

**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

**Thomas H. Cleveland
Solar Health and Safety Expert**

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

May 16, 2022

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

Matthew C. McDonnell (0090164)

Jonathan R. Secrest (0075445)

David A. Lockshaw, Jr. (0082403)

Dickinson Wright PLLC

180 East Broad Street, Suite 3400

Columbus, Ohio 43215

(614) 591-5461

cpirik@dickinsonwright.com

mmcdonnell@dickinsonwright.com

jsecrest@dickinsonwright.com

dlockshaw@dickinsonwright.com

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

2 My name is Thomas H. Cleveland. I am an experienced solar engineer with a broad
3 background in many aspects of solar energy, and photovoltaics (“PV”) in particular. I have
4 a full-time position as a Solar Engineer at a small energy engineering firm in Raleigh, NC,
5 however, I am presenting this testimony as a private consultant with expertise on the health
6 and safety impacts of photovoltaics. My business address is 4141 Laurel Hills Rd. Raleigh,
7 NC. As I stated in my initial testimony filed on May 4, 2022, my testimony provides
8 additional context, support, and clarification for Birch Solar 1, LLC’s (“Applicant” or
9 Birch Solar”) Application for a Certificate of Environmental Compatibility and Public
10 Need (“Certificate”), filed in Case No. 20-1605-EL-BGN on February 12 and 17, 2021, as
11 supplemented, and further supplemented by responses to data requests that were received
12 from and filed in the docket (“Application”), and my testimony addresses the potential for
13 environmental, health, and safety impacts from photovoltaic modules.

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 Applicant’s commitment to the type of module to be used for the**
25 **Project, together with the conditions in the Stipulation, does the facility represent the**
26 **minimum adverse environmental impact on those resources considering the state of**
27 **available technology and the nature and economics of the various alternatives, and**
28 **other pertinent considerations?**

29 Yes.
30
31

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

3 Yes.

4

5 **6. Does this conclude your supplemental testimony?**

6 Yes. However, I reserve the right to update my testimony to respond to any further
7 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)

Counsel:

jodi.bair@OhioAGO.gov
Kyle.Kern@OhioAGO.gov
epierce@auglaizecounty.org
RDove@keglerbrown.com
EChristensen@bdlaw.com
jlandfried@bdlaw.com
HJacobs@bdlaw.com
JReagan@bdlaw.com
amilam@ofbf.org
cendsley@ofbf.org
clay@cbalyeat.com
lcurtis@ofbf.org
jvankley@vankleywalker.com

Administrative Law Judges:

Michael.Williams@puco.ohio.gov
Jesse.Davis@puco.ohio.gov

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5/16/2022 4:53:53 PM

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

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