Applicant Exhibit 30

BEFORE
THE OHIO POWER SITING BOARD

In the Matter of the Application of Birch Solar 1, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Allen and Auglaize Counties, Ohio.	)))))	Case No. 20-1605-EL-BGN

DIRECT TESTIMONY OF

Shanelle Montana
Vice President Development
Lightsource Renewable Energy US, LLC

on behalf of
Birch Solar 1, LLC

May 4, 2022

/s/ *Christine M.T. Pirik*
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1. Please state your name, current title, and business address.

My name is Shanelle Montana. I am Vice President Development for Lightsource Renewable Energy US, LLC ("Lightsource US"). My business address is 400 Montgomery St. 8th Floor San Francisco, CA 94104.

2. Please summarize your educational background and professional experience.

I obtained my Bachelors Degrees in Environmental Studies and Legal Studies from Hamline University as well as my Masters in Public Policy from the American University School of Public Affairs in Washington DC. I began my career at Deloitte Consulting focusing on the implementation of renewable energy for the Department of Defense and other federal agencies. In the last decade, I have been managing project development across the United States, specializing in renewables in Midwest farm communities. Coming from a farm family, I have had the amazing opportunity to see the impact of renewable energy on my own family farm and agricultural community in the Midwest and also be part of the industry across the U.S. My own farm experience plays into how I approach my development work every day, as we work to develop projects which connect to and benefit the communities we work in. A copy of my resume is attached to my testimony as Attachment SM-1.

3. On whose behalf are you offering testimony?

I am testifying on behalf of Birch Solar 1, LLC ("Applicant" or "Birch Solar"), which is a wholly-owned subsidiary of Lightsource US. The ultimate parent of Lightsource US is Lightsource bp Renewable Energy Investments Limited ("Lightsource bp"). Birch Solar is seeking to develop the proposed Birch Solar facility ("Project") in Allen and Auglaize Counties, Ohio.

4. What is your role with respect to the Birch Solar Project?

In my position as Vice President Development, I oversee the permitting process for the Project, including the production of the various studies and reports required for the Birch Solar application that was filed with the Ohio Power Siting Board ("Board") for a certificate of environmental compatibility and public need ("Certificate"). In addition, and

equally important, I take the lead on community, landowner and public relations for the Project and have had the incredible opportunity to get to know the Allen and Auglaize County Communities.

5. Are you familiar with the Application that Birch Solar filed in this case?

Yes, I was involved in the preparation of the Application.[1] On February 12 and 17, 2021, Birch Solar filed its Application for a Certificate with the Board. Since that time, there has been six supplements to the Application filed and thirteen responses to data requests from the Board's Staff ("Staff").[2] Together, I refer to those documents as the "Application."

6. What is the purpose of your testimony?

The purpose of my testimony is the following:

- Provide background concerning Birch Solar's Application.
- Sponsor parts of the Application including the Project overview, components, public outreach, schedule, socioeconomic, complaint resolution, interconnection, lighting plan, placement of visual screening, land use, Federal Aviation Administration ("FAA") information, insurance, and financial information.
- Sponsor some of the exhibits to the Application, including Application Exhibits C, E-F, H-I, M, and V.
- Sponsor the admission of the Application.

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1 Applicant Exhibits 1 and 2.

2 Applicant Ex. 3, Supplement to Application filed March 25, 2021; Applicant Exhibit 4, Second Supplement to Application filed March 31, 2021; Applicant Exhibit 5, Third Supplement to Application filed April 5, 2021; Applicant Exhibit 6, Fourth Supplement to Application filed October 5, 2021; Applicant Exhibit 7, Updated Second Supplement to Application filed February 9, 2022; Fifth Supplement to Application filed February 17, 2022; Applicant Exhibit 9, Sixth Supplement to Application filed May 4, 2022; Applicant Exhibit 10, Response to First Data Request filed March 12, 2021; Applicant Exhibit 11, Response to Second Data Request filed April 6, 2021; Applicant Exhibit 12, Response to Third Data Request filed April 9, 2021; Applicant Exhibit 13, Response to Fourth Data Request filed on April 12, 2021; Applicant Exhibit 14, Response to Fifth and Six Data Requests filed April 28, 2021; Applicant Exhibit 15, Response to Seventh Data Request filed June 7, 2021; Applicant Exhibit 16, Response to Eighth Data Request filed on June 8, 2021; Applicant Exhibit 17, Response to Ninth Data Request filed September 27, 2021; Applicant Exhibit 18, Response to Tenth Data Request filed October 14, 2021; Applicant Exhibit 19, Response to Eleventh Data Request filed October 14, 2021; Applicant Exhibit 20, Response to Twelfth Data Request filed October 15, 2022; Applicant Exhibit 21, Response to thirteenth Data Request filed October 18, 2021; Applicant Exhibit 22, Supplemental Response to Tenth Data Request filed December 30, 2021.

