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June 24, 2024

Ms. A. Shonta Dunston
Chief Clerk
NC Utilities Commission
430 N. Salisbury Street
Room 5063
Raleigh, NC 27603-5919

Re: In the Matter of Application of Albemarle Beach Solar, LLC for a Certificate of Public Convenience and Necessity to Construct an 80-MW Solar Facility in Washington County, NC
NCUC Docket EMP-103, Sub o
Supplemental Reply Testimony of Bradley Fite

Dear Ms. Dunston:

On behalf of Albemarle Beach Solar, LLC (“Albemarle Beach” or “Applicant”), we herewith submit the Supplemental Reply Testimony of Bradley Fite in further support of Applicant’s Motion to Withdraw Proposed Amendment, Lift Stay, and Amend Certificate of Public Convenience and Necessity which was previously filed in this docket.

Twelve hard copies of the Supplemental Reply Testimony will be provided to the Clerk’s Office within 24 hours of filing and the Testimony, in native format, will also be provided to NCUCExhibits@ncuc.net.

Please do not hesitate to contact me if you have any questions concerning this submission.

A Pennsylvania Limited Liability Partnership



Ms. A. Shonta Dunston
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Thank you for your assistance.

Sincerely,

/s/ Benjamin L. Snowden

Ben Snowden

pbb

Enclosure

Copy to: NC Public Staff

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

**DOCKET NO. EMP-103, SUB 0
BEFORE THE NORTH CAROLINA UTILITIES COMMISSION**

In the Matter of)
Application of Albemarle Beach)
Solar, LLC, for a Certificate of)
Public Convenience and)
Necessity to Construct a 140-MW)
Solar Facility in Washington)
County, North Carolina)

SUPPLEMENTAL REPLY TESTIMONY OF

BRADLEY FITE

ON BEHALF OF ALBEMARLE BEACH SOLAR, LLC

JUNE 24, 2024

1 **Q. PLEASE STATE YOUR NAME, TITLE, AND BUSINESS ADDRESS.**

2 A. My name is Bradley Fite. I am the President of Operations for SunEnergy1, LLC (“SE1”
3 or the “Company”), the parent of Applicant Albemarle Beach Solar, LLC (“Albemarle
4 Beach Solar” or “Applicant”). My business address is 192 Raceway Drive, Mooresville,
5 North Carolina 28117.

6 **Q. PLEASE DESCRIBE YOUR RELATIONSHIP WITH THE APPLICANT IN THIS**
7 **DOCKET AND YOUR EMPLOYMENT RESPONSIBILITIES.**

8 A. I have been employed by SunEnergy1 for approximately 13 years. I currently manage all
9 staff and operations related to constructing and maintaining the facilities affiliated with
10 SunEnergy1. I also am involved with the development and design of the projects. Although
11 I am not directly involved with our state filings, I am the key license holder for all licenses
12 required by the State of North Carolina to perform its operations.

13 **Q. PLEASE DESCRIBE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.**

14 A. I have over 40 years of experience in the construction industry. I currently hold the
15 following licenses: NC Unlimited Electrical Contractor, NC Class A General Contractor
16 and NC Public Utility Electrical Licensing. I have previously held certifications from (UL)
17 Underwriter Laboratories, (NASCLA) National Association of State Contractors Licensing
18 Agencies, (NETA) National Electrical Testing Association, and (NABCEP) North
19 American Board of Certified Energy Practitioners.

20 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE NORTH CAROLINA**
21 **UTILITIES COMMISSION?**

22 A. Yes. I have provided testimony in support of CPCN applications for several other projects
23 developed by SunEnergy1 and its affiliates, including the following: Windsor Hwy 17

1 Solar, LLC (Docket No. SP-4655, Sub 0); Camden Mill Dam Road Solar, LLC (Docket
2 No. SP-4230, Sub 0); Shiloh Sandy Hook Solar, LLC (Docket No. SP-4104, Sub 0);
3 Albertson Solar, LLC (Docket No. SP-3777, Sub 0); Sunbury McCoy Lane Solar, LLC
4 (Docket No. SP-3353, Sub 0); and SunEnergy1 LLC (Docket No. SP-751, Sub 9).

