Applicant Exhibit 19

BEFORE
THE OHIO POWER SITING BOARD

In the Matter of the Application of Pleasant Prairie Solar Energy, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Franklin County, Ohio.	)))))	Case No: 20-1679-EL-BGN

DIRECT TESTIMONY OF

Josh Hreha
Senior Renewable Development Manager
Invenergy

on behalf of
Pleasant Prairie Solar Energy, LLC

August 16, 2022

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

My name is Josh Hreha. I am a Senior Renewable Development Manager for Invenergy LLC ("Invenergy"). My business address is One Wacker Drive, Suite 1800, Chicago, Illinois 60606.

2. Please summarize your educational and professional experience.

I have a B.S. in Building Construction Management from Purdue University and an M.B.A. with a specialization in Architecture from Drury University. I have worked for Invenergy since April 20, 2019. Prior to Invenergy, I was employed at Scannell Properties where I worked to develop and design mixed use real estate developments in residential areas. While at Invenergy, I have worked in a project development role for projects located in Pennsylvania, West Virginia, and Ohio.

3. On whose behalf are you offering testimony?

I am testifying on behalf of the Applicant in the case, Pleasant Prairie Solar Energy, LLC ("Pleasant Prairie Solar" or "Applicant"). Pleasant Prairie Solar is an affiliate of Invenergy Solar Project Development LLC, an affiliate of Invenergy Renewables LLC, which is in turn an affiliate of Invenergy LLC ("Invenergy").

Invenergy develops, owns, and operates power generation and energy storage facilities in the Western Hemisphere, Europe, and Japan. Invenergy has a proven track record in establishing and maintaining longstanding, profitable relationships with utilities, suppliers, and the communities in which its projects are located. Invenergy has developed more than 30,000 megawatts ("MW") of utility-scale wind, solar, natural gas, and energy storage projects in the United States ("U.S."), Central and South America, Canada, Europe, and Japan. This includes more than 22,000 MW of projects in operation, almost 3,500 MW in construction, and 4,100 MW contracted. Invenergy is North America's largest independent renewable power generation company. Invenergy is focusing on the development and operation of solar energy projects. Invenergy's first operational solar project is the 20-MW Grand Ridge Solar facility, located adjacent to its Grand Ridge Wind facility in LaSalle County, Illinois. Invenergy has 21 additional operating solar facilities in the U.S. and

Canada, with numerous other projects in various stages of construction and advanced development.

Several of Invenergy's affiliates have received certificates from the Ohio Power Siting Board ("Board"), namely: Hardin Solar Energy LLC, received a certificate in Case No. 17-773-EL-BGN in February 2018 and commenced construction in October 2018; Vinton Solar Energy LLC, received a certificate in Case No. 17-774-EL-BGN in September 2018; Hardin Solar Energy II LLC, received a certificate in Case No. 18-1360-EL-BGN in May 2019; Hardin Solar Energy III LLC, received a certificate in Case No. 20-1678-EL-BGN in September 2021; and Cadence Solar Energy LLC, received a certificate in Case No. 20-1677-EL-BGN in November 2021.

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

In my position as Senior Renewable Development Manager, I oversee and manage all facets of project planning and development for the Pleasant Prairie Solar Energy Project ("Project" or "Facility"). I oversee the permitting process for the Project, and the production of the various studies required to complete the Application[1] before the Board for a certificate of environmental compatibility and public need to construct a 250-MW solar-powered generation facility in Franklin County.

5. What is the purpose of your testimony?

The purpose of my testimony is to provide a summary of the Project and a description of the process that led to the joint stipulation and recommendation ("Stipulation"), which was filed in the docket on October 29, 2021, with additional signature pages being filed on

[1] Together the following documents comprise the Application in this case: Applicant Ex. 1, Application filed on February 19, 2021; Applicant Ex, 2, Supplement to Application filed April 7, 2021; Applicant Exhibit 3, Second Supplement to Application filed April 21, 2021; Applicant Exhibit 4, Third Supplement to Application filed October 6, 2021; Applicant Exhibit 5, Response to First Data Request filed March 18, 2021; Applicant Exhibit 6, Response to Second Data Request filed April 16, 2021; Applicant Exhibit 7, Response to Third Data Request filed April 16, 2021; Applicant Exhibit 8, Response to Fourth Data Request filed April 20, 2021; Applicant Exhibit 9, Supplemental Response to Second and Third Data Requests filed May 12, 2021; Applicant Ex. 10, Second Supplemental Response to Third Data Request filed June 2, 2021; Applicant Ex. 11, Response to Fifth Data Request filed June 9, 2021; Applicant Exhibit 12, Response to Sixth Data Request filed June 9, 2021; and Applicant Exhibit 13, Third Supplemental Response to Third Data Request and Supplemental Response to Fifth Data Request filed July 6, 2021.

