

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION
AT RICHMOND, JULY 30, 2024

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APPLICATION OF

HECATE ENERGY PULASKI LLC

CASE NO. PUR-2024-00107

For approval and certification of
certain electrical facilities associated
with a small renewable (solar) energy
project

ORDER FOR NOTICE AND COMMENT

On July 5, 2024, Hecate Energy Pulaski LLC ("Pulaski I Solar" or "Applicant") filed an Application with the State Corporation Commission ("Commission") for a certificate of public convenience and necessity ("CPCN") pursuant to Code §§ 56-265.2 A 1 and 56-46.1 to construct, own, and operate the following facilities in Pulaski County, Virginia: (i) a collection substation and other electrical facilities by which solar power will be stepped up from 34.5 kilovolts ("kV") to 138 kV by means of step-up transformers ("Collection Substation"); and (ii) an approximate 6.4 mile 138 kV overhead generation tie line and associated facilities ("Gen-Tie Line") (Collection Substation and Gen-Tie Line, collectively "Collection Facilities") extending from the Collection Substation to the transmission grid at a point of interconnection ("POI") with Appalachian Power Company's ("APCo") transmission facilities.¹

Pulaski I Solar requests a CPCN for only the Collection Facilities and not for the 150 megawatts alternating current ("MW") solar energy project ("Solar Facilities") that the Applicant is developing in Pulaski County, Virginia.² Pulaski I Solar states that it has received a permit by

¹ Application at 1.

² *Id.* at 2. Applicant states that construction is expected to start in the second or third quarter of 2025. Application, Appendix 1 at 3.

rule authorization letter from the Department of Environmental Quality ("DEQ") authorizing Pulaski I Solar to construct and operate the Solar Facilities.³ The Applicant states that the Collection Facilities are necessary and integral components needed to connect the Solar Facilities to the transmission grid for the sale of electricity, capacity, and other services into the PJM Interconnection, L.L.C. ("PJM") wholesale market.⁴

To accommodate the interconnection of the Solar Facilities, Applicant states that a new 138 kV switchyard ("APCo POI Switchyard") will be constructed at the POI that will be owned and operated by APCo.⁵ Applicant further states that either APCo or Pulaski I Solar will construct the APCo POI Switchyard.⁶ Pulaski I Solar states that it is not aware of any Commission precedent requiring an entity to obtain a CPCN to only construct a switchyard that will be owned and operated by an incumbent electric utility.⁷ Because APCo will own and operate the APCo POI Switchyard, Pulaski I Solar states that it is not required to obtain a CPCN to construct the APCo POI Switchyard.⁸ Applicant, however, asserts that if the Commission determines that Pulaski I Solar requires a CPCN to construct, but not own or operate, the APCo POI Switchyard, then Pulaski I Solar hereby requests a CPCN to construct that facility.⁹

³ Application at 2.

⁴ *Id.* at 2-3.

⁵ *Id.* at 1-2.

⁶ *Id.* at 2.

⁷ *Id.*

⁸ *Id.*

⁹ *Id.* Pulaski I Solar notes that "[t]o the extent necessary, the term 'Collection Facilities' also includes the APCo POI Switchyard, but only if the Commission determines that Pulaski I Solar requires a CPCN to construct but not own or operate that facility." *Id.*

Pulaski I Solar states the Collection Substation will be located on approximately 1.4 acres in the eastern portion of the Solar Facilities site and will be fenced in.¹⁰ The Applicant further states that the approximately 6.4-mile Gen-Tie Line will deliver the solar power from the Solar Facilities to the POI with APCo's facilities.¹¹ The Application states that there is no available existing right-of-way between the Solar Facilities and the POI, and that the Gen-Tie Line will be located exclusively on easements or leases obtained from private landowners.¹² The Application states that the proposed right-of-way has a maximum width of approximately 100 feet, but that it could be wider in various locations as needed to ensure compliance with safety requirements or due to other factors.¹³ According to the Applicant, the APCo POI Switchyard will be constructed near APCo's existing Morgans Cut Substation.¹⁴ Pulaski I Solar represents that it has secured site control (through options to lease, options for easement and options to purchase) from private property owners of land needed for the Collection Facilities.¹⁵

