

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of)	
Kingwood Solar I LLC for a Certificate)	Case No. 21-117-EL-BGN
of Environmental Compatibility and)	
Public Need)	

SUPPLEMENTAL TESTIMONY OF ALEX ODOM

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

3 **A.1.** My name is Alex Odom. The address of my company's headquarters is 33 Moulton
4 Street, Cambridge, MA 02138.

5 **Q.2. Did you previously present direct testimony in this proceeding?**

6 **A.2.** Yes. I presented direct testimony in this proceeding that was filed on February 23,
7 2022.

8 **Q.3. On whose behalf are you offering this supplemental testimony?**

9 **A.3.** I am submitting this supplemental testimony on behalf of the Applicant, Kingwood
10 Solar I LLC ("Kingwood Solar"). This testimony is in addition to my direct testimony.

11 **Q.4. What is the purpose of your supplemental testimony?**

12 **A.4.** To address the 500-foot inverter setback that is in Condition 4 of the Joint
13 Stipulation and Recommendation as to Certificate Conditions (the "Joint Stipulation").
14 The Joint Stipulation was filed on March 4, 2022.

15 **Q.5. Have you reviewed the Joint Stipulation?**

16 **A.5.** Yes.

17 **Q.6. Can you please describe the proposed changes to Condition 4 as a result of the Joint**
18 **Stipulation?**

1 **A.6.** The proposed changes to Condition 4 generally relate to modifications to the
2 Project's layout and increased setbacks. With respect to sound, the Joint Stipulation now
3 includes "a minimum setback of from the project's inverter stations of at least 500 feet
4 from non-participating residences as of the application filing date."

5 **Q.7. Did you update your analysis of the operational sound levels as a result of the 500 foot**
6 **setback from the inverters?**

7 **A.7.** Yes.

8 **Q.8. Can you please describe that analysis?**

9 **A.8.** I updated the acoustical model, conducted using Cadna/A, a widely-accepted
10 software package. The updates consisted of relocating the inverter pad equipment to
11 match an updated project layout provided to me by Kingwood Solar that included the
12 minimum inverter setback of 500 feet. The quantity of inverters (qty. 52), distribution
13 transformers (qty. 52), and the substation transformer (qty. 1), remained unchanged from
14 the initial analysis. Some sections of solar panels were removed from the project with the
15 revised layout, so the number of tracker motors (qty. 122) was reduced slightly from our
16 initial analysis (originally qty. 127). The tracker motors are the least significant sound
17 source in the project, since they operate only intermittently during the day and do not
18 operate at night. Our modeling was conservative and assumed all tracker motors run
19 continuously during the day, when in reality, they operate intermittently and
20 asynchronously.

21 **Q.9. Did the increased setback of 500 feet for inverters change the modeled sound levels**
22 **from your original analysis?**

1 **A.9.** In general, the establishment of the setback of 500 feet for inverters reduced the
2 project sound levels. In our initial analysis, described in Exhibit K of the Application and
3 my direct testimony, we determined that the Project sound sources would not increase
4 daytime sound levels at 50 non-participating residences by more than 2 dB above the
5 designated ambient Leq, and would not increase nighttime sound levels at non-
6 participating residences by more than 4 dB above the designated ambient Leq. The project-
7 only sound level that corresponded with the 2 dB daytime increase was 39 dBA, and the
8 project-only sound level that corresponded with the 4 dB nighttime increase was 39 dBA.
9 Using the revised layout with a minimum inverter setback of 500 feet, we determined that
10 the Project sound sources will not increase daytime sound levels at non-participating
11 residences by more than 1 dB above the designated ambient Leq, and will not increase
12 nighttime sound levels at non-participating residences by more than 3 dB above the
13 designated ambient Leq. The project-only sound level that corresponded with 1 dB
14 daytime increase was 37 dBA, and the project-only sound level that corresponded with the
15 3 dB nighttime increase was 37 dBA. Both of these results show an improvement over the
16 initial analysis. A sound contour map of the analysis is attached as Attachment A to this
17 supplemental testimony and tables showing the project-only sound level and expected
18 increase over ambient for both the initial analysis and revised analysis are attached to this
19 supplemental testimony as Attachment B.