- Introduce the witnesses who will present additional direct testimony in support of the Application.
- Describe Birch Solar's outreach to the local community in the area of the Project.
- Describe the economic benefits of the Project.
- Support the Applicant's commitment to comply with the commitments made in the Application, supplements to the Application, responses to data requests from the Staff, and the conditions in the Staff Report of Investigation file on October 20, 2021 ("Staff Report").

7. Are the Application, including all exhibits and figures attached to the Application, the supplement to the Application, and all responses to the data requests from the Staff, true and accurate to the best of your knowledge?

Yes, they are**.**

8. Did Birch Solar cause the Application and notices to be served on property owners, tenants, adjacent property owners, various local government officials, and libraries?

Yes. The certificates of service were filed and have been marked as Applicant Exhibits 23, 25, and 27-29.

9. Did Birch Solar cause notices of the public information meetings, the Application, and the hearings to be published in a newspapers of general circulation in Allen and Auglaize Counties, Ohio?

Yes. Proofs of publication were filed and have been marked as Applicant Exhibits 24, 26, and 28-29.

10. Who are the additional witnesses supporting the Birch Solar Application in this proceeding?

- Derek Brown (Applicant Exhibit 31): Site Plan, Geotechnical Investigation Report, Horizontal Directional Drilling Inadvertent Return Contingency Plan, Hydrology and Flood Inundation Study, Application Exhibits A, K, L, O; drain tile assessment; Final Hydrology and Flood Inundation Study dated June 3, 2021, which was filed as Attachment 1 to the Applicant's Response to the Seventh Data Request from the

Staff; and the Engineering and Constructability Report ("ECR"), Supplemental Response to Tenth Data Request filed December 30, 2021.

- Courtney Dohoney (Applicant Exhibit 32): Preliminary Decommissioning Plan, Economic Impact Report, Construction Route Study and Road Condition Report, Glare Hazard Assessment, Wetland and Waterbody Delineation Report, Visual Resources Technical Report, Preliminary Drain Tile Assessment, Sound Report, Application Exhibits B, G, J, N, P, U, and W-X; outreach with the State Historic Preservation Office and the Memorandum of Understanding; landscape plan for the architectural report.
- Alyssa Edwards (Applicant Exhibit 33): Exhibit D – Vegetation Management Plan, Revegetation Plan, Threatened and Endangered Species Habitat Survey Report, United States Fish and Wildlife Service and Ohio Department of Natural Resources ("ODNR") Correspondence, Application Exhibits D, Q, R, and Sixth Supplement to the Application filed on May 4, 2022; and grazing.
- Ryan Weller (Applicant Exhibit 34): Cultural Resources Management Preliminary Review, Cultural Resources Work Plan, History/Architecture Reconnaissance Survey, Phase 1 Archaeological Survey Report, Application Exhibits S-T, Supplement to the Application filed March 25, 2021, and Response to Staff Condition 33 filed December 30, 2021.
- Thomas Stewart (Applicant Exhibit 35): ODNR Orphan Well Program as it relates to the ECR.
- Thomas Cleveland (Applicant Exhibit 36): potential for environmental, health, and safety impacts from photovoltaic modules
- Andrew Lines (Applicant Exhibit 37): Value of Neighboring Property.

11. Have you reviewed the Certificate conditions recommended by the Staff on pages 50 through 58 of the Staff Report?

Yes.

12. Does the Applicant accept the Certificate conditions recommended by the Board's Staff in the Staff Report and commit to complying with those conditions as part of its

Certificate issued in this case?

Yes.

13. Please provide an overview of the proposed facility.

As described in detail in the Application, the Project will be an up to 300 megawatt ("MW") solar generation facility. Lightsource US's model is to build, own, and operate solar projects, including managing the design and construction of the projects, operating the projects throughout their useful lives, and making a substantial financial investment in the communities in which they are located.