Pulaski I Solar states that it has not yet completed the final engineering for the Gen-Tie Line and requests that the Commission allow it to construct the Gen-Tie Line without returning to the Commission for approval of minor deviations to the proposed route.¹⁶ Pulaski I Solar specifically requests that the Commission authorize slight changes to the Gen-Tie Line route

¹⁰ *Id.*

¹¹ *Id.* at 3.

¹² *Id.* at 6.

¹³ Application, Appendix 1 at 9.

¹⁴ Application at 4.

¹⁵ *Id.* at 5. Applicant further notes that it will require certain land use permits from the Virginia Department of Transportation. *Id.* at 5 n.7.

¹⁶ *Id.* at 6.

based on engineering considerations without requiring a new application to the Commission, provided such changes "are limited in nature and do not require new easements or rights-of-way."¹⁷

Additionally, Pulaski I Solar requests that the Commission grant it an exemption from the provisions of Chapter 10 of Title 56 of the Code, consistent with the Commission's prior precedent in granting CPCNs under the Utility Facilities Act when the applicant offers all of its electric energy and capacity output into the PJM wholesale markets.¹⁸ Applicant also requests waiver from Staff Guidelines with respect to the Collection Facilities to the extent the Guidelines appear designed to obtain information from an incumbent utility whose rates and services are regulated by the Commission.¹⁹

As provided by Code § 62.1-44.15:21 D 2, the Commission and the State Water Control Board ("Board") consult on wetland impacts prior to the siting of electric utility facilities that require a CPCN. Acting on behalf of the Board, the DEQ must prepare a Wetland Impacts Consultation on this Application, as required by the Code and Sections 2 and 3 of the Department of Environmental Quality - State Corporation Commission Memorandum of Agreement Regarding Consultation on Wetland Impacts (July 2003).²⁰ The Staff of the

¹⁷ *Id.*

¹⁸ *Id.* at 22-23.

¹⁹ *Id.* at 23.

²⁰ *In re Receiving comments on a draft memorandum of agreement between the State Water Control Board and the State Corporation Commission*, Case No. PUE-2003-00114, 2003 S.C.C. Ann. Rept. 474, Order Distributing Memorandum of Agreement (July 30, 2003).

Commission ("Staff") has requested the Office of Wetlands & Stream Protection at DEQ to provide the Wetland Impacts Consultation for the Collection Facilities.²¹

As provided by Code §§ 10.1-1186.2:1 B and 56-46.1 A, the Commission and DEQ coordinate reviews of the environmental impact of electric generating plants and associated facilities. Pursuant to the Code and consistent with the Department of Environmental Quality - State Corporation Commission Memorandum of Agreement Regarding Coordination of Reviews of the Environmental Impacts of Proposed Electric Generating Plants and Associated Facilities (August 2002),²² the Commission receives and considers reports on the proposed facilities from state environmental agencies. Staff has requested the DEQ to coordinate an environmental review of this Application by the appropriate agencies and to provide a report on the review.²³

Finally, in conjunction with the filing of its Application, Pulaski I Solar filed a Motion for Protective Ruling and Additional Protective Treatment ("Motion") and a proposed protective ruling that establishes procedures governing the use of confidential information in this proceeding.

NOW THE COMMISSION, upon consideration of this matter, is of the opinion and finds that this matter should be docketed; Pulaski Solar I should provide public notice of its Application; interested persons should have an opportunity to file comments on the Application,

²¹ Letter from Kelli Jo Cole, Esquire, State Corporation Commission, dated July 9, 2024, to David L. Davis, Department of Environmental Quality, filed in Case No. PUR-2024-00107.

