

**BEFORE
THE OHIO POWER SITING BOARD**

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

REBUTTAL TESTIMONY OF JIM HOBART

1 **Q.1. Please state your name, title and business address.**

2 **A.1.** My name is Jim Hobart and I am a partner at Public Opinion Strategies. Our office
3 is located at 214 North Fayette Street, Alexandria, VA 22314.

4 **Q.2. What is your professional background?**

5 **A.2.** I have worked for Public Opinion Strategies since September of 2007, so it will be
6 15 years this September. During that time, I have been involved in more than 1500 research
7 projects, including conducting statewide, congressional, state legislative, and local ballot
8 initiative surveys in Ohio. I was named a Rising Star by Campaign Election Magazines and
9 have been a part of the polling team that was named pollster of the year by the American
10 Association of Political Consultants.

11 **Q.3. Please describe Public Opinion Strategies and the services it offers.**

12 **A.3.** Public Opinion Strategies is one of the nation's leading public opinion firms,
13 specializing in political, public affairs, public policy, and corporate positioning research.
14 Since the founding of Public Opinion Strategies in 1991, the firm has conducted 10 million
15 interviews, completed a total of 24,412 projects, and currently represents six governors,
16 ten Senators, and 50 Members of Congress. Since 2004, along with its Democratic partner,
17 the firm conducts The NBC News Poll and, since 2007, the CNBC All-America Economic

1 Survey. The firm now has 12 partners, is the largest political and public affairs survey
2 research firm in the country, and among the 50 largest research firms in the country.

3
4 We created, and today manage, a vibrant public affairs practice, having completed more
5 than 7,000 public affairs projects since our founding. The firm represents Fortune 500
6 companies and over 30 major trade associations and has become the premier health care
7 research firm in the country, having completed more than 1700 focus groups and 1245
8 surveys on the topic of health care. The firm's additional areas of expertise range from
9 crisis and brand management, to education, finance, and technology as well as establishing
10 a large research practice focused on the utility and energy sectors.

11 **Q.4. What are your duties as a Partner at Public Opinion Strategies?**

12 **A.4.** As a partner, I am responsible for selling research, overseeing every aspect of the
13 research process including drafting surveys, overseeing all aspects of fielding including
14 setting quotas to ensure the most accurate results, presenting the research to clients, and
15 offering them strategic counsel based on the results of that research. A team of two to three
16 people reports to me depending on the time of year. I have conducted research in every
17 state in the country with the exception of Hawaii, and in many foreign countries.

18 **Q.5. On whose behalf are you offering testimony?**

19 **A.5.** I am testifying on behalf of the Applicant, Kingwood Solar I LLC.

20 **Q.6. What is the purpose of your rebuttal testimony?**

21 **A.6.** I am filing rebuttal testimony in response to various witnesses who testified about
22 the local opposition to the project. This includes Mr. Zeto's testimony (Staff Exhibit 11),
23 Mr. Ewry's testimony (Cedarville Township Exhibit 1), Mr. Huddleson's testimony

(Greene County Exhibit 1), Mr. Combs's testimony (Xenia Township Exhibit 1), and Mr. Hollister's testimony (Miami Township Exhibit 3).

Q.7. Can you please describe any observations you made about how each of the individuals listed above assessed the opinion of local residents regarding the Kingwood Solar Project?

A.7. Each individual assessed the opinions of local residents by talking to Greene County residents and/or reviewing public comments filed on the Board's docket in this case.

Q.8. In your experience, is this is a reliable way to evaluate the public opinion?

A.8. No, because it is not a representative sample of the township, county, or state. On any issue or in any type of political campaign, there is always going to be a minority. Very often, that minority is quite vocal, and can vary in size based on the total population. To use an Ohio example, Congressman Jim Jordan represents a very conservative district and is one of the most conservative members of the House. As a result, in 2020, he easily won re-election with approximately 68% of the vote. However, more than 100,000 voters still voted for his Democratic opponent, and it is likely that many of those voters have an intense dislike of Congressman Jordan. Were I to talk to voters in the more Democratic-leaning parts of that district, I could talk to hundreds of voters who do not support Jordan. However, that does not mean the vast majority of the district does not support him.

