

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. EMP-105, SUB 0

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of the Application of
Friesian Holdings, LLC for a Certificate
of Public Convenience and Necessity

NCEMC'S INITIAL COMMENTS

On May 15, 2019, Friesian Holdings, LLC (“Friesian”) filed an application for a certificate of public convenience and necessity (“CPCN”) for a 70-MW_{AC} solar photovoltaic facility in Scotland County, North Carolina (“Project”). Therein, Friesian indicated that it anticipated execution of a Project-related purchase power agreement (“Project PPA”) between it and North Carolina Electric Membership Corporation (“NCEMC”). The Project PPA has now been executed.

NCEMC is a generation and transmission (“G&T”) cooperative. To supply power to its member distribution cooperatives, NCEMC produces and sells power that it produces at NCEMC-owned electric generation resources; NCEMC also purchases and resells power, pursuant to wholesale contracts, from power providers such as Duke Energy Carolinas, LLC, Duke Energy Progress, LLC, Dominion Energy North Carolina, and others like Friesian.

As a G&T cooperative, NCEMC continuously strives to supply power to its members that is affordable, reliable, and safe. Beginning a decade ago, NCEMC also began assisting its members with their compliance obligations under the North Carolina Renewable Energy and Energy Efficiency Portfolio Standard (“REPS”). This assistance frequently took the form of purchasing renewable energy certificates from utility-scale

solar facilities. More recently, NCEMC developed and began to pursue strategic business objectives under an initiative it christened “*A Brighter Energy Future*” (“BEF”), which entails supplying power that is not only affordable, reliable, and safe, but also increasingly low carbon (see attached BEF overview). Once constructed, the Project – specifically, the parties’ execution of the Project PPA – will simultaneously advance NCEMC’s pursuit of BEF and further its ability to achieve REPS compliance.

For the foregoing reasons, NCEMC supports issuance of a CPCN for the Project.

This the 18th day of July, 2019.

**NORTH CAROLINA ELECTRIC
MEMBERSHIP CORPORATION**

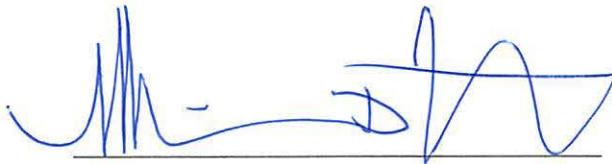
By:

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing document has been served upon all parties of record by electronic mail, or depositing the same in the United States mail, postage prepaid.

This the 18th day of July, 2019.

A handwritten signature in blue ink, appearing to read "John Doe".

A Brighter Energy Future



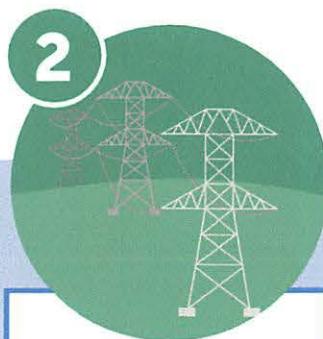
Driven by service and inspired by innovation, North Carolina's Electric Cooperatives are building a brighter energy future for 2.5 million North Carolinians. Working together, this group of 26 electric cooperatives is developing and delivering new energy solutions that put cooperative consumers and the vitality of our state first. The roots of these forward-focused energy solutions grow from three values North Carolina's Electric Cooperatives believe in:

- 1 Creating a low-carbon emissions environment through sustainability and continued investment in low- and zero-emissions resources.
- 2 Integrating technology to make distribution grids more resilient, robust and flexible for an energy future that includes consumers' participation through demand response programs and new energy resources distributed across the grid.
- 3 Improving efficiency of the overall energy sector by electrifying processes formerly powered by fossil fuels. Electric vehicles are a primary example of this conversion.



Low Carbon

Low Carbon Intensity
Industrial Process Conversion
Sustainability



Grid Flexibility

Distributed Energy Resources
Microgrids
Distribution Operators



Beneficial Electrification

Electric Transportation
Agribusiness
Economic Development