²² *In re Receiving comments on a draft memorandum of agreement between the Department of Environmental Quality and the State Corporation Commission*, Case No. PUE-2002-00315, 2002 S.C.C. Ann. Rept. 559, Order Distributing Memorandum of Agreement (Aug. 14, 2002).

²³ Letter from Kelli Jo Cole, Esquire, State Corporation Commission, dated July 9, 2024, to Bettina Rayfield, Department of Environmental Quality, filed in Case No. PUR-2024-00107.

file a notice of participation as a respondent, and request that a hearing be convened; Staff should be directed to investigate the Application and present its findings and recommendations in a report ("Staff Report"); and a Hearing Examiner should be assigned to conduct all further proceedings in this matter, including ruling on the Applicant's Motion and submission of a final report.

To promote administrative efficiency and timely service of filings upon participants, the Commission will, among other things, direct the electronic filing of testimony and pleadings unless they contain confidential information, and require electronic service on parties to this proceeding.

Accordingly, IT IS ORDERED THAT:

- (1) This matter is docketed and assigned Case No. PUR-2024-00107.
- (2) All pleadings in this matter shall be submitted electronically to the extent authorized by 5 VAC 5-20-150, *Copies and format*, of the Commission's Rules of Practice and Procedure ("Rules of Practice"). Confidential and Extraordinarily Sensitive Information shall not be submitted electronically and should comply with 5 VAC 5-20-170, *Confidential information*, of the Rules of Practice. Any person seeking to hand deliver and physically file or submit any pleading or other document shall contact the Clerk's Office Document Control Center at (804) 371-9838 to arrange the delivery.
- (3) Pursuant to 5 VAC 5-20-140, *Filing and service*, of the Rules of Practice, the Commission directs that service on parties and Staff in this matter shall be accomplished by electronic means. Concerning Confidential or Extraordinarily Sensitive Information, parties and Staff are instructed to work together to agree upon the manner in which documents containing such information shall be served upon one another, to the extent practicable, in an electronically

protected manner, even if such information is unable to be filed in the Office of the Clerk, so that no party or Staff is impeded from preparing its case.

(4) As provided by Code § 12.1-31 and 5 VAC 5-20-120, *Procedure before hearing examiners*, of the Rules of Practice, a Hearing Examiner is appointed to conduct all further proceedings in this matter, including ruling on the Motion and filing a final report. A copy of each filing made with the Commission's Clerk's office in this matter shall also be sent electronically to the Office of the Hearing Examiners.²⁴

(5) An electronic copy of the public version of the Application may be obtained by submitting a written request to counsel for the Applicant: Robert F. Riley, Esquire, or Bradley J. Nowak, Esquire, Williams Mullen, 8350 Broad Street, Suite 1600, Tysons, Virginia 22102, or rriley@williamsmullen.com or bnowak@williamsmullen.com. Interested persons also may download unofficial copies from the Commission's website: scc.virginia.gov/pages/Case-Information.

(6) On or before August 27, 2024, the Applicant shall cause to be sent by first class mail a copy of the notice and sketch map prescribed in Ordering Paragraph (7) to all owners, as of the date of this Order, of: (1) property contiguous to the Collection Substation and APCo POI Switchyard, and (2) property within the route of the proposed Gen-Tie Line, as indicated on the map or sketch of the route filed with the Commission, which requirement shall be satisfied by mailing to such persons at such addresses as are indicated in the land books maintained by the commissioner of revenue, director of finance, treasurer, or other officer of the county or municipality designated as provided by § 58.1-3100 *et seq.* of the Code.

²⁴ Such electronic copies shall be sent to: OHEParalegals@scc.virginia.gov.

