

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. EMP-116, SUB 0

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

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| In the Matter of Application of Juno Solar, LLC, for a Certificate of Public Convenience and Necessity to Construct a 275-MW Solar Facility in Richmond County, North Carolina |)))))) | NOTICE OF COMPLETENESS AND MOTION TO STAY |
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NOW COMES THE PUBLIC STAFF – North Carolina Utilities Commission, by and through its Executive Director, Christopher J. Ayers, and provides the notice required by Commission Rule R8-63(d) with respect to the completeness of the application filed by Juno Solar, LLC (Juno or Applicant).

On July 12, 2021 and July 13, 2021, Juno filed an application for a certificate of public convenience and necessity to construct a solar facility with a capacity of 275-MW_{AC} to be located in Richmond County, North Carolina, along with the direct testimony of witness Piper Miller supporting the application. On July, 19, 2021, the Public Staff sent the Applicant an email correspondence requesting additional information needed to review the application and deem it complete. In response to the deficiencies identified by the Public Staff, the Applicant filed revised pre-filed direct testimony and additional supplemental information, including a revised site plan, on July 27, 2021.

In its application, Juno provided the estimated construction cost for the solar facility as required by Rule R8-63(b)(2)(i). The solar facility is located in Duke Energy Progress, LLC (DEP) service territory. The Application does not include

the results of any interconnection studies completed by DEP or affected systems studies by neighboring utilities, if applicable.¹

The Public Staff is concerned that the facility plans to interconnect to a known constrained transmission line in an identified constrained area.² In her revised direct testimony, witness Miller states that the project has submitted an Interconnection Request and is expected to be studied in the Transitional Cluster Study, which is anticipated to begin in mid-2021.³ As the Commission is aware, DEP is awaiting approval at the Federal Energy Regulatory Commission (FERC) of its application to revise its Open Access Transmission Tariff (OATT) and begin cluster studies.

Until such time as FERC approves queue reform and the cluster studies that will include this facility are completed, the Network Upgrade costs for the facility will be unknown. The Phase 1 (Power Flow/Voltage) and Phase 2 (Stability and Short Circuit) studies are critical to understanding impacts of the Juno facility on the transmission system and its estimated cost responsibility for any Network Upgrades needed to interconnect the facility. The Public Staff is concerned because those impacts and costs associated with potential Network Upgrades

¹ The Public Staff does not have any information regarding whether there is the potential for affected system costs for this facility. Duke Energy Carolinas, LLC (DEC) is a potential affected system. This is an issue the Public Staff plans to investigate further prior to filing testimony. If there are any affected system impacts, the Public Staff would have the same concerns expressed in the Notice of Completeness and Motion for Stay filed on July 7, 2021 in Docket No. EMP-117, Sub 0.

² Witness Miller states that the facility will have a single point of interconnection to the DEP Richmond-Laurel Hill 230 kV transmission line. Miller Revised Direct Testimony, at 13. This line is identified as a transmission line in the constrained infrastructure area of DEP. See DEP Lines and Constrained Infrastructure PDF under "Generator Interconnection Information" folder on the DEP Oasis Website, May 9, 2018. Available at <http://www.oasis.oati.com/cpl/index.html> (last accessed July 27, 2021).

³ Miller Revised Direct Testimony, at 15.

could ultimately be passed on to the using and consuming public pursuant to DEP's OATT.

The Public Staff has reviewed Juno's revised application in accordance with Commission Rule R8-63(d) and hereby notifies the Commission that it considers the application to be complete. However, the Public Staff recommends that the Commission stay the proceedings in this docket pending the completion of interconnection studies by DEP, and any affected system studies by potential affected systems, if applicable.

WHEREFORE, the Public Staff respectfully requests that the Commission consider Juno's application to be complete, that this proceeding be stayed pending further order of the Commission, and that no procedural order be issued during the period of the stay.

Respectfully submitted this the 27th day of July, 2021.

PUBLIC STAFF
Christopher J. Ayers
Executive Director

Dianna W. Downey
Chief Counsel

Electronically submitted
/s/ Layla Cummings
Staff Attorney

4326 Mail Service Center
Raleigh, North Carolina 27699-4300
Telephone: (919) 733-6110
layla.cummings@psncuc.nc.gov

CERTIFICATE OF SERVICE

I certify that I have served a copy of the foregoing Notice of Completeness and Motion to Stay on all parties of record in this proceeding, or their attorneys of record, in accordance with Commission Rule R1-39, by mail, first class or better; by hand delivery; or by means of facsimile or electronic delivery upon agreement of the receiving party.

This the 27th day of July, 2021.

Electronically submitted
/s/ Layla Cummings
Staff Attorney