

MARCUS W. TRATHEN 1600 WELLS FARGO CAPITOL CENTER 150 FAYETTEVILLE STREET RALEIGH, NC 27601

T 919.839.0300 F 919.839.0304 MTRATHEN@BROOKSPIERCE.COM

June 12, 2020

Via Electronic Filing

Ms. Kim Campbell Chief Clerk North Carolina Utilities Commission 4325 Mail Service Center Raleigh, NC 27699-4300

Re: Docket No. E-2, Sub 1220

Williams Solar Complaint Against Duke Energy Progress

Dear Ms. Campbell:

By this letter, and pursuant to the Commission's Order Scheduling Remote Hearing issued June 3, 2020, I am submitting for filing on behalf of Williams Solar, LLC, in the above-referenced proceeding, Complainant's Hearing Exhibit List.

Please do not hesitate to contact me should any questions arise in connection with this filing.

Sincerely,

BROOKS, PIERCE, McLENDON, HUMPHREY & LEONARD, LLP

Marcus W. Trathen

cc: Parties of Record

STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

DOCKET NO. E-2, SUB 1220

| In the Matter of | | |
|---------------------------|---|-----------------------|
| Williams Solar, LLC, |) | |
| Complainant, |) | |
| - |) | COMPLAINANT'S HEARING |
| v. |) | EXHIBIT LIST |
| |) | |
| Duke Energy Progress, LLC |) | |
| Respondent. |) | |

Complainant Williams Solar, LLC, pursuant to the Commission's June 3, 2020 Order Scheduling Remote Hearing, submits the following list of exhibits that it may introduce at the hearing in this matter. In addition, Williams Solar will introduce the prefiled Direct and Rebuttal Testimony of Jonathan Burke and Charles E. Bolyard, Jr., and all exhibits submitted therewith.

| EX. NO. | DESCRIPTION |
|-----------|---|
| WS Ex. 1 | DEP Final Accounting Report Tracker Q3 2018 (CONFIDENTIAL) |
| WS Ex. 2 | DR No. 1-22 and 1-23 Maximo Labor Rates Historical |
| WS Ex. 3 | Fully Executed Williams Solar, LLC FSA (February 25, 2019) |
| WS Ex. 4 | Email from DEP to GreenGo re: Interconnection Agreement for Execution Williams Solar LLC CHKLIST 15007 (October 10, 2019) |
| WS Ex. 5 | DEP Invoice to GreenGo (October 10, 2019) |
| WS Ex. 6 | DEP email to Pike re: 190222 1200 Williams Solar LLC RFI.pdf (March 28, 2019) |
| WS Ex. 7 | DEP internal email re: Follow Up Transformer Inrush Evaluation Results NC2016 02927 (CHKLIST 15007) Williams Solar LLC (October 23, 2018) |
| WS Ex. 8 | DEP internal email re: Cost Estimation (March 19, 2019) |
| WS Ex. 9 | DEP internal email re: True up labor calculation (March 26, 2019) |
| WS Ex. 10 | DEP internal email re: Cost Estimation Tool – Revised (August 26, 2019) |

