BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of Hardin	:	
Wind LLC for a Certificate to construct a	:	Case No. 13-1177-EL-BGN
Wind-Powered Electric Generating Facility	:	
in Hardin County and Logan County, Ohio.	:	
	:	
In the Matter of Applications of the Hardin	:	
Wind LLC for a Certificate of	:	Case No. 13-1767-EL-BSB
Environmental Compatibility and Public	:	
Need for a Substation Project in Hardin	:	
County.	:	
	•	
In the Matter of Applications by the Hardin	:	
Wind LLC for a Certificate of	:	Case No. 13-1768-EL-BTX
Environmental Compatibility and Public	·	
Need for a 345 kV Transmission Line in		
Hardin County.	:	
Hardin County.	•	
	•	

PREFILED TESTIMONY OF ANDREW CONWAY ON BEHALF OF THE STAFF OF THE OHIO POWER SITING BOARD

STAFF EX. ____

1	1.	Q.	Please state your name and business address.
2		A.	My name is Andrew Conway. My business address is 180 E. Broad Street,
3			Columbus, Ohio 43215.
4			
5	2.	Q.	By who are you employed?
6		A.	I am employed by the Public Utilities Commission of Ohio (Commission).
7			
8	3.	Q.	Please describe your job title and duties?
9		A.	I am employed as an Engineering Specialist in the Efficiency and
10			Renewables Division of the Energy and Environment Department. In this
11			position, I review technical issues associated with energy efficiency and
12			renewable energy applications, assigned areas in Applications for a
13			Certificate of Environmental Compatibility and Public Need to construct
14			major utility facilities and economically significant wind farms, and other
15			duties.
16			
17	4.	Q.	Would you briefly state your educational background and work history?
18		A.	I have a Bachelor of Science degree in Chemical Engineering and minor in
19			Chemistry from the University of Toledo. I am also a registered profes-
20			sional engineer in the State of Ohio. From 2001 to 2009, I was employed
21			by the Ohio Environmental Protection Agency as an environmental spe-

1			cialist. From 2009 to present, I have been employed in my current position
2			at the Commission.
3			
4	5.	Q.	Have you previously testified before the OPSB?
5		A.	Yes. I previously testified in Case No. 08-0666-EL-BGN (Buckeye Wind
6			LLC) and Case No. 12-0160-EL-BGN (Champaign Wind).
7			
8	6.	Q.	What is the purpose of your testimony in these cases?
9		A.	I am testifying in support of the Staff Report of Investigation in these
10			cases. I am testifying in support of the specific sections of the staff reports
11			where I was the main contributing author. Specifically, I contributed to the
12			turbine foundations and assembly, pipeline protection, safety manuals,
13			EMF, and high winds sections of the staff reports. I also contributed and
14			recommended the conditions associated with those same sections of the
15			staff reports.
16			
17	7.	Q.	How did you evaluate the pipeline protection section?
18		A.	I inspected the proposed project area on August 1, 2013 and November 7,
19			2013. I reviewed the national pipeline mapping system on the US DOT
20			pipeline and hazardous materials safety administration website and the
21			Ventyx EV Energy Map, in order to determine if there were any gas
22			transmission and hazardous liquid pipelines in the proposed project area.

1			There were several in the project area. I inquired with the Applicant about
2			their knowledge of any natural gas or hazardous liquid pipelines within the
3			project area. I requested that the Applicant provide the distances to the
4			closest wind turbines if there were pipelines within the project area. The
5			Applicant confirmed that there were several proposed turbine locations
6			within the recommended pipeline setbacks. I recommended condition 12
7			for Case No. 13-1177-EL-BGN. This condition addresses and avoids the
8			possibility of a wind turbine falling onto a pipeline and stressing the
9			pipeline.
10			
11	8.	Q.	How did you evaluate the different turbine model safety manuals?
12		A.	The Applicant provided safety manuals for the Gamesa G97 and REpower
13			MM100 turbine models. I reviewed these safety manuals. I also reviewed
14			manufacturers' minimum setback recommendations/guidance. Because it
15			is possible that the Applicant could select different turbine models prior to
16			construction, I recommended, in condition 4 for Case No. 13-1177-EL-
17			BGN, that if other turbine models are selected that the safety manual or
18			similar document shall be provided to staff for review prior to
19			commencement of construction.
20			
21	9.	Q.	How did you evaluate Electric and Magnetic Fields (EMF)?

1		A.	I reviewed the application section entitled "Electric and Magnetic Fields"
2			and the Applicant's Notice of List of Commitments filed on December 13,
3			2013. I determine that the Applicant has a current state of knowledge and
4			procedures in place to address EMF complaints.
5			
6	10.	Q.	How did you evaluate high winds?
7		A.	I reviewed the Application's section entitled "Floods and Winds." I
8			reviewed the wind turbine model brochures and technical specifications. I
9			was able to confirm that the Applicant would take appropriate precautions
10			in the event of extreme weather and implement numerous safety features to
11			minimize potential impacts from high winds.
12			
13	11.	Q.	Does this conclude your testimony?
14		А.	Yes, it does. However, I reserve the right to submit supplemental testi-
15			mony as described herein, as new information subsequently becomes avail-
16			able or in response to positions taken by other parties.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of Andrew Conway, submitted on behalf of the Staff of the Ohio Power Siting Board, was served via electronic mail, upon the following parties of record, this 16th day of January, 2014.

> <u>/s/Thomas G. Lindgren</u> Thomas G. Lindgren

Assistant Attorney General

Parties of Record:

M. Howard Petricoff Stephen M. Howard Gretchen L. Petrucci Miranda R. Leppla Michael J. Settineri Vorys Sater Seymour & Pease 52 East Gay Street P.O. Box 1008 Columbus, OH 43215-1008 mhowardpetricoff@vorys.com smhoward@vorys.com glpetrucci@vorys.com mrleppla@vorys.com mjsettineri@vorys.com William A. Adams, Esq. Bailey Cavalieri LLC 10 West Broad Street, Suite 2100 Columbus, Ohio 43215 William.Adams@baileycavalieri.com

Chad A. Endsley Chief legal Counsel Ohio farm Bureau Federation 280 North High Street P.O. Box 182383 Columbus, Ohio 43218-2383 cendsley@ofbf.org

Joe and Deb Grant 201616 State Route 68N Belle Center, Ohio 43310 joedebgrant@gmail.com This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/16/2014 3:51:20 PM

in

Case No(s). 13-1177-EL-BGN, 13-1767-EL-BSB, 13-1768-EL-BTX

Summary: Testimony Prefiled Testimony of Andrew Conway electronically filed by Mrs. Tonnetta Y Scott on behalf of PUCO