

BEFORE  
THE OHIO POWER SITING BOARD

In the Matter of the Application )  
of Kingwood Solar I LLC, for a )  
Certificate of Environmental ) Case No. 21-0117-EL-BGN  
Compatibility and Public Need )

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**DIRECT TESTIMONY OF VERITY DIGEL ON BEHALF OF CITIZENS  
FOR GREENE ACRES, INC., JENIFER ADAMS, P. CHANCE BALDWIN,  
JACOB CHURCH, VERITY DIGEL, JED HANNA, KRAJICEK FAMILY TRUST,  
JAMES JOSEPH KRAJICEK, KAREN LANDON, NICOLE MARVIN, CHAD  
MOSSING, KAREN MOSSING, NICHOLAS PITSTICK, KYLE SHELTON,  
MARLIN VANGSNESS, JEAN WEYANDT, AND JERALD WEYANDT**

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

A.1. Verity Digel. I live at 3523 Wilberforce Clifton Road, Cedarville, Ohio 45314 with my husband Matthew Digel and our three children.

**Q.2. On whose behalf are you offering testimony in this case?**

A.2. I am offering testimony on behalf of Intervenors Citizens of Greene Acres, Inc., Jenifer Adams, P. Chance Baldwin, Jacob Church, Verity Digel, Jed Hanna, Krajicek Family Trust, James Joseph Krajicek, Karen Landon, Nicole Marvin, Chad Mossing, Karen Mossing, Nicholas Pitstick, Kyle Shelton, Marlin Vangsness, Jean Weyandt, and Jerald Weyandt. My testimony will refer to the Citizens for Greene Acres, Inc. as "CGA."

**Q.3. Are you an intervenor in this case?**

A.3. Yes, I am an intervenor.

**Q.4. Are you or any member of your immediate family a member of CGA?**

A.4. Yes, my husband Matthew Digel and I are members.

**Q.5. What is your occupation?**

A.5. I am a physicians' assistant in an emergency room.

1 **Q.6. Are you familiar with the location that has been proposed for the Kingwood Solar**  
2 **project?**

3 A.6. Yes. I have become familiar with the locations of the proposed project area by reviewing  
4 maps of the project area in the application filed with the Ohio Power Siting Board. In my  
5 testimony, I will refer to the Kingwood Solar project as the “Project” and the land  
6 proposed for the site of the Project as the “Project Area.”

7 **Q.7. Do you or any members of your immediate family own property adjacent to the**  
8 **Project Area?**

9 A.7. Yes, Matthew Digel and I own land and a house on an eight-acre parcel located at 3523  
10 Wilberforce Clifton Road in Cedarville, Ohio, which is adjacent to the Project Area on  
11 three sides.

12 **Q.8. When was your house built?**

13 A.8. Around 1880.

14 **Q.9. Did you already own your property at the time you first learned that Kingwood**  
15 **Solar might construct a solar project in the area?**

16 A.9. I had heard rumors about the solar project prior to purchasing the property. However, I  
17 felt comfortable in buying the property, because our realtor assured me that the  
18 construction of the solar project was “highly unlikely.” I thought that this information  
19 was accurate, since the realtor is the son of one of the landowners who is participating in  
20 the Project.

21 **Q.10. Can you see portions of the Project Area from your house and land, and if so,**  
22 **describe those views.**

1 A.10. Yes, we can see the Project Area on three sides of our property from our land. The view  
2 of the Project Area to the north of our property is visible from the first and second floor  
3 windows on that side of our house. I can see some of the Project Area on the west side of  
4 our property from the first and second floor windows on that side of our house. I also can  
5 see the Project Area to the east of the house from the first and second floor windows on  
6 the east side of the house, even though the Project Area on the east side is not adjacent to  
7 our property. The views are especially prominent from the second floor windows. The  
8 distance between our house and the Project Area to the north is about 120 to 150 feet.

9 **Q.11. What if any recreational activities are conducted in your yard?**

10 A.11. My family and I spend considerable time on recreational activities in our yard, especially  
11 the children. I have a hobby of growing flowers to produce cut flowers. My children's  
12 activities including riding all terrain vehicles, climbing trees, soccer, and volleyball.  
13 These recreational activities occur in areas from which the Project Area can be easily  
14 seen.

15 **Q.12. Does this conclude your direct testimony?**

16 A.13. Yes.

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**CERTIFICATE OF SERVICE**

I hereby certify that, on February 28, 2022, a copy of the foregoing written direct testimony was served by electronic mail on the following: Jodi Bair at [Jodi.Bair@ohioattorneygeneral.gov](mailto:Jodi.Bair@ohioattorneygeneral.gov); Daniel A. Brown at [dbrown@brownlawdayton.com](mailto:dbrown@brownlawdayton.com); Kevin Dunn at [kdd@planklaw.com](mailto:kdd@planklaw.com); John Hart at [jehartlaw@gmail.com](mailto:jehartlaw@gmail.com); Werner Margard III at [nbmorse@vorys.com](mailto:nbmorse@vorys.com); [Werner.Margard@ohioattorneygeneral.gov](mailto:Werner.Margard@ohioattorneygeneral.gov); Michael Settineri at [mjsettineri@vorys.com](mailto:mjsettineri@vorys.com); Lee Slone at [lee.slone@dinsmore.com](mailto:lee.slone@dinsmore.com); Charles Swaney at [cswaney@woh.rr.com](mailto:cswaney@woh.rr.com); David Watkins at [dw@planklaw.com](mailto:dw@planklaw.com); Anna Sanyal at [aasanyal@vorys.com](mailto:aasanyal@vorys.com); Nathaniel Morse at [nmorse@vorys.com](mailto:nmorse@vorys.com); Thaddeus Boggs at [tboggs@fbtlaw.com](mailto:tboggs@fbtlaw.com); Chad A. Endsley at [cendsley@ofbf.org](mailto:cendsley@ofbf.org); Amy M. Milam at [amilam@ofbf.org](mailto:amilam@ofbf.org); and Leah F. [Curtis at lcurtis@ofbf.com](mailto:Curtis@lcurtis@ofbf.com).

/s/ Jack A. Van Kley  
Jack A. Van Kley

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**Case No(s). 21-0117-EL-BGN**

Summary: Testimony of Verity Digel electronically filed by Mr. Jack A. Van Kley on behalf of Citizens for Greene Acres, Inc. and Adams, Jenifer and Pitstick, Nicholas and Church, Jacob and Baldwin, P.Chance and Hanna, Jed and Krajicek Family Trust and Landon, Karen and Krajicek, James Joseph and Digel, Verity and Marvin, Nicole and Mossing, Chad and Mossing, Karen and Weyandt, Jerald and Weyandt, Jean and Vangsness, Marlin and Shelton, Kyle