

**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) Case No. 20-1605-EL-BGN
Solar-Powered Electric Generation Facility in)
Allen and Auglaize Counties, Ohio.)

SUPPLEMENTAL TESTIMONY OF

**Derek Brown
Vice President
Solar Market Leader
Kleinfelder Group, Inc.**

**on behalf of
Birch Solar 1, LLC**

May 16, 2022

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

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

2 My name is Derek Brown. My title with Kleinfelder Group, Inc. (“Kleinfelder”) is Vice
3 President, Solar Market Leader. I am assigned to Kleinfelder’s Denver office which is
4 located at 707 17th Street, Suite 3000, Denver, CO 80202. As I stated in my initial direct
5 testimony filed on May 4, 2022, I support the information contained in Exhibit A (“Site
6 Plan”), Exhibit K (“Geotechnical Investigation Report”), Exhibit L (“Horizontal
7 Directional Drilling Inadvertent Return Contingency Plan”), Exhibit O (“Hydrology and
8 Flood Inundation Study dated December 18, 2020”), and Final Hydrology and Flood
9 Inundation Study dated June 3, 2021 (which was filed as Attachment 1 to the Applicant’s
10 Response to the Seventh Data Request from the Staff) that are part of the Application for
11 a Certificate of Environmental Compatibility and Public Need (“Certificate”) filed with the
12 Ohio Power Siting Board by Birch Solar 1, LLC (“Applicant” or “Birch Solar”) in this case
13 (“Application”).
14

15 **2. What is the purpose of your supplemental testimony?**

16 The purpose of my supplemental testimony is to support the Joint Stipulation and
17 Recommendation (“Stipulation”) that was filed in this proceeding on May 16, 2022, as it
18 relates to the Application exhibits that I am supporting.
19

20 **3. Have you reviewed the Stipulation that was filed in this proceeding on May 16, 2022,
21 and the Certificate Conditions recommended in the Stipulation?**

22 Yes I have.
23

24 **4. Based upon the commitments Birch Solar has made through the Geotechnical Report,
25 HDD Plan, Hydrology Study, Drain Tile Assessment, and Engineering
26 Constructability Report together with the conditions in the Stipulation, is it possible
27 to determine the nature of the probable environmental impact of the facility?**

28 Yes.
29

30 **5. Based upon the commitments Birch Solar has made through the Geotechnical Report,
31 HDD Plan, Hydrology Study, Drain Tile Assessment, and Engineering
32 Constructability Report together with the conditions in the Stipulation, does the**

1 **facility represent the minimum adverse environmental impact on those resources?**

2 Yes.

3

4 **6. Are your opinions and conclusions in your testimony made with a reasonable degree**
5 **of professional certainty?**

6 Yes.

7

8 **7. Does this conclude your supplemental testimony?**

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

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 16th day of May, 2022.

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

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Case No(s). 20-1605-EL-BGN

Summary: Testimony - Supplemental Testimony of Derek Brown electronically filed
by Christine M.T. Pirik on behalf of Birch Solar 1, LLC