November 5, 2021 and February 16, 2022, and is being offered in this proceeding as Joint Exhibit 1. Together, the Stipulation filed on October 29, 2021, and the additional signature pages filed on November 5, 2021 and February 16, 2022, comprise the full Stipulation and Joint Exhibit 1. I will sponsor the admission of the Stipulation into evidence in this case, along with the Applicant's exhibits listed in the Stipulation, which include the Application and supplements, certificates of service, and proofs of publication. I intend to explain the background of the Stipulation and the reasons why I believe it should be adopted by the Board. In addition, my testimony will confirm that the Stipulation complies with the Board's three-part test for evaluating stipulations.

6. Is the Application and all exhibits and appendices attached to the Application, true and accurate to the best of your knowledge?

Yes, they are**.**

7. Did Pleasant Prairie 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 14 and 16-18.

8. Did Pleasant Prairie Solar have notices of the public information meetings, the Application, and the hearings published in a newspaper of general circulation in Franklin County, Ohio?

Yes. Proofs of publication were filed and have been marked as Applicant Exhibits 15 and 17-18.

9. Please provide a summary and overview of the proposed Facility.

As described in detail in the Application, which was filed in this case on February 19, 2021, as supplemented on April 7, April 21, and October 6, 2021 ("Application"), the Project is comprised of up to 250 MW of alternating current solar photovoltaic ("PV") generation. The Facility will inject up to 250 MWs into the grid via the existing American Electric

Power ("AEP") Cole Road 345 kilovolt ("kV") substation. Construction of the Facility is expected to begin as early as the first quarter of 2023, and commercial operation is planned for as early as the fourth quarter of 2024.

10. Will the Facility comply with all applicable regulations?

Yes, the Facility is designed to comply with all applicable state and federal regulations, and the Applicant is committed to ensure the final layout adheres to all applicable regulations.

11. Please describe Pleasant Prairie's public information program to provide the local community information about the Project.

Pleasant Prairie Solar followed the Board's public information and public notice requirements. It hosted a virtual public information meeting on December 14, 2020, prior to filing the Application. However, Pleasant Prairie Solar went beyond these requirements to engage the local community.

Pleasant Prairie Solar's community outreach has included 3,154 phone calls to residents within three miles of the Project Area in order to gauge support for solar projects. Of the residents reached by phone, 88.5% indicated that they support or have no opinion on solar as a source of sustainable energy, while only 11.5% were opposed. In addition to the phone survey, there was direct outreach through over 315 phone calls to those who live in close proximity to the site in order to provide information, answer questions and concerns, and gauge support.

In addition to these phone calls, Pleasant Prairie Solar contacted neighbors of the Project in person through a door-to-door program. Representatives of Pleasant Prairie Solar knocked on over 176 doors to speak with those who live in particularly close proximity to the Project in order to provide information and answer questions and concerns.

Outreach also included informational packets that were sent to 239 local residents and community leaders to provide detailed information about the Project.

In addition to these various methods of individual contact, Pleasant Prairie Solar created a website, https://pleasantprairiesolar.com/, where FAQs have been published and updated, as well as a contact portal where people could send in their questions. Each of these questions have been answered with a return email or phone call within one business day.

Finally, Pleasant Prairie Solar has made every effort to address concerns about the Project and work with the local community. In addition to the public information meeting that was held, there have been several meetings, both in person and virtual, with neighbors of the Project, in order to address their concerns and collaborate with them on solutions. One such meeting, was a special 'Open House' event held on April 9, 2021 where Pleasant Prairie Solar team members with various backgrounds in Engineering, Environmental Compliance, and Development discussed the Project in detail with local landowners and officials.

12. Did you attend the public hearing held on July 19, 2021?

Yes. 27 people offered sworn testimony, with two married couples testifying together. 16 people testified in support of the Project, 9 people testified stating concerns for the Project, 1 person testified as a neutral party, and 1 spoke on issues unrelated to the Project.