The Project Area will encompass approximately 2,345 acres of land, with the area needed for Project infrastructure including solar modules, trackers, inverters, internal access roads, and a Project substation totaling approximately 1,410 acres. The land for the Project is leased from local farmers, and will be returned to the farmers at the end of Project operations with all equipment removed. Throughout this Application, the Applicant has balanced the desire of local farmers to use their farmland for a solar project, the goals of the state of Ohio for additional clean energy development and infrastructure, and the requests of the community surrounding the Project to screen, offset the Project from major roads, and reduce changes to the current environment of the Project Area. Birch Solar's approach is to work with the local community and neighbors to ensure that it develops and constructs the Project as a good neighbor and long-term member of the local community. The development of the Project was typical of most generation projects. After initial interconnection screenings, Birch Solar began speaking with the area farmers. Over approximately one year, an initial Project boundary was created and at that time Birch Solar began speaking with the greater community, local officials, and other government agencies introducing the Project. During the pre-application period, Birch Solar met with the local community in a public setting (virtual and in person) on four separate occasions. During those meetings, questions or concerns were documented and responses were incorporated into the Project as much as possible. As part of the Project design considerations, and with the consideration of the significant input received in the community outreach, the Applicant is implementing commitments for the Project, including the following:

- 300-foot panel setbacks from Breese Road and panel setbacks starting at 300 feet from homes, in addition to evergreen screening;
- Neighboring Landowner Financial Benefit program for any home within 500 feet of the solar panels with the benefits ranging from $10,000 to $50,000 depending on proximity, and a Home Value Agreement for homes most affected by the Project; Neither of these landowner benefit programs require endorsement, confidentiality, or support of the Project by the landowner;
- Discreet 6-foot cedar post farm fence around the Project to match the aesthetic of the surrounding area;
- Planting of evergreen trees and shrubs around the Project in external facing areas that will protect residents' viewsheds, eliminating or limiting Project visibility;
- Maintaining the natural environment of the area and conserving habitats by not removing wooded areas or wetlands, with generous setbacks from any wetland areas to ensure they are undisturbed;
- Optimizing the Project engineering to maintain 300 MW capacity while reducing the land needed for the Facility to 1,410 acres, which remains inside the original planned pre-application boundary. This is a reduction of 1,190 acres from the acreage presented at the public information meetings in November 2020;
- The Applicant's customary best project practices that are beyond industry standards or permit requirements and that address other community concerns;
- Recycling all solar panels, which includes any panels damaged during construction, operations, and all panels left at the end of life/decommissioning;
- Only use modules that pass the United States Environmental Protection Agency ("USEPA") Toxicity Characterization Leaching Procedure ("TCLP") to ensure modules do not contain toxic metals or waste defined as hazardous. Passing the TCLP tests classified any remaining unrecyclable panel materials as universal waste;
- Creation of pollinator habitat to boost local biodiversity and foster wildlife habitat and a sheep grazing program, if acceptable to the local community and nearby landowners; and
- A $500,000 community fund for Allen and Auglaize Counties.

In the Application, the Applicant balanced the right of the farmers to maximize the use of their land with the desires of the local community and the state of Ohio's goals of additional economic development and infrastructure.

14. What is the general purpose of the facility?

The facility's purpose is to create electrons which are then put onto the PJM grid and used in a private Power Purchase Agreement.

15. Will the facility comply with all applicable regulations?

Yes, the facility is designed to comply with all applicable state and federal regulations, and Birch Solar is committed to ensuring that the final layout adheres to all applicable state and federal regulations. The Applicant is committed to obtaining all necessary state and federal approvals.

16. Please summarize the Visual Impact Mitigation and Lighting Plan contained in Exhibit V of the Application.

The Visual Impact Mitigation and Lighting Plan ("Plan") details the attributes of the Project, which allow it to be in sync with the surrounding community. For this Project, we began by minimizing the size of the Project Area and increasing setbacks from homes and heavily traveled public roadways, like Breese Road, to minimize views. Further, because of the setbacks from Breese Road, the landowners can continue to farm that land, further reducing views of the Project during the growing season when crops are present. Lastly, the Project is implementing vegetative screening which would again further block any visual impact of the Project. The Plan has photosimulations of the Project to visualize the setbacks and screening the Project is implementing. Additionally, Birch Solar incorporated community and landowner feedback to identify ways to better integrate the facility into the landscape. As a result of this effort, the Project design includes cedar post farm fencing around the external facing areas of the Project rather than the originally proposed chain link fencing. This farm fencing will better blend into the existing agricultural landscape.

