

**BEFORE THE OHIO POWER SITING BOARD**

<b>In the Matter of the Application of Ross County Solar, LLC for a Certificate of Environmental Compatibility and Public Need.</b>	) ) ) ) )	<b>Case No. 20-1380-EL-BGN</b>
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**DIRECT TESTIMONY OF ISAAC OLD**

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

**A.1.** My name is Isaac Old. I am employed by Resource Systems Group, Inc. (“RSG”) as a Senior Consultant in RSG’s acoustics group. My business address is 55 Railroad Row, White River Junction, VT 05001.

**Q.2. What are your duties as Senior Consultant?**

**A.2.** As a Senior Consultant, I manage and perform the work for projects related to acoustics and noise. This includes noise assessments for projects from a wide variety of sectors, including solar power development. I also manage and mentor some acoustics staff and work on technical knowledge development.

**Q.3. What is your educational and professional background?**

**A.3.** I have a Bachelor of Science (B.S.) in Physics from Centre College, Danville, Kentucky and a Master of Science (M.S.) in Architectural Acoustics from Rensselaer Polytechnic Institute, Troy, New York. I am a full member of both the Institute of Noise Control Engineering (INCE) and the Acoustical Society of America (ASA).

I have more than ten years of experience in the field of acoustics with much of that experience in researching, modeling, measuring, and analyzing noise from electrical generation and distribution projects.

1 I have also worked in many other public and private sectors including, recreation, public  
2 lands, mining, firearms, commercial and residential development, transportation, and  
3 healthcare.

4 **Q.4. On whose behalf are you offering testimony?**

5 **A.4.** I am testifying on behalf of the Applicant, Ross County Solar, LLC (“Applicant”),  
6 regarding its Application filed in Case No. 20-1380-EL-BGN.

7 **Q.5. What is the purpose of your supplemental testimony?**

8 **A.5.** To address Conditions 15 and 16 of the Joint Stipulation filed on May 18, 2021.  
9 Additionally, I am adopting Mr. Eddie Duncan’s testimony, which was previously filed on  
10 April 14, 2021.

11 **Q.6. Have you reviewed the Joint Stipulation?**

12 **A.6.** Yes.

13 **Q.6. Do you support Condition 15 of the Joint Stipulation?**

14 **A.6.** Yes. This condition is drafted to ensure that construction noise impacts emanating  
15 from pile driving and hoe ram operations are mitigated. Specifically, the Applicant has  
16 committed to limiting pile driving operations to the hours of 9 a.m. to 7 p.m., Monday  
17 through Saturday, except in areas where pile driving noise will not exceed the daytime  
18 ambient Leq (44 dBA) plus 10 dBA, within which pile driving may also occur between 7  
19 a.m. and 9 a.m. Further, the condition requires Applicant to provide a map to Staff  
20 indicating areas where pile driving cannot occur from 7 a.m. to 9 a.m. because pile driving  
21 noise in those areas will exceed 54 dBA. The condition also limits hoe ram operations  
22 from 10 a.m. to 4 p.m., Monday through Friday. Finally, the Applicant is required to

1 provide a notice to adjacent landowners regarding upcoming construction activities,  
2 including the potential for nighttime construction.

3 **Q.7. Is Condition 15 in the Joint Stipulation in the public interest?**

4 **A.7.** Yes. While the Applicant has committed to minimizing construction noise to the  
5 extent practicable in the Application, Condition 15 will ensure further mitigation of  
6 construction noise.

7 **Q.8. Do you support Condition 16 of the Joint Stipulation?**

8 **A.8.** Yes. The condition lays out the process the Applicant must follow if the final  
9 inverters and substation transformer selected for the Project have higher sound power  
10 output than the sound power output data used in my sound modeling (Exhibit Q to the  
11 Application). If so, then the Applicant will submit an updated noise model for the Project  
12 to show that as modeled the sound levels of the final inverters and substation transformer  
13 will not exceed the Project Area average daytime ambient level of 44 dBA plus five dBA  
14 at any nonparticipating landowner's residence.

15 Additionally, the condition also directs what the Applicant must do if sound power output  
16 data for the inverters or transformer is not available. First, if the transformer data from the  
17 manufacturer is not available, the Applicant is to update the noise model using the NEMA  
18 TR1 standard. Second, if inverter data from the manufacturer is not available, the  
19 Applicant will utilize a similar inverter model to update the noise model prior to  
20 construction. Once constructed, the Applicant is to take sound level measurements in close  
21 proximity to the inverter to determine the sound power level of the installed inverter. If  
22 the sound power level of the installed inverter is 2 dBA or more above the sound power  
23 level used in the updated pre-construction model, then the sound propagation model will

1 be updated to ensure project-wide compliance with the applicable sound level limit. If the  
2 sound power level is determined to be less than 2 dBA above the sound power level used  
3 in the updated pre-construction model, then the Project will be deemed in-compliance.

4 **Q.9. Is Condition 16 in the Joint Stipulation in the public interest?**

5 **A.9.** Yes. The condition ensures that the sound modeling data previously submitted as  
6 Exhibit Q is appropriately updated if the inverters or transformers finally chosen for the  
7 Project have a higher sound output or if the noise data from the manufacturer is not  
8 available.

9 **Q.10. Does this conclude your supplemental direct testimony?**

10 **A.10.** Yes, it does.

## **CERTIFICATE OF SERVICE**

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 21st day of May 2021.

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Summary: Testimony Supplemental testimony of Isaac Old electronically filed by Ms. Anna Sanyal on behalf of Ross County Solar, LLC