

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Yellow)
Wood Solar Energy, LLC for a Certificate of)
Environmental Compatibility and Public Need) Case No: 20-1680-EL-BGN
to Construct a Solar-Powered Electric)
Generation Facility in Clinton County, Ohio.)

DIRECT TESTIMONY OF

**Raleigh Barnes
Senior Campaign Manager
Calvert Street Group, LLC**

**on behalf of
Yellow Wood Solar Energy, LLC**

September 19, 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 Raleigh Barnes. I am a Senior Campaign Manager for Calvert Street Group.
3 (“Calvert”). My business address is 164 Rosa L. Parks Blvd., Nashville, Tennessee, 37203.

4
5 **2. Please summarize your educational background and professional experience.**

6 In 2015, I received a Bachelor of Arts in Public Relations from Lipscomb University in
7 Nashville, Tennessee. Currently, I am a part-time law school student at Nashville School
8 of Law (“NSL”) in Nashville, Tennessee where I began courses in August 2021. I have
9 worked for Calvert since February 2018 and was hired as a Campaign Manager. In March
10 2021, I was promoted to a Senior Campaign Manager. Prior to Calvert, I worked on
11 political campaigns in Tennessee and for a non-profit organization based in Nashville. A
12 copy of my resume is attached to my testimony as Attachment RB-1.

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

15 I am testifying on behalf of Yellow Wood Solar Energy, LLC (“Applicant” or “Yellow
16 Wood”), which is seeking to develop the proposed Yellow Wood Solar facility (“Project”)
17 in Clinton County, Ohio.

18
19 **4. What is the purpose of your testimony?**

20 The purpose of my testimony is to provide support for public engagement information
21 including Exhibit G that is part of the Application for a Certificate of Environmental
22 Compatibility and Public Need (“Certificate”) filed with the Ohio Power Siting Board
23 (“Board”) by Yellow Wood in Case No. 20-1680-EL-BGN on February 24, 2021, as
24 supplemented on June 17, August 19, September 3, and October 8, 2021, and as further
25 supplemented by responses to data requests that were received from the Board’s Staff and
26 filed in the docket (“Application”).

27
28 My testimony, together with the other witnesses testifying for Yellow Wood in this case,
29 supports Joint Exhibit 1 filed in the case on August 8, 2022, which is the Joint Stipulation
30 and Recommendation filed by Yellow Wood, the Board’s Staff (“Staff”), and the Ohio
31 Farm Bureau Federation (“OFBF”) (“Stipulation”), and approval of Yellow Wood’s
32 Application for a Certificate to construct the Project.

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5. Please describe the history of your involvement with the Yellow Wood Project?

My employer, Calvert, was hired in October 2020 as a community relations specialist to provide Project information and educate the community about the Project in Clinton County, Ohio. A team and I first traveled to Clinton County in November 2020. For the first few months of travel, Calvert engaged adjacent landowners to share Project information and meet with Project landowners. Once Calvert completed this phase, Calvert met with local coalitions and organizations, canvassed supportive residents of renewable energy, and attended Clark and Jefferson Township meetings. These activities took place on a regular basis up until October 2021 when the public hearing took place. Since the completion of the public hearing, Calvert has been in the community on a few occasions for meetings with residents.

6. Have you reviewed the Stipulation that was filed in this proceeding on August 8, 2022 and the Certificate Conditions recommended in the Stipulation?

Yes I have.

7. Please explain and summarize the public engagement information managed by Calvert contained in Exhibit G of the Application filed on February 24, 2021.

Calvert executed a series of outreach tactics for the Project. In November 2020, a phone campaign was executed over the course of three days. Residents were asked about their familiarity with utility-scale solar projects, knowledge of the Project, and their interest in learning more about the Project. Not all residents were contacted due to phone disconnection and out-of-date or missing phone numbers. 3,966 phone numbers were called and 82% of residents supported or had no opinion of a solar energy project in the area, while 18% opposed. Also in November 2020, Calvert mailed 103 Project packets to neighbors of the Project and community leaders. This included a cover letter, information about Invenergy,¹ and a fact sheet about the Project. In December 2020, Invenergy hosted

¹ Yellow Wood is an affiliate of Invenergy Solar Project Development LLC, which is an affiliate of Invenergy Renewables LLC. Invenergy Renewables LLC is, in turn, an affiliate of Invenergy LLC.