17. Please describe Birch Solar's public information program to provide the local community information about the Project.

After initial interest by local farmers in a solar project was identified, the Project began socializing an initial Project boundary which was roughly created based on farmer interest. Over approximately one year, the initial boundary was created and at that time the Project began speaking to the greater community, local officials, and other stakeholders or governmental agencies introducing the Project. During the pre-application period, the Project met with the local community in a public setting (virtual and in person) on four separate occasions. During those meetings, questions or concerns were documented and responses were incorporated into the Project as much as possible. As stated throughout my testimony, our community engagement impacted the layout and equipment used on the Project site. Throughout the development of the site, the Applicant has spoken at over a dozen county or local government and stakeholder meetings and has continued to educate the community about the benefits of the Project.

18. In your experience, what are some of the common public comments that arise during the development of a utility-scale solar generation facility?

Public comments that arise during the development of a utility-scale solar generation facility typically reflect both project support and project opposition. Our Project is no different. Supportive comments typically reflect the economic development and increased tax base and school funding, the desire for a cleaner electric grid, the support of farmer's property rights, and the jobs created by the Project, to name a few. In opposition, comments were submitted questioning the need for the Project, potential health impacts, the impact the Project would have on the community and the aesthetic the Project would create, to name a few. Like in many areas new to solar energy, education was a key component to our community outreach and we took time to meet with many local governments, community stakeholders, and individuals in order to discuss the technology and Project specifics.

19. Did you review the written public comments submitted to the docket in this proceeding?

Yes. I have read every comment on the docket posted as of May 4, 2022.

20. Did you attend the local public hearing held on November 4, 2021?

Yes. On November 4, 2021, 59 people offered sworn testimony at the local public hearing at the Allen County Fairgrounds. Of those witnesses, 20 people testified in support, 38 people testified with objections or concerns, and one person testified as neutral.

21. Please describe, generally, the topics raised by those testifying at the local public hearing and in the written public comments in the docket.

The local public hearing contained a mix of comments both in favor of the Project and in opposition. Those testifying in support of the Project had diverse comments, including the desire for Allen and Auglaize Counties to have clean energy projects, the benefit the Project would have on the tax base and school funding, the rights of farmers and private property owners, the jobs and economic benefits of the Project, and the need for jobs in the community. Those in opposition mentioned the potential for aesthetic changes in the community, the decrease in farmland, the potential for health impacts and skepticism around solar technology. Additionally, there were multiple comments regarding the current state of the Project Area and, in particular, numerous concerns around drainage and flooding currently existing in the area, unrelated to the Project.

22. What positive benefits will the Project provide to the local community?

The Project will bring a myriad of benefits to the local community. Beginning with construction and development, the Project will allow farmers to use their land in a more sustainable way both environmentally and economically. Family farms in the Project Area will not continue to be subject to the ups and downs of farming, but will have consistent income. The land, which would normally be row cropped in mostly corn or soybeans, will have a chance to once again create a native biodiverse ecosystem which then increases biodiversity in the surrounding area and helps to establish root structures that help with flooding and drainage. The construction of the Project creates indirect and direct benefits including over 400 full-time jobs.

The Project has committed to applying for a Payment In Lieu of Taxes ("PILOT") and, if adopted, 80% of the construction jobs will then be required to be from in state. Those workers and the Project create indirect opportunities for the surrounding community restaurants, gas stations, hotels, and ancillary construction support services. With the PILOT, the Project will increase the tax revenue from the associated area by over ten times, to approximately $2.7M annually or approximately $94M throughout the life of the Project. These additional funds can be used for new school and county infrastructure or other programs at the school and counties' discretion.

The state of Ohio has a long history of being a leader in the energy sector. This Project continues that leadership, continuing to bring in the benefits of local production to the state of Ohio. These benefits include a more diverse, sustainable, and reliable electrical grid.

