a CPCN has been issued by this Commission to American Beech Solar, LLC. This factual error was not detected until shortly after the testimony had been submitted.
3. The Applicant respectfully prays for leave to resubmit the reply testimony with corrected pages 3 and 4 in lieu of the originals of those pages, and to have these corrected pages deemed as timely filed, all as shown as Exhibit 2 to this Motion. For the benefit of the Commission, also attached as Exhibit 1 are copies of pages 3 and 4 of a comparison of the original and the revised versions of the aforesaid testimony, which shows that the changes to the original pages are limited to the references to American Beech.
4. The Applicant has informed the Public Staff, through counsel, that it intends to seek leave to amend the pre-filed testimony submitted in this docket on October 25, 2021, and to ask that the corrected pages be deemed as timely filed; the Public Staff has authorized the

undersigned to confirm that the Public Staff has no objection to the Commission granting the Applicant leave to resubmit the reply testimony with the corrected pages, or deeming such pages as timely filed.

5. Good cause exists to grant the Applicant leave to amend the previously filed reply testimony to correct the erroneous references to American Beech. No prejudice will result from allowing the Applicant to amend the pre-filed testimony to correct the record, or by deeming such corrected pages to be timely filed as of October 25, 2021.

WHEREFORE, the Applicant respectfully prays that the Commission grant the Applicant leave to amend the reply testimony of Ms. Linda Nwadike submitted in this docket on October 25, 2021, by substituting the corrected reply testimony attached hereto as Exhibit 2, and deeming such pages to be timely filed as of October 25, 2021.

Respectfully submitted this 26th day of October, 2021.



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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Motion for Leave to Amend Reply Testimony pertaining to the reply testimony originally filed and served on October 25, 2021, was served this day upon the following by electronic mail:

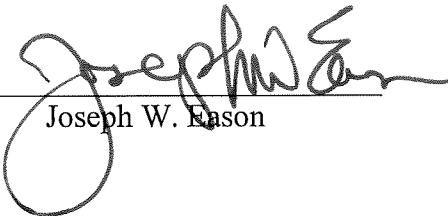
Christopher Ayers, Esq.
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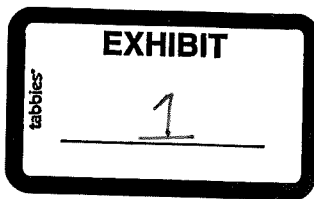
Energy Division
NC Public Staff
EnergyDivision@psncuc.gov

Mark Allen
Dominion Energy
mark.allen@dominionenergy.com

This the 26th day of October, 2021.



Joseph W. Eason



1 A. Witness Metz responds to that question on page 5 of his Second Supplemental Testimony,
2 testifying that “[b]ifurcation does not change my other analyses.”

3
4 **Q. IN LIGHT OF THE RESPONSES OF WITNESS METZ TO THE THREE TOPICS IDENTIFIED IN THE**
5 **SEPTEMBER ORDER, WHY IS THE APPLICANT SUBMITTING REPLY TESTIMONY?**

6 A. The Commission in the September Order said that it was not persuaded that it
7 should hold this proceeding “in abeyance indefinitely” as the Public Staff was
8 recommending at that time.

9 The Commission also expressly found in the September Order that “...there is
10 sufficient information in the record for the Commission to consider and render a decision
11 as to the 80 MW Phase 1 portion of the Facility.” September Order, p. 7.

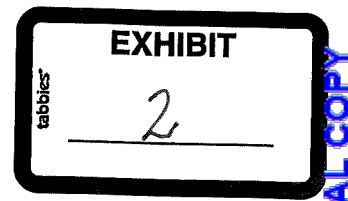
12 But the Public Staff now opposes issuance of a CPCN to the Applicant, for the
13 reasons advanced in Witness Metz’s Second Supplemental Testimony, which appear to
14 arise primarily from the decision of the FERC to reject as unjust and unreasonable the
15 Affected System Operating Agreement (“ASOA”) signed by Duke Energy Progress (“DEP”)
16 with the developer of another solar merchant plant, American ~~Beach~~ Beech Solar, LLC. ~~This~~
17 ~~Commission already issued a CPCN to the developer of that~~ That proposed project, which
18 also was to be located in DENC’s retail service territory, and was also studied in the AC1
19 cluster, ~~and was also shown to~~ will require the same network updates to the Battleboro-
20 Rocky Mount line segment on the DEP system.

