

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of)	
REPUBLIC WIND, LLC for a Certificate to)	
Build and Operate an Electric Transmission)	Case No. 19-1066-EL-BTX
Line, Seneca County, Ohio)	

DIRECT TESTIMONY OF

**Dalton S. Carr
Development Manager
Apex Clean Energy**

on behalf of

Republic Wind, LLC

December 29, 2020

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

A-1. My name is Dalton S. Carr. I am the Development Manager for Apex Clean Energy (“Apex”). My business address is 310 4th St. NE, Suite 300, Charlottesville, VA 22902.

Q-2. What is your educational and professional background?

A-2. I hold a Bachelor of Arts degree in Environmental Studies, with additional honors as a Scholar in Energy Studies from Yale University. Since 2015, I have been employed with Apex as Development Manager and responsible for wind development projects in Ohio, Kentucky and West Virginia. I have also worked on solar projects in Indiana, Kentucky, and West Virginia. Prior to my current position with Apex, I held positions with two environmental and energy companies.

Q-3. On whose behalf are you offering testimony?

A-3. I am testifying on behalf of the Applicant, Republic Wind, LLC (“Republic Wind” or “Applicant”). Republic Wind is a wholly owned subsidiary of Apex. Apex is an independent renewable energy development company founded in 2009. It is focused on building utility-scale generating facilities. Apex is building one of the largest, most diversified portfolios of renewable energy resources capable of producing over 13,000 MW of clean energy. It has wind and solar energy projects successfully operating in Illinois, Oklahoma, Texas, and Colorado. Apex has completed 13 wind facilities totaling approximately 2,388 megawatts of clean energy.

Q-4. What is your role with respect to Republic Wind?

A-4. In my position as Development Manager, I oversee and manage all facets of project planning and development for the Republic Wind farm project. I oversee the permitting process, and the production of the various studies required to complete the application before the Ohio Power Siting Board (“OPSB” or “Board”) for the wind project’s certification as a wind-powered electric generation facility, including certification of the supporting transmission line facilities.

Q-5. What is the purpose of your pre-filed testimony?

1 **A-5.** The purpose of my testimony is to provide background information about the initial
2 application (“Original Application”) (filed on August 27, 2019) and amended application
3 (“Amended Application”) (filed on February 25, 2020) of Republic Wind, LLC
4 Transmission Line Project (the “Project”). I will be sponsoring these exhibits for
5 submission into evidence in this case. In addition, I will explain why the Amended
6 Application justifies issuance of a Certificate of Environmental Compatibility and Public
7 Need for construction and operation for the Project.

8 **Q-6. Please provide a summary and description of the Project.**

9 **A-6.** The Applicant will construct and operate a 7.4 mile 138kV transmission line and point of
10 interconnect (“POI”) switchyard. It will be used for delivering power from the Republic
11 Wind Farm (pending approval in Case No. 17-2295-EL-BGN) to the electric transmission
12 power grid. Located in Seneca County, the Applicant would own all structures and
13 equipment that would be associated with the POI switchyard. The Applicant also
14 proposes a 100-foot wide right-of-way for the transmission line, which would incorporate
15 approximately 100 structures for support ranging from 60 to 105 feet in height. Thirty-
16 nine poles would be 60-75 feet, 57 poles would be 75 to 100 feet, and four poles would
17 be 100 to 105 feet in height. The final design would encompass final pole location and
18 placement on plans issued for construction. If a certificate is issued by the Board, the
19 Applicant anticipates construction would commence and take approximately six to nine
20 months to complete and place the facilities in service. The Applicant indicates in its
21 project schedule that this would occur by the summer of 2021.

22 **Q-7. Are you sponsoring any exhibits as part of your testimony?**

23 **A-7.** Yes. I am sponsoring the Original Application, Amended Application, and proofs of
24 service filed marked as Exhibits 1-3, respectively. I am also sponsoring the proofs of
25 publication, marked as Exhibit 4.

26 **Q-8. What was the reason behind filing the Amended Application?**

27 **A-8.** The Original Application was amended to ensure that adjacent landowners were
28 amenable to the Preferred Route and to resolve a local subdivision issue. The Applicant
29 agreed to relocate the POI Switchyard to a parcel adjacent to the one proposed in the

1 Original Application, and the western 1.1 miles of the Preferred Route, as described in
2 the Original Application, will be shifted northward so that it connects to the new POI
3 Switchyard location. The Applicant also eliminated the Alternate Route A1, which was
4 included in the Original Application.

