



434 Fayetteville Street  
Suite 2800  
Raleigh, NC 27601  
☎ 919.755.8700 📠 919.755.8800  
WWW.FOXROTHSCILD.COM

BENJAMIN L. SNOWDEN  
Direct No: 919-719-1257  
Email: bsnowden@foxrothschild.com

March 22, 2024

Ms. A. Shonta Dunston  
Chief Clerk  
NC Utilities Commission  
430 N. Salisbury Street  
Room 5063  
Raleigh, NC 27603

**Re: Docket No. EMP-117, Sub 0  
Additional Interconnection Studies for AE1-072**

Dear Ms. Dunston:

I write on behalf of applicant Shawboro East Ridge Solar ("Shawboro") to inform the Commission of additional interconnection studies and agreements that have been issued by PJM Interconnection and Duke Energy Progress ("DEP") since the filing of proposed orders in this docket. When proposed orders were filed in June 2023, the parties were in agreement that the Shawboro project would not trigger any Upgrades on either the PJM or DEP system that would be reimbursed by North Carolina ratepayers. That is still the case today.

The updated interconnection studies and agreements are as follows:

1. Generator Interconnection Affected System Study Report for PJM Interconnection Cluster AE1, prepared by Duke Energy Progress and dated November 30, 2023 ("November 2023 Study Report").

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The November 2023 Study Report revises the affected system study reports issued by DEP in December 2022 and March 2023, which were filed in this docket on January 20, 2023, and March 30, 2023, respectively. Neither DEP nor PJM notified the Applicant or its parent company, SunEnergy1, of the November 2023 Study Report. SunEnergy1 only discovered the existence of the report in February 2023, after inquiring with DEP about the status of Affected System Studies and being directed to DEP's OASIS web site, where affected system studies may be found.

With respect to the Shawboro project (queue no. AE1-072), the results of the November 2023 Study Report are largely unchanged from the March 2023 Report. Reconductoring of the Greenville-Everetts 230 kV line, currently allocated to project AD1-022, is still listed as a contingent facility, with no cost allocated to Shawboro. Accordingly, the analyses and conclusions regarding Affected System Studies in the parties' previously filed testimony and in the Proposed Orders are not impacted by the November 2023 Study Report.

2. Generation Interconnection Facility Study Report For PJM Generation Interconnection Request Queue Position AE1-072 (July 2023) ("Facilities Study")
3. Interconnection Construction Service Agreement among PJM Interconnection, L.L.C. and Shawboro East Ridge Solar, LLC and Virginia Electric and Power Company (eff. Sept. 7, 2023) ("ICSA"); and
4. Original Interconnection Service Agreement No. 7101 (Oct. 10, 2023) ("ISA")

The Facilities Study, ICSA, and ISA are based on the results of the revised System Impact Study issued by PJM in January 2022 and discussed in the Supplemental Testimony of Rob Price (filed on February 14, 2023) and the Second Supplemental Testimony of Jay Lucas (filed on March 23, 2023). Collectively, these documents provide additional detail and updated cost estimates on the work required to interconnect Shawboro to the PJM system.



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These documents update the estimated cost allocation for System Upgrades for the facility (from \$2,328,614, as reported in the System Impact Study and Mr. Price's testimony, to \$4,112,100, as reported in the Facilities Study<sup>1</sup>). They also provide estimated construction costs of \$4,323,618 for two "Non-Direct Connection Network Upgrades" required specifically for interconnection of the project,<sup>2</sup> and PJM Oversight Costs of \$1,193,658 for facilities that will be constructed by Shawboro. All of these costs will be borne by Shawboro, which will not receive any reimbursement for them from PJM.

SunEnergy1 does not anticipate any further interconnection studies from either PJM or DEP.<sup>3</sup> The studies and agreements filed today do not change the fact that Shawboro does not trigger any reimbursable Upgrade costs on either the PJM or DEP system. Accordingly, the Applicant submits that there is no reason to reopen the record in this matter. The Applicant has provided these documents to the Public Staff, which agrees that this matter can be decided without further proceedings.

There are no disputed issues in this matter, which has now been ripe for a decision by the Commission for more than nine months. Further delay in issuance of a CPCN will have adverse consequences for the Applicant and its parent company, SunEnergy1. The Applicant respectfully requests that the Commission issue a decision on the Application as soon as reasonably possible.

Sincerely,

/s/ Benjamin L. Snowden

Ben Snowden

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<sup>1</sup> This is referred to in the Facilities Study as "Contribution for Previously Identified Upgrades" (Facilities Study at 2), and refers to Shawboro's allocation for the cost of PJM Upgrade No. n6144. This is also discussed in Schedule F of the ISA.

<sup>2</sup> These are PJM Upgrades No. n8432.1 and n8432.2, discussed on page 4 of the Facilities Study and in Section 3.0(b) (page 12) of the ISA.

<sup>3</sup> DEP's most recent Affected System Studies Quarterly Report, filed in Docket No. E-100 Sub 170 on February 1, 2024, states that DEP's study of AE1-072 is "completed."