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October 18, 2019

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BSnowden@kilpatricktownsend.com**VIA ELECTRONIC FILING**Ms. Shonta Dunston  
Deputy Clerk  
North Carolina Utilities Commission  
430 North Salisbury Street  
Raleigh, North Carolina 27603**Re: Docket No. EMP-107, SUB 0**

Dear Ms. Dunston:

Enclosed for filing is the Supplemental Direct Testimony of Christopher Killenberg in this matter.

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

Sincerely,

Ben Snowden  
Kilpatrick Townsend & Stockton LLP

Enclosure

SUPPLEMENTAL PRE-FILED DIRECT TESTIMONY OF  
CHRISTOPHER KILLENBERG  
ON BEHALF OF HALIFAX COUNTY SOLAR LLC  
NCUC DOCKET NO. EMP-107, SUB 0

**INTRODUCTION**

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

3           A.     My name is Christopher Killenberg. I am Director of Business Development –  
4 Southeast for Community Energy Solar LLC, a Delaware limited liability company (“Community  
5 Energy”), a solar energy development company based in Radnor, Pennsylvania. My business  
6 address is 151 E. Rosemary St., Suite 202, Chapel Hill, NC 27514. I am also Special Manager for  
7 Halifax County Solar LLC.

8           **Q.     ARE YOU THE SAME CHRISTOPHER KILLENBERG WHO CAUSED**  
9 **TO BE FILED PREFILED DIRECT TESTIMONY IN THIS MATTER ON AUGUST 30,**  
10 **2019?**

11          A.     I am.

12          **Q.     WHAT IS THE PURPOSE OF THIS SUPPLEMENTAL DIRECT**  
13 **TESTIMONY?**

14          A.     To respond to the Commission’s September 25, 2019, *Order Scheduling Hearing,*  
15 *Requiring Filing of Testimony, Establishing Procedural Guidelines and Requiring Public Notice,*  
16 which directed the Applicant to file additional testimony addressing the amount of network  
17 upgrades on Dominion’s transmission system, if any, required to accommodate the operation of  
18 the proposed 80 MW solar PV generating facility in Halifax County, North Carolina (the “Project”  
19 or the “Facility”).

20           **Q.     HAS THE PROJECT BEEN ASSESSED NETWORK UPGRADES, AND IF**  
21 **SO WHAT IS THE APPROXIMATE COST OF THE PROPOSED UPGRADES?**

22           A.     In December 2017, Halifax County Solar LLC received the System Impact Study  
23 Report from PJM for the Project. The report identified a number of New System Upgrades for  
24 which the cost allocation to the Project would total \$32,778,412. Since that time, a number of  
25 prior-queued projects have withdrawn from the PJM queue. As a result, almost all of the New  
26 System Upgrades identified in the report are either no longer required, or the Project is not the first  
27 to cause the need for the upgrade. In addition, a major reconductoring project for which Halifax  
28 County Solar LLC was allocated a portion of the cost was recently approved by PJM as a baseline  
29 project that will be funded by PJM. Consequently we do not expect our Project to be allocated  
30 any cost responsibility for any New System Upgrades.

31           **Q.     IF NETWORK UPGRADES ARE REQUIRED FOR THE PROJECT, WILL**  
32 **THE PROJECT BE REIMBURSED FOR THE COST OF THOSE UPGRADES?**

33           A.     No. Any New System Upgrade costs allocated by and paid to PJM by Halifax  
34 County Solar LLC would not be eligible for reimbursement, consistent with the term of the PJM  
35 Open Access Transmission Tariff.<sup>1</sup>

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

37           A.     Yes.

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<sup>1</sup> It is unclear at present whether the Project will trigger Upgrades on Affected Systems, the cost of which may be eligible for reimbursement. No Affected Systems Study has been conducted at this time.