

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Icebreaker)	
Windpower Inc., for a Certification to)	
Construct a Wind-Powered Electric)	Case No. 16-1871-EL-BGN
Generation Facility in Cuyahoga County,)	
Ohio)	

DIRECT TESTIMONY OF W. SUSAN DEMPSEY

Q. Please state your name for the record?

A. W. Susan Dempsey.

Q. Have you been granted intervention by the Ohio Power Siting Board in this case?

A. Yes I have.

Q. What is your general understanding of the proposed Icebreaker Project?

A. I understand that Icebreaker has proposed an offshore 6-turbine wind-powered electric generating facility located in Lake Erie, 8-10 miles off the shore of Cleveland in Cuyahoga County. It purports to be the first proposed freshwater offshore wind turbine facility in North America and the Great Lakes. I also understand that the Project is not intended to be a commercially feasible, stand-alone electric generating facility. I understand it is to be subsidized with a \$40 million federal grant. The Project itself will only produce approximately 20.7 MW of generation at full capacity. I oppose the Project because I think it is a terrible idea to permit this type of private development in Lake Erie. As Icebreaker itself has acknowledged, the Project would be precedent-setting. I think the Project will endanger the fresh waters of Lake Erie and mar the scenic beauty of the Lake. I have serious concerns that the Project will kill migrating birds -- concerns that are the subject of the expert analysis of Henry Streby. And it is my understanding that the Project does not make economic sense for the electricity market -- a matter that is the subject of the expert analysis of Richard Brown.

Q. What is the purpose of your testimony?

A. To state my concerns and objections to any proposed wind turbines being located in the fresh waters of Lake Erie. These concerns and objections arise in my position as a resident and homeowner in Bratenahl, on the shore of Lake Erie, as a taxpayer of Cuyahoga County, and as a recreational user of Lake Erie and its shores.

Q. Do you reside in Cuyahoga County?

A. Yes.

Q. How long have you been a resident of Cuyahoga County?

A. My entire life.

Q. What is your residential address?

A. One Bratenahl Place, Suite 910, Bratenahl, Ohio 44108.

Q. How long have you lived at this address?

A. Since 1997.

Q. Are you a homeowner and property owner of Cuyahoga County?

A. Yes. I own two condominium units in the One Bratenahl Place tower.

Q. Do you pay property taxes in Cuyahoga County?

A. Yes.

Q. Do you also pay state, county and federal taxes?

A. Yes I do.

Q. What is the distance from your residence to the shores of Lake Erie?

A. About 100 yards. From my unit on the ninth floor, to the west I see Cleveland, and to the north and northwest I see Lake Erie.

Q. Are you personally a recreational user of Lake Erie?

A. Yes.

Q. Please explain.

A. I've grown up around the Lake. I was born in Euclid. When I was a child, our family had a cottage in East Lake. For most of the summer, we spent time in and on the lake, swimming, boating and fishing and enjoying the sunsets. Our home in Euclid was on a street that dead-ended at the shore of the Lake. We had a little beach club and we swam and boated from the beach and watched sunsets over the Lake. We also watched storms over the Lake. We also had a cottage in East Lake. We spent large portions of our summers on the beaches there. As an adult, I started sailing. When I lived in Cleveland Heights, I was crewing on several different boats. I spent lots of summers on the Lake, sailing and enjoying the Lake. Now, I can sit on my balcony and watch sunsets, watch the birds that come across the Lake. It's my backyard.