(7) On or before August 27, 2024, the Applicant shall publish on one (1) occasion, the sketch map of the proposed Collection Substation, APCo POI Switchyard, and the route of the Gen-Tie Line, as provided in Volume 2, Appendix 1, Attachment V.A. to the Application, and the following notice as display advertising (not classified) in a newspaper or newspapers of general circulation in Pulaski County, Virginia:

NOTICE TO THE PUBLIC OF AN APPLICATION BY
HECATE ENERGY PULASKI LLC FOR APPROVAL AND
CERTIFICATION OF CERTAIN ELECTRICAL FACILITIES
ASSOCIATED WITH A SMALL RENEWABLE (SOLAR)
ENERGY PROJECT IN PULASKI COUNTY, VIRGINIA
CASE NO. PUR-2024-00107

On July 5, 2024, Hecate Energy Pulaski LLC ("Pulaski I Solar" or "Applicant") filed an Application with the State Corporation Commission ("Commission") for a certificate of public convenience and necessity ("CPCN") pursuant to Code §§ 56-265.2 A 1 and 56-46.1 to construct, own, and operate the following facilities in Pulaski County, Virginia: (i) a collection substation and other electrical facilities by which solar power will be stepped up from 34.5 kilovolts ("kV") to 138 kV by means of step-up transformers ("Collection Substation"); and (ii) an approximate 6.4 mile 138 kV overhead generation tie line and associated facilities ("Gen-Tie Line") (Collection Substation and Gen-Tie Line, collectively "Collection Facilities") extending from the Collection Substation to the transmission grid at a point of interconnection ("POI") with Appalachian Power Company's ("APCo") transmission facilities.

Pulaski I Solar requests a CPCN for only the Collection Facilities and not for the 150 megawatts alternating current ("MW") solar energy project ("Solar Facilities") that the Company is developing in Pulaski County, Virginia. Pulaski I Solar states that it has received a permit by rule authorization letter from the Department of Environmental Quality authorizing Pulaski I Solar to construct and operate the Solar Facilities. The Applicant states that the Collection Facilities are necessary and integral components needed to connect the Solar Facilities to the transmission grid for

the sale of electricity, capacity, and other services into the PJM Interconnection, L.L.C. ("PJM") wholesale market.

To accommodate the interconnection of the Solar Facilities, Applicant states that a new 138 kV switchyard ("APCo POI Switchyard") will be constructed at the POI that will be owned and operated by APCo. Applicant further states that either APCo or Pulaski I Solar will construct the APCo POI Switchyard. Pulaski I Solar states that it is not aware of any Commission precedent requiring an entity to obtain a CPCN to only construct a switchyard that will be owned and operated by an incumbent electric utility. Because APCo will own and operate the APCo POI Switchyard, Pulaski I Solar states that it is not required to obtain a CPCN to construct the APCo POI Switchyard. Applicant, however, asserts that if the Commission determines that Pulaski I Solar requires a CPCN to construct, but not own or operate, the APCo POI Switchyard, then Pulaski I Solar hereby requests a CPCN to construct that facility.

Pulaski I Solar states the Collection Substation will be located on approximately 1.4 acres in the eastern portion of the Solar Facilities site and will be fenced in. The Applicant further states that the approximately 6.4-mile Gen-Tie Line will deliver the solar power from the Solar Facilities to the POI with APCo's facilities. The Application states that there is no available existing right-of-way between the Solar Facilities and the POI, and that the Gen-Tie Line will be located exclusively on easements or leases obtained from private landowners. The Application states that the proposed right-of-way has a maximum width of approximately 100 feet, but that it could be wider in various locations as needed to ensure compliance with safety requirements or due to other factors. According to the Applicant, the APCo POI Switchyard will be constructed near APCo's existing Morgans Cut Substation. Pulaski I Solar represents that it has secured site control (through options to lease, options for easement and options to purchase) from private property owners of land needed for the Collection Facilities.

Pulaski I Solar states that it has not yet completed the final engineering for the Gen-Tie Line and requests that the Commission allow it to construct the Gen-Tie Line without returning to the Commission for approval of minor deviations to the proposed route. Pulaski I Solar specifically requests that the Commission authorize slight changes to the Gen-Tie Line route based on engineering considerations without requiring a new

application to the Commission, provided such changes "are limited in nature and do not require new easements or rights-of-way."

