

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Wild Grains)
Solar, LLC for a Certificate of Environmental)
Compatibility and Public Need for a Solar Facility)
Located in Van Wert County, Ohio.)

Case No. 21-0823-EL-BGN

DIRECT TESTIMONY OF

**JACOB RUNNER, D.P.C.
Engineering & Environmental Services**

**Environmental Design & Research, Landscape Architecture, Engineering &
Environmental Services, D.P.C.**

on behalf of

**Wild Grains Solar, LLC,
a wholly owned subsidiary of Avangrid Renewables, LLC**

May 13, 2022

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

A.1 Jacob S. Runner, Practice Area Leader GIS Services, 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 Practice Area Leader 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, GIS Services Manager, and Practice Area Leader GIS Services. 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.

Q.4 Have you testified previously before the Ohio Power Siting Board?

A.4 No.

Q.5 Have you previously served as an expert witness before any other court, agency, or other body on the subject you plan to offer testimony on today?

A.5 Yes, I have previously testified before the New York State Public Service Commission or 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

1 matter of Canisteo Wind Energy LLC's Application for a Certificate of Environmental
2 Compatibility and Public Need (Case No. 16-F-0205). In addition, I prepared written
3 rebuttal testimony in the matter of Baron Wind LLC's Application for a Certificate of
4 Environmental Compatibility and Public Need (Case No. 15-F-0122), written rebuttal
5 testimony in the matter of Alle-Catt Wind Energy LLC's Application for a Certificate of
6 Environmental Compatibility and Public Need (Case 17-F-0282), and I have previously
7 submitted pre-filed testimony in the matters of Heritage Wind, LLC's Application for a
8 Certificate of Environmental Compatibility and Public Need (16-F-0546), Morris Ridge
9 Solar Energy Center, LLC's Application for a Certificate of Environmental Compatibility
10 and Public Need (18-F-0440), and Horseshoe Solar Energy LLC's Application for a
11 Certificate of Environmental Compatibility and Public Need (18-F-0663).

12 **Q.6 On whose behalf are you offering testimony?**

13 **A.6** I am testifying on behalf of the Applicant in the case, 21-0823-EL-BGN ("Applicant" or
14 "Wild Grains").

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

16 **A.7** The purpose of my testimony is to provide additional context, support, and clarification
17 regarding the information set forth in the Glare Analysis, filed as Exhibit N to the
18 Application for a Certificate of Environmental Compatibility and Public Need, filed by
19 Wild Grains in case 21-0823-EL-BGN (the "Application") on November 16, 2021.

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

21 **A.8** EDR conducted a baseline solar glare analysis using ForgeSolar's SGHAT software to
22 identify potential glare impacts that may result from the operation of the Project. This
23 analysis was conducted using industry standard methods and model inputs and was
24 conducted to comply with the FAA's Interim Solar Policy. This report provides an
25 assessment of the potential for solar related glare and glint that could be experienced at
26 residences, airports, and roadways located near the proposed Project.

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

1 **A.9** I was involved in the Wild Grains Solar Glare Analysis Report from its beginning through
2 its completion. I conducted the analyses, prepared the report, and corresponding figures.

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

4 **A.10** Results from the glare analysis determined that no glint or glare would be received at any
5 of the identified residences, airports, or travel routes.

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

7 **A.11** Yes. However, I reserve the right to update this testimony to respond to any further
8 testimony, reports, and/or evidence submitted in this case.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Direct Testimony of Jacob Runner was served via electronic mail upon the parties of record listed below this 13th day of May 2022:



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Summary: Testimony of Jacob Runner on behalf of Wild Grains Solar, LLC
electronically filed by Teresa Orahod on behalf of Herrnstein, Kara