23. Please explain the Complaint Resolution Plan and Notices contained in Exhibit H of the Application.

The Complaint Resolution Plan provides a framework whereby community members can voice their complaints regarding the Project construction or operation directly to Birch Solar. The Complaint Resolution Plan highlights the ways Birch Solar will receive complaints including establishing a "hotline," on site visitation, and written complaints via mail or email. In addition, consistent with Condition 27 of the Staff Report, no less than 14 days prior to the start of construction, Birch Solar will send notification and the Complaint Resolution Plan to: affected property owners and tenants, including those individuals who were provided notice of the public informational meetings; residences, airports, schools, and libraries, located within one mile of the Project Area; parties to this case; county commissioners, township trustees, and emergency responders; and anyone who has requested updates regarding the Project.. Theses notices will provide notice of construction, along with an overview of construction schedules, and contact information for Birch Solar. Notices will also be sent out prior to commencement of facility operation.

Birch Solar will enter complaints into an electronic complaint log and assign a point of contact for each complaint within one week of receipt. The Project will resolve complaints

within 30 days, unless extenuating circumstances exist.

24. Are you aware that the Board must make certain determinations under R.C. 4906.10 before issuing a certificate for the construction, operation, and maintenance of a major utility facility?

Yes. I am aware that there are eight criteria considered by the Board in making its determination for the issuance of a certificate.

25. Does R.C. 4906.10(A)(1), which requires the Board to determine that the basis of need for the facility, apply to Board's review of this Application?

No. R.C. 4906.10(A)(1) applies only to an electric transmission line or a gas pipeline, and is not applicable to this generating facility.

26. Does the Application enable the Board to determine the nature of the probable environmental impact of the facility?

Yes. The Application addresses all of the subject matter areas necessary for the Board to determine the nature of the probable environmental impact of the facility. The Application includes detailed surveys, assessments, and reports related to probable socioeconomic impacts, ecological impacts, and public services, facilities, and safety. The Application narrative and exhibits and figures, along with subsequent data request responses, provides all of the information necessary to determine the probable impacts. Further, each of these topics are supported by witnesses in the case.

27. Based on the Applicant's commitments in the Application, along with the conditions in the Staff Report, does the facility represent the minimum adverse environmental impact, considering the state of available technology and the nature and economics of the various alternatives, and other pertinent considerations?

Yes. The Application addresses all the subject matter areas necessary for the Board to determine the nature of the probable environmental impact of the facility. The Application includes detailed surveys, assessments, and reports related to probable socioeconomic impacts, ecological impacts, and impacts to public services, facilities, and safety. The

Application narrative and exhibits and figures, along with subsequent supplements and responses to Staff's data requests, provide the information necessary to determine the probable impacts. In addition, due to the past history of the area and the multiple oil and gas wells located on site, the Project represents optimal land use when compared to other potential uses which are more intensive or involve greater human activity.

In addition, the Applicant's commitment to comply with all conditions recommended by the Staff in the Staff Report further supports a determination that the facility represents the minimum adverse environmental impact, considering the state of available technology and the nature and economics of the various alternatives, and other pertinent considerations.

28. Is the facility consistent with regional plans for expansion of the electric power grid of the electric systems serving this state and interconnected utility systems and that the facility will serve the interests of electric system economy and reliability?

Yes. The regional plans for expansion of the electric power grid of the electric systems serving the state are determined by PJM. The Applicant submitted an interconnection request to PJM on September 20, 2019. The Feasibility Study for the Project was received on January 31, 2020, and the subsequent System Impact Study Report from PJM was received August, 2020.

An Interim Interconnection Service Agreement ("ISA") was executed in August, 2021 and a final ISA will be executed upon completion of the Facilities Studies (anticipated in 3rd quarter of 2022). The Application further describes that the Project would provide additional electrical generation to the regional transmission system. The PJM system, is often compared to a plumbing system. Electrons are used where they are needed and this Project would contribute to the diversity and reliability of the PJM grid.

29. Does the facility comply with the requirements established by the state of Ohio for: air pollution control; solid and hazardous waste; water pollution control; permitting for a major increase in withdrawal of waters; and aeronautical requirements?

Yes. The Application addresses air pollution topics and demonstrates that there is no pollutant emissions associated with the Project and no emissions are created by the operations of the Project.