20 **Q.10. Do your overall conclusions regarding the potential noise impact of the Project**
21 **remain the same as stated in your direct testimony?**

22 **A.** Yes.

23 **Q.11. Does this conclude your supplemental testimony?**

1 **A.10.** Yes, it does.

CERTIFICATE OF SERVICE

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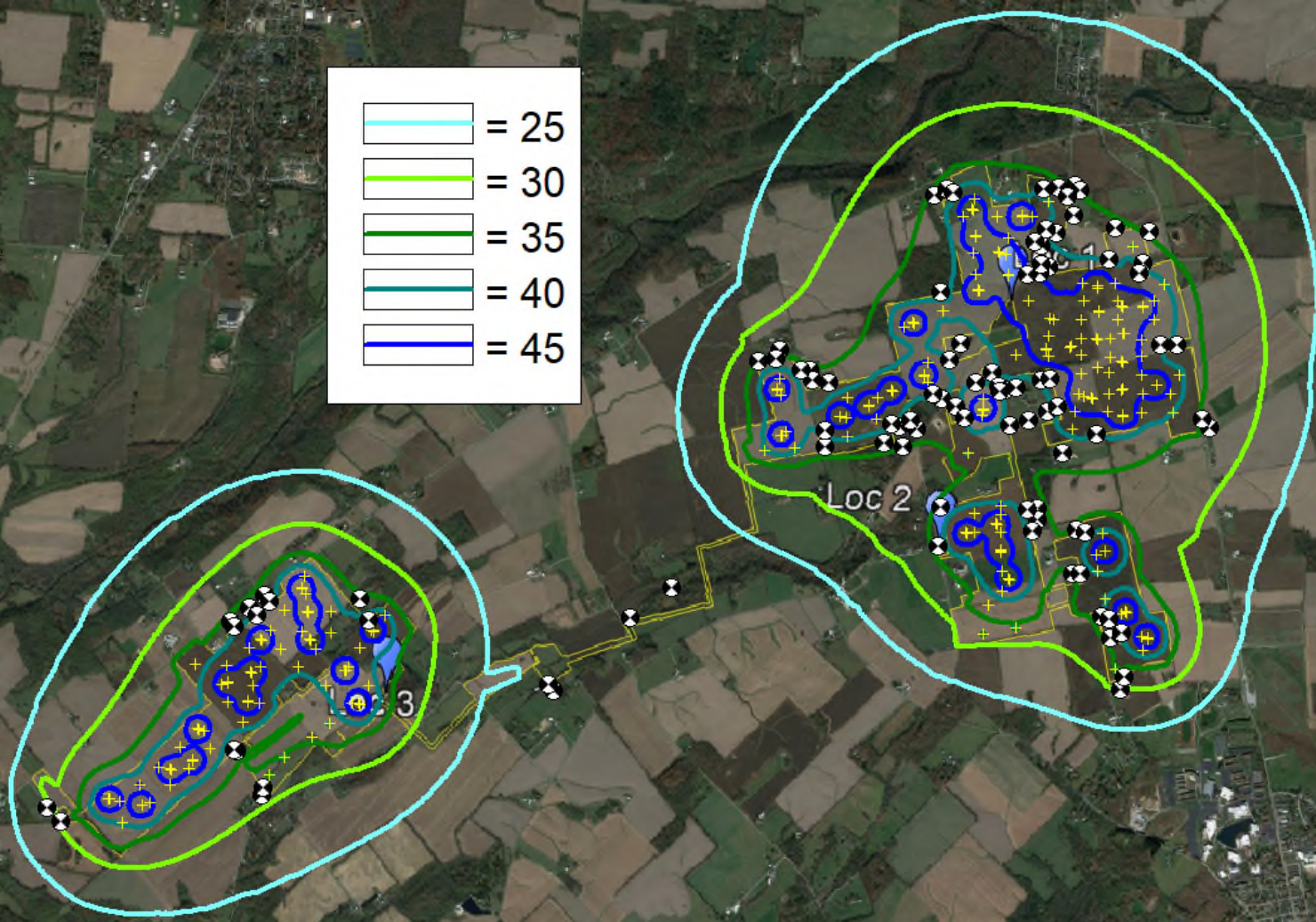
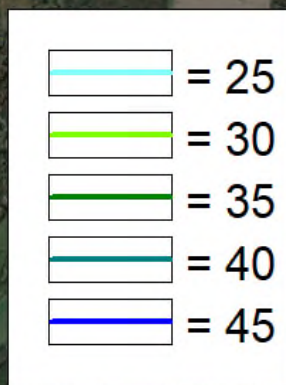
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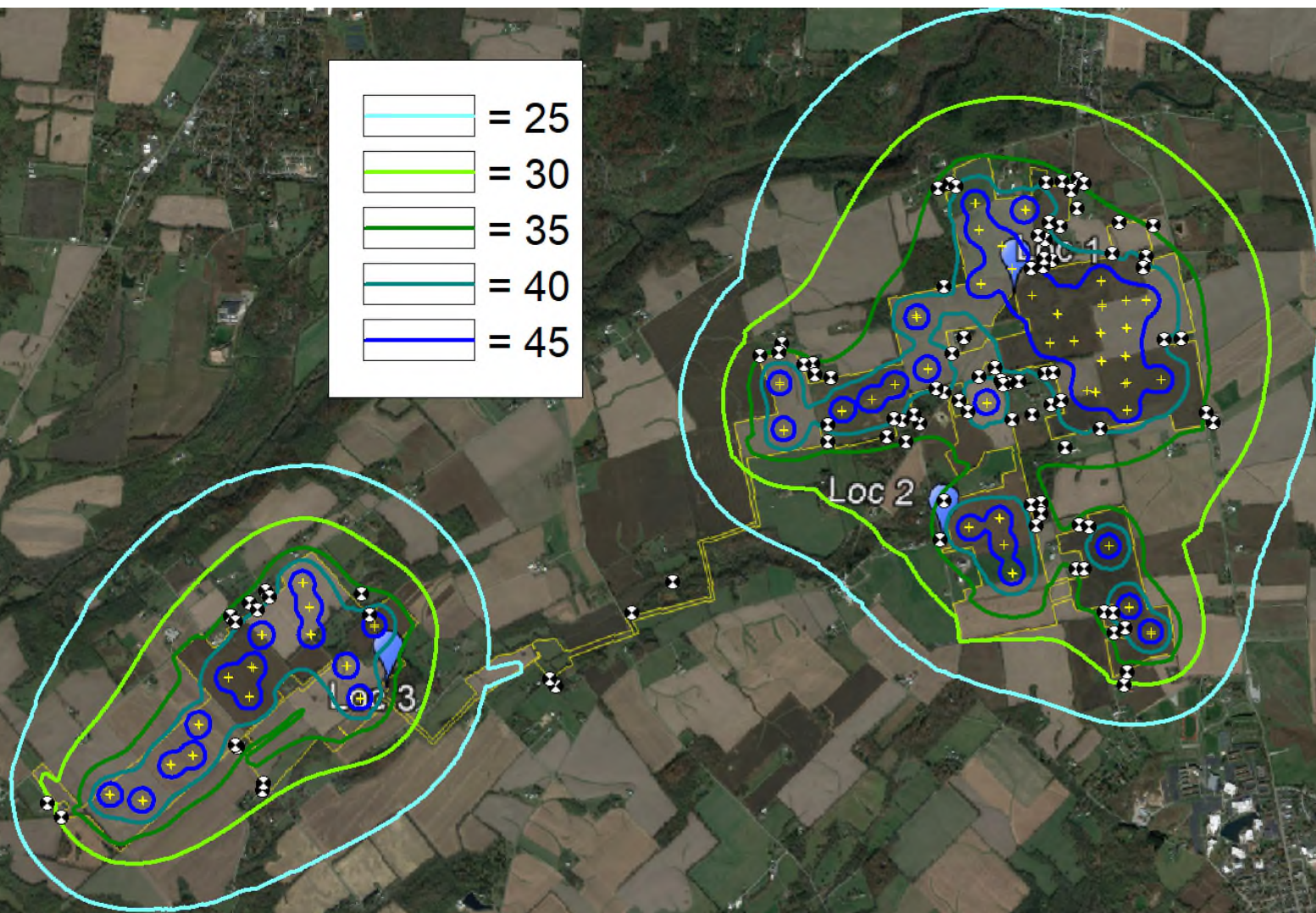
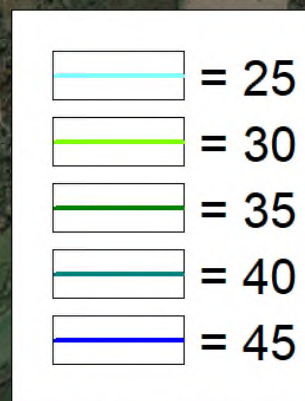
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Nighttime

