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January 4, 2022

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

**RE: *In the matter of the Applications of Macadamia Solar, LLC
in Consolidated Dockets EMP-119 Subs 0 and 1
CONSENT MOTION TO CONTINUE HEARING***

Dear Ms. Dunston:

On behalf of Macadamia Solar, LLC, in the above referenced matters and consolidated dockets, I herewith provide the Consent Motion to Continue Hearing.

Thank you for your assistance with this submittal. Should you have any questions concerning this filing, please do not hesitate to contact me.

Sincerely,

/s/ Benjamin L. Snowden

Benjamin L. Snowden

pbb

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota
Nevada New Jersey New York North Carolina Pennsylvania South Carolina Texas Washington

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. EMP-119, SUB 0
DOCKET NO. EMP-119, SUB 1

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. EMP-119, SUB 0

In the matter of:
Application of Macadamia Solar, LLC for
a Certificate of Public Convenience and
Necessity to Construct a Merchant Plant
Solar Energy Facility in Washington
County, North Carolina

DOCKET NO. EMP-119, SUB 1

CONSENT MOTION
TO CONTINUE HEARING

In the matter of:
Application of Macadamia Solar, LLC for
a Certificate of Environmental
Compatibility and Public Convenience
and Necessity to Construct Transmission
Line in Washington County, North
Carolina

NOW COMES Macadamia Solar, LLC (“Macadamia” or “Applicant”), by and through its undersigned attorney, and hereby requests a continuance of the expert witness hearing currently scheduled for January 25, 2022, pending receipt of additional interconnection studies and issuance of a revised procedural order in these consolidated dockets. In support of its motion, Applicant states the following:

1. The Commission’s September 24, 2021, *Order Consolidating Dockets, Scheduling Hearings, Requiring Filing of Testimony, Establishing Procedural Guidelines,*

and Requiring Public Notice scheduled an expert witness hearing in this matter for January 25, 2022.

2. In Testimony filed on November 23, 2021, Public Staff witness Jay Lucas recommended that the Commission “hold the record in this docket open” until: (1) PJM releases its retooling of PJM cluster AD1, which is currently scheduled to occur in January 2022; and (2) DEP completes its study of the retooling and develops a revised affected system study, if necessary. In Rebuttal Testimony filed on December 10, 2021, Applicant’s witness Donna Robichaud agreed that a brief delay of the evidentiary hearing to allow for the production of these reports and supplemental testimony (if necessary) would be appropriate.

3. The Applicant expects to receive a retooled system impact study for the AD1 cluster in late January 2022 and an Affected System Study (if one is necessary) approximately 30 days after that. Given that these interconnection studies will be delivered relatively soon, the Applicant believes it would be efficient and appropriate to delay the expert witness hearing to allow sufficient time for these studies to be provided, and for the parties to provide supplemental testimony if necessary.

4. The Applicant and the Public Staff are in discussions regarding an appropriate procedural schedule upon delivery of the revised study(ies), and the Applicant plans to file a procedural motion after receipt of a retooled study from PJM. The parties agree that in the meantime, it would be appropriate to continue the January 25 expert witness hearing pending establishment of a new procedural schedule.

5. The Applicant has discussed this matter with the Public Staff, which does not object to the request for a continuance.

WHEREFORE, Petitioner respectfully requests that the expert witness hearing currently scheduled for January 25, 2022, be continued pending receipt of updated interconnection studies and issuance of a revised procedural order for these consolidated dockets.

Respectfully submitted this the 4th day of January 2022.

By: /s/ Benjamin L. Snowden
Benjamin L. Snowden
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CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing CONSENT MOTION TO CONTINUE HEARING on each of the parties of record by United States mail, first class mail, or by means of electronic delivery upon agreement of the receiving party.

This is the 4th day of January 2022.

/s/ Benjamin L. Snowden

Benjamin L. Snowden

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