

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Application of **REPUBLIC**    )  
**WIND, LLC** for a Certificate of Environmental    )  
Compatibility and Public Need for a Wind-    ) Case No. 17-2295-EL-BGN  
Powered Electric Generating Facility in Seneca    )  
and Sandusky Counties, Ohio.                    )

**DIRECT SUPPLEMENTAL TESTIMONY OF**

**Dalton S. Carr  
Development Manager  
Apex Clean Energy**

**on behalf of**

**Republic Wind, LLC**

**October 28, 2019**

1 **Q-1. Please state your name.**

2 **A-1.** My name is Dalton S. Carr.

3 **Q-2. Are you the same Dalton S. Carr who previously filed testimony in this case on**  
4 **October 21, 2019?**

5 **A-2.** Yes, I am.

6 **Q-3. What is the purpose of your pre-filed supplemental testimony?**

7 **A-3.** The purpose of my testimony is to respond to the Supplement to the Staff Report filed  
8 October 18, 2019, but not made available to Republic Wind until October 21, 2019—the  
9 same day my initial pre-filed direct testimony was due and filed. The supplemental Staff  
10 Report proposes two additional conditions to the terms and 57 conditions of the July 25,  
11 2019 Staff Report. The purpose of my supplemental testimony is to review these  
12 additional conditions—Condition 58 and 59—and respond on behalf of the Applicant.

13 **Q-4. Does Republic Wind have any recommended modifications to the additional**  
14 **conditions proposed in the Supplemental Staff Report?**

15 **A-4.** Yes. Republic Wind requests the Board to revise the both additional conditions as  
16 discussed in my testimony below. .

17 **Q-5. Condition 58 states: “The Applicant shall not use turbine models Siemens Gamesa**  
18 **SG145 (4.5 MW), Nordex N149 (4.5 MW), or Nordex N149 (4.8 MW) at turbine**  
19 **location 37.” Do you propose modifications to this condition?**

20 **A-5.** For the reasons stated in the supplemental testimony of Isaac Old, filed October 28, 2019,  
21 Republic Wind believes this recommended condition is inconsistent with the OPSB  
22 precedent for noise standards and inconsistent with the noise limitations placed on the  
23 rest of the project area. Republic Wind demonstrated that it is fully compliant with the  
24 OPSB’s standard of average nighttime sound level + 5 dBA (46 dBA with respect to  
25 turbine location 37); this standard was further memorialized as a condition in Republic’s  
26 original Staff Report. Yet, OPSB staff is requesting that the OPSB apply a new and more  
27 stringent standard to this particular location. Accordingly, Republic Wind believes the  
28 Board should not adopt this condition. Alternatively, to the extent the Board decides to  
29 adopt Condition 58, it should be modified to state “The Applicant shall use noise reduced

1 operation modes at turbine location 37 to achieve a 41 dBA noise limitation.” As Mr. Old  
2 explains, although we disagree with the 41 dBA noise limitation, Republic Wind can  
3 achieve this limit using noise reduced operation modes with all of the proposed turbines.

4 **Q-6. Condition 59 states: “The Applicant shall only construct a turbine where the total**  
5 **height will be below the no effect height of 1,400 feet above mean sea level for**  
6 **turbine locations 6, 9, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27,**  
7 **28, 29, 30, 31, 32, 33, 34, 35, 38, 40, and 41.” Do you propose modifications to this**  
8 **condition?**

9 **A-6.** For the reasons stated in the supplemental direct testimony of Benjamin M. Doyle, filed  
10 October 28, 2019, Republic Wind believes that neither air safety nor efficiency require  
11 that the height or locations of the turbines be changed, based upon the information  
12 provided. Accordingly, Republic Wind cannot accept this condition.

13 **Q-7. Does this conclude your testimony?**

14 **A-7.** Yes, it does.

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Direct Supplemental Testimony of Dalton Carr was served upon the following parties of record via regular or electronic mail this 28<sup>th</sup> day of October 2019.



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Summary: Text Supplemental Testimony of Dalton S. Carr on behalf of Republic Wind, LLC  
electronically filed by Teresa Orahod on behalf of Devin D. Parram