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February 22, 2021

VIA ELECTRONIC FILING

Kimberley Campbell
Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Raleigh, N.C. 27603

Re: **Docket No. EMP-114, Sub 0**

Pre-filed Supplemental Testimony of Matt Crook in Support of Oak Trail Solar, LLC's Application for a Certificate of Public Convenience and Necessity for a Merchant Plant

Dear Clerk Campbell:

Enclosed for filing is the pre-filed supplemental testimony of Matt Crook incorporating and supporting Oak Trail Solar, LLC's Application for a Certificate of Public Convenience and Necessity for a Merchant Plant and Supplemental Application Addendums Nos. 1, 2, and 3 in the above-referenced docket. The Addendums are all filed under seal because they constitute confidential and proprietary information within the scope of G.S. § 132-1.2.

Thank you for your assistance. Please contact me if you have any questions.

Sincerely,

/s/ E. Merrick Parrott

Enclosure

cc: Parties of Record

PPAB 6122217v1

PREFILED SUPPLEMENTAL TESTIMONY OF
MATT CROOK
ON BEHALF OF OAK TRAIL SOLAR, LLC

NCUC DOCKET NO. EMP-114 Sub 0

INTRODUCTION

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

4 A. My name is Matt Crook. I am a project developer for Oak Trail
5 Solar, LLC ("Oak Trail"). My business address is 800 Town and Country Blvd.,
6 Suite 500, Houston, TX 77024.

7 **Q. ARE YOU THE SAME MATT CROOK WHO CAUSED TO BE**
8 **FILED PREFILED DIRECT TESTIMONY IN THIS MATTER ON SEPTEMBER**
9 **17, 2020?**

10 A. Yes.

11 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL**
12 **TESTIMONY?**

13 A. The purpose of my testimony is to provide additional information in
14 response to the Commission's December 18, 2020 *Order Scheduling Public*
15 *Witness Hearing, Revising Deadlines Related to Public Witness Hearing and*
16 *Revising Required Public Notice*, which directed the Applicant to file additional
17 testimony addressing issues related to interconnection costs and the Applicant's
18 plans to sell the energy and capacity generated by the Project.

19 **Q1. ARE THERE ANY NETWORK UPGRADES TO DENC'S OR ANY**
20 **AFFECTED SYSTEM'S TRANSMISSION SYSTEM REQUIRED TO**
21 **ACCOMMODATE THE OPERATION OF THE APPLICANT'S PROPOSED**

22 **FACILITY? IF SO, PROVIDE THE AMOUNT OF NETWORK UPGRADES ON**
23 **DENC'S OR ANY AFFECTED SYSTEM'S TRANSMISSION SYSTEM, IF ANY,**
24 **REQUIRED TO ACCOMMODATE THE OPERATION OF THE APPLICANT'S**
25 **PROPOSED FACILITY.**

26 A. There are no network upgrades to affected systems transmission
27 systems. Since filing the application, Oak Trail received a Facility Study Report
28 for PJM queue positions AD2-160 and AE2-253 in December, 2020, which
29 details the network upgrades required on DENC's transmission system.
30 ***Confidential* Supplemental Application Addendum 1.** As shown in the
31 Facility Study Report, the estimated cost of the network upgrades is ***BEGIN**
32 **CONFIDENTIAL*** [REDACTED] ***END CONFIDENTIAL*.**

33 **Q2. IF THERE ARE ANY REQUIRED SYSTEM UPGRADES, DOES**
34 **THE APPLICANT HAVE LEVELIZED COST OF TRANSMISSION (LCOT)**
35 **INFORMATION FOR THE SYSTEM UPGRADES? IF SO, PROVIDE THE LCOT**
36 **INFORMATION FOR ANY REQUIRED TRANSMISSION SYSTEM UPGRADES**
37 **OR MODIFICATIONS.**

38 A. As described in my prefiled direct testimony, the LCOT for the
39 Facility is \$1.94. The Applicant's LCOT analysis is detailed in ***Confidential***
40 **Supplemental Application Addendum 2.** This LCOT compares favorably to
41 the average LCOTs identified in the 2019 Lawrence Berkeley National
42 Laboratory Interconnection Cost Study ("LBNL Study") for solar in MISO (\$1.56),
43 PJM (\$3.22), and EIA (\$2.21) that the Public Staff referenced and the
44 Commission cited in its *Order Denying Certificate of Public Convenience and*
45 *Necessity for Merchant Plant Generating Facility* issued on June 11, 2020 in

46 Docket EMP-105 Sub 0. Further, the entire cost of the network upgrades will be
47 borne by the Project and not reimbursed.

