

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Grover Hill)
Wind, LLC for a Certificate of Environmental)
Compatibility and Public Need to Construct a) Case No. 20-417-EL-BGN
Wind-Powered Electric Generation Facility in)
Paulding County, Ohio.)

DIRECT TESTIMONY OF

**Alex Daberko
Managing Director
Starwood Energy Group Global, Inc.**

**on behalf of
Grover Hill Wind, LLC**

October 12, 2022

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

2 My name is Alex Daberko. I am a Managing Director of Grover Hill Wind, LLC and of
3 Starwood Energy Group Global, Inc. (“Starwood”). My business address is 5 Greenwich
4 Office Park, Floor 2, Greenwich, CT 06831.

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

7 I have a B.A. in Mathematics & Economics from Yale University and an M.B.A. from
8 Columbia University. I have worked for Starwood since 2007. While at Starwood, I have
9 led Starwood’s wind development efforts, successfully financing and constructing projects
10 in several states. Prior to Starwood, I was a part of the Energy & Power Investment
11 Banking team at Merrill Lynch where I specialized in commodity and commodity-linked
12 transactions.

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

15 I am testifying on behalf of the Applicant in this case, Grover Hill Wind, LLC (“Grover
16 Hill” or “Applicant”). Grover Hill is a wholly-owned subsidiary of Renewstar, L.L.C
17 (“Renewstar”).

18
19 Renewstar is the owner and developer of over 1,140 megawatts (“MW”) of wind-
20 generating capacity across the United States. Renewstar is an affiliate of Starwood.
21 Renewstar was the parent company that developed the North West Ohio Wind Energy
22 (“NWOWE”) Project (Case No. 13-197-EL-BGN), a 105 MW wind energy generation
23 facility, situated on approximately 10,000 acres of land immediately west of the Grover
24 Hill Project Area. The NWOWE Project commenced commercial operations in September
25 2018. Starwood is a leading energy infrastructure investment firm affiliated with Starwood
26 Capital Group Global, L.P. (“Starwood Capital”), a 31-year-old global private investment
27 group with over 4,500 professionals and approximately \$125 billion in assets under
28 management.

29
30 The Starwood team combines extensive specialized experience in acquiring, financing,
31 developing, and optimizing energy infrastructure assets. Since its inception in 2005,

Starwood has completed investments totaling more than \$8 billion in enterprise value across natural gas generation, renewable generation, and transmission.

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

In my position as Managing Director, I oversee and manage all facets of Project planning and development for the Grover Hill Project (“Project” or “Facility”). I oversee the team responsible for the permitting process for the Project, and the production of the various studies required to complete the Application before the Ohio Power Siting Board (“Board”) for a certificate of environmental compatibility and public need to construct a wind-powered generation facility in Paulding County, Ohio.

5. Are you familiar with the Application that Grover Hill filed in this case?

Yes. On May 3, 2021, Grover Hill filed its application for a certificate of environmental compatibility and public need with the Board (Applicant Exhibit 1). Since that time, there have been six supplements to the Application (Applicant Exhibits 2-7), and 17 responses to interrogatories from the Board’s Staff (“Staff”) (Applicant Exhibits 8-31). Together, I refer to those documents as the “Application.”

6. 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 7, 2022 and is being offered in this proceeding as 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, interrogatories, 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.

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

Yes, they are.

1
2 **8. Did Grover Hill cause the Application and notices to be served on property owners,**
3 **tenants, adjacent property owners, various local government officials, and libraries?**

4 Yes. The certificates of service were filed and have been marked as Applicant Exhibits 32,
5 34-35, 37, and 39-41.
6

7 **9. Did Grover Hill have notices of the public information meetings, the Application, and**
8 **the hearings published in a newspaper of general circulation in Paulding County,**
9 **Ohio?**

10 Yes. Proofs of publication were filed and have been marked as Applicant Exhibits 33-34,
11 36, 38, and 40-41.
12

13 **10. Please provide a summary and overview of the proposed Facility.**

14 Grover Hill proposes to construct the Project, a new wind-energy facility located within
15 9,600 acres of leased land in Latty Township, Paulding County. The Project is comprised
16 of an up to 150-MW alternating current (“AC”) wind-powered electric generating facility.
17 The facility will inject up to 150 MWs into the grid. The Project also consists of access
18 roads, electrical interconnection, construction staging areas, an operations and maintenance
19 facility, meteorological tower, and substation.
20

21 **11. What is the general purpose of the Facility?**

22 The general purpose of the Facility is to produce clean and renewable wind-powered
23 electricity to maximize reliably-priced electricity to the Ohio bulk power transmission grid
24 to serve the needs of electric utilities and their customers. The electricity generated by the
25 facility will be transferred to the transmission grid operated by PJM Interconnection, LLC
26 (“PJM”) for sale at wholesale or under a power purchase agreement.
27

28 **12. Will the Facility comply with all applicable regulations?**

29 Yes, the Facility is designed to comply with all applicable state and federal regulations,
30 and the Applicant is committed to ensure the final layout adheres to all applicable
31 regulations.
32

13. Please describe Grover Hill's public information program to provide the local community information about the Project.

