

**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) Case No: 20-1679-EL-BGN
Construct a Solar-Powered Electric Generation)
Facility in Franklin County, Ohio.)

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

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

5
6 **2. Please summarize your educational and professional experience.**

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

13
14 **3. On whose behalf are you offering testimony?**

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

19
20 Invenergy develops, owns, and operates power generation and energy storage facilities in
21 the Western Hemisphere, Europe, and Japan. Invenergy has a proven track record in
22 establishing and maintaining longstanding, profitable relationships with utilities, suppliers,
23 and the communities in which its projects are located. Invenergy has developed more than
24 30,000 megawatts (“MW”) of utility-scale wind, solar, natural gas, and energy storage
25 projects in the United States (“U.S.”), Central and South America, Canada, Europe, and
26 Japan. This includes more than 22,000 MW of projects in operation, almost 3,500 MW in
27 construction, and 4,100 MW contracted. Invenergy is North America’s largest independent
28 renewable power generation company. Invenergy is focusing on the development and
29 operation of solar energy projects. Invenergy’s first operational solar project is the 20-MW
30 Grand Ridge Solar facility, located adjacent to its Grand Ridge Wind facility in LaSalle
31 County, Illinois. Invenergy has 21 additional operating solar facilities in the U.S. and

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

3
4 Several of Invenergy's affiliates have received certificates from the Ohio Power Siting
5 Board ("Board"), namely: Hardin Solar Energy LLC, received a certificate in Case No. 17-
6 773-EL-BGN in February 2018 and commenced construction in October 2018; Vinton
7 Solar Energy LLC, received a certificate in Case No. 17-774-EL-BGN in September 2018;
8 Hardin Solar Energy II LLC, received a certificate in Case No. 18-1360-EL-BGN in May
9 2019; Hardin Solar Energy III LLC, received a certificate in Case No. 20-1678-EL-BGN
10 in September 2021; and Cadence Solar Energy LLC, received a certificate in Case No. 20-
11 1677-EL-BGN in November 2021.

12
13 **4. What is your role with respect to the Project?**

14 In my position as Senior Renewable Development Manager, I oversee and manage all
15 facets of project planning and development for the Pleasant Prairie Solar Energy Project
16 ("Project" or "Facility"). I oversee the permitting process for the Project, and the
17 production of the various studies required to complete the Application¹ before the Board
18 for a certificate of environmental compatibility and public need to construct a 250-MW
19 solar-powered generation facility in Franklin County.

20
21 **5. What is the purpose of your testimony?**

22 The purpose of my testimony is to provide a summary of the Project and a description of
23 the process that led to the joint stipulation and recommendation ("Stipulation"), which was
24 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.

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

10
11 **6. Is the Application and all exhibits and appendices attached to the Application, true**
12 **and accurate to the best of your knowledge?**

13 Yes, they are.

14
15 **7. Did Pleasant Prairie Solar cause the Application and notices to be served on property**
16 **owners, tenants, adjacent property owners, various local government officials, and**
17 **libraries?**

18 Yes. The certificates of service were filed and have been marked as Applicant Exhibits 14
19 and 16-18.

20
21 **8. Did Pleasant Prairie Solar have notices of the public information meetings, the**
22 **Application, and the hearings published in a newspaper of general circulation in**
23 **Franklin County, Ohio?**

24 Yes. Proofs of publication were filed and have been marked as Applicant Exhibits 15 and
25 17-18.

26
27 **9. Please provide a summary and overview of the proposed Facility.**

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

1 Power (“AEP”) Cole Road 345 kilovolt (“kV”) substation. Construction of the Facility is
2 expected to begin as early as the first quarter of 2023, and commercial operation is planned
3 for as early as the fourth quarter of 2024.
4

5 **10. Will the Facility comply with all applicable regulations?**

6 Yes, the Facility is designed to comply with all applicable state and federal regulations,
7 and the Applicant is committed to ensure the final layout adheres to all applicable
8 regulations.
9

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

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

16 Pleasant Prairie Solar’s community outreach has included 3,154 phone calls to residents
17 within three miles of the Project Area in order to gauge support for solar projects. Of the
18 residents reached by phone, 88.5% indicated that they support or have no opinion on solar
19 as a source of sustainable energy, while only 11.5% were opposed. In addition to the phone
20 survey, there was direct outreach through over 315 phone calls to those who live in close
21 proximity to the site in order to provide information, answer questions and concerns, and
22 gauge support.
23

24 In addition to these phone calls, Pleasant Prairie Solar contacted neighbors of the Project
25 in person through a door-to-door program. Representatives of Pleasant Prairie Solar
26 knocked on over 176 doors to speak with those who live in particularly close proximity to
27 the Project in order to provide information and answer questions and concerns.
28

29 Outreach also included informational packets that were sent to 239 local residents and
30 community leaders to provide detailed information about the Project.
31

1
2 In addition to these various methods of individual contact, Pleasant Prairie Solar created a
3 website, <https://pleasantprairiesolar.com/>, where FAQs have been published and updated,
4 as well as a contact portal where people could send in their questions. Each of these
5 questions have been answered with a return email or phone call within one business day.

