

BEFORE THE OHIO POWER SITING BOARD

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

SUPPLEMENTAL TESTIMONY OF WILLIAM RISSE

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

A.1. My name is William Risse. I am a Permitting Specialist for National Grid Renewables, 8400 Normandale Lake Blvd., Suite 1200, Bloomington, Minnesota 55437. Ross County Solar, LLC (“Applicant”) is a subsidiary of National Grid Renewables. I am the Permitting Project Manager for the Ross County Solar Project (“Project”).

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

A.2. I am testifying on behalf of the Applicant.

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

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

Q.4. Have you reviewed the Joint Stipulation filed on May 18, 2021?

A.4. Yes. I was involved in the drafting and negotiation of the Joint Stipulation.

Q.5. Why is the Applicant providing additional testimony in this proceeding?

A.5. The Applicant is providing testimony in support of the Joint Stipulation filed on May 18, 2021. Staff originally proposed conditions in its Staff Report of Investigation, which was issued on March 22, 2021. Since then, the parties have made modifications to the conditions as a result of negotiating the Joint Stipulation. Specifically, I am providing testimony to address changes made to Conditions 1, 4, 5, 8, 9, 10, 11, 22, 23, and 25. Additionally, Conditions 26, 27, 28, and 29 were added as a result of negotiations with

1 certain parties in the proceeding. The Applicant is also providing testimony from Matthew
2 Robinson of Environmental Design & Research, Landscape Architecture, Engineering &
3 Environmental Services, D.P.C.; Eddie Duncan of Resource Systems Group, Inc.; Ryan
4 Rupprecht of Cardno, Inc.; and August Christensen of Westwood Professional Services,
5 Inc.

6 **Q.6. Why were Conditions 1, 23, and 24 of the Staff Report modified?**

7 **A.6.** The Applicant suggested very minor revisions to these conditions for clarity and
8 these changes were further discussed in my testimony filed on April 14, 2021.

9 **Q.7. Why was Condition 4 of the Staff Report modified?**

10 **A.7.** This condition was modified to allow the Applicant to hold separate preconstruction
11 conferences for the different phases of construction related to the Project. The condition
12 also directs the Applicant to provide the final geotechnical study/evaluation, including
13 boring test results, with the final project design to Staff at least 30 days prior to each
14 preconstruction conference. Overall, the condition ensures that the Applicant provides
15 Staff with all necessary information prior to each phase of Project construction.

16 Additionally, I would like to make one clarification. On May 7, 2021, Staff reached out to
17 the Applicant to note that the boring logs for this Project (Exhibit C to the Application) and
18 another National Grid Renewables project, the Yellowbud Solar Project (Case No. 20-972-
19 EL-BGN), listed the same site, Williamsport Pike, Clarksburg, Ohio. After internal
20 communication, and review of the latitude and longitude listed at each boring location, the

Applicant determined that boring logs for this Project contained the correct data, but the site name had not been updated.

Q.8. Why was Condition 5 of the Staff Report modified?

A.8. Staff's original proposed condition was removed because Condition 4, as noted above, directs the Applicant to provide the final geotechnical study/evaluation with the final project design. A new Condition 5 was included to provide the Applicant flexibility during the construction process but to also ensure that any changes made after the submission of final engineering drawings were provided to Staff to ensure compliance with the Joint Stipulation conditions. A similar condition was approved in the Yellowbud Solar Project case (Case No. 20-972-EL-BGN).

Q.9. Why was Condition 8 of the Staff Report modified?

A.9. The condition was revised to ensure that the Applicant provides copies of necessary federal or state permits and authorizations no less than seven days prior to the applicable construction activities. Again, a similar condition was approved by the OPSB in the Yellowbud Solar Project case.

Q.10. Why was Condition 9 of the Staff Report modified?

A.10. This condition was modified to add a reference to R.C. 4906.13.

Q.11. Why was Condition 10 of the Staff Report modified?

