

**BEFORE  
THE OHIO POWER SITING BOARD**

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

---

**DIRECT TESTIMONY OF**

**JACOB RUNNER**

**on behalf of**

**Union Ridge Solar, LLC**

**September 2, 2021**

---

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

**A-1.** Jacob S. Runner, GIS Services Manager, Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C. (EDR), 217 Montgomery Street, Suite 1100, Syracuse, New York 13202.

**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 York and Ohio.

**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 Environmental Information and Mapping, SUNY College of Environmental Science & Forestry, in 2012. Since my employment with EDR, I have worked in the capacity as Environmental Analyst/GIS Specialist, Senior Environmental Analyst/GIS Specialist, Environmental Project Manager, and GIS Services Manager. I have over 10 years of experience performing and/or supervising projects involving environmental surveys, state and federal wetland permitting, spatial analyses, environmental impact assessments, and preparation of multiple state siting board applications and environmental impact 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  
7 testimony, and as an expert witness I was subject to cross examination under oath, in the  
8 matter of Canisteo Wind Energy LLC's Application for a Certificate of Environmental  
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  
11 Environmental Compatibility and Public Need (Case No. 15-F-0122), written rebuttal  
12 testimony in the matter of Alle-Catt Wind Energy LLC's Application for a Certificate of  
13 Environmental Compatibility and Public Need (Case 17-F-0282), and I have previously  
14 submitted pre-filed testimony in the matters of Heritage Wind, LLC's Application for a  
15 Certificate of Environmental Compatibility and Public Need (16-F-0546), Morris Ridge  
16 Solar Energy Center, LLC's Application for a Certificate of Environmental Compatibility  
17 and Public Need (18-F-0440), and Horseshoe Solar Energy LLC's Application for a  
18 Certificate of Environmental Compatibility and Public Need (18-F-0663).

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"  
21 or "Union Ridge").

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

**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 Application for a Certificate of Environmental Compatibility and Public Need, filed by Union Ridge in case 20-1757-EL-BGN (the “Application”) on March 26, 2021.

**Q.8 Please describe the study you and your firm undertook on behalf of the Applicant.**

**A-8.** EDR conducted a baseline solar glare analysis using ForgeSolar’s SGHAT software to identify potential glare impacts that may result from the operation of the Project. This analysis was conducted using industry standard methods and model inputs and was 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.

**Q.9 What was your role in the Solar Glare Analysis Report conducted for the Application?**

**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.

**Q.10 What were the results of the Solar Glare Analysis Report you performed?**

**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.

**Q.11 Does this conclude your direct testimony?**

**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<sup>nd</sup> day of September 2021 *via* electronic mail.



---

Dylan F. Borchers

Matthew D. Stewart, Esq.  
Assistant Prosecuting Attorney  
20 South Second Street, Fourth Floor  
Newark, OH 43055  
[mstewart@lcounty.com](mailto:mstewart@lcounty.com)

*Counsel for Intervenors Licking County Planning Commission; Harrison Township Board of Trustees; Jared Knerr, Engineer of Licking County, Ohio; and Licking County Soil & Water Conservation District*

Carolyn J. Carnes, Esq.  
Assistant Prosecuting Attorney  
20 South Second Street, Fourth Floor  
Newark, OH 43055  
[ccarnes@lcounty.com](mailto:ccarnes@lcounty.com)

*Counsel for Intervenor Board of County Commissioners, Licking County, Ohio*

Chad A. Endsley, Esq.  
Leah F. Curtis, Esq.  
Amy M. Milam, Esq.  
Ohio Farm Bureau Federation  
280 North High Street, P.O. 182383  
Columbus, OH 43218-2383  
[cendsley@ofbf.org](mailto:cendsley@ofbf.org)  
[lcurtis@ofbf.org](mailto:lcurtis@ofbf.org)  
[amilam@ofbf.org](mailto:amilam@ofbf.org)

*Counsel for Intervenor Ohio Farm Bureau Federation*

Kyle Kern  
Assistant Attorneys General  
Public Utilities Section  
30 East Broad Street, 16<sup>th</sup> Floor  
Columbus, OH 43215  
[kyle.kern@ohioattorneygeneral.gov](mailto:kyle.kern@ohioattorneygeneral.gov)

*Counsel for Staff of the Ohio Power Siting Board*

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**9/2/2021 5:20:32 PM**

**in**

**Case No(s). 20-1757-EL-BGN**

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