21 Following the decision of the FERC on October 1, 2021, and apparently based on
22 the Public Staff’s conclusion that “[t]he FERC’s ruling indicates a strong likelihood that
23 affected system costs paid by generators will have to be reimbursed by DEP, and therefore

1 by its captive ratepayers, going forward...”, the Public Staff now recommends that the
2 Commission deny the application of Pitt Solar for a CPCN as to the 80 MW facility that has
3 been studied as part of PJM’s AC1 cluster.

4 Pitt Solar submits this reply testimony to refute the Public Staff recommendation
5 that the Commission deny the Applicant’s CPCN due to the October 1, 2021 FERC Ruling in
6 the American Beech Solar proceeding. The FERC ruling was a single decision based on a
7 single generation resource. In its ruling the FERC acknowledged that the decision of
8 whether to approve a non-conforming ASOA was subject to a fact-specific analysis.
9 Additionally, in that American Beech case, DEP did not meet its burden under Section 205
10 of the Federal Power Act, but that does not mean that DEP would not be able to make such
11 a showing in a future proceeding.

12 Additionally, denial of this CPCN would be inconsistent with the NCUC’s
13 conclusions and actions on the other PJM AC1 cluster applications, as CPCN’s have already
14 been granted ~~not only to American Beech but also for~~to Edgecombe Solar and Halifax
15 County Solar, all of which will need to have upgrades made to the same segment of line on
16 the DEP system. Pitt Solar did not trigger the requirement for the \$31 million in affected
17 system upgrades, as this upgrade is required if any of the PJM AC1 cluster projects studied
18 by DEP, as the affected system, moves forward. Moreover, PJM issued a revised System
19 Upgrade Study Report in October 2021 where PJM confirmed that the Battleboro – Rocky
20 Mount upgrade is still required to maintain system reliability. Finally, it would be
21 discriminatory and unfair to grant CPCNs for Edgecombe Solar and Halifax County Solar but
22 not Pitt Solar, particularly when Pitt Solar has agreed in previous testimonies that it is



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Oct 26 2021

BEFORE THE
NORTH CAROLINA UTILITIES COMMISSION
RALEIGH, NORTH CAROLINA

PITT SOLAR, LLC
DOCKET NO. EMP-102, SUB 1

REPLY TESTIMONY
OF
LINDA NWADIKE

OCTOBER 25, 2021

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INTRODUCTION

Q. THE RECORD IN THIS PROCEEDING CONFIRMS THAT YOU HAVE SUBMITTED MULTIPLE ROUNDS OF PRE-FILED TESTIMONY IN THIS DOCKET INVOLVING A PROPOSED MERCHANT ELECTRIC GENERATION PLANT TO BE SITED IN PITT COUNTY, WITHIN THE NORTH CAROLINA RETAIL ELECTRIC SERVICE TERRITORY OF VIRGINIA ELECTRIC POWER COMPANY, D/B/A DOMINION NORTH CAROLINA ENERGY ("DENC"). WHAT IS THE PURPOSE OF THE REPLY TESTIMONY YOU ARE SUBMITTING TODAY IN THIS DOCKET?

A. In response to the Commission's order in this docket entered on September 14, 2021 (the "September Order"), Pitt Solar, LLC (the "Applicant"), timely filed its amended application reducing the size of the proposed facility in this docket to 80 MW, corresponding to the portion of the originally proposed facility that has been grouped for study purposes into PJM Cluster AC1 (originally described as "Phase 1"). Pitt Solar also contemporaneously filed a new, separate application for the 70 MW portion of the originally proposed facility that has been grouped for study purposes into PJM cluster AF2, which was docketed with this Commission as EMP-102, Sub 2.

On October 19, 2021, the Public Staff, in response to the September Order and subsequent extension orders, and after reviewing the amended and new applications of Pitt Solar, filed the Second Supplemental Testimony of Dustin R. Metz.

The purpose of my Reply testimony is to respond on behalf of the Applicant to the Second Supplemental Testimony submitted by Public Staff witness Metz.