| WS Ex. 11 | DEP internal email re: DEC – Projected Exposure (May 23, 2019) |
|-----------|---|
| WS Ex. 12 | DEP internal email re: DG Cost Estimate Exposure (May 9, 2019) |
| WS Ex. 13 | DEP internal email re: Cost Estimate Training 3 (August 8, 2019) |
| WS Ex. 14 | DEP internal email re: Estimate Tool Presentation (August 27, 2019) |
| WS Ex. 15 | DEP internal email re: Cost Estimation Training Day 2 (August 7, 2019) |
| WS Ex. 16 | DEP internal email re: SIS Model (March 28, 2019) |
| WS Ex. 17 | DEP internal email and attachment re: Cost Overruns for Public Staff Meeting 6-13 (Strata Projects Kalish and Trent River) (May 23, 2019) |
| WS Ex. 18 | DEP internal email re: DEC True up – Potential exposure (May 16, 2019) |
| WS Ex. 19 | WS_78-92 – Fully Executed OTP Williams Solar (CONFIDENTIAL) |
| WS Ex. 20 | WS_93-95 - Fully Executed PSA Amendment_ELA_2250-024 (CONFIDENTIAL) |
| WS Ex. 21 | WS_96 – Interconnection Request Williams Solar, LLC CHKLIST 15007 |
| WS Ex. 22 | PIKE 8-9 – Pike internal email re: Assistance requested_ DPAC - Coverage through the holidays (December 17, 2018) (CONFIDENTIAL) |
| WS Ex. 23 | PIKE 135-168 – Sample Study - 15007-WW (CONFIDENTIAL) |
| WS Ex. 24 | Email from Jack Jirak, Counsel to Duke Energy, to NCCEBA (Nov. 5, 2019) |
| WS Ex. 25 | Williams Solar System Impact Study Agreement |
| WS Ex. 26 | CONFIDENTIAL Att D MSA 7000 Amendment No.2 Pike |
| WS Ex. 27 | Excerpt of Rebuttal Testimony of Gary Freeman, Docket No. E-100, Sub 101 (Jan. 8, 2019) |
| WS Ex. 28 | Excerpt of Testimony of Jay Oliver, Docket No. E-2, Sub 1109 (Oct. 30, 2019) |
| WS Ex. 29 | Excerpts of Public Staff Testimony of Jeff Thomas, Docket No. E-2, Sub 1219 (April 13, 2020) |
| WS Ex. 30 | Order Approving Revised Interconnection Standard, Docket No. E-100, Sub 101 (May 15, 2015) |
| WS Ex. 31 | Order Approving Revised Interconnection Standard and Requiring Reports and Testimony, Docket No. E-100, Sub 101 (June 14, 2019) |
| WS Ex. 32 | Excerpt of Transcript of Technical Conference, Docket No. E-100, Sub 101 (March 2, 2015) |

| WS Ex. 33 | Order Approving REPS and REPS EMF Rider and REPS Compliance Report, Docket No. E-2, Sub 1109 (Jan. 17, 2017) |
|-----------|---|
| WS Ex. 34 | Duke Report on Interconnection Cost Allocation Procedures, Docket No. E-100, Sub 101, et al. (March 1, 2017) |
| WS Ex. 35 | Duke Report on Interconnection Fee-Related Work and Post-Commercial Operations, Docket No. E-100, Sub 101 (Feb. 28, 2020) |
| WS Ex. 36 | Excerpts of Hearing Transcript, Docket No. E-2, Sub 1185 (March 5, 2020) |
| WS Ex. 37 | G.S. 105-164.13 |

Respectfully submitted, this 12th day of June, 2020.

Marcus W. Trathen

N.C. State Bar No. 17621

Eric M. David

N.C. State Bar No. 38118

BROOKS, PIERCE, McLENDON,

HUMPHREY & LEONARD, LLP

Suite 1600, Wells Fargo Capitol Center

150 Fayetteville Street

P.O. Box 1800 (zip 27602)

Raleigh, NC 27601

(919) 839-0300, ext. 207 (phone)

(919) 839-0304 (fax)

mtrathen@brookspierce.com

edavid@brookspierce.com

Matthew B. Tynan
N.C. State Bar No. 47181
BROOKS, PIERCE, MCLENDON,
HUMPHREY & LEONARD, LLP
Suite 2000 Renaissance Plaza
Greensboro, North Carolina 27401
(336) 373-8850
(336) 378-1001 (fax)
mtynan@brookspierce.com
Attorneys for Complainant

Certificate of Service

I hereby certify that a copy of the foregoing *Exhibit List* has been served this day upon counsel of record by electronic mail or by delivery to the United States Post Office, first-class postage pre-paid.

This the 12th day of June, 2020.

BROOKS, PIERCE, MCLENDON, HUMPHREY & LEONARD, LLP

By: \s\ Marcus Trathen