



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

May 29, 2020

Ms. Kimberley A. Campbell, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

Re: Docket No. EMP-110, Sub 0 – CPCN for 120MW Located on Woodard Rd. Near Morning Rd. on its Western Side and Middle Tract Rd. to the East in Bertie County

Dear Ms. Campbell:

In connection with the above-referenced docket, I transmit herewith for filing on behalf of the Public Staff the testimony of Evan D. Lawrence, Utilities Engineer, Electric Division.

By copy of this letter, we are forwarding copies to all parties of record.

Sincerely,

/s/ Layla Cummings
Staff Attorney
layla.cummings@psncuc.nc.gov

LC/cia

Attachment

Executive Director (919) 733-2435	Communications (919) 733-5610	Economic Research (919) 733-2267	Legal (919) 733-6110	Transportation (919) 733-7766
Accounting (919) 733-4279	Consumer Services (919) 733-9277	Electric (919) 733-2267	Natural Gas (919) 733-4326	Water (919) 733-5610

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May 29 2020

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. EMP-110, SUB 0

In the Matter of)	
Application of Sumac Solar LLC, for a)	TESTIMONY OF
Certificate of Public Convenience and)	EVAN D. LAWRENCE
Necessity to Construct a 120-MW Solar)	PUBLIC STAFF – NORTH
Facility in Bertie County, North Carolina)	CAROLINA UTILITIES
)	COMMISSION

**BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. EMP-110, SUB 0**

**Testimony of Evan D. Lawrence
On Behalf of the Public Staff
North Carolina Utilities Commission**

May 29, 2020

1 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND**
2 **PRESENT POSITION.**

3 A. My name is Evan D. Lawrence. My business address is 430 North
4 Salisbury Street, Dobbs Building, Raleigh, North Carolina. I am an
5 engineer with the Electric Division of the Public Staff – North Carolina
6 Utilities Commission.

7 **Q. BRIEFLY STATE YOUR QUALIFICATIONS AND DUTIES.**

8 A. My qualifications and duties are included in Appendix A.

9 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

10 A. The purpose of my testimony is to make recommendations to the
11 Commission on the request for a Certificate of Public Convenience
12 and Necessity (CPCN) filed on April 16, 2020, by Sumac Solar, LLC
13 (Applicant) to construct a 120-megawatt AC (MW_{AC}) solar
14 photovoltaic (PV) merchant electric generating facility in Bertie
15 County, North Carolina (the Facility). My testimony also provides the

1 Public Staff's position on the estimated cost of network upgrades that
2 are necessary for the Facility to interconnect to the grid.

3 **Q. PLEASE BRIEFLY DESCRIBE THE PROPOSED GENERATION**
4 **FACILITY.**

5 A. The Applicant proposes to construct a 120-MW_{AC} solar PV electric
6 generating facility in Bertie County, North Carolina. The Facility's
7 inverters will provide alternating current at 34,500 volts (34.5 kV)
8 which it will step up to 230 kV in order to connect to an existing
9 Dominion Energy North Carolina (DENC) transmission line. The
10 Applicant expects the yearly generation to be approximately 270,000
11 megawatt-hours. Solar is an intermittent energy source; therefore,
12 the maximum dependable capacity of the Facility is 0 MW. The
13 expected life of the Facility is a minimum of 20 years with an
14 additional 15 year service life with the appropriate equipment
15 updates.

16 **Q. HAS THE APPLICANT SHOWN A NEED FOR ITS PROPOSED**
17 **FACILITY?**

18 A. Yes. The Facility will interconnect with the transmission system of
19 DENC, which is a member of PJM. The Applicant stated it is actively
20 negotiating power purchase agreements (PPAs) with a group of
21 investment-grade off-takers for all of the Facility's output.

1 The Applicant anticipates contracting the sale of energy, capacity,
2 and renewable energy certificates from the Facility within the PJM
3 market.

4 On May 1, 2020, in Docket No. E-100 Sub 165, DENC filed its 2020
5 Integrated Resource Plan (IRP) that indicates that it is planning for
6 the development of 6,720 MW of solar generation by 2035 and
7 11,520 MW by 2045. Appendix 4H indicates that both energy
8 consumption and peak demand will increase through 2035.¹

9 **Q. HAS THE APPLICANT COMPLIED WITH THE COMMISSION'S**
10 **FILING REQUIREMENTS?**

11 A. Yes. The Public Staff reviewed the application and the direct
12 testimony of the Applicant's witness, Kara Price, and determined that
13 the application is complete.

