

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Application of :  
Firelands Wind, LLC for a Certificate of :  
Environmental Compatibility and Public : Case No. 18-1607-EL-BGN  
Need for the Emerson Creek Wind Farm :  
in Erie Huron and Erie counties, Ohio. :

**PREFILED TESTIMONY  
OF**

**Jason A. Cross**

**ON BEHALF OF THE STAFF OF THE  
PUBLIC UTILITIES COMMISSION OF OHIO,  
POWER SITING DEPARTMENT**

**STAFF EX. \_\_\_\_**

**September 21, 2020**

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

2 A. My name is Jason A. Cross. My business address is 180 East Broad Street,  
3 6th Floor, Columbus, Ohio 43215-3793.  
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 Utilities Specialist 3 in the GIS and Operations division of the Power Siting  
8 Department.  
9

10 3. Q. Please summarize your educational background.

11 A. I received an Associate of Science degree in Electronics Engineering  
12 Technology from ITT Technical Institute in 1993 and a Bachelor of Science  
13 degree in Electronics Engineering Technology from DeVry University in  
14 1998.  
15

16 4. Q. Please summarize your work experience.

17 A. I have been employed by the PUCO for roughly nineteen years, from 2001  
18 to present. While employed in the Power Siting Department, my  
19 responsibilities at the PUCO have primarily involved engineering, including,  
20 but not limited to, grid interconnection, Ohio’s portion of the bulk electric  
21 system, and regional transmission organizations. I have been the staff expert  
22 on grid interconnection related items in over one hundred staff reports.

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

2           A.     Yes. In addition, I have assisted in the preparation of multiple staff reports  
3           and investigations before the OPSB and the PUCO.  
4

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

6           A.     I am sponsoring a portion of the Staff Report of Investigation (Staff Report).  
7           Specifically, I was a staff analyst for portions of the Staff Report pertaining  
8           to whether the Applicant has provided information that the facility is  
9           consistent with regional plans for expansion of the electric power grid of the  
10          electric systems serving this state and interconnected utility systems and that  
11          the facility will serve the interests of electric system economy and  
12          reliability.  
13

14    7.     Q.     Does this facility serve the interests of electric system economy and  
15          reliability?

16          A.     Yes, the Applicant included PJM Interconnection, LLC's ("PJM") System  
17          Impact Study (SIS) in its application. Furthermore, the project would  
18          provide additional electrical generation to the regional transmission grid.  
19

20    8.     Q.     Are you testifying to any specific conditions? If so, what are they?

21          A.     I am testifying to conditions 12 and 13 of the Staff report filed on March 2,  
22          2020.

1 9. Q. Why is Staff recommending condition 12?

2 A. Condition 12 requires the Applicant to notify OPSB Staff, before  
3 commencement of construction, that the Interconnection Service Agreement  
4 and Interconnection Construction Service Agreement has been executed.

5

6 10. Q. Why is Staff recommending condition 13?

7 A. Condition 13 caps the injection of energy into the Bulk Power System at  
8 297.7 MW.

9

10 11. Q. Does this conclude your testimony?

11 A. Yes, it does. However, I reserve the right to submit supplemental testimony  
12 as described herein, as new information subsequently becomes available or  
13 in response to positions taken by other parties.

## PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of Jason A. Cross, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, Power Siting Department, was served via electronic mail, upon the following parties of record, this 21<sup>st</sup> day of September, 2020.

/s/Werner L. Margard

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Summary: Testimony of Jason A. Cross electronically filed by Mrs. Tonnetta Y Scott on behalf of OPSB