Receiver	Project-Only Sound Level (dBA)				Change in Project-Only Sound Level (dB)	
	Initial Analysis		Revised Layout		Daytime	Nighttime
	Daytime	Nighttime	Daytime	Nighttime		
NP1	28	28	29	29	1	1
NP2	36	36	36	36		
NP3	32	32	31	31	-1	-1
NP4	37	37	36	36	-1	-1
NP5	39	39	36	36	-3	-3
NP6	39	39	37	37	-2	-2
NP7	35	35	36	36	1	1
NP8	19	19	20	20	1	1
NP9	15	15	16	16	1	1
NP10	36	36	35	35	-1	-1
NP11	37	37	34	34	-3	-3
NP12	36	36	35	35	-1	-1
NP13	36	36	36	36		
NP14	37	37	38	38	1	1
NP15	38	38	39	39	1	1
NP16	35	35	35	35		
NP17	35	35	36	36	1	1
NP18	39	39	39	39		
NP19	38	38	39	39	1	1
NP20	37	37	36	36	-1	-1
NP21	39	39	39	39		
NP22	38	38	39	39	1	1
NP23	38	38	40	40	2	2
NP24	38	38	39	39	1	1
NP25	38	38	39	39	1	1
NP26	40	40	41	41	1	1
NP27	37	37	37	37		
NP28	38	38	39	39	1	1
NP29	35	35	36	36	1	1
NP30	36	36	36	36		
NP31	37	37	36	36	-1	-1
NP32	39	39	35	35	-4	-4
NP33	37	37	35	35	-2	-2
NP34	35	35	38	38	3	3
NP35	36	36	36	36		
NP36	32	32	30	30	-2	-2
NP37	42	42	38	38	-4	-4
NP38	40	40	38	38	-2	-2
NP39	34	34	33	33	-1	-1
NP40	35	35	36	36	1	1
NP41	36	36	37	37	1	1
NP42	36	36	36	36		
NP43	35	35	35	35		
NP44	35	35	35	35		
NP45	37	37	37	37		
NP46	39	39	39	39		
NP47	41	41	41	41		
NP48	42	42	42	42		
NP49	43	43	44	44	1	1
NP50	36	36	35	35	-1	-1

Receiver	Expected Increase over Ambient (dB)				Change in Increase over Ambient (dB)	
	Initial Analysis		Revised Layout		Daytime	Nighttime
	Daytime	Nighttime	Daytime	Nighttime		
NP1		1		1		
NP2	1	3	1	3		
NP3		1		1		
NP4	1	3	1	3		
NP5	2	4	1	3	-1	-1
NP6	2	4	1	3	-1	-1
NP7	1	2	1	3		1
NP8						
NP9						
NP10						
NP11		1				-1
NP12						
NP13						
NP14		1		1		
NP15		1		1		
NP16						
NP17						
NP18		1		1		
NP19		1		1		
NP20		1		1		
NP21		1		1		
NP22		1		1		
NP23		1		1		
NP24		1		1		
NP25		1		1		
NP26		1		1		
NP27		1		1		
NP28		1		1		
NP29		1		1		
NP30		1		1		
NP31		1		1		
NP32		2		1		-1
NP33		1		1		
NP34		1		1		
NP35		1		1		
NP36						
NP37	1	1		1	-1	
NP38		1		1		
NP39						
NP40						
NP41				1		1
NP42						
NP43						
NP44						
NP45		1		1		
NP46		1		1		
NP47		1		1		
NP48	1	1	1	1		
NP49	1	2	1	2		
NP50						

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Summary: Stipulation Supplemental Testimony of Alex Odom electronically filed by
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