6
7 Finally, Pleasant Prairie Solar has made every effort to address concerns about the Project
8 and work with the local community. In addition to the public information meeting that was
9 held, there have been several meetings, both in person and virtual, with neighbors of the
10 Project, in order to address their concerns and collaborate with them on solutions. One
11 such meeting, was a special ‘Open House’ event held on April 9, 2021 where Pleasant
12 Prairie Solar team members with various backgrounds in Engineering, Environmental
13 Compliance, and Development discussed the Project in detail with local landowners and
14 officials.

15
16 **12. Did you attend the public hearing held on July 19, 2021?**
17 Yes. 27 people offered sworn testimony, with two married couples testifying together. 16
18 people testified in support of the Project, 9 people testified stating concerns for the Project,
19 1 person testified as a neutral party, and 1 spoke on issues unrelated to the Project.

20
21 **13. Please generally summarize the comments raised at the local public hearing.**
22 Supportive comments of the Project ranged from various aspects, including: property
23 rights of the participating landowners; how the Project will have deer fencing and be
24 screened; and how-like any construction project the earthwork and drainage design of the
25 Project is regulated by permit, civil engineering licensed based ethical standards, and law
26 precedence to not affect non-participating landowners. Additionally, comments of how the
27 Project’s diverse planting mix and removal from annually tilled sod and agricultural
28 operations will improve local ecology and stormwater management in the area were also
29 raised.

1 Comments communicating concern over the Project might be summarized as concern over
2 viewshed preferences, concern over adjacent property impacts, and concern over hazardous
3 chemicals or materials being utilized at the Project.
4

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

7 The Applicant has been working in Franklin County and meeting with landowners
8 specifically regarding the Pleasant Prairie Solar Project since 2019. Throughout this time,
9 we have formed strong relationships with local landowners, as well as county officials.
10

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

13 The Board's Staff ("Staff") issued a Staff Report of Investigation on July 1, 2021 ("Staff
14 Report"). The local public hearing was subsequently held on July 19, 2021. The
15 Stipulation, which was signed by the Applicant, Staff, the Boards of Township Trustees
16 for Pleasant and Prairie Townships, Board of Park Commissioners of the Columbus and
17 Franklin County Metropolitan Park District ("Metro Parks"), No Prairie Solar, LLC
18 ("NPA"), and the Ohio Farm Bureau Federation, was filed on October 29, 2021, with
19 additional signatures filed on November 5, 2021 and February 16, 2022. The evidentiary
20 hearing was called and continued on August 16, 2021 and is scheduled to recommence
21 August 29, 2022.
22

23 In my opinion, Staff completed its investigation process seamlessly. The Applicant did not
24 detect any major issues or hurdles during Staff's investigation of the Application. We do
25 not have concerns with the Staff Report and our proposed Stipulation revisions related to
26 refinement and clarification of condition language.
27

28 Further, Pleasant Prairie Solar worked closely with the Staff and all intervenors to arrive
29 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

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

4
5 **16. Have you reviewed the Stipulation?**

6 Yes.

7
8 **17. Are you aware that the Board must make certain determinations under Ohio Revised
9 Code (“R.C.”) 4906.10 before issuing a certificate for the construction, operation, and
10 maintenance of a major utility facility?**

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

13
14 **18. Does the first of these criteria under R.C. 4906.10(A)(1), which requires the Board to
15 determine the basis of need for the facility, apply to the Board’s review of this
16 Application?**

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

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

22 Yes. The Application addresses all the subject matter areas necessary for the Board to
23 determine the nature of the probable environmental impact of the Facility. The Application
24 includes detailed surveys, assessments, and reports related to probable socioeconomic
25 impacts, ecological impacts, and public services, facilities, and safety. The Application
26 narrative and exhibits, along with subsequent supplements and interrogatory responses,
27 provide the information necessary to determine the probable impacts. Lastly, the
28 Stipulation expands upon the information included in the Application to confirm the
29 probable impacts from the Project.

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

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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

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

3
4 **23. Does the Application, as agreed to through the Stipulation, enable the Board to
5 determine that the Facility will serve the public interest, convenience, and necessity?**

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

12
13 **24. Does the Application, as agreed to through the Stipulation, enable the Board to
14 determine that the Facility's impact on the viability as agricultural land of any land
15 in an agricultural district is not applicable?**

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

17
18 **25. Does the Application, as agreed to through the Stipulation, enable the Board to
19 determine that the Facility incorporates maximum feasible water conservation
20 practices, considering available technology and the nature and economics of the
21 various alternatives?**

22 Yes.

23
24 **26. Do you believe that the settlement was the product of serious bargaining among
25 capable, knowledgeable parties?**

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

29
30
31

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

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

15

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

18 No.

19

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

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

25

26 **30. Does this conclude your testimony?**

27 Yes. However, I reserve the right to update my testimony to respond to any further testimony
28 submitted in this case.

29

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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Attachment JH-1
Pleasant Prairie Letter to Parties

July 27, 2022

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

4879-1219-6902 v1 [39579-53]

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

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