Q. FOCUSING ON THE LANGUAGE OF ORDERING PARAGRAPH 2 OF THE COMMISSION'S SEPTEMBER ORDER, DOES THE PUBLIC STAFF HAVE A VIEW ON WHETHER THE

1 COMMISSION SHOULD BIFURCATE THE APPLICATION IN THIS PROCEEDING TO ALLOW
2 THE COMMISSION TO CONSIDER THE TWO DIFFERENT PORTIONS OF THE PROPOSED
3 FACILITY SEPARATELY?

4 A. Yes. Public Staff Witness Metz testifies on pages 4 and 5 of his Second
5 Supplemental Testimony that the Public Staff agrees with the bifurcation of the two
6 phases of the project in this specific instance. As made clear in my testimony in support
7 of the Applicant's amended application filed in September, Pitt Solar also agrees to the
8 bifurcation of the two phases of the originally proposed facility into two separate
9 applications in two separate dockets for two separate Certificates of Public Convenience
10 and Necessity ("CPCN").

11

12 Q. FOCUSING ON THE SAME PARAGRAPH OF THE SEPTEMBER ORDER, DOES BIFURCATION
13 RAISE ANY ISSUES OR CONCERNS FOR THE PUBLIC STAFF?

14 A. No. Witness Metz, on page 5 of his Second Supplemental Testimony, confirms
15 that "[t]he Public Staff has no concerns about bifurcation itself...". Although Witness
16 Metz expresses some new concerns in his most recent testimony, those concerns do not
17 result from the bifurcation of the originally proposed facility into separate applications
18 and dockets.

19

20 Q. AND, FOCUSING SOLELY ON THE THIRD TOPIC IDENTIFIED IN THE SAME PARAGRAPH OF
21 THE SEPTEMBER ORDER, DOES BIFURCATION CHANGE THE PUBLIC STAFF'S ANALYSES AS
22 TO EITHER PORTION OF THE ORIGINALLY PROPOSED FACILITY?

1 A. Witness Metz responds to that question on page 5 of his Second Supplemental
2 Testimony, testifying that “[b]ifurcation does not change my other analyses.”

3
4 Q. IN LIGHT OF THE RESPONSES OF WITNESS METZ TO THE THREE TOPICS IDENTIFIED IN
5 THE SEPTEMBER ORDER, WHY IS THE APPLICANT SUBMITTING REPLY TESTIMONY?

6 A. The Commission in the September Order said that it was not persuaded that it
7 should hold this proceeding “in abeyance indefinitely” as the Public Staff was
8 recommending at that time.

9 The Commission also expressly found in the September Order that “...there is
10 sufficient information in the record for the Commission to consider and render a decision
11 as to the 80 MW Phase 1 portion of the Facility.” September Order, p. 7.

12 But the Public Staff now opposes issuance of a CPCN to the Applicant, for the
13 reasons advanced in Witness Metz’s Second Supplemental Testimony, which appear to
14 arise primarily from the decision of the FERC to reject as unjust and unreasonable the
15 Affected System Operating Agreement (“ASOA”) signed by Duke Energy Progress (“DEP”)
16 with the developer of another solar merchant plant, American Beech Solar, LLC. That
17 proposed project, which also was to be located in DENC’s retail service territory and was
18 also studied in the AC1 cluster, will require the same network updates to the Battleboro-
19 Rocky Mount line segment on the DEP system.

20 Following the decision of the FERC on October 1, 2021, and apparently based on
21 the Public Staff’s conclusion that “[t]he FERC’s ruling indicates a strong likelihood that
22 affected system costs paid by generators will have to be reimbursed by DEP, and
23 therefore by its captive ratepayers, going forward...”, the Public Staff now recommends

1 that the Commission deny the application of Pitt Solar for a CPCN as to the 80 MW facility
2 that has been studied as part of PJM's AC1 cluster.

3 Pitt Solar submits this reply testimony to refute the Public Staff recommendation
4 that the Commission deny the Applicant's CPCN due to the October 1, 2021 FERC Ruling
5 in the American Beech Solar proceeding. The FERC ruling was a single decision based on a
6 single generation resource. In its ruling the FERC acknowledged that the decision of
7 whether to approve a non-conforming ASOA was subject to a fact-specific analysis.
8 Additionally, in that American Beech case, DEP did not meet its burden under Section 205
9 of the Federal Power Act, but that does not mean that DEP would not be able to make
10 such a showing in a future proceeding.