A.11. This condition was modified to direct the Applicant to include a reference to the Board's docketing system in the notices for the start of construction and start of facility construction. Additionally, the Applicant must also file these notices on the docket and confirm that it has complied with all preconstruction-related conditions. Overall, this condition ensures that property owners, local officials, and other interested parties are

1 informed about project construction and operations and are able to submit complaints, if
2 any arise.

3 **Q.12. Why was Condition 11 of the Staff Report modified?**

4 **A.12.** This condition was modified to ensure that the Applicant submits its emergency
5 plan prior to the preconstruction conference for review and acceptance by Staff.

6 **Q.13. Why was Condition 25 of the Staff Report modified?**

7 **A.13.** The condition was modified to direct the Applicant to provide, at least 30 days prior
8 to the preconstruction conference, the status of each water well in the Project Area. With
9 regard to one water well, the Applicant must field verify the well's location prior to
10 construction as it may be in a different location than in the publicly available dataset.

11 **Q.14. Why was Condition 26 added to the Joint Stipulation?**

12 **A.14.** This condition was added through negotiations to ensure that noxious weeds are
13 not established or propagated during the implementation of pollinator-friendly plantings.

14 **Q.15. Why was Condition 27 added to the Joint Stipulation?**

15 **A.15.** This condition was drafted as a result of negotiations. The Applicant, in its
16 Application, has committed to establish a road use and maintenance agreement ("RUMA")
17 with the Ross County Engineer for roadway monitoring and temporary repairs during
18 project construction and post-construction improvements. The condition further refines
19 this commitment and directs the Applicant to enter into a RUMA with the townships, the
20 Ross County Board of Commissioners, and the Ross County Engineer to ensure that local
21 roadways will be repaired to a condition equal to their preconstruction condition following
22 the completion of Project construction. Financial security will also be established in the
23 RUMA to cover the costs of any construction-related damages that are not repaired by the

1 Applicant. In the event a RUMA is not established with any of the local jurisdictions, then
2 the Applicant will establish a bond amount with the Ross County Engineer to repair any
3 damages caused by construction. As noted in our application, and in the testimony of Mr.
4 Bonifas, solar facilities such as the proposed Project are anticipated to have minimal
5 impacts to local roadways, and oversized loads are limited. We would not anticipate
6 significant damages to local roadways, and plan to keep roadways at least in their existing
7 condition through Project construction.

8 **Q.16. Why was Condition 28 added to the Joint Stipulation?**

9 **A.16.** This condition was also drafted as a result of negotiations. The condition directs
10 the Applicant to provide final inverter and solar panel specifications and the final project
11 layout drawings to the townships prior to construction. The Applicant will also provide
12 the start of construction and start of facility operation notices, which are further discussed
13 in Condition 10, to the townships' boards of trustees. Finally, the Applicant will also
14 provide a copy of its quarterly complaint summary report, as further described in condition
15 10, to the boards of trustees.

16 **Q.17. Why was Condition 29 added to the Joint Stipulation?**

17 **A.17.** Again, this condition was drafted as a result of negotiations. The Applicant, in its
18 Application, has already committed to posting a performance bond with the OPSB as the
19 obligee based on the net costs of decommissioning prior to the commencement of
20 commercial operations of the Project. The Applicant has also committed to reevaluate
21 decommissioning costs through an Ohio-licensed engineering firm or professional
22 engineer every five years thereafter through the life of the Project and increasing the bond
23 if decommissioning costs increase. This condition memorializes this commitment in the

1 Joint Stipulation, and ensures the decommissioning cost is reflective of the final layout of
2 the Facility. Further, the bond will be structured such that the Applicant is the principal,
3 the guarantor of the bond (likely an insurance company) will be the surety and the OPSB
4 is the obligee.