48 **Q3. IS THERE ANY INTERCONNECTION STUDY AVAILABLE FOR**
49 **THE PROPOSED FACILITY? IF SO, PROVIDE ANY INTERCONNECTION**
50 **STUDY RECEIVED FOR THE PROPOSED FACILITY. IF THE APPLICANT**
51 **HAS NOT RECEIVED A STUDY, PROVIDE A DATE BY WHEN THE STUDY IS**
52 **EXPECTED TO BE COMPLETED.**

53 A. As described in Exhibit 2 to the CPCN application and as
54 referenced above, the Facility has received the following interconnection studies:
55 (1) System Impact Study for PJM queue position AD2-160, provided as
56 *Confidential* Application Addendum 5; (2) System Impact Study for PJM queue
57 position AE2-253, provided as *Confidential* Application Addendum 6; and (3)
58 Facility Study Report for PJM queue positions AD2-160 and AE2-253, provided
59 as *Confidential* Supplemental Application Addendum 1 (collectively, the
60 “Interconnection Studies”).

61 **Q4. IS THE APPLICANT AWARE OF ANY SYSTEM OTHER THAN**
62 **THE STUDIED SYSTEM THAT IS OR WILL BE AFFECTED BY THE**
63 **INTERCONNECTION? IF YES, EXPLAIN THE IMPACT AND BASIS.**

64 A. Oak Trail is not aware of any system other than the studied system
65 that is or will be affected by the interconnection. As shown in the Interconnection
66 Studies, no Project-related impacts on an Affected System have been identified.

67 **Q5. IS THE APPLICANT PROPOSING TO SELL ENERGY AND**
68 **CAPACITY FROM THE FACILITY TO A DISTRIBUTION UTILITY REGULATED**
69 **BY THE COMMISSION? IF SO, PROVIDE A DISCUSSION OF HOW THE**

70 **FACILITY'S OUTPUT CONFORMS TO OR VARIES FROM THE REGULATED**
71 **UTILITY'S MOST RECENT INTEGRATED RESOURCE PLAN (IRP).**

72 A. No.

73 **Q6. IS THE APPLICANT PROPOSING TO SELL ENERGY AND**
74 **CAPACITY FROM THE PROPOSED FACILITY TO A DISTRIBUTION UTILITY**
75 **NOT REGULATED BY THE COMMISSION BUT SERVING RETAIL**
76 **CUSTOMERS IN NORTH CAROLINA (E.G. CO-OP OR MUNI)? IF SO,**
77 **DISCUSS HOW THE FACILITY'S OUTPUT CONFORMS TO OR VARIES**
78 **FROM THE PURCHASING DISTRIBUTION UTILITY'S LONG-RANGE**
79 **RESOURCE PLAN.**

80 A. No.

81 **Q7. IS THE APPLICANT PROPOSING TO SELL ENERGY AND**
82 **CAPACITY FROM THE PROPOSED FACILITY TO A PURCHASER WHO IS**
83 **SUBJECT TO A STATUTORY OR REGULATORY MANDATE WITH RESPECT**
84 **TO ITS ENERGY SOURCING (E.G., A REPS REQUIREMENT OR VIRGINIA'S**
85 **NEW STATUTORY MANDATE FOR RENEWABLES)? IF SO, EXPLAIN HOW,**
86 **IF AT ALL, THE PROPOSED FACILITY WILL ASSIST OR ENABLE**
87 **COMPLIANCE WITH THAT MANDATE. IN ADDITION, PROVIDE ANY**
88 **CONTRACTS THAT SUPPORT THAT COMPLIANCE.**

89 A. No.

90 **Q8. DOES THE APPLICANT HAVE A POWER PURCHASE**
91 **AGREEMENT (PPA), REC SALE CONTRACTS OR CONTRACTS FOR**
92 **COMPENSATION FOR ENVIRONMENTAL ATTRIBUTES FOR THE OUTPUT**
93 **OF THE PROPOSED FACILITY? IF SO, PROVIDE ANY PPA AGREEMENTS,**

94 **REC SALE CONTRACTS, OR CONTRACTS FOR COMPENSATION FOR**
95 **ENVIRONMENTAL ATTRIBUTES FOR THE OUTPUT OF THE FACILITY.**

96 A. Yes. As described in Application Exhibit 3 and my prefiled direct
97 testimony, Oak Trail has a fully executed Power Purchase Agreement (“PPA”)
98 with a large Commercial and Industrial customer for the entirety of the Facility’s
99 output, as well as the Renewable Energy Credits generated by the Facility. The
100 PPA is being provided as ***Confidential*** **Supplemental Application**
101 **Addendum 3.**

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

103 A. Yes.