

BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of Ross County Solar, LLC for a Certificate of Environmental Compatibility and Public Need.)))))	Case No. 20-1380-EL-BGN
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SUPPLEMENTAL TESTIMONY OF AUGUST CHRISTENSEN

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

A.1. My name is August Christensen. I am a Director of Solar and Storage, civil engineer in the Power Division, and a firm shareholder at Westwood Professional Services, Inc. (“Westwood”). My business address is: 3701 12th St. N, Suite 206, St. Cloud, MN 56303.

Q.2. On whose behalf are you offering testimony?

A.2. I am testifying on behalf of the Applicant, Ross County Solar, LLC (“Applicant”), in support of its Application filed in Case No. 20-1380-EL-BGN.

Q.3. Did you previously provide testimony on behalf of Applicant?

A.3. Yes, on April 14, 2021.

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

A.4. The purpose of my supplemental testimony is to address Conditions 17 and 29 in the Joint Stipulation filed on May 18, 2021.

Q.5. Do you support Condition 17 of the Joint Stipulation?

A.5. Yes. The Applicant has committed in the Application that any main drain tiles damaged during construction will be identified, documented, and repaired (Drain Tile Mitigation Plan, Appendix A to Exhibit E of the Application). Additionally, Joint Stipulation Condition 17 imposes a similar requirement that the Applicant avoid or

1 minimize damage to functioning field tile drainage systems and soils resulting from the
2 construction, operation, and/or maintenance of the Project in agricultural areas and to
3 promptly repair any damaged drain tile systems at the Applicant's expense. All repairs
4 will be completed by a qualified contractor. Further, Condition 17 not only requires the
5 Applicant to promptly repair any damage to drain tile in the Project Area, but also to
6 promptly repair drain tile in the Project Area to protect the field tile system of an adjacent
7 landowner if the adjacent landowner's drain tile system is affected by the drain tile system
8 in the Project Area. Examples of drain tiles that may not be repaired are lateral drain tile
9 lines which function to remove water from existing fields to the main tiles. That function
10 is not necessary for a solar facility as ground water can migrate naturally into the soil. That
11 is why lateral drain tile lines that are damaged and contained within the Project Area may
12 not be repaired (subject to Condition 17) depending on the need to replace the lateral drain
13 tile lines and subject to individual landowner agreements previously negotiated during the
14 leasing process.

15 **Q.6. Is Condition 17 in the Joint Stipulation in the public interest?**

16 **A.6.** Yes. The requirements in Condition 17 ensure that damage to functioning drain
17 tile is minimized and any damage is promptly repaired.

18 **Q.7. Do you support Condition 29 in the Joint Stipulation?**

19 **A.7.** Yes. The Applicant has committed that it will post a performance bond with the
20 OPSB as the obligee based on the net costs of decommissioning (taking into account the
21 salvage value of the panels and other equipment), currently calculated to be \$4,694,666,
22 prior to the commencement of commercial operation of the Project (Decommissioning
23 Plan, Exhibit N to the Application). Condition 29 imposes a similar requirement on the

1 Applicant. Additionally, the condition requires the Applicant to reevaluate
2 decommissioning costs based on the final construction layout through an Ohio-licensed
3 engineering firm or professional engineer, and also every five years thereafter during the
4 life of the Project. If the evaluation indicates that decommissioning costs have increased,
5 the Applicant is to increase the amount of the performance bond accordingly.

6 **Q.8. Is Condition 29 of the Joint Stipulation in the public interest?**

7 **Q.8.** Yes. As I previously noted in my direct testimony filed on April 14, 2021, we are
8 finding that the anticipated costs of decommissioning are decreasing over time as we gain
9 a better understanding of decommissioning of solar facilities, and through the
10 establishment of a resale market for equipment including solar panels and inverters.
11 However, Condition 29 ensures that in the event decommissioning costs do increase over
12 time, then the amount of the performance bond is also increased accordingly.

13 **Q.9. Does this conclude your supplemental direct testimony?**

14 **A.9.** Yes, it does.

CERTIFICATE OF SERVICE

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5/21/2021 4:42:53 PM

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Case No(s). 20-1380-EL-BGN

Summary: Testimony Supplemental Testimony of August Christensen electronically filed by Ms. Anna Sanyal on behalf of Ross County Solar, LLC