5 The Preferred Route for the Project was selected because it was determined to be the
6 most efficient and safer way to deliver electricity generated by the Republic Wind Farm
7 to the regional power grid. Further, the Preferred Route also has less environmental and
8 social impacts. After considering all factors following discussions with local officials and
9 taking into consideration landowner preferences, the Applicant determined that the
10 location of the Preferred Route for the Project is better suited for the Project.

11 **Q-9. Did you review the Staff Report that was issued on August 13, 2020?**

12 **A-9.** Yes.

13 **Q-10. What impacts will the Republic Wind Transmission Line project have on the**
14 **environment?**

15 **A-10.** Based on the criteria set forth in R.C. 4906.10(A), the Project will have a minimum
16 adverse environmental impact and will serve the public interest, convenience, and
17 necessity. Specifically, the Applicant's proposed transmission facility project would
18 address the need to provide the proposed Republic Wind Farm's connection to the
19 electrical power grid pursuant to R.C. 4906.10(A)(1) and (6).

20 With regards to the nature of the probable environmental impact of the proposed facility
21 under R.C. 4906.10(A)(2), (3), and (7), the Project will have a limited socioeconomic and
22 ecological impact on the surrounding area.

23 When examining socioeconomic impacts, the Project developmental plan centered on
24 preservation of agricultural activities, job creation and economic opportunities.
25 Consequently, the Project would not affect the existing population. Moreover, the
26 Applicant wanted minimum impacts to existing land use. For that reason, the Applicant
27 does not intend to remove or relocate any existing structures, and there will be minimal
28 disruption to surrounding residential and commercial land. Importantly, the Applicant's

1 literature review concluded that the proposed project would not physically or indirectly
2 impact above-ground cultural resources. In addition, the Applicant conducted an
3 archaeological survey of the affected Project area, and the Ohio Historic Preservation
4 Office reviewed the Applicant's final historic and archaeological studies, concluding that
5 no further historical or archeological survey is necessary for the Project. Further, the
6 Project is located adjacent to a wooded area that offers natural screening of portions of
7 the transmission line and on three sides of the proposed switchyard location, which
8 minimizes visual impacts.

9 The Project also took steps to minimize impacts to the ecological resources in the project
10 area. Impacts to vegetation would be limited to the initial clearing for the proposed 100-
11 foot right-of-way and along access roads, and operational maintenance clearing activities
12 required for human safety. Further, the Applicant does not object to conditions proposed
13 in the Staff Report to protect threatened and endangered species during Project
14 construction. These include adherence to seasonal tree cutting dates for trees that are
15 suitable habitat for the Indiana bat and northern long-eared bat, as well as avoidance of
16 construction activities in the habitats of the upland sandpiper and northern harrier during
17 these species' nesting periods.

18 The Project will also avoid impacts to streams and wetlands through a number of
19 measures. Project construction and operation activities will not require in-water crossing
20 of streams by equipment and there will be no in-water work. The Project was designed so
21 that transmission poles were sited outside of wetlands and waterbodies, thereby avoiding
22 all temporary soil disturbance and permanent direct fill impacts to these areas.

23 Moreover, the proposed facility is consistent with regional plans for expansion of the
24 electric power grid of the electric systems serving this state and interconnected utility
25 systems, and that the facility would serve the interests of electric system economy and
26 reliability according to the requirements under R.C. 4906.10(A)(4). And, the Applicant
27 will obtain any authorization or permits with regard to any air and water pollution
28 control, withdrawal of waters of the state, solid and hazardous wastes, and air navigation.
29 The Project is committed to conserving and handling all construction materials in

1 accordance with any applicable state laws, and the facility may require the use of
2 minimal amounts of water for dust control and for concrete foundations during
3 construction. However, the transmission line would not require the use of any water
4 during operation as outlined in R.C. 4906.10(A)(5) and (8). Ultimately, the Applicant
5 worked diligently with stakeholders and took a conservative approach in designing the
6 Project in order to reduce social and environmental disturbance.

