

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of South :
Field Energy, LLC, for a Certificate of : Case No. 15-1716-EL-BGN
Environmental Compatibility and Public :
Need to Construct an Electric Generation :
Facility in Columbiana County. :

In the Matter of the Application of South :
Field Energy, LLC, for a Certificate of : Case No. 15-1717-EL-BTX
Environmental Compatibility and Public :
Need for a Transmission Line in :
Columbiana County. :

**PREFILED TESTIMONY
OF
JAMES S. O'DELL
SITING, EFFICIENCY, AND RENEWABLE ENERGY DIVISION
RATES AND ANALYSIS DEPARTMENT**

Staff Exhibit _____

June 17, 2016

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

2 A. My name is James S. O'Dell, and my business address is 180 East Broad
3 Street, 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 (PUCO) as a
7 senior Siting Specialist in the Siting, Efficiency and Renewable Energy
8 Division of the PUCO's Rates and Analysis Department.

9

10 3. Q. Please summarize your educational background and work experience.

11 A. I hold Bachelor's Degrees from The Ohio State University in Political
12 Science (1988) and Sociology (1997). Additionally, I received a Master's
13 Degree in City and Regional Planning from The Ohio State University in
14 1992. I also have significant course work completed towards a Master's
15 Degree in Public Policy from Central Michigan University.

16

17 I have been employed by the PUCO since 1991. I have worked almost
18 exclusively on power siting activities during that time. I have provided
19 analysis for over 250 cases before the Ohio Power Siting Board (Board).
20 My responsibilities typically include application review and the preparation
21 of analysis for major utility facility applications in Ohio. Additionally, I
22 process and review accelerated filings such as Letters of Notification and

1 Construction Notices. I have been the lead analyst for more than 40 gener-
2 ation facility, substation, and long transmission line applications, responsi-
3 ble for the preparation of staff reports and coordination of Staff review and
4 field work for major utility facilities. In the past, I also have been the pri-
5 mary author for the Board's annual reports.

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

9 A. Yes. Most recently, I testified as the lead analyst for the Avon Lake Gas
10 Addition Project, Case Number 14-1717-GA-BLN.

11
12 5. Q. What is the purpose of your testimony in this proceeding?

13 A. I am sponsoring the two Staff Reports of Investigation (Staff Reports) that
14 were filed separately in the dockets of the generation facility (Case No. 15-
15 1716-EL-BGN) and interconnection facilities (Case No. 15-1717-EL-BTX)
16 cases on May 20, 2016. I was the Staff project lead on both cases, and
17 managed the Staff investigations and preparation of the Staff Reports.

18
19 6. Q. What kinds of cases are these?

20 A. In Case No. 15-1716-EL-BGN, the Applicant proposes to construct, own,
21 operate, and maintain a natural gas-fired combined-cycle generating facility
22 with a capacity of 1.105 MW in Yellow Creek Township, Columbiana

1 County, Ohio. In Case No. 15-1717-EL-BTX, the Applicant also proposes
2 to construct a 3.9-mile long 345 kV transmission line and associated
3 switching station to interconnect the generating facility to the existing
4 FirstEnergy 345 kV transmission circuit to deliver energy from the facility
5 to the electric power grid.
6

7 7. Q. Do you have any changes or corrections to make to either or both of the
8 Staff Reports of Investigation?

9 A. Yes. In the Staff Report for the interconnection facilities in Case No. 15-
10 1717-EL-BTX, the reference made to "...the application filed by Paulding
11 Wind Farm III, LLC..." in the first paragraph between the recommended
12 conditions of certificate heading and general conditions sub-heading on
13 page 35 should be changed to "...the application filed by South Field
14 Energy, LLC...."
15

16 8. Q. Do you have any other changes?

17 A. No.
18

19 9. Q. Do you agree with South Field Energy's request to have both the Preferred
20 and Alternate Routes approved so it can have the flexibility to elect and
21 give notice to the Board no later than 120-days prior to construction which
22 route it will construct, as described in the direct testimonies of Jonathan

1 Winslow at pages 14-16 and Lynn Gresock at pages 15-16 that were filed
2 in these dockets on June 13, 2016?

3 A. No.

4
5 10. Q. Why not?

6 A. Staff has never before recommended both the Preferred Route and Alter-
7 nate Route with applicant discretion to choose one prior to construction in
8 any other Board transmission case. Staff has an obligation to investigate,
9 evaluate, and make findings and recommendations on the criteria in
10 R.C. 4906.10(A)(1) through (8) as applied to South Field Energy's Appli-
11 cation. While both routes are viable and similar, Staff found that the Alter-
12 nate Route is likely to present a greater degree of potential adverse impact
13 to Agricultural District lands. See Staff's conclusion at page 25 of the Staff
14 Report addressing this particular criteria under R.C. 4906.10(A)(7) in Case
15 No. 15-1717-EL-BTX. While Staff does not expect the Agricultural
16 District lands to be removed from the program or experience a significant
17 drop in agricultural production, the construction and operation of the Alter-
18 nate Route would have a greater impact on Agricultural District lands and
19 could result in greater land use conflicts.

20
21 11. Q. What is Staff's recommendation on the route to be approved and con-
22 structed?

1 A. Staff recommends the Board find that South Field Energy's Preferred Route
2 represents the minimum adverse environmental impact, and therefore com-
3 plies with the requirements specified in R.C. 4906.10(A)(3).
4

5 12. Q. Does this conclude your testimony?

6 A. Yes, it does. However, I reserve the right to submit supplemental testi-
7 mony as described herein, as new information subsequently becomes avail-
8 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 **James S. O'Dell** submitted on behalf of the Staff of the Ohio Power Siting Board, was served via electronic mail upon the following parties of record this 17th day of June, 2016.

/s/ John H. Jones

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Case No(s). 15-1716-EL-BGN, 15-1717-EL-BTX

Summary: Testimony Prefiled Testimony of James S. O'Dell 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