

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 ANGIE HANNA 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 home address.**

A.1. Angie Hanna. I live at 3251 Wilberforce Clifton Road, Cedarville, Ohio 45314 with my husband Jed Hanna and two of our children.

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

A.2. I am offering testimony on behalf of Intervenor 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 Weyand. My testimony will refer to the Citizens for Greene Acres, Inc. as "CGA."

**Q.3. Are you a member of CGA?**

A.3. Yes.

**Q.4. Is any member of your family an intervenor in this case?**

A.4. Yes, my husband Jed Hanna is an intervenor.

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

A.5. I have been employed as a registered nurse at a local hospital for 22 years.

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

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

9 A.7. Yes, the property of almost five acres at 3251 Wilberforce Clifton Road at which Jed  
10 Hanna and I live is adjacent to the Project Area. My testimony will refer to the property  
11 at 3251 Wilberforce Clifton Road as the “Residential Parcel.” Jed owns this property.  
12 Attached Exhibit A, which is a photograph that I took on May 7, 2021, accurately depicts  
13 the front of our house, the front part of our yard, and the driveway to the house. The  
14 Project Area is adjacent to the entire north side and the entire west side of the Residential  
15 Parcel. A portion of the Project Area to the west of our property is shown as a black field  
16 on the left side of Exhibit A.

17 **Q.8. Do any members of your immediate family own any other property that is near the**  
18 **Project Area?**

19 A.8. Yes, Hanna Family Properties LLC owns a 2.6-acre parcel at 3265 Wilberforce Clifton  
20 Road, which includes a house occupied by a renter. My testimony will refer to this  
21 property as the “Rental Property.” The Rental Property is located on the southern  
22 boundary of the Residential Parcel.

23 **Q.9. Have you been involved in decisions made by Hanna Family Properties LLC?**

1 A.9. Yes, Jed and I collaborate on the decisions made by Hanna Family Properties LLC.

2 **Q.10. Did you know about the Project at the time the Rental Property was purchased?**

3 A.10. Yes.

4 **Q.11. If that is the case, why was this property purchased?**

5 A.11. The prior owner of the Rental Property had sold the Residential Parcel to Jed Hanna and  
6 was allowing us to use the driveway on the Rental Property for access between our house  
7 and Wilberforce-Clifton Road. When the Rental Property was offered for sale, Jed and I  
8 decided to buy the property through Hanna Family Properties LLC so that we would not  
9 lose the access from our house to Wilberforce-Clifton Road.

10 **Q.12. What are the distances between your house and other things on the Residential**  
11 **Parcel and the Project Area?**

12 A.12. The Project Area is 70 feet from the western wall of our house and 41 feet from the  
13 northern wall of our house. The Project Area is 20 feet from our barn, 37 feet from our  
14 pool, and 30 feet from our well.

15 **Q.13. Describe the yard on the Residential Parcel.**

16 A.13. The house is surrounded on four sides with lawn. The lawn on the west and north sides  
17 of the yard extends to the edge of the property, abutting the Project Area. An  
18 aboveground pool is located in the west lawn, 37 feet from the property boundary that  
19 abuts the Project Area. A porch is attached to the front of the house. A large deck is  
20 located on the west side of the house. A playground set and a sandbox are located south  
21 of our house with a view of the Project Area to the west.

22 **Q.14. Describe your views of the Project Area from the house and yard at the Residential**  
23 **Parcel.**

1 A.14. My family and I have clear and close views of the crop field in the Project Area from the  
2 yard west and north of our house, from the porch in front of the house, from the deck on  
3 the west side of our house, and from the windows on the north and west sides on the first  
4 and second floors of the house. Attached Exhibit B is a true and accurate copy of a  
5 photograph I took from the front porch of our house showing the Project Area to the  
6 west, which is the field depicted starting beyond the grass of our yard. Attached Exhibits  
7 C through F are true and accurate copies of photographs I took through windows on the  
8 first and second floors of our house showing our grassed west yard and the Project Area  
9 immediately behind the grass starting at the edge of the field. Attached Exhibits G  
10 through I are true and accurate copies of photographs I took through windows on the first  
11 and second floors of our house showing our grassed north yard and the Project Area  
12 immediately behind the grass starting at the edge of the field. I took the photographs in  
13 Exhibits B through I in 2021 or 2022.

14 **Q.15. What if any recreational activities are conducted in your yard at the Residential**  
15 **Parcel?**

16 A.15. My family and I enjoy sitting and relaxing on the front porch and the deck. We have  
17 some meals on the deck. We entertain friends and family for outdoor parties in the fall  
18 and host many swimming parties in the summer. We have recreational activities in our  
19 yard, including flying kites and riding four-wheelers, a golf cart, and a go-cart. Our  
20 children play in the yard, including in the playground set and sandbox.

21 **Q.16. Have you seen any birds in your yard at the Residential Parcel or in the Project**  
22 **Area adjacent to this yard?**

1 A.16. Yes. I occasionally see Great Blue Herons. On one occasion last summer, I saw two  
2 Bald Eagles sitting in the Project Area north of our yard and have seen them flying over  
3 the Project Area. Ducks have nested near our yard. I have seen Sandhill Cranes flying  
4 over our property.

5 **Q.17. Does this conclude your direct testimony?**

6 A.17. Yes.

7

# EXHIBIT A



# EXHIBIT B





# EXHIBIT C





# EXHIBIT D





# EXHIBIT E



# EXHIBIT F





# EXHIBIT G



# EXHIBIT H





# EXHIBIT I





1  
2 **CERTIFICATE OF SERVICE**  
3

4 I hereby certify that, on February 28, 2022, a copy of the foregoing written direct  
5 testimony was served by electronic mail on the following: Jodi Bair at  
6 [Jodi.Bair@ohioattorneygeneral.gov](mailto:Jodi.Bair@ohioattorneygeneral.gov); Daniel A. Brown at [dbrown@brownlawdayton.com](mailto:dbrown@brownlawdayton.com); Kevin  
7 Dunn at [kdd@planklaw.com](mailto:kdd@planklaw.com); John Hart at [jehartlaw@gmail.com](mailto:jehartlaw@gmail.com); Werner Margard III at  
8 Nathaniel B. Morse at [nbmorse@vorys.com](mailto:nbmorse@vorys.com); [Werner.Margard@ohioattorneygeneral.gov](mailto:Werner.Margard@ohioattorneygeneral.gov);  
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13 [amilam@ofbf.org](mailto:amilam@ofbf.org); and Leah F. [Curtis at lcurtis@ofbf.com](mailto:Curtis@lcurtis@ofbf.com).

14 /s/ Jack A. Van Kley\_\_\_\_\_  
15 Jack A. Van Kley  
16



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Summary: Testimony of Angie Hanna electronically filed by Mr. Jack A. Van Kley on  
behalf of Citizens for Greene Acres & Its Member Intervenors