

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Hardin :  
Wind LLC Regarding its Certificate to : Case No. 14-1557-EL-BGA  
Construct a Wind-Powered Electric :  
Generation Facility in Hardin and Logan :  
counties, Ohio. :

**PREFILED TESTIMONY  
OF  
JON WHITIS  
OHIO POWER SITING BOARD STAFF**

**Staff Exhibit \_\_\_\_\_**

**September 24, 2015**

1 1. Q. Please state your name and your business address.

2 A. My name is Jon Whitis, and my business address is 180 East Broad Street,  
3 Columbus, OH 43215.  
4

5 2. Q. By whom are you employed and what is your position?

6 A. I am employed by the Public Utilities Commission of Ohio (Commission)  
7 as a Utility Specialist 2 in the Siting, Efficiency and Renewable Energy  
8 Division of the Commission's Rates and Analysis Department. My posi-  
9 tion includes assigned duties by the Chairman of the Ohio Power Siting  
10 Board (Board) to investigate applications filed with the Board and assist in  
11 preparing reports on such investigations.  
12

13 3. Q. Please summarize your educational background.

14 A. I hold a Bachelor's Degree from The Ohio State University in Business  
15 Administration. Additionally, I received a Master's Degree from Ashland  
16 University in Business Administration.  
17

18 4. Q. How long have you been employed by the Commission and in what capac-  
19 ity?

20 A. I have been employed by the Commission since 1987. I have worked on  
21 power siting activities since 2002. I have developed analysis for over 50  
22 cases before the Ohio Power Siting Board (Board). My responsibilities

1 typically include application review and the preparation of analysis for  
2 major utility facilities in Ohio. I have been the lead analyst in more than 30  
3 applications, responsible for the preparation of staff reports and coordina-  
4 tion of Staff review and field work for major utility facilities.

5  
6 5. Q. Have you testified in prior proceedings before the Ohio Power Siting  
7 Board?

8 A. Yes. I testified in Buckeye Wind LLC, Case No. 08-666-EL-BGN.  
9

10 6. Q. What is the subject matter of the present case?

11 A. In Case No. 14-1557-EL-BGA, the Applicant proposes to amend its Certif-  
12 icate of Environmental Compatibility and Public Need issued in Case No.  
13 13-1177-EL-BGN, known as the Scioto Ridge Wind Farm, by relocating  
14 and adding facility components.  
15

16 7. Q. What is the purpose of your testimony in this proceeding?

17 A. I am sponsoring the Staff Report of Investigation (Staff Report) that was  
18 filed in the docket of this case on September 4, 2015. I was the Staff pro-  
19 ject lead on this case, and managed the Staff investigation and preparation  
20 of the Staff Report. Consistent with the Board's September 9, 2015 Entry,  
21 my testimony addresses the relocated and new facilities that the Board

1 identified to be within the scope of the issues that can be addressed in the  
2 hearing of this matter.

3 Specifically, Staff notes that the Applicant proposes to relocate five turbine  
4 sites in addition to the relocation and addition of non-turbine associated  
5 facilities. Staff stated within the Staff Report that these proposals introduce  
6 substantial changes in the location of these portions of the facility.

7  
8 8. Q. Do you have any changes or corrections to make to the Staff Report of  
9 Investigation?

10 A. No.

11  
12 9. Q. What is Staff's general role in this case?

13 A. Staff's role in this case is to evaluate the project proposal and develop con-  
14 ditions to minimize impacts to the proposed project site and surrounding  
15 landowners.

16  
17 10. Q. How did Staff perform the evaluation in this case?

18 A. Staff reviewed the application, issued data requests to the Applicant to  
19 gather and supplement project information, as needed. Staff also made  
20 multiple visits to the project site.

1 Following its evaluation in this case, Staff prepared the aforementioned  
2 Staff Report for the Board, stating the facts necessary for the Board to make  
3 its determination on whether to approve the Applicant's application.  
4

5 11. Q. Within the Staff Report, Staff references 13 access road shifts and 7 new  
6 collection lines. Did the Applicant agree with Staff's calculation of the  
7 number of access road shifts and new collection lines being proposed for  
8 this case?

9 A. Yes, the application states there would be 10 access roads road shifts and 6  
10 new collection lines. However, based on Staff's GIS data review and other  
11 supplemental information provided by the Applicant, Staff correctly calcu-  
12 lated there would be 13 access road shifts and 7 new collection lines. The  
13 Applicant agreed with Staff's calculation of the number of access road  
14 shifts and new collection lines being proposed for this case.  
15

16 12. Q. You mentioned conditions. What are these?

17 A. Staff develops and recommends conditions designed to minimize various  
18 impacts and disruptions to the project area and to surrounding landowners.  
19 The conditions establish a cooperative framework that promotes good com-  
20 munications among the applicant, landowners, local governmental authori-  
21 ties, and the Staff to address issues that may arise during all phases of the  
22 project.

1    13.    Q.    As a result of its evaluation, what did the Staff conclude in this case?

2            A.    Staff believes that the conditions approved by the Board in Case No. 13-  
3            1177 as part of Hardin Wind's certificate are adequate to address and to  
4            mitigate reasonably anticipated impacts of this amendment. Staff therefore  
5            recommends approval by the Board.

6

7    14.    Q.    Does this conclude your testimony?

8            A.    Yes, it does. However, I reserve the right to submit supplemental testi-  
9            mony as described herein, as new information subsequently becomes avail-  
10          able or in response to positions taken by other parties.

## PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of **Jon Whitis** submitted on behalf of the Staff of the Ohio Power Siting Board, was served via electronic mail or U.S. Mail upon the parties listed below this 24<sup>th</sup> day of September, 2015.

*/s/ John H. Jones*

**John H. Jones**

Assistant Attorney General

### Parties of Record:

Gretchen L. Petrucci  
Michael J. Settineri  
Vorys Sater Seymour & Pease  
52 East Gay Street  
P.O. Box 1008  
Columbus, OH 43216-1008  
[glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)  
[mjsettineri@vorys.com](mailto:mjsettineri@vorys.com)

Mark Yurick  
Taft Stettinius & Hollister  
65 East State Street, Suite 1000  
Columbus, OH 43215  
[yurick@taft.com](mailto:yurick@taft.com)

Joseph J. Grant  
20616 U.S. Highway 68N  
Belle Center, OH 43310

James L. Klink  
11316 Northlake Drive  
Lakeview, OH 43331  
[jmklink@yahoo.com](mailto:jmklink@yahoo.com)

Chad A. Endsley  
Ohio Farm Bureau Federation, Inc.  
280 North High Street, 6<sup>th</sup> Floor  
P.O. Box 182383  
Columbus, OH 43218  
[cendsley@ofbf.org](mailto:cendsley@ofbf.org)

William E. Campbell  
9523 Heron Way  
Belle Center OH 43310

Anthony & Devin Elsasser  
6051 Twp Rd 200  
Belle Center, OH 43310

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**9/24/2015 2:40:40 PM**

**in**

**Case No(s). 14-1557-EL-BGA**

Summary: Testimony Prefiled Testimony of Jon White submitted by Assistant Attorney General John Jones on behalf of the Staff of the Ohio Power Siting Board. electronically filed by Kimberly L Keeton on behalf of Ohio Power Siting Board