Description of the Proposed Route and Collection Facilities

In connection with a proposed solar generating facility in Pulaski County, Virginia, Pulaski I Solar proposes to construct the Collection Substation and an approximately 6.4-mile 138 kV overhead Gen-Tie Line, which are necessary components and are required to interconnect the Solar Facilities with APCo's transmission facilities at a new point of interconnection, the APCo POI Switchyard. The Gen-Tie Line will begin in the eastern portion of the Solar Facilities site at the Collection Substation. The line will traverse easterly, crossing Cleburne Boulevard, and then after approximately 1.9 miles turns southeast for approximately 0.5 mile. The route turns northeast approximately 0.6 mile and then southeast for approximately 0.5 mile to go around the New River Valley Airport. After crossing Ruebush Road, the route travels northerly along Ruebush Road for approximately 0.3 mile before heading easterly and then south 1.8 miles towards Route 11. The route then crosses Route 11 and then parallels Route 11 and the Norfolk Southern Railroad heading easterly approximately 0.5 mile before crossing the railroad and Old Route 11 to head south to interconnect to APCo's transmission system at the APCo POI Switchyard near the Morgans Cut Substation.

The proposed Gen-Tie Line will be a single circuit on monopole structures that will average approximately 80 feet and 90 feet in height above ground. The minimum above ground structure height is approximately 60 feet and structures will not exceed approximately 110 feet in height above ground. All directions, distances, and heights are approximate and are based upon preliminary engineering and subject to change during final design.

The Collection Substation will have three breakers arranged in a ring bus configuration with connections for the outgoing single circuit Gen-Tie Line and two incoming feeders from the step-up transformers.

All distances and directions are approximate. A map of the proposed Collection Substation, APCo POI Switchyard and the route of the Gen-Tie Line accompanies this notice and can be found in Appendix 1, Attachment V.A. to the Application. A more detailed map of the proposed routes may be viewed on the Commission's website:

scc.virginia.gov/pages/Transmission-Line-Projects. A more complete description of the proposed Collection Substation, APCo POI Switchyard and the Gen-Tie Line may be found in the Application.

The Commission may consider sites and routes not significantly different from the descriptions in this notice without additional notice to the public.

To promote administrative efficiency and timely service of filings upon participants, the Commission has directed the electronic filing of documents and pleadings, unless they contain confidential information, and required electronic service on parties to this proceeding. In accordance therewith, all pleadings, briefs, or other documents required to be served in this matter shall be submitted electronically to the extent authorized by 5 VAC 5-20-150, Copies and format, of the Commission's Rules of Practice and Procedure ("Rules of Practice"). Confidential and Extraordinarily Sensitive Information shall not be submitted electronically and should comply with 5 VAC 5-20-170, Confidential information, of the Rules of Practice. Any person seeking to hand deliver and physically file or submit any pleading or other document shall contact the Clerk's Office Document Control Center at (804) 371-9838 to arrange the delivery.

An electronic copy of the public version of the Application also may be obtained by submitting a written request to counsel for the Applicant: Robert F. Riley, Esquire or Bradley J. Nowak, Esquire, Williams Mullen, 8350 Broad Street, Suite 1600, Tysons, Virginia 22102, or rriley@williamsmullen.com or bnowak@williamsmullen.com. Interested persons also may download unofficial copies of the public version of the Application and other documents filed in this case from the Commission's website: scc.virginia.gov/pages/Case-Information.

On or before October 22, 2024, any interested person may submit comments on the Application by following the instructions on the Commission's website: scc.virginia.gov/casecomments/Submit-Public-Comments. Those unable, as a practical matter, to submit comments electronically may file such comments with the Clerk of the State Corporation Commission, c/o Document Control Center, P.O. Box 2118, Richmond, Virginia 23218-2118. All comments shall refer to Case No. PUR-2024-00107.