11 Additionally, denial of this CPCN would be inconsistent with the NCUC's
12 conclusions and actions on the other PJM AC1 cluster applications, as CPCN's have
13 already been granted to Edgecombe Solar and Halifax County Solar, all of which will need
14 to have upgrades made to the same segment of line on the DEP system. Pitt Solar did
15 not trigger the requirement for the \$31 million in affected system upgrades, as this
16 upgrade is required if any of the PJM AC1 cluster projects studied by DEP, as the affected
17 system, moves forward. Moreover, PJM issued a revised System Upgrade Study Report in
18 October 2021 where PJM confirmed that the Battleboro – Rocky Mount upgrade is still
19 required to maintain system reliability. Finally, it would be discriminatory and unfair to
20 grant CPCNs for Edgecombe Solar and Halifax County Solar but not Pitt Solar, particularly
21 when Pitt Solar has agreed in previous testimonies that it is responsible for all affected
22 system Network Upgrade Costs assigned to the Applicant's facility, if any, without
23 reimbursement.

1 The Public Staff, through Witness Metz, also recommended alternatively, should
2 the Commission decide to approve the amended application of Pitt Solar for the 80 MW
3 facility, that the Commission impose three new conditions on the CPCN, over and above
4 the conditions proposed by the Public Staff that the Applicant has repeatedly stated that
5 it would accept.

6 Pitt Solar would like to state, In that regard, that if the Commission decides to
7 issue the requested CPCN, the Applicant does not object to the addition of the three (3)
8 new conditions proposed by the Public Staff on page 17 of Witness Metz's Second
9 Supplemental Testimony. The Applicant also reiterates its acceptance of the conditions
10 that were proposed in testimony submitted by Witness Metz in 2020, when the Public
11 Staff supported the issuance of a CPCN to Pitt Solar. Therefore, Pitt Solar respectfully
12 urges the Commission to proceed to decision and issue the requested CPCN for the 80
13 MW facility described in the amended application, subject to the accepted conditions.

14

15 Q. DOES THE APPLICANT INSIST THAT AFFECTED SYSTEM UPGRADE COSTS ON THE DEP
16 SYSTEM BE SUBJECT TO REIMBURSEMENT BY DEP AS A PRECONDITION TO ITS
17 CONSTRUCTION OF THE PROPOSED 80 MW FACILITY?

18 A. No. The Applicant is an affiliate of SunEnergy1 ("SE1"). SE1 has overseen the
19 development of many solar projects interconnected to the transmission system operated
20 by PJM. In many cases the involved transmission was "independent" under FERC
21 principles, such that the applicable FERC-approved tariffs provided that the costs of
22 upgrades to the interconnecting network operated by PJM, and/or to the transmission
23 network of an "affected system" nearby, be paid by SE1 or its affiliate, without

1 reimbursement. In all instances the SE1 affiliate, as the interconnection customer, agreed
2 to pay for the network upgrade costs resulting from its interconnection of its project,
3 including upgrade costs on affected systems, without obtaining a commitment to be
4 reimbursed for the payments made to the interconnecting network, or to the owner of
5 an affected transmission system.

6 The Applicant would like to reiterate that it previously confirmed its willingness
7 to pay DEP's projected \$31 million in system upgrade costs without reimbursement. If
8 the upgrade costs were not previously paid or committed to be paid by a prior developer
9 in the PJM AC1 queue, the Applicant agreed to sign an AOSA that required Pitt Solar to
10 pay such costs to DEP, without including any reimbursement obligation on the part of
11 DEP as a non-independent transmission operator.

12 The FERC, however, apparently believes that allowing DEP to file and use a large
13 generator AOSA without a reimbursement obligation would undermine federal law and
14 policy favoring wholesale competition in the generation segment of the electric industry,
15 and the formation of new, independent generators to foster such wholesale competition.
16 The FERC clearly fears that non-independent transmission operators such as DEP/DEC will
17 use control over transmission assets and the interconnection process to gain advantages
18 in the market for the output of current or future generation assets, to the detriment of
19 independent owners of generation resources or proposed generation resources who do
20 not own or operate transmission assets.

21 The Applicant does not believe it is fair or reasonable for its requested 80 MW
22 CPCN to be denied, or for it to risk the future revocation of a CPCN for the 80 MW facility,

1 because the FERC may intend to aggressively enforce this aspect of its Order 2003 (or
2 Order 2003A).