- Q. Have you had occasion to review the Expert Report prepared by Richard E. Brown, Ph.D., P.E. of ExPonent, Inc. filed in this case?
- A. Yes I have from a layperson's perspective. I don't have any expertise in the matters he analyzes.
- Q. Do you support and endorse the findings and conclusions of Mr. Brown's Expert Report?
- A. Yes I do, again from a layperson's perspective.
- Q. Have you had occasion to review the Expert Report prepared by Henry M. Strieby, Ph.D., Assistant Professor of Ecology, University of Toledo Department of Environmental Services, also filed in this case?
- A. Yes I have, again from a layperson's perspective, not as an expert.
- Q. Do you support and endorse the findings and conclusions of Mr. Strieby's Expert Report?
- A. Yes I do, again from a layperson's perspective.
- Q. Please summarize your concerns and objections with the proposed Icebreaker Project and the application for siting certification.
- A. I don't think anybody should put any wind turbines in Lake Erie. Not one. Not six. And certainly not 1600. It's the greatest natural resource we have in the State of Ohio. The State should protect the Lake for the benefit of the citizens of the State. It should not be used to benefit a private, for-profit business affiliated with a Norwegian corporation, Fred.Olsen Renewables. I just don't think that wind turbines are appropriate to be put into Lake Erie, into my drinking water, into the scenic views that are outside my window. Lake Erie is freshwater. There isn't that much fresh water in the world. We should protect it. I want to protect Lake Erie. I want to protect it for the millions who drink the water provided by the Lake, for swimmers, boaters, for the fish, for the birds, for the developers investing in Cleveland's lake front - housing, dining and scenic viewing opportunities. I've watched the Lake get polluted and I've watched it get clean. I've lived there when there were no miggies and no mayflies because of the pollution in the Lake. They're finally coming back. I'd like to maintain that. I don't think we should be doing anything that creates a risk for bad consequences to the Lake. I'm trying to protect Lake Erie.
- Q. How did you come to seek to intervene in this case to oppose the Icebreaker Project?
- A. I believe I first learned about the Project through articles in The Plain Dealer. As I've stated, I want to protect Lake Erie. I looked at the docket in this case, and saw that Benesch, Friedlander, Coplan & Aronoff, LLP, was representing some Cuyahoga County residents who were seeking to intervene to oppose the Project. I called John Stock at Benesch to seek assistance in intervening to oppose this Project.

- Q. Before calling Mr. Stock, did any business or organization contact you to seek to have you intervene in this case?
- A. No. I'd simply read about the Project and thought it was a very bad idea. I decided to contact Mr. Stock to try to get involved in this case to protect Lake Erie. That is my sole motivation and my sole objective -- to protect the Lake.
- Q. Are you receiving anything of value for your participation in this case?
- A. No, only the hope that Lake Erie will be protected.
- Q. What action are you asking the Ohio Power Siting Board to take in this case?
- A. I am urging the Board to fully investigate and scrutinize the proposed application, to consider my objections and concerns with the application and the findings and conclusions of the expert reports of Henry Streby and Richard Brown, and to deny, or substantially modify the required siting certification as appropriate and justified. I urge the Board to fully consider the consequences to Lake Erie and the surrounding communities that arise from this application to site power generation facilities in Lake Erie and to open the door to future commercial development in this great resource. This Project, heavily subsidized by county, state, and federal dollars, cannot be justified in economic grounds and the balance of interests should be weighed in favor of protecting the environment, wildlife, habitats, and the recreational resources of Lake Erie -- Ohio's greatest natural asset. Lake Erie should be a National Park not become an industrial park.
- Q. Does this conclude your direct testimony?
- A. Yes it does.

CERTIFICATE OF SERVICE

The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of this document was served upon all counsel of record via electronic mail at the following addresses this 14th day of September, 2018:

cpirik@dickinsonwright.com
todonnell@dickinsonwright.com
wvorys@dickinsonwright.com
john.jones@ohioattorneygeneral.gov
thomas.lindgren@ohioattorneygeneral.gov
mleppla@theoec.org
tdougherty@theoec.org
mjsettineri@vorys.com
glpetrucci@vorys.com
paul@ptblaw.com
cravenor@theoec.org
cameron.simmons@ohioattorneygeneral.gov

megan.addison@puco.ohio.gov
Nicholas.walstr@puco.ohio.gov

/s/ John F. Stock

John F. Stock

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/14/2018 2:07:49 PM

in

Case No(s). 16-1871-EL-BGN

Summary: Testimony Direct Testimony of W. Susan Dempsey electronically filed by John F Stock on behalf of W. Susan Dempsey and ROBERT M. Maloney