The Application addresses solid and hazardous waste and demonstrates that the operations of the Project will generate only small amounts of non-hazardous waste such as cardboard or packaging, which will be recycled or disposed of offsite. The Project will only utilize Tier 1 equipment suppliers to ensure the solar modules are not hazardous to people or the environment. The Project requires the panels to have passed TCLP testing to ensure the modules are categorized as non-hazardous under federal law and could be disposed of in regular landfills just like household garbage. However, the Applicant is committed to recycling all solar panels from the Project, which includes any panels damaged during construction, operations, and all panels at the end of life or decommissioning. In accordance with Condition 42 of the Staff Report, at the time of solar panel end of life and if the Applicant is unable to recycle the panels, retired panels marked for disposal shall be sent to an engineered landfill with various barriers.

The Application addresses water and water pollution and demonstrates that the Project has no water pollutants associated with the operations of the Project. The Project does not anticipate any impacts to public or private wells or water supplies during the construction and operation of the Project.

The Applicant has committed to adhering to the Ohio Environmental Protection Agency's Guidance on Post-Construction Storm Water Controls for Solar Panel Arrays, in accordance with Condition 21 of the Staff Report. Further, the Project is not subject to any aeronautical requirements. Further, Birch Solar will comply with Conditions 30 and 31 in the Staff Report addressing repair and replacement of drain tile, and is working with both Allen and Auglaize Counties, and the townships, to develop a drainage and road use plan.

In addition, the Applicant's commitment to comply with all conditions recommended by the Staff in the Staff Report further supports a determination that the facility these requirements.

30. Does the facility serve the public interest, convenience, and necessity?

Yes. The Application addresses public interest, convenience, and necessity through discussion and analysis of topics such as, but not limited to, the following:

- The socioeconomic impacts of the Project;
- The Project's commitment to an Adjacent Neighbor Neighboring Landowner Financial Benefit program for any home within 500 feet of the solar panels with the benefits ranging from $10,000 to $50,000 depending on proximity, and a Home Value Agreement for homes most affected by the Project. This offer has already been provided to the adjacent neighbors mitigating concerns around property value.
- The expansion of grazing and farming operations on the site, which furthers the agricultural nature of the Project Area and allows for additional economic income to local farmers. The extensive public engagement efforts made throughout the development of the Project;
- The guarantee for liability insurance;
- A decommissioning bond ensuring the financial means to remove the equipment and return the land to substantially its current condition;
- A complaint resolution process;
- The implementation of community requests and feedback, including, but not limited to, setback, screening, layout, adjacent neighbor financial payments, and fencing styles;
- Increased setbacks along roadways such at Breese Road as to not interfere with any County infrastructure plans for sewer or water extensions.
- A layout which balances Shawnee Township's Comprehensive Plan's desire for a continued agricultural aesthetic – through setbacks, agricultural fencing, and grazing - as well as the desire for growth, but continues to allow the land to be agricultural in nature, and fully revert back to row cropping, at the end of the life

of the Project. Most other uses for this land, homes or industrial, would not allow for the continued farm presence after the life of the project.

- The Project's commitment to be a good neighbor with a $500,000 Community Fund, which will be used for community projects and initiatives.
  - This includes an already received $50,000 payment to the Shawnee Football Parents Association for a down payment on the new Shawnee Football Stadium and a commitment to fund the remaining $250,000 if the Project is able to advance; and
  - Sponsorship of the 2021 Allen County Fair for $8,000 to assist with Fair programing.
- The creation of a Revegetation Plan, in consultation with Project neighbors, which will create additional biodiversity around the Project.
- The creation of over 400 full time employees, 80% of which are required to be in-state, for construction of the Project. These workers, and the Project, have direct and in-direct (ancillary services) economic benefits.
- An approximately $4M operations and maintenance budget which is largely spent in the community with local vendors, workers, and contractors.
- Allows Allen and Auglaize County the opportunity to be leaders within the energy sector by supplying energy to the PJM grid. Similar to agricultural products, Ohio-made electricity is able to be contracted and sold on the market creating additional economic industry for Allen and Auglaize Counties.
- Negotiation of a Drainage and Road Use Agreement ("DRUMA"), which incorporates community specific requests and accommodates County concerns not only for roads, but also drainage on the Project, creating greater transparency and certainty for local governments.

Discussion of these topics as well as others, as presented in the Application and witness testimony in this case, enables the Board to determine that the facility will serve the public interest, convenience, and necessity.

31. Does the Application enable the Board to determine what the facility's impact will be on the viability as agricultural land of any land in an existing agricultural district?