3

4 Q. DOES THE PUBLIC STAFF EXPLAIN ITS CONCERNS WITH THE FERC DECISION REGARDING
5 THE OBLIGATION OF DEP TO REIMBURSE THE PAYMENTS INITIALLY MADE BY AN
6 INTERCONNECTION CUSTOMER ON THE TRANSMISSION SYSTEM OWNED BY DENC THAT
7 DEP FORCASTS WILL REQUIRE IT TO INCUR NETWORK UPGRADE COSTS AS AN "AFFECTED
8 SYSTEM"?

9 A. Yes. in the words of Witness Metz, with respect to merchant plant generation "located
10 within the PJM footprint of DENC", the Public Staff is concerned that "captive ratepayers
11 ultimately will be responsible for affected system costs necessary to interconnect
12 merchant plant generators *without ratepayers directly receiving the energy or capacity*
13 *from the generators...*" Second Supplemental Testimony, pp 10 -11 (emphasis added). If
14 the Public Staff's recommendation is that the dispositive factor for issuance of a CPCN
15 that requires network upgrades should be whether the retail ratepayers of DEP (or DEC),
16 or some other incumbent public utility, will actually receive the energy or capacity output
17 of a proposed generation resource, it will be difficult or impossible to achieve the pro-
18 competition goals as to the ownership and operation of generation resources that the
19 FERC's interconnection policies are intended to promote. Incumbent utilities effectively
20 will determine which generation resources will be built through the exercise of their
21 purchasing policies and practices.

22 Q. LOOKING AT PAGE 13 OF WITNESS METZ'S SECOND SUPPLEMENTAL TESTIMONY, THE
23 PUBLIC STAFF APPEARS TO BELIEVE THAT MERCHANT POWER PLANTS SHOULD BE

1 LOCATED NEARER LOAD CENTERS AND NOT “ON THE OUTER EDGES OF THE
2 [INTERCONNECTING] SYSTEM, “BECAUSE SUCH MERCHANT PLANTS MAY NOT BE
3 “BENEFICIAL TO EFFICIENT LONG-TERM UTILITY PLANNING”. AS A PROPOSED DEVELOPER
4 OF MERCHANT PLANTS, WHAT IS THE APPLICANT’S RESPONSE TO THESE CONCERNS?

5 A. First, most load centers either are, or are located within, densely populated
6 areas. The cost of land in most densely populated areas typically make it cost prohibitive
7 to acquire and develop a sufficiently large site to erect a utility-scale solar generation
8 resource as a merchant developer. Such increased development costs may make the site
9 incapable of being financed, because there is no assurance of recovery of the sunk costs
10 for the acquisition and construction of a merchant plant by its developer. Only a utility
11 assured of revenues from captive rate payers would likely be willing or able to finance
12 large solar generation resources located in densely populated areas near load centers.

13 Moreover, a merchant plant developer typically is regarded as reducing its risk by
14 locating generation resources on or near the “seams” or boundaries separating different
15 wholesale markets. The duration of the initial outtake contracts for a merchant plant
16 developer may not match the useful life of its proposed generation resource. Locating a
17 production plant near a seam or boundary increases the potential options for selling the
18 output of the facility in its later years, rather than “locking-in” the resource into servicing
19 a single wholesale market.

20 Similarly, the suggestion that increases in congestion and congestion-related
21 charges are or may be beneficial “to North Carolina” would appear to run directly
22 counter to the FERC’s goal of attracting additional investment in transmission facilities, so
23 as to promote more competition in the generation segment of the industry. Additionally,

1 PJM manages congestion through generation dispatch, and the risk is on the generator,
2 because the generator on the wrong side of congestion will risk not being dispatched.
3

4 Q. WHAT IS THE RESPONSE OF THE APPLICANT TO THE CONCERNS EXPRESSED BY WITNESS
5 METZ REGARDING UNCERTAINTIES ARISING FROM THE RISK THAT ONE OR MORE OF THE
6 PROJECTS IN THE PJM QUEUES WILL WITHDRAW OR NOT GO FORWARD, AND HOW
7 THAT IMPACTS THE ECONOMICS OF THE PROPOSED 80 MW FACILITY IN PJM CLUSTER
8 AC1?