13. Please generally summarize the comments raised at the local public hearing.

Supportive comments of the Project ranged from various aspects, including: property rights of the participating landowners; how the Project will have deer fencing and be screened; and how-like any construction project the earthwork and drainage design of the Project is regulated by permit, civil engineering licensed based ethical standards, and law precedence to not affect non-participating landowners. Additionally, comments of how the Project's diverse planting mix and removal from annually tilled sod and agricultural operations will improve local ecology and stormwater management in the area were also raised.

Comments communicating concern over the Project might be summarized as concern over viewshed preferences, concern over adjacent property impacts, and concern over hazardous chemicals or materials being utilized at the Project.

14. Did you encounter any objections to the Pleasant Prairie Solar Project from the government officials in the area?

The Applicant has been working in Franklin County and meeting with landowners specifically regarding the Pleasant Prairie Solar Project since 2019. Throughout this time, we have formed strong relationships with local landowners, as well as county officials.

15. Please provide the background on the process leading up to the Stipulation and the evidentiary hearing.

The Board's Staff ("Staff") issued a Staff Report of Investigation on July 1, 2021 ("Staff Report"). The local public hearing was subsequently held on July 19, 2021. The Stipulation, which was signed by the Applicant, Staff, the Boards of Township Trustees for Pleasant and Prairie Townships, Board of Park Commissioners of the Columbus and Franklin County Metropolitan Park District ("Metro Parks"), No Prairie Solar, LLC ("NPA"), and the Ohio Farm Bureau Federation, was filed on October 29, 2021, with additional signatures filed on November 5, 2021 and February 16, 2022. The evidentiary hearing was called and continued on August 16, 2021 and is scheduled to recommence August 29, 2022.

In my opinion, Staff completed its investigation process seamlessly. The Applicant did not detect any major issues or hurdles during Staff's investigation of the Application. We do not have concerns with the Staff Report and our proposed Stipulation revisions related to refinement and clarification of condition language.

Further, Pleasant Prairie Solar worked closely with the Staff and all intervenors to arrive at the Stipulation. As evidenced by the letter attached to my testimony, Attachment JH-1,[2]

[2] Counsel for the townships noted that the letter sent to the parties had typographical errors in the last sentence of the first paragraph. The letter attached hereto as Attachment JH-1 corrects the typographical errors and correctly

the Applicant has good neighbor agreements with both Metro Parks and NPS. All parties to this matter confirmed in writing that they received copies of the attached letter and the agreements.

16. Have you reviewed the Stipulation?

Yes.

17. Are you aware that the Board must make certain determinations under Ohio Revised Code ("R.C.") 4906.10 before issuing a certificate for the construction, operation, and maintenance of a major utility facility?

Yes. My attorney has advised me that there are eight criteria considered by the Board in making its determination for the issuance of a certificate.

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

No. My attorney has advised me that R.C. 4906.10(A)(1) only applies to an electric transmission line or a gas pipeline and is not applicable to this generating facility.

19. Does the Application, as agreed to through the Stipulation, enable the Board to determine the nature of the probable environmental impact of the facility?

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 public services, facilities, and safety. The Application narrative and exhibits, along with subsequent supplements and interrogatory responses, provide the information necessary to determine the probable impacts. Lastly, the Stipulation expands upon the information included in the Application to confirm the probable impacts from the Project.

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reflects that the signature page for Prairie Township (not Pleasant Township) was filed on November 5, 2021 (not November 11, 2021).

20. Does the Application, as agreed to through the Stipulation, support 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?

Yes. The information included in the Application, together with the Stipulation, reflects that that Project has a minimum adverse environmental impact.

21. Does the Application, as agreed to through the Stipulation, enable the Board to determine that the Facility is consistent with regional plans for expansion of the electric power grid of the electric systems serving this state and interconnected utility systems 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 Interconnection, LLC ("PJM"). PJM performed studies analyzing the proposed Facility, its proposed interconnection point, and the related impacts on the electric power grid, as well as for compliance with PJM and North American Electric Reliability Corporation ("NERC") reliability criteria. The PJM System Impact Studies and Feasibility Study, included in the Application, show that the Facility is consistent with the regional plans for expansion of the electric power grid serving Ohio and the interconnected utility systems, and that the proposed Facility will serve the interest of the electric system's economy and reliability.

22. Does the Application, as agreed to through the Stipulation, enable the Board to determine that the Facility will 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, revealing that the proposed Project would not produce air pollution through emissions. The Application addresses solid and hazardous waste, revealing that the proposed Project would not produce solid or hazardous

waste, and will not result in water pollution. Further, the Project complies with the aeronautical requirements.