14 On April 23, 2020, the Public Staff filed a Notice of Completeness
15 pursuant to Commission Rule R8-63(d) and requested that the
16 Commission issue a procedural order setting the docket for hearing,
17 requiring public notice, and address any other procedural matters.

¹ The Public Staff has not completed an analysis of the most recently filed DENC IRP and the Commission has not yet accepted the 2020 IRP for planning purposes. The most recent DENC Commission-accepted IRP is the 2019 IRP Update filed on August 29, 2019, in Docket No. E-100, Sub 157, which indicates it is planning for the development of 5,400 MW of solar generation by 2044. Appendix 2H of the 2019 IRP Update indicates that summer peak demand will increase through 2034. Appendix 2I of the 2019 IRP Update indicates that energy consumption will increase through 2034 as well.

1 On April 28, 2020, the Commission issued an Order Requiring Filing
2 of Testimony, Establishing Procedural Guidelines, and Requiring
3 Public Notice (Procedural Order).

4 On May 12, 2020, the Applicant filed the testimony of Donna
5 Robichaud, addressing the network upgrades required on the DENC
6 transmission system to accommodate the operation of the proposed
7 facility as required by ordering paragraph 6 of the Procedural Order.

8 **Q. HAS THE APPLICANT PROVIDED ANY TESTIMONY**
9 **REGARDING NETWORK UPGRADES?**

10 A. Yes. The direct testimony of Ms. Robichaud stated that the Facility
11 would require network upgrades at an estimated cost of
12 \$43,517,840. Additionally, Ms. Robichaud stated that \$30,750,000 of
13 the upgrade cost was the result of rebuilding DENC's Everetts-
14 Greenville 230 kV transmission line. However, the Applicant does not
15 expect this work will be required as a coal-fired Non-Utility Generator
16 retired its facility on April 22, 2019. Ms. Robichaud further indicated
17 that the Applicant will be funding the entire cost of these upgrades
18 and will not receive reimbursement of those costs from PJM, DENC,
19 or DENC's ratepayers.

20 **Q. DOES THE PUBLIC STAFF HAVE ANY CONCERNS REGARDING**
21 **THE APPLICANT'S TESTIMONY ON NETWORK UPGRADES?**

1 A. Not at this time. The Applicant has allayed the Public Staff's concerns
2 regarding the potential for significant network upgrade costs that
3 could ultimately be borne by the using and consuming public.
4 However, if this potential arises in the future, the Public Staff would
5 re-evaluate its position on this issue.

6 **Q. HAS THE STATE CLEARINGHOUSE FILED COMMENTS IN THE**
7 **DOCKET?**

8 A. No. On May 21, 2020, the State Clearinghouse filed a letter stating
9 the Application of Sumac Solar, LLC had been received and the
10 review of the project should be completed on June 10, 2020.

11 **Q. WHAT IS THE PUBLIC STAFF'S RECOMMENDATION ON THE**
12 **APPLICATION FOR A CPCN?**

13 A. The Public Staff recommends that the Commission issue the
14 requested CPCN subject to the following conditions:

15 1. The Applicant shall construct and operate the Facility in strict
16 accordance with applicable laws and regulations, including
17 any local zoning and environmental permitting requirements;

18 2. The CPCN shall be subject to Commission Rule
19 R8-63(e) and all orders, rules and regulations as are now or
20 may hereafter be lawfully made by the Commission;

QUALIFICATIONS AND EXPERIENCE

EVAN D. LAWRENCE

I graduated from East Carolina University in Greenville, North Carolina in May of 2016 earning a Bachelor of Science degree in Engineering and a concentration in Electrical Engineering. I started my current position with the Public Staff in September of 2016. Since that time my duties and responsibilities have focused around the review of renewable energy projects, rate design, and renewable energy portfolio standards compliance. I have filed affidavits in Dominion Energy North Carolina's 2017 and 2018 REPS cost recovery proceeding, testimony in DEP's 2019 REPS cost recovery proceeding, an affidavit in DEC's 2019 REPS cost recovery proceeding, testimony in New River Light and Power's (NRLP) most recent rate case proceeding, and testimony in additional small power producer and merchant electric generating facilities (EMPs). Additionally, I am currently serving as a co-chair of the National Association of State Utility and Consumer Advocates (NASUCA) DER and EE committee.