On or before October 22, 2024, any person or entity wishing to participate as a respondent in this proceeding may do so by filing a notice of participation with the Clerk of the Commission at scc.virginia.gov/clk/efiling. Those unable, as a practical matter, to file a notice of participation electronically may file such notice by U.S. mail to the Clerk of the Commission at the address listed above. Notices of participation shall include the email address of the party or its counsel. The respondent shall serve a copy of the notice of participation on counsel to the Applicant. Pursuant to 5 VAC 5-20-80 B, *Participation as a respondent*, of the Commission's Rules of Practice, any notice of participation shall set forth: (i) a precise statement of the interest of the respondent; (ii) a statement of the specific action sought to the extent then known; and (iii) the factual and legal basis for the action. Any organization, corporation, or government body participating as a respondent must be represented by counsel as required by 5 VAC 5-20-30, *Counsel*, of the Rules of Practice. All filings shall refer to Case No. PUR-2024-00107.

On or before October 22, 2024, any interested person or entity may file with the Clerk of the Commission at: scc.virginia.gov/clk/efiling, a request that the Commission convene a hearing on the Company's Application. Those unable, as a practical matter, to file a request for hearing electronically may file such request for hearing by U.S. mail to the Clerk of the Commission at the address listed above. Such request for hearing shall include the email address of the filer or its counsel, if available. Requests for hearing must include: (i) a precise statement of the filing party's interest in the proceeding; (ii) a statement of the specific action sought to the extent then known; (iii) a statement of the legal basis for such action; and (iv) a precise statement why a hearing should be conducted in this matter. The interested person shall simultaneously serve a copy of the hearing request on counsel to the Company at the address set forth above. All requests for a hearing shall refer to Case No. PUR-2024-00107.

Any documents filed in paper form with the Office of the Clerk of the Commission in this docket may use both sides of the paper. In all other respects, except as modified by the Commission's Order for Notice and Comment, all filings shall comply fully with the requirements of 5 VAC 5-20-150, *Copies and format*, of the Rules of Practice.

The Rules of Practice, the Commission's Order for Notice and Comment, and the public version of the Application and other

documents filed in this case may be viewed on the Commission's website at: scc.virginia.gov/pages/Case-Information.

HECATE ENERGY PULASKI LLC

(8) On or before August 27, 2024, the Applicant shall serve a copy of this Order for Notice and Comment on the following local officials in Pulaski County, to the extent the position exists: the chairman of the board of supervisors of the county; the mayor or manager (or equivalent official) of every city and town; and the county, city, or town attorney. Service shall be made electronically where possible; if electronic service is not possible, service shall be made by either personal delivery or first-class mail to the customary place of business or residence of the person served.

(9) On or before September 17, 2024, the Applicant shall file proof of the notice and service required by Ordering Paragraphs (7) and (8), including the name, title, and address of each official served, with the Clerk of the Commission by filing electronically at scc.virginia.gov/clk/efiling.

(10) On or before September 17, 2024, the Applicant shall file with the Clerk of the Commission, electronically at scc.virginia.gov/clk/efiling, a certificate of mailing of the notice to owners of property prescribed by Ordering Paragraph (6). The certificate shall not include the names and addresses of the owners of property served, but the Applicant shall maintain a record of this information.

(11) On or before October 22, 2024, any interested person may file comments on the Application by following the instructions found on the Commission's website: scc.virginia.gov/casecomments/Submit-Public-Comments. Those unable, as a practical matter, to submit comments electronically may file such comments by U.S. mail to the Clerk of the State

Corporation Commission, c/o Document Control Center, P.O. Box 2118, Richmond, Virginia 23218-2118. All comments shall refer to Case No. PUR-2024-00107.