1 a virtual Public Information Meeting (“PIM”) and 22 of the PIM attendees were residents
2 within a three-mile radius of the Project. Multiple nearby landowners expressed concerns
3 or raised questions. Calvert took note of all residents who did so and conducted outreach
4 to address all concerns that were raised. By the time the application was submitted in
5 January 2021, 261 additional, personal phone calls had been made to follow up with
6 residents and 124 doors were knocked on in attempt to talk to surrounding neighbors.
7

8 **8. Did you review the written public comments submitted to the docket in this**
9 **proceeding?**

10 Yes. I have read every comment on the docket posted as of September 18, 2022. I reviewed
11 and analyzed all 273 comments. When I combine all of the comments that were
12 electronically filed from a given household with the individual comments that were not
13 filed electronically, a total of 77 independent comments were submitted in the docket in
14 support of the Yellow Wood Project. The 77 comments are representative of household
15 comments, rather than every individual comment. If households are combined and
16 repetitive or duplicative comments are removed (while still maintaining one comment per
17 person and/or household), only 72 households and individuals submitted comments that
18 can be characterized as opposing the Yellow Wood Project.
19

20 Of significance, the Clinton County Trails Coalition and Wilmington-Clinton Chamber of
21 Commerce each submitted a letter/comment in support of the Project.
22

23 **9. Are you familiar with and have you reviewed the testimony given at the local public**
24 **hearing held on October 20, 2021?**

25 Yes. On October 20, 2021, 36 people offered testimony at the local hearing held at the
26 Clinton County Fairgrounds. Twenty-five residents testified in support of the Project at the
27 local public hearing with only nine residents testifying against the Project. Those who
28 spoke in favor of the Project included: Bob Thobaben, President of the Clinton County
29 Park Board; Michael Young of Local Union 18; Keri Hodson, a substitute teacher and
30 school bus driver for Wilmington City Schools; and, first grader Kannon Arnett. Bruce
31 Saunders of the Clinton County Trails Coalition also expressed appreciation, stating the

1 trails group is “forever grateful that Yellow Wood is interested in partnering with us to
2 provide an additional health and wellness benefit to a currently underserved part of our
3 county.” Opposing residents raised concerns about the Board process, loss of farmland,
4 and sound generation once the facility is complete.
5

6 **10. Please describe, generally, the topics raised by those who have submitted written**
7 **public comments in the docket.**

8 A variety of both concerns and reasons of supporting the Project have been submitted as
9 public comments to the docket. Regarding Project concern, those comments focus upon
10 the deprivation of active farmland, viewshed, construction traffic, and activities of field
11 surveying teams. Regarding support, those comments refer to local economic benefits,
12 property rights, preservation of farmland for future generations, and general support for the
13 expansion of renewable energy in society. Dessie Rogers, the Executive Director of the
14 Wilmington-Clinton Chamber of Commerce and Bruce Saunders, the president of the
15 Clinton County Trails Coalition, both submitted supportive letters that focus on economic
16 investment and benefit to the community.
17

18 **11. Are you aware of other public outreach efforts made by Yellow Wood?**

19 Yes. In late July 2021, Yellow Wood began a phone campaign of Clinton County residents
20 that began with a universe of 608 households. Calvert called households three times unless
21 respondents stated they did not want us to call. We introduced ourselves as “Yellow Wood
22 Solar community outreach” and posed two questions:

- 23 1. Do you support solar energy farms in Clinton County?
- 24 2. The Clinton County Commissioners need to hear your support for Yellow Wood.
25 Misinformation about solar energy has been spreading through our community and
26 the commissioners need to hear these benefits about the Project. (Refer to Project
27 fact sheet). Would you be willing to leave them a voicemail saying that you support
28 the Yellow Wood Project?