5 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS PROCEEDING?**

6 A. No. The previous witness testifying for Applicant, Jason Hathcock, is no longer associated
7 with SunEnergy1 or Albemarle Beach Solar and is not available to testify. I am authorized
8 and designated to provide testimony regarding the project in this docket.

9 I have read and are familiar with the Motion to Withdraw Proposed Amendment, Lift Stay,
10 and Amend Certificate of Public Convenience and Necessity filed by the Applicant in this
11 docket on March 27, 2024. I have also reviewed and am familiar with the Pre-Filed
12 Supplemental Direct Testimony of Jason Hathcock filed on March 27, 2024.

13 **Q. ARE YOU PERSONALLY FAMILIAR WITH THE MATTERS DISCUSSED IN**
14 **MR. HATHCOCK'S PRE-FILED DIRECT TESTIMONY?**

15 A. Yes.

16 **Q. DO YOU ADOPT MR. HATHCOCK'S PRE-FILED DIRECT TESTIMONY, AS IF**
17 **IT WERE YOUR OWN, FOR ALL PURPOSES IN THIS DOCKET?**

18 A. Yes, I do.

19 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL REPLY TESTIMONY?**

20 A. The purpose of my testimony is to respond to the testimony of Mr. Evan D. Lawrence on
21 behalf of the Public Staff – North Carolina Utilities Commission, in his testimony filed on
22 June 10, 2024.

1 **Q. IN HIS TESTIMONY, MR. LAWRENCE STATES THAT THE ALBEMARLE**
2 **BEACH FACILITY NEVER OPERATED IN A MANNER THAT WOULD**
3 **COMPROMISE THE OPERATIONS OF THE ELECTRIC SYSTEM. DO YOU**
4 **AGREE WITH HIS CONCLUSION?**

5 A. Yes, I do. As stated in Mr. Hathcock’s prefiled testimony, both PJM and Duke Energy
6 Progress (“DEP”) studied the proposed increase in injection capacity of the Facility and
7 concluded that it could be accommodated without causing any impacts on the PJM,
8 Dominion, or DEP systems; and would not result in impacts to any other system.

9 **Q. MR. LAWRENCE ALSO STATES THAT SUNENERGY1 CONSTRUCTED THE**
10 **FACILITY WITHIN THE APPROVED FOOTPRINT. DO YOU AGREE?**

11 A. Yes, I do. As shown in satellite image of the Albemarle Beach facility included as Exhibit
12 A, the Albemarle Beach facility was constructed within the footprint approved by the
13 Commission.

14 **Q. WHAT RECOMMENDATIONS DOES MR. LAWRENCE MAKE REGARDING**
15 **ALBEMARLE BEACH’S REQUEST TO AMEND ITS CPCN?**

16 A. Mr. Evans recommends that the Commission approve the requested amendment. He also
17 recommends that the Commission require SunEnergy1 to do the following:

- 18 1. Make a filing in each docket for each facility for which it currently holds a
19 CPCN, within 90 days of the Commission’s order in this proceeding, attesting that:
20 (1) the facility has been constructed within the approved site boundary, and (2) the
21 facility is operating with a nameplate capacity no greater than what has been
22 approved in the CPCN; and

1 2. If for any facility, SE1 cannot make the attestations in the foregoing
2 paragraph, it shall file with the Commission a request to amend its CPCN for that
3 facility.

4 **Q. DO THE APPLICANT AND ITS PARENT COMPANY, SUNENERGY1 LLC,**
5 **AGREE WITH THESE THE RECOMMENDATIONS?**

6 A. Yes.

7 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

8 A. Yes.

Exhibit A
Albemarle Beach Solar LLC – As-built