(12) On or before October 22, 2024, any person or entity wishing to participate as a respondent in this proceeding may do so by filing a notice of participation at scc.virginia.gov/clk/efiling. Those unable, as a practical matter, to file a notice of participation electronically may file such notice by U.S. mail to the Clerk of the Commission at the address listed in Ordering Paragraph (11). Such notice of participation shall include the email addresses of such parties or their counsel. The respondent shall serve a copy of the notice of participation on counsel to the Applicant. Pursuant to 5 VAC 5-20-80 B, *Participation as a respondent*, of the Rules of Practice, any notice of participation shall set forth: (i) a precise statement of the interest of the respondent; (ii) a statement of the specific action sought to the extent then known; and (iii) the factual and legal basis for the action. Any organization, corporation, or government body participating as a respondent must be represented by counsel as required by 5 VAC 5-20-30, *Counsel*, of the Rules of Practice. All filings shall refer to Case No. PUR-2024-00107.

(13) Within five (5) business days of receipt of a notice of participation as a respondent, the Applicant shall serve upon the respondent a copy of the public version of the Application and supporting materials, unless these materials already have been provided to the respondent.

(14) On or before October 22, 2024, any interested person or entity may file with the Clerk of the Commission at: scc.virginia.gov/clk/efiling, a request that the Commission convene a hearing on the Company's Application. Those unable, as a practical matter, to file a request for hearing electronically may file such request for hearing by U.S. mail to the Clerk of the Commission at the address in Ordering Paragraph (11). Such request for hearing shall include

the email address of the filer or its counsel, if available. Requests for hearing must include: (i) a precise statement of the filing party's interest in the proceeding; (ii) a statement of the specific action sought to the extent then known; (iii) a statement of the legal basis for such action; and (iv) a precise statement why a hearing should be conducted in this matter. A copy of such hearing request shall simultaneously be served on counsel to the Company at the address set forth in Ordering Paragraph (5). All requests for a hearing shall refer to Case No. PUR-2024-00107.

(15) On or before October 29, 2024, Pulaski I Solar shall file with the Clerk of the Commission, its response to any request for hearing filed in this matter. The Company shall serve a copy of such response on Staff, any respondents, and the interested person or entity requesting a hearing.

(16) On or before November 12, 2024, Staff shall investigate the Application and file with the Clerk of the Commission a Staff Report containing its findings and recommendations. A copy thereof shall be served on counsel to the Applicant and all respondents.

(17) On or before November 26, 2024, Pulaski I Solar shall file with the Clerk of the Commission and serve on the Staff and any respondents any response in rebuttal to the Staff Report and any comments filed by interested persons or entities, including DEQ, in this proceeding. The Company shall serve a copy of its response in rebuttal on Staff and all respondents. Additionally, the Company shall serve a copy of its rebuttal testimony on DEQ by email to bettina.rayfield@deq.virginia.gov.

(18) Any documents filed in paper form with the Office of the Clerk of the Commission in this docket may use both sides of the paper. In all other respects, except as modified herein,

all filings shall comply fully with the requirements of 5 VAC 5-20-150, *Copies and format*, of the Rules of Practice.

(19) The Rules of Practice 5 VAC 5-20-260, *Interrogatories or requests for production of documents and things*, shall be modified for this proceeding as follows: responses and objections to written interrogatories and requests for production of documents shall be served within seven (7) calendar days after receipt of the same. In addition to the service requirements of 5 VAC 5-20-260 of the Rules of Practice, on the day that copies are filed with the Clerk of the Commission, a copy of the interrogatory or request for production shall be served electronically on the party to whom the interrogatory or request for production is directed or the assigned Staff attorney, if the interrogatory or request for production is directed to Staff.²⁵ Except as modified herein, discovery shall be in accordance with Part IV of the Rules of Practice, 5 VAC 5-20-240 *et seq.*

(20) This matter is continued.

A COPY hereof shall be sent electronically by the Clerk of the Commission to all persons on the official Service List in this matter. The Service List is available from the Clerk of the Commission.

²⁵ The assigned Staff attorney is identified on the Commission's website, scc.virginia.gov/pages/Case-Information, by clicking "Docket Search," then clicking "Search by Case Information," and entering the case number, PUR-2024-00107, in the appropriate box.