Yes. Within the Project Area, 2,345 acres are included which are currently being farmed in row crops. The Vegetation Management Plan contained in Application Exhibit D and Revegetation Plan contained in the Sixth Supplement to the Application, as well the conditions set forth in the Staff Report, will ensure that, throughout the life of the Project, a mix of native and pollinator seeding will increase biodiversity and soil nutrients and has the potential to increase pollinators on adjacent farmed parcels. After the Project is decommissioned, the Project Area can again be used for row crops or other agricultural projects. All impacts of the Project are temporary. The use of this land for a solar project is optimal because of its ability to maintain farmland within the community.

32. Does the facility comply with the requirements established by the state of Ohio to prepare and provide a decommissioning plan and cost estimate for the Project?

Yes. A Decommissioning Plan was prepared to provide for the removal of the Project and estimate the total cost to retire the Project at the end of its useful life per O.A.C. Rule 4906-4-06(F)(5). The decommissioning costs include the costs to return the site to substantially the same conditions that existed before construction of the Project. The Decommissioning Plan reviews the decommissioning sequence and presents a 12 to 18 month plan to begin within 12 months of ceasing operations. While some components may be sold as scrape or resold completely, as the Decommissioning Plan indicates, all damaged or end of life panels will be recycled. Soil will be decompacted as needed and returned to original condition to be farmed, if decided by the landowner.

Consistent with Condition 41 in the Staff Report, Birch Solar will provide financial security to ensure funds are available to decommission the Project. The financial security will be in the form of a performance bond with the Board as an obligee. A final Decommissioning Plan will be prepared by a professional engineer registered with the state board of registration for professional engineers and surveyors and submitted to the Board's Staff for review prior to construction. The decommissioning bond will be updated every 5 years during the life of the Project.

33. Does the facility incorporate maximum feasible water conservation practices, considering available technology and the nature and economics of the various alternatives?

Yes.

34. Does this conclude your testimony?

Yes. However, I reserve the right to update my testimony to respond to any further testimony, reports, and/or evidence submitted in this case.

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CERTIFICATE OF SERVICE

The Ohio Power Siting Board'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 these cases. In addition, the undersigned certifies that a copy of the foregoing document is also being served upon the persons below this 4th day of May, 2022.

/s/ Christine M.T. Pirik
Christine M.T. Pirik (0029759)

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Attachment SM-1
Shanelle Montana
Resume

DICKINSON WRIGHT PLLC

SHANELLE C. EVENS MONTANA
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Experienced Project Director with a demonstrated history of working in the clean energy industry. In addition, owner of one of the first micro distilleries in Minnesota. Strong project management skills with a track record of taking large projects from an idea to operation. Active community participant in clean energy and entrepreneurial organizations. Dedicated to sustainable development in rural and underserved communities.

Professional Experience

Lightsource bp, *Vice President, Development* **2020 – present**
Lead development of solar project throughout Midwest and Southern States.

- Manage team of project developers throughout the Midwest, Northeast and Southeast United States.
- Focus teams development of projects using "Responsible Solar" methodologies
- Train employees and manage public relations and grassroots outreach to further the Development Team's efforts of public engagement.
- Establish development portfolios from greenfield to construction.

Lightsource bp, *Director of Development*

- Focused on permitting projects in complex regulatory structures
- Coordinated with state and federal agencies to advance first of its kind technology and project development
- Managed public relations, grassroots outreach, and corporate presentation in contested permitting environments
- Lead regional and state-wide advocacy for clean energy in mostly conservative states removing political boundaries for clean energy
- Nurtured top corporate off-take relationships through development processes
- Delivered projects on budget and on time.

Du Nord Craft Spirits, LLC, *Co-Owner and Founding Member* **2013 – present**
Co-own and operate one of Minnesota's first local grain to glass micro-distilleries and cocktail rooms.

- Lead the legislative advocacy for the microdistillery industry to ensure a fair industry for beer, wine, and spirits.
- Ensure corporate mission – advancing communities and families through ethical business – is accomplished
- Manage hiring, human resources, and payroll for bar and full-time distillery staff.
- Oversee the marketing, social media, and sales in wholesale and retail markets.

BayWa Solar Project, LLC, *Director of Development* **2019 - 2020**
Managed team of national developers completing projects from acquisition to operations.

