

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH  
DOCKET NO. SP-100, SUB 35

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:	)	
Request for Declaratory Ruling by	)	
Sunstone Energy Development LLC that the Jurisdiction	)	AFFIDAVIT OF
of the North Carolina Utilities Commission does not	)	Dan Swayze
Extend to the Federal Enclave within Fort Bragg	)	

NOW COMES the undersigned Dan Swayze, who being duly sworn deposes and says as follows:

1. My name is Dan Swayze. I am over eighteen (18) years of age, suffer from no disability, and am competent to testify as to the matters set forth herein, all of which are based on personal knowledge except where otherwise indicated.
2. I am Manager of Sunstone Energy Development LLC who oversees development activities.
3. I am aware that Sunstone Energy Development LLC is submitting Reply Comments in support of its Request for Declaratory Ruling in the above-referenced docket, and provide this affidavit in connection with that filing.
4. Under its proposed solar services agreement with Bragg Communities, LLC (BCL), Sunstone proposes to generate solar energy from a mixture of rooftop and ground mount units. The Sunstone facilities would be located entirely within the cantonment area of Fort Bragg.
5. The rooftop units generate power that is first routed to the structures on which they sit, and electrons not immediately consumed in that fashion reach the installation's

distribution grid that is owned by Sandhills Utility Services, LLC (SUS). SUS is a private entity that owns, operates and maintains the on-base distribution grid on Fort Bragg.

6. Power generated by the ground mount units goes first to the SUS grid before it is available for consumption by military housing structures.

7. SUS owns and controls the infrastructure that connects and distributes power between and among the military housing owned and managed by BCL.

8. Bi-directional metering measures the amount of power generated by the Sunstone solar facilities, and the Fort Bragg Directorate of Public Works (FBDPW) provides BCL a credit for that production against its monthly usage. Neither SUS nor Sunstone can identify whether all of the electrons generated by the Sunstone facility that enter the on-base distribution grid will ultimately be consumed by military housing.

9. FBDPW is a retail customer of Duke Energy Progress, LLC (DEP), but upon information and belief no other user of electricity on the Fort Bragg installation is a retail customer of DEP. Thus, Sunstone's customer, BCL, is not itself a customer of DEP.

10. Based on the projected size and scope of the proposed Sunstone project, FBDPW will still acquire more than 90 percent of its electricity from DEP.

11. The Sunstone project at Fort Bragg is one component of a seven-installation solar energy generation program approved by the United States Army.

12. Pursuant to the Army's approval of the program, Sunstone and Corvias Solar Solutions, LLC thus far have worked together to install solar energy capability at Aberdeen Proving Ground (7.1 MW of rooftop and ground mount), Fort Meade (8.7 MW, rooftop), and Fort Riley (10.5 MW, rooftop). At each site, the entity producing the energy enters an agreement with the privatized military housing provider for that installation.

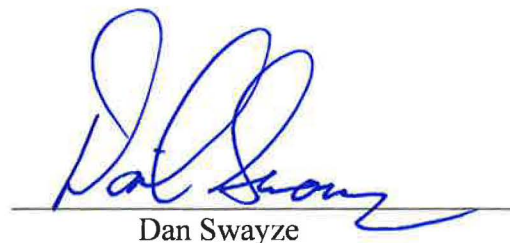
13. Sunstone also has developed, and its indirect affiliates operate, a solar-energy producing facility on Edwards Air Force Base (3.9 MW, rooftop).

14. Under the Military Housing Privatization Initiative (MHPI) contained in the National Defense Authorization Act for Fiscal Year, 1996, and the Army's implementation of it in the Residential Communities Initiative (RCI), Service Members receive a BAH that is intended to approximate the cost of adequate housing for wherever the Service Member chooses to live. If a Service Member or a Service Member and his or her family *choose* to reside in BCL's privatized military housing on base at Fort Bragg, the Service Member's BAH is allocated directly to BCL (the housing provider) to cover one hundred percent (100%) of the Service Member's basic rent obligations. If the Service Member chooses to live off base in private housing, the BAH is paid directly to the Service Member to contribute to the Service Member's housing expenses.

15. The Request for Declaratory Relief highlights a single project to be built and operated within the Fort Bragg federal enclave pursuant to an alternative energy program adopted by a federal military branch. It poses no risk of replication in DEP's franchised territory areas which are outside of a federal enclave. Sunstone is not involved in the development of any additional solar energy projects on military bases within North Carolina.

16. Further your affiant sayeth not.

This the 20th day of July, 2021.

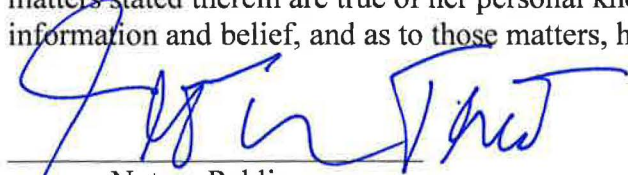


Dan Swayze

STATE OF NEW YORK

COUNTY OF NEW YORK

Before me this 20 day of July, 2021 appeared DAN SWAYZE, known to me to be the person identified in the foregoing affidavit, who, being duly sworn deposes and says that the matters stated therein are true of her personal knowledge except where stated to be based on information and belief, and as to those matters, he believes them to be true.

  
\_\_\_\_\_  
Notary Public

(SEAL)

My Commission Expires: 4/6/2023