5 **Q.18. Does the Joint Stipulation benefit the public interest?**

6 **A.18.** Yes. The Project is a major infrastructure project and a major capital investment;
7 it benefits the community. The Project will generate clean and quiet renewable electricity
8 and will provide “on peak” power during the high demand period of mid-day and late
9 afternoon. In addition, the Project will benefit the local economy through jobs created
10 during construction, additional new jobs to support operation, and new tax revenue.

11 The Joint Stipulation further benefits the public interest by requiring the Project to take
12 steps and meet certain requirements during the construction and operation of the Project to
13 minimize impacts of the Project. Several of these requirements are a result of negotiations
14 between the Stipulation Parties. For example, the Joint Stipulation requires the Applicant
15 to submit any changes to the Project layout, which are made after the submission of final
16 engineering drawings, to Staff for review. This will ensure that any such changes comply
17 with certificate conditions (Condition 5). The Applicant has committed to provide the start
18 of construction notice to an expanded group of constituents, including affected landowners,
19 residences located within one mile of the Project Area, schools, libraries, airports, county
20 commissioners, township trustees, and emergency responders, as well as anyone who has
21 requested updates regarding the Project (Condition 10).

22 Through Condition 14 of the Joint Stipulation, the Applicant has committed to a two-
23 pronged vegetative screening approach, which will benefit landowners adjacent to the

1 Project by reducing the Project's visual impact. First, the Applicant will replace any failed
2 plantings during the first five years after construction to ensure that at least 90% of the
3 vegetation screening has survived as of the five-year point. The purpose of the five-year
4 period is to allow plantings to become established. Second, the Applicant must maintain
5 vegetative screening, which will consist of various landscape modules, for the life of the
6 Project. Under this second prong, the Applicant must replace failed plantings within a
7 screening module, if necessary, to ensure the screening module remains effective at that
8 location (Condition 14).

9 The Joint Stipulation protects the field tile systems of landowners adjacent to the Project
10 Area in ensuring that any damaged and unrepaired field tile systems within the Project Area
11 do not affect adjacent field tile systems (Condition 17). The Applicant will adhere to
12 seasonal cutting dates for the removal of trees to protect bats and avoid construction in the
13 habitats for the northern harrier and upland sandpiper during their nesting periods
14 (Conditions 19, 20, and 21), unless an alternative course of action is identified in
15 consultation with the applicable agency. To protect sensitive areas such as wetlands and
16 streams, the Joint Stipulation authorizes an environmental specialist to stop construction
17 activities for up to 48 hours. This would allow the Applicant and Staff to respond to any
18 reported issues and minimize environmental impacts, if any, to the sensitive areas within
19 the Project Area (Condition 22). The Applicant will also take steps to prevent the
20 establishment and/or further propagation of noxious weeds when implementing Condition
21 26.

22 Finally, negotiations yielded three additional conditions to ensure that roads in the Project
23 Area are restored to pre-construction conditions; the townships are provided with final

1 inverter and solar panel specifications, final project layout drawings, and start of
2 construction and start of facility operations notifications; and that the Applicant post a
3 performance bond to cover the costs of decommissioning (Conditions 27, 28, and 29).

4 **Q.19. Does the Joint Stipulation violate any important regulatory principle or practice?**

5 **A.19.** No, it does not.

6 **Q.20. Is the Joint Stipulation a product of serious bargaining among capable,**
7 **knowledgeable parties?**

8 **A.20.** Yes. I was personally involved in the negotiations that resulted in the Joint
9 Stipulation. All parties participated in those negotiations and were represented by counsel.
10 The Joint Stipulation, as a package, is the product of serious bargaining among capable
11 knowledgeable parties.

12 **Q.21. What do you recommend that the Ohio Power Siting Board do in regard to the Joint**
13 **Stipulation?**

14 **A.21.** I recommend that the Ohio Power Siting Board adopt the Joint Stipulation,
15 including the recommended conditions, without modification.

16 **Q.22. Does this conclude your supplemental direct testimony?**

17 **A.22.** Yes, it does.

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