7 **Q-11. Does Republic Wind Transmission Line accept the conditions in the Staff Report?**

8 **A-11.** Yes, we accept all the conditions in the Staff Report, with a minor modification to
9 Condition No. 15.

10 **Q-12. Please discuss the modification to Condition 15.**

11 **A-12.** Our recommended modification to Condition 15 is limited. Immediately below is
12 Condition 15 as proposed by Staff, with our proposed deletion of the last sentence:

13 If Staff and the ODNR, in consultation with the USFWS, determine the project
14 results in significant adverse impact to wild animals, the ODNR and Staff will
15 notify the Applicant. As soon as possible and no longer than 30 days after
16 receiving notification of the significant adverse impact, Applicant shall implement
17 practices to rectify the significant adverse impact, which will include
18 development and submission of a mitigation plan or adaptive management
19 strategy to Staff and the ODNR for review to confirm compliance with this
20 condition. ~~Operation activities that could adversely impact the identified animals~~
21 ~~shall be modified to minimize risk until the mitigation plan or adaptive~~
22 ~~management strategy is agreed upon.~~

23 We recommend the deletion of the last sentence of this condition because it appears to be
24 a carry-over from certificate language applicable to generation facilities. Notably,
25 operational activities cannot be modified for the transmission line without impacting the
26 entire wind project, which is in contrast to modifying operation activities for a specific
27 turbine or turbines or other associated facility. Once installed, the transmission line itself
28 is a static facility, regardless of operation status, whether it is transmitting electrons or

1 not. If the condition is meant to refer to certain operational activities which can be
2 modified or altered, such as right-of-way maintenance, the condition should be clarified
3 accordingly. We believe that this proposed modification enshrines the requirement that
4 the Applicant will work with Staff and ODNR to rectify a significant adverse impact, but
5 that operation activities in reference to the operation of the transmission line itself are not
6 consequentially modified prior to an agreed upon adaptive management strategy.

7 **Q-13. Did you encounter any objections to the Project from the officials in the area?**

8 **A-13.** Local officials understand that there are separate applications before the OPSB for
9 transmission and for generation components of the wind project. We have informed local
10 officials of the proposed transmission route on multiple occasions, and they are aware of
11 the layouts of transmission facilities under review by OPSB Staff. To date, we have not
12 encountered any objections to the transmission project from officials in the area.

13 **Q-14. Did you take into account the public input in its deliberations?**

14 **A-14.** Yes. The Applicant has worked closely with affected residents to ensure that their
15 concerns were taken into consideration when determining the Preferred Route. As
16 mentioned above, extensive discussions with host landowners and neighboring property
17 owners for the Project helped guide the modifications included in the Amended
18 Application. The re-location of the POI Switchyard and associated shift in the last mile of
19 the Project route were designed to ensure satisfaction on the part of host landowners. In
20 addition, the re-location of the POI Switchyard achieves greater physical screening of the
21 POI Switchyard, resulting in a reduced visual impact to neighboring properties.

22 Finally, I note that the local public hearing is scheduled for January 7, 2021, which will
23 be another opportunity for public input. The local public hearing is scheduled subsequent
24 to the due date for this testimony. I respectfully reserve the right to supplement this
25 testimony in response to testimony taken at the public information hearing.

26 **Q-15. What impact will the Project have on the community?**

27 **A-15.** The Project will benefit consumers because it will ensure that increased demands for
28 electricity are met in the future and that existing service reliability is strengthened and

1 enhanced throughout the area. The Project will also support tax revenues for the local
2 community including several municipalities and school districts. Further, the Applicant
3 will need to comply with numerous conditions to minimize environmental, sociological,
4 cultural, and other impacts to the area.

5 **Q-16. Does this conclude your testimony?**

6 **A-16.** Yes, it does; however, the local public hearing is scheduled for January 7, 2021, which is
7 subsequent to the filing deadline of this testimony. As mentioned above, I reserve the
8 right to supplement my testimony to address concerns raised at the public hearing.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Direct Testimony of Dalton Carr was served upon the following parties of record via regular or electronic mail this 29th day of December 2020.



Devin D. Parram

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Summary: Testimony of Dalton Carr electronically filed by Teresa Orahoud on behalf of Devin D. Parram