- Coordinated development review of acquisitions and greenfield projects focusing on interconnection, environmental, land use and permitting conditions.
- Developed utility scale projects in PJM and MISO for multiple commercial and utility offtake.
- Initiated BayWa's membership into multiple industry organizations on the ISO and national level. Representing BayWa's interests on the Clean Grid Alliance Board.
- Implemented monthly project risk review and weekly company project update coordination with multiple departments.
- Lead creation of landowner and vendor payments management system and community giving strategy.

EDF Renewables, Minneapolis, MN, *Project Development Manager* **2015-2019**

Lead grid scale wind, solar, and storage projects through development, sale and construction.

- Establish relationships with federal, state and local governments to advance the clean energy industry by opening new markets, reducing regulatory burdens, increasing capacity markets and encouraging fair siting standards.
- Manage project development, including, but not limited to: greenfielding, land acquisition, community relations, interconnection, permitting, offtake strategy and environmental assessments.
- Communicate with project landowners and project community stakeholders to ensure smooth construction and operations of projects.
- Represent EDFR on industry associations and boards.

EDF Renewable Energy, Minneapolis, MN, *Associate, Regulatory & Legislative Affairs* **2011 - 2015**

Develop and identify new market and policy opportunities for solar and wind development in states included in the Midcontinent Independent System Operator and the New England Independent System Operator

- Manage and maintain legislative, administrative, and commission relationships to benefit development activities and expand markets
- Represent EDF-RE in industry associations to ensure association goals align with market opportunities and industry collaboration
- Drive EDF-RE's policy agenda using print and broadcast media, public testimony, lobby days, and events
- Coordinate internal policy involvement including Political Action Committee fundraisers and policy educational events for staff

EDF Renewable Energy, Minneapolis, MN, *Landowner & Community Outreach* **2010 – 2011**

Managed relationships and communications with local development communities across the Midwest

- Create and maintain relationships with stakeholders in development areas including municipal councils, interest groups and associations
- Presented project and company information at local events including town halls, city councils, and county commissions
- Hosted Landowner Dinners and public meetings to introduce EDF-RE and wind development to rural communities
- Managed the Landowner and Community Outreach staff

Deloitte Consulting, Washington D.C. *Consultant, Strategy & Operations – Energy & Resources* **2008 –2010**

Led workstreams on various public and private sector projects to ensure clients met their strategic and financial goals. Assisted in building the firm's presence though the creation of thought-ware in energy management and renewable energies.

- Developed energy management strategies for the U.S. Navy, including renewable energy and energy efficiency solutions, to increase Shore Installation energy security and efficiency
- Examined the market and technical feasibility of fixed energy infrastructure assets and alternative energy supply chains
- Analyzed alternative fuel infrastructure and policies for the U.S. Dept. of Energy and private sector clients to ensure market viability and efficiency

American University, Washington D.C. *Financial Aid Counselor, Office of Enrollment* **2006 – 2008**

- Reviewed and reconciled student accounts and financial aid packages which included federal loans and grants, outside lender loans, and scholarships
- Advised students in financial planning, loan consolidation, and repayment
- Maintained precise and highly detailed university-wide data and records

United States Senator Mark Dayton, Fort Snelling, MN Constituent *Advocate Intern* **Summer, 2005**

- Researched and advocated constituent concerns regarding housing, environment, and education
- Drafted and revised constituent letters and email correspondence
- Attended constituent events and federal organization meetings on behalf of Senator Mark Dayton

Professional Leadership

- **Du Nord Foundation**, Board Member and Founder
- **Clean Grid Alliance (**formerly Wind on the Wires), Board Member and Communications Committee Chair, 2015-present
- **CERTS Woman in Energy**, 2017
- **Women of Wind Energy**, Co-Chair of Minnesota Chapter, 2015-2019
- **Minnesota Solar Energy Industry Association,** Board Member, 2014-2016

Education

American University, School of Public Affairs, Washington, D.C.
M.A., Public Policy, May 2008
Relevant Academic Preparation: Public Program Evaluation, Statistical Analysis with STATA, SAS, ACASTAT, Government Financing, Policy Analysis, Public Managerial Economics

Hamline University, Saint Paul, MN *Wesley Scholar*
B.A., Legal Studies, *Paralegal Certificate*, May 2006
B.S., Environmental Studies, May 2006

Summary: Testimony - Direct Testimony of Shanelle Montana electronically filed by Christine M.T. Pirik on behalf of Birch Solar 1, LLC