BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of Union Ridge)	
Solar, LLC for a Certificate of Environmental)	Case No. 20-1757-EL-BGN
Compatibility and Public Need for a Solar)	
Facility Located in Licking County, Ohio.)	

DIRECT TESTIMONY OF

JACOB RUNNER

on behalf of

Union Ridge Solar, LLC

September 2, 2021

- 1 Q.1 Please state your name, title, and business address.
- 2 A-1. Jacob S. Runner, GIS Services Manager, Environmental Design & Research, Landscape
- 3 Architecture, Engineering & Environmental Services, D.P.C. (EDR), 217 Montgomery
- 4 Street, Suite 1100, Syracuse, New York 13202.
- 5 Q.2 What are your duties as a GIS Services Manager?
- A-2. As the GIS Services Manager with EDR, my responsibilities include standardizing GIS work flows and adapting them to unique projects and/or datasets, mentoring and overseeing professional development of GIS staff, QA/QC of GIS deliverables, research and development of new or expanded GIS services, management of stand-alone GIS projects, and internal coordination of GIS-related project needs and deadlines. I have also been responsible for conducting and/or overseeing numerous solar glare assessments in New
- 12 York and Ohio.

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Q.3 What is your education and professional background?

A-3. I received a Bachelor of Science Degree in Environmental Science with a concentration in 14 Environmental Information and Mapping, SUNY College of Environmental Science & 15 Forestry, in 2012. Since my employment with EDR, I have worked in the capacity as 16 17 Environmental Analyst/GIS Specialist, Senior Environmental Analyst/GIS Specialist, Environmental Project Manager, and GIS Services Manager. I have over 10 years of 18 experience performing and/or supervising projects involving environmental surveys, state 19 20 and federal wetland permitting, spatial analyses, environmental impact assessments, and preparation of multiple state siting board applications and environmental impact 21 22 statements.

- 1 Q.4 Have you testified previously before the Ohio Power Siting Board?
- 2 **A-4.** No.
- 3 Q.5 Have you previously served as an expert witness before any other court, agency, or
- 4 other body on the subject you plan to offer testimony on today?
- 5 A-5. Yes, I have previously testified before the New York State Public Service Commission or 6 Board on Electric Generation Siting and Environment. I provided written rebuttal testimony, and as an expert witness I was subject to cross examination under oath, in the 7 matter of Canisteo Wind Energy LLC's Application for a Certificate of Environmental 8 9 Compatibility and Public Need (Case No. 16-F-0205). In addition, I prepared written 10 rebuttal testimony in the matter of Baron Wind LLC's Application for a Certificate of Environmental Compatibility and Public Need (Case No. 15-F-0122), written rebuttal 11 testimony in the matter of Alle-Catt Wind Energy LLC's Application for a Certificate of 12 Environmental Compatibility and Public Need (Case 17-F-0282), and I have previously 13 submitted pre-filed testimony in the matters of Heritage Wind, LLC's Application for a 14 Certificate of Environmental Compatibility and Public Need (16-F-0546), Morris Ridge 15 Solar Energy Center, LLC's Application for a Certificate of Environmental Compatibility 16 17 and Public Need (18-F-0440), and Horseshoe Solar Energy LLC's Application for a Certificate of Environmental Compatibility and Public Need (18-F-0663). 18
- 19 Q.6 On whose behalf are you offering testimony?
- 20 **A-6.** I am testifying on behalf of the Applicant in the case, Union Ridge Solar, LLC ("Applicant" or "Union Ridge").

Q.7 What is the purpose of your testimony?

- 2 **A-7.** The purpose of my testimony is to provide additional context, support, and clarification
- regarding the information set forth in the Glare Analysis, filed as Exhibit M to the
- 4 Application for a Certificate of Environmental Compatibility and Public Need, filed by
- 5 Union Ridge in case 20-1757-EL-BGN (the "Application") on March 26, 2021.
- 6 Q.8 Please describe the study you and your firm undertook on behalf of the Applicant.
- 7 A-8. EDR conducted a baseline solar glare analysis using ForgeSolar's SGHAT software to
- 8 identify potential glare impacts that may result from the operation of the Project. This
- 9 analysis was conducted using industry standard methods and model inputs and was
- 10 conducted to comply with the FAA's Interim Solar Policy. This report provides an
- assessment of the potential for solar related glare and glint that could be experienced at
- residences, airports, and roadways located near the proposed Project.
- 13 Q.9 What was your role in the Solar Glare Analysis Report conducted for the
- 14 **Application?**
- 15 A-9. I was involved in the Union Ridge Solar Solar Glare Analysis Report from its beginning
- through its completion. I conducted the analyses, prepared the report, and corresponding
- figures.

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- 18 Q.10 What were the results of the Solar Glare Analysis Report you performed?
- 19 **A-10.** Results from the glare analysis determined that no glint or glare would be received at any
- of the identified residences, airports, or travel routes.
- 21 Q.11 Does this conclude your direct testimony?
- 22 **A-11.** Yes, it does. However, I reserve the right to offer supplemental testimony if necessary.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Testimony was served upon the parties of record listed below this 2^{nd} day of September 2021 via electronic mail.

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Summary: Testimony of Jacob S. Runner on behalf of Union Ridge Solar, LLC electronically filed by Teresa Orahood on behalf of Dylan F. Borchers