23. Does the Application, as agreed to through the Stipulation, enable the Board to determine that the Facility will serve the public interest, convenience, and necessity?

Yes. The Application addresses public interest, convenience, and necessity through discussion and analysis. Additionally, post Application support shown at the Project's Public Hearing, as well as support from the Franklin County Commissioners in passing a resolution for County to be a Qualified Energy Zone, thus, approving Pleasant Prairie Solar's application as a Qualified Energy Project under R.C. 5727.75 further shows positive public interest and support.

24. Does the Application, as agreed to through the Stipulation, enable the Board to determine that the Facility's impact on the viability as agricultural land of any land in an agricultural district is not applicable?

Yes. There are no agricultural districts in the Project Area.

25. Does the Application, as agreed to through the Stipulation, enable the Board to determine that the Facility incorporates maximum feasible water conservation practices, considering available technology and the nature and economics of the various alternatives?

Yes.

26. Do you believe that the settlement was the product of serious bargaining among capable, knowledgeable parties?

Yes. Counsel for all parties were invited to all settlement negotiations. Representatives of the parties involved in the deliberations leading to the Stipulation were aware of and knowledgeable about the issues addressed in the Stipulation.

27. Do you believe the settlement, as a package, benefits the public interest?

Yes. The Stipulation ensures that the Project will represent the minimum adverse environmental impact for both construction and operations, considering the state of available technology, and the nature and economics of the various alternatives, as well as other pertinent considerations. The construction and operation of the Facility provides benefits to the public interest via the employment of approximately 800 workers at peak construction and 4 full time employees during operations. In addition to the construction and operations benefits, the Project represents a just and reasonable investment that balances landowner rights while addressing many of the questions and concerns voiced by the community. In addition to the construction and operation benefits that include a representation of many leading best practices in land stewardship and conservation via diverse native plantings and elimination of annual tilling and fertilizer use. The Project also represents an investment in clean energy infrastructure, which is in the public interest as a means of mitigating the effects of climate change.

28. To your knowledge, does the settlement package violate any important regulatory principle or practice?

No.

29. Why do you believe the Stipulation should be accepted?

The Stipulation strikes an appropriate balance that provides a path forward for the Facility to be constructed and to operate while ensuring that the Facility represents minimum adverse impact, considering the state of available technology and the nature and economics of the various alternatives, and other pertinent considerations.

30. Does this conclude your testimony?

Yes. However, I reserve the right to update my testimony to respond to any further testimony 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 August, 2022.

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

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Administrative Law Judge:

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4856-6195-7635 v1 [39579-53]

Attachment JH-1
Pleasant Prairie Letter to Parties

July 27, 2022

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July 27, 2022

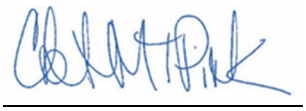
Re: Pleasant Prairie Solar Energy LLC, Case No. 20-1679-EL-BGN

Counsel,

As you are aware, Pleasant Prairie Solar Energy LLC ("Pleasant Prairie"), the Ohio Power Siting Board Staff, the Boards of Township Trustees for Pleasant and Prairie Townships, the Board of Park Commissioners of the Columbus and Franklin County Metropolitan Park District ("Metro Parks"), and the Ohio Farm Bureau Federation filed a Joint Stipulation and Recommendation ("Stipulation") in this matter on October 29, 2021. No Prairie Solar, LLC ("NPS") agreed not to oppose the Stipulation. The Stipulation signature pages for the Board of Trustees for Prairie Township and Metro Parks were subsequently filed on November 5, 2021 and February 16, 2022, respectively.

Pleasant Prairie also entered into an Option Lease Agreement that included an Underground Collection Easement with Metro Parks, which was distributed to the parties on May 7, 2022. Subsequently, Pleasant Prairie entered into a Landowner Construction and Operation Agreement with NPS members. A copy of the Landowner Construction and Operation Agreement is attached. Please confirm in writing your receipt of the attached Landowner Construction and Operation Agreement by sending email correspondence to all parties in this proceeding with said acknowledgment.

Regards,



Christine M.T. Pirik

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Case No(s). 20-1679-EL-BGN

Summary: Testimony - Direct Testimony of Josh Hreha - Senior Renewable Development Manager Invenergy electronically filed by Christine M.T. Pirik on behalf of PLEASANT PRAIRIE SOLAR ENERGY LLC