9 A. Using queue activity data from 2011 through October 8, 2021, on pages 13
10 through 16 of his Second Supplemental Testimony, Witness Metz describes the
11 quantities of capacity included within PJM's interconnection queue that are in service,
12 still active, or that have been withdrawn or suspended over that period of ten-plus years.
13 He then uses the uncertainties arising from proposals across the DENC service territory in
14 this State to identify three basis concerns about how those general concerns may affect
15 the \$31 million of upgrades on the one transmission line segment on the DEP system
16 impacted by the AC1 cluster.

17 The Applicant respectfully submits that these uncertainties were among those
18 which the bifurcation process was intended to "cabin" by deferring consideration of a
19 CPCN as to the 70 MW portion of the plant that is now the subject of the application for a
20 separate CPCN in EMP-102, Sub 2. The Commission has already found that it has
21 sufficient information to proceed to rule on the application for a CPCN to construct the
22 80 MW facility studied as part of PJM cluster AC1. Pitt Solar respectfully urges the
23 Commission, for the reasons provided in all of the testimony and filings in this docket

1 submitted by the Applicant, to grant the Applicant the CPCN requested in its Amended
2 Application.

3

4 Q. WHAT IS THE RESPONSE FROM THE APPLICANT TO MR. METZ'S RECOMMENDATION FOR
5 A JOINT STUDY TO EVALUATE THE IMMEDIATE TIE LINE(S) THAT ARE BEING IMPACTED BY
6 CONTINGENT UPGRADES DUE TO THE INCREASING VOLUMES OF MERCHANT POWER
7 PLANTS PROPOSED TO BE LOCATED IN THE DENC SERVICE AREA WITHIN NORTH
8 CAROLINA?

9 A. The Applicant does not believe this Commission needs the results of such a study
10 to rule on the Applicant's amended application for approval of the requested 80 MW
11 CPCN. PJM's current process is to identify to DEP all merchant power plants in North
12 Carolina or outside of the state of North Carolina that overload DENC – DEP tie lines. This
13 expanded study to enable a long-term view of this part of the electrical system should
14 not be deemed relevant to this CPCN application by a AC1 cluster participant. The
15 Battleboro – Rocky Mount line upgrade has been identified as necessary for the PJM AC1
16 cluster for some time, and the NCUC has already approved CPCNs for two merchant
17 generators in this cluster (EMP-101 for Edgecombe Solar and EMP-107 for Halifax County
18 Solar). Pitt Solar does not trigger any additional DEP system upgrades other than what is
19 already required to operate these previously approved merchant generation facilities.
20 Therefore, it seems only fair that the Applicant should likewise be granted a CPCN,
21 without discrimination, given the willingness to accept all the proposed conditions
22 identified in my testimony. Finally, the Applicant reiterates for the record that
23 construction of the project over the next several months will benefit the community

1 surrounding the proposed facility during construction and afterwards, and that the
2 Applicant has contractual/financial obligations to construct and operate the project as
3 soon as possible, and would like to proceed in its efforts to meet those obligations.

4

5 Q. DOES THAT CONCLUDE YOUR REPLY TESTIMONY?

6 A. Yes.

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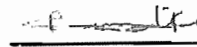
STATE OF NORTH CAROLINA

COUNTY OF IREDELL

VERIFICATION

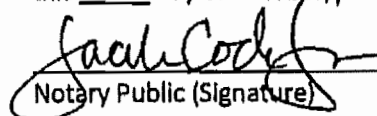
I, Linda Nwadike, being first duly sworn, depose and say that I am duly authorized to act on behalf of Pitt Solar, LLC as Director of Permitting and Community Relations for SunEnergy1, LLC, the parent, and an affiliate of the Petitioner; that I have read the foregoing Pre-Filed Reply Testimony, and that 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 25 day of October, 2021.



Linda Nwadike
SunEnergy1, LLC

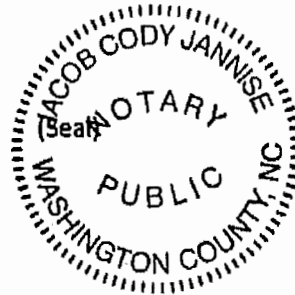
Sworn to and subscribed to before me
this 25 day of October, 2021.



Notary Public (Signature)

Jacob Cody Jannise

Notary Public (Printed)



My Commission Expires: March 16, 2024