

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH, NORTH CAROLINA
DOCKET NO. EMP 102 Sub 1

In the Matter of Application of Pitt Solar,)
LLC, for a Certificate of Public Convenience) APPLICANT’S MOTION FOR
and Necessity to Construct a 150-MW Solar) LEAVE TO AMEND ONE PAGE OF
Facility in Pitt County,) SUPPLEMENTAL TESTIMONY
North Carolina)

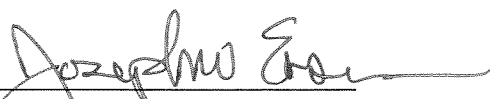
NOW COMES Pitt Solar, LLC, (the “Applicant”), by and through its undersigned counsel, and respectfully moves this Commission for leave to amend one line (line 18) on page 3 of the supplemental testimony of Ms. Linda Nwadike filed in this proceeding on June 1, 2021, to remove an erroneous reference to a PJM Queue, as shown by the corrected page 3 of such filing attached hereto and incorporated here by reference, and that the Commission accept and deem this corrected page 3 as timely filed in this docket as of June 1, 2021. In support of this motion for leave, the Applicant shows unto the Commission the following:

1. On June 1, 2021, the Applicant caused to be filed in this docket the supplemental testimony of Ms. Linda Nwadike, which testimony responded to the questions this Commission posed in the Order entered in this proceeding on May 7, 2021.
2. At line 18 of page 3 of the aforesaid pre-filed testimony as filed on June 1, there is an erroneous reference to PJM queue “AC1-189”.
3. The Public Staff contacted the counsel for the Applicant about this mistaken reference to that PJM queue on June 11, 2021, and was advised that the reference was made in error.
4. The Applicant respectfully prays for leave to submit the attached corrected page 3 of the aforesaid pre-filed testimony of Ms. Nwadike for the original page 3 that contains the mistaken reference to that PJM queue.
5. The Applicant previously informed the Public Staff that it intended to seek leave to amend the pre-filed testimony submitted in this docket on June 1, 2021, to correct line 18 on page 3.
6. The Public Staff has no objection to the Commission granting the Applicant leave to submit the attached corrected page 3 of that supplemental testimony, and deeming such page as timely filed as of June 1, 2021.

7. Good cause exists to grant the Applicant leave to amend the previously filed supplemental testimony to correct page 3, in that the reference to the PJM queue was both unnecessary and incorrect. No prejudice will result from allowing the Applicant leave to amend the pre-filed testimony to submit the corrected page 3 attached to this motion, and deeming such page to be timely filed as of June 1, 2021.

8. WHEREFORE, the Applicant respectfully prays that the Commission grant the Applicant leave to amend the supplemental testimony of Ms. Linda Nwadike submitted in this docket on June 1, 2021, by substituting the corrected page 3 attached hereto, and deeming such page to be timely filed as of June 1, 2021.

Respectfully submitted this 14th day of June, 2021.



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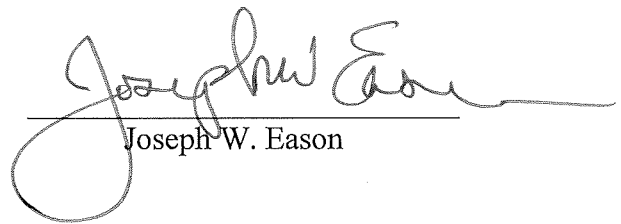
CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Motion for Leave to Amend, together with the attached corrected page 3 of the supplemental testimony submitted on June 1, 2021, and supporting pre-filed testimony, was served upon the following by electronic mail:

Christopher Ayers, Esq.
Executive Director-NC Public Staff
Chris.Ayers@psncuc.nc.gov

Gina Holt
NC Public Staff-Legal Division
Gina.Holt@psncuc.nc.gov

This the 14th day of June, 2021.



Joseph W. Eason

1 **Q. The May Order also directs the Applicant to file a narrative explanation of**
2 **the full cost of transmission upgrades for both the 80 MW of the Facility in**
3 **the AC1 cluster and the 70 MW in the AF2 cluster, including interconnection**
4 **facilities, Network Upgrade Costs, and Affected System upgrade costs. If the**
5 **Applicant does not know the full costs, the Applicant is to explain when the**
6 **cost estimates are expected. The Applicant also is to explain if any of the**
7 **above-stated costs provided in any of the cost studies are subject to change or**
8 **revision. If the costs are subject to change or revision, the Applicant's**
9 **explanation is to include an overview of the circumstances that would lead to**
10 **a change or revision of these costs. What is the response of the Applicant?**

11 A. The transmission upgrades for the initial 80 MW phase of the Facility (PJM
12 Queue AC1-189) are currently estimated by PJM to be \$8,922,829. The PJM
13 cost estimate will be reduced in part because Pitt Solar has opted to self-build
14 some of the attachment facilities that were included in the original study at an
15 estimated cost in the PJM Study of \$685,295, and also opted to self-build the
16 new switching station, which had an estimated cost in the PJM study of
17 \$6,474,940.

18 The Duke Affected System cost estimate is currently \$31,285,275. The
19 Applicant understands that American Beech Solar, LLC has entered into an
20 Affected System Operating Agreement with Duke to request and pay for this
21 scope of work.