29 71 households responded to the first question. Of those who responded, 60.6% of
30 households responded “yes” and 39.4% responded “no,” 43 to 28 households respectively.

1 Of those that responded “yes,” 14 households agreed they would be willing to leave a
2 voicemail for the Clinton County Commissioners.

3
4 **12. Based upon the commitments Yellow Wood has made through the Application,**
5 **together with the conditions in the Stipulation and the public outreach information,**
6 **does the Project serve the public interest, convenience, and necessity?**

7 Yes.

8
9 **13. Are your opinions and conclusions in your testimony made with a reasonable degree**
10 **of certainty based upon generally accepted and recognized standards within your**
11 **industry?**

12 Yes.

13
14 **14. Does this conclude your testimony?**

15 Yes. However, I reserve the right to update my testimony to respond to any further
16 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 19th day of September, 2022.

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

Counsel:

jodi.bair@OhioAGO.gov

tboggs@fbtlaw.com

jshamp@fbtlaw.com

ekelly@fbtlaw.com

amilam@ofbf.org

cendsley@ofbf.org

lcurtis@ofbf.org

jvankley@vankleywalker.com

Administrative Law Judges:

daniel.fullin@puco.ohio.gov

jacqueline.St.John@puco.ohio.gov

Attachment RB – 1
Raleigh Barnes
Resume

Raleigh Barnes

Public affairs and community relations specialist with exceptional communication, writing, organizational and research skills with a deep knowledge of renewable energy, zoning, land-use, and local governments.

3523 McGavock Pike
Nashville, TN 37217
(615) 557-7287
raleighbarnes@gmail.com

EXPERIENCE

Calvert Street Group, Nashville, TN — Senior Campaign Manager

MARCH 2021 - PRESENT

Oversee and strategize public affairs campaigns and manage client relationships in the renewable energy industry. Directly manage teams led by project managers and closely monitor their day-to-day responsibilities.

Calvert Street Group, Nashville, TN — Campaign Manager

FEBRUARY 2018 – MARCH 2021

Managed public affairs campaigns in renewable energy and development focused on controversial land-uses, researched zoning ordinances and properties, and worked closely with stakeholders, landowners, and attorneys. Executed public affairs campaign plans and executed communication with elected officials.

2nd Vote, Nashville, TN — Outreach Manager

AUGUST 2016 - FEBRUARY 2018

Led nationwide outreach efforts for the organization to build awareness around corporate activity and spending. Managed junior staff and interns in building out an extensive research database of corporate spending of Fortune 500 companies.

Grant Starrett for U.S. Congress, Murfreesboro, TN — Lead Advocate

JANUARY 2016 - AUGUST 2016

Served as a Field Representative for Grant Starrett for U.S. Congress and was promoted to the Lead Advocate of the Field Representative team. Coordinated door-to-door efforts and strategies throughout Tennessee's 4th Congressional District.

EDUCATION

Nashville School of Law, Nashville, TN

AUGUST 2021 - PRESENT

Lipscomb University, Nashville, TN — B.A. Public Relations

AUGUST 2012 - DECEMBER 2015

SKILLS

Communication, research, writing, leadership, organization.

Dedicated, hardworking, focused on building relationships.

Effective speaker and negotiator.

Understanding of zoning, permitting, and local approval processes.

AWARDS

2019 CLEANIE AWARD, Spotsy for Solar - Gold Winner of a national public affairs campaign in clean energy.

2018 Lenz Award - Recipient of the Employee of The Year at Calvert Street Group.

NOTABLE PROJECTS

Spotsy for Solar – Led and managed the grassroots public affairs strategy to build support for the Spotsylvania Solar Energy Center. Apply a positive pressure on the local government and created over 3,000 active supporters across Spotsylvania County over three months.

Sumter for Solar – Led the public affairs campaign for the ten thousand-acre Sumter County (GA) solar farm. Able to guide the applicant to approval.

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in

Case No(s). 20-1680-EL-BGN

Summary: Testimony - Direct Testimony of Raleigh Barnes electronically filed by
Christine M.T. Pirik on behalf of Yellow Wood Solar Energy, LLC