To use a non-political example, I do a significant amount of work on school district referendums in Illinois. Often, the parents of students on the swim team are extremely vocal about supporting more money to pay for either a new pool, or renovations for the current

1 pool. However, when we test this in a survey, it is almost always the LEAST popular
2 funding item. Similarly, there is often a vocal minority who opposes any type of property
3 tax increase to fund school district renovations or improvements. However, the referenda
4 themselves often pass with more than 60% of the vote.

5 **Q.9. In your experience, what is the best way to evaluate public opinion about something**
6 **like the Kingwood Solar Project?**

7 **A.9.** A poll of a representative sample of the electorate.

8 **Q.10. Did Public Opinion Strategies conduct a poll about the Kingwood Solar Project?**

9 **A.10.** Yes. A summary of the poll results was admitted into the case record as Citizens
10 Exhibit 16.

11 **Q.11. Can you please describe how Public Opinion Strategies conducted the poll?**

12 **A.11.** Public Opinion Strategies purchased a list of registered voters in Greene County
13 from a third party vendor, as we do for most every survey. We then wrote the questionnaire,
14 with input from the client. Every effort is made to make sure the questions are as fair and
15 balanced as possible to ensure we are getting an accurate read on the electorate. Once the
16 survey was finalized, it was administered by live interviewers from a third party phone
17 center that we frequently use. We interviewed a total of 350 registered voters, with 140
18 interviews conducted with landline respondents and 210 interviews conducted with cell
19 phone respondents. Public Opinion Strategies set quotas by age, gender, and region to
20 ensure a representative sample based on the makeup of the registered voters in the
21 electorate. The margin of error on surveys of 350 registered voters is plus or minus 5.24%.
22 350 registered voters is a very strong sample size for a county the size of Greene County
23 where there are approximately 120,000 registered voters. When we conducted statewide

polls in Ohio for a wide variety of clients including presidential, U.S. Senate, and gubernatorial campaigns, we typically interview between 600 and 800 respondents. There are more than eight million registered voters in Ohio.

Q.12. Based on the poll results, do Greene County residents support the Kingwood Solar Project?

A.12. Yes, 63% of voters support the solar project, compared to 23% who are opposed. 37% are strong supporters, while 15% are strongly opposed. Support is strong throughout the county, with both men and women, and with voters of all ages.

Q.13. Was there a difference between poll respondents who knew about the Project prior to responding to the poll and those who did not?

A.13. Among the 40% of the voters who had heard about the project prior to the poll, 63% support the project and 30% are opposed.

Q.14. Based on the poll results, what conclusions about local support or opposition to the Kingwood Solar Project can you make?

A.14. A clear majority of Greene County voters support the Project. It is important to keep in mind that 23% of voters being opposed would still mean that 27,000 of voters in the county would be opposed, meaning it is certainly plausible for elected officials to hear from a significant number of opponents. However, it also means that 93,000 voters support the Project.

Q.15. Do you agree with the conclusions about local opposition presented by Mr. Zeto, Mr. Ewry, Mr. Huddleson, and Mr. Combs?

1 **A.15.** There are certainly residents in the County who oppose the project, and the poll
2 shows that. However, the polls also demonstrate close to 3 times as many County residents
3 support the project.

4 **Q.16. What information does the poll provide as to the Kingwood Solar Project?**

5 **A.16.** The poll makes it clear that a majority of voters in Greene County support the
6 Kingwood Solar Project.

7 **Q.17. Does this conclude your rebuttal testimony?**

8 **A.17.** Yes, it does.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following via email on
this 14th day of April 2022.

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Summary: Testimony Rebuttal Testimony of Jim Hobart electronically filed by Mr.
Michael J. Settineri on behalf of Kingwood Solar I LLC