Grover Hill followed the Board's public information and public notice requirements. It hosted three virtual public information meetings on August 11, 2020, August 12, 2020, and February 2, 2021, prior to filing the Application. Since 2019, Grover Hill has maintained an office in Paulding, Ohio managed by a full-time Operations Manager and Community Affairs Coordinator. In addition, Grover Hill is maintaining a website with information about the Project.

14. Are you familiar with the testimony provided at the local public hearing held on February 8, 2022?

Yes. 11 people offered sworn testimony. 6 people testified in support of the Project, 4 people testified stating concerns for the Project, and 1 person testified as neutral.

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

Comments at the local public hearing focused on a number of different topics regarding the Project. Those who spoke about the benefits of the Project emphasized how the wind project would provide jobs, greater economic opportunity, and increased revenue for the county, township, and schools. In addition, a member of the Operating Engineers Local Union 18 emphasized the Project would create jobs, providing a positive economic impact and clean energy for Ohio. A representative from the County Economic Development office spoke in favor of the positive economic effects from the wind Project, noting that the revenue from wind development has enabled community-wide benefits including enhanced police protection, and improvements to township roads, schools, libraries, and hospitals. Latty Township residents described how wind projects have helped fund new playgrounds and libraries and other community-wide benefits that extended to individuals that did not have land leased with the projects, including better roads, schools, and up to date fire and emergency medical services. The superintendent from the Wayne Local School District explained how wind development revenue has provided for additional specialized educational staff to be employed to assist struggling students, which has been linked to increased student performance and an elevated school district report card score from the Ohio Department of Education—without a need to increase taxes.

Individuals that provided testimony describing concerns regarding the Project focused on the impact on property values and the surrounding viewshed, shadow flicker, noise, the tax rate applicable to wind projects, turbine height, interactions with county commissioners regarding the Project, informal petition gathering efforts to document opposition, supply and demand related to current interconnection capacity, and construction activities related to the Project.

The commitments in the Application and the conditions in the Stipulation address each of the concerns raised. It is Grover Hill's intent to strictly adhere to all applicable rules and regulations, and the conditions in the Stipulation. In some instances, Grover Hill has exceeded those protections.

16. Did you encounter any objections to the Grover Hill Project from the officials in the area?

No. The Applicant has been working in Paulding County and meeting with landowners regarding the Grover Hill Wind Project for more than 10 years. Throughout this time, we have formed strong relationships with local landowners, as well as county officials.

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

The Staff issued a Staff Report of Investigation on January 24, 2022, that was supplemented on September 9, 2022 (jointly referred to herein as the "Staff Report"). The local public hearing was subsequently held on February 8, 2022. The Stipulation, which was signed by the Applicant and Staff was filed on October 7, 2022. The evidentiary hearing commenced on March 3, 2022, and was called and continued.

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, as modified by the proposed Stipulation.

18. Have you reviewed the Stipulation that was filed in this docket on October 7, 2022?

Yes.

19. 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.

20. 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.

21. 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, as supplemented, addresses all of 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.

22. Does the Application, as agreed to through the Stipulation, enable the Board to determine 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. Grover Hill’s commitment to comply with all commitments in the Application and the conditions set forth in the Stipulation supports a determination that the facility represents the minimum adverse environmental impact, considering the state of available

1 technology and the nature and economics of the various alternatives, and other pertinent
2 considerations.

3
4 **23. Does the Application, as agreed to through the Stipulation, enable the Board to**
5 **determine that the Facility is consistent with regional plans for expansion of the**
6 **electric power grid of the electric systems serving this state and interconnected utility**
7 **systems that the Facility will serve the interests of electric system economy and**
8 **reliability?**

9 Yes. The regional plans for expansion of the electric power grid of the electric systems
10 serving the state are determined by PJM. PJM performed studies analyzing the proposed
11 Facility, its proposed interconnection point, and the related impacts on the electric power
12 grid, as well as for compliance with PJM and North American Electric Reliability
13 Corporation (“NERC”) reliability criteria. The PJM System Impact Studies and Feasibility
14 Studies, included in the Application, show that the Facility is consistent with the regional
15 plans for expansion of the electric power grid serving Ohio and the interconnected utility
16 systems, and that the proposed Facility will serve the interest of the electric system’s
17 economy and reliability.

18
19 **24. Does the Application, as agreed to through the Stipulation, enable the Board to**
20 **determine that the Facility will comply with the requirements established by the state**
21 **of Ohio for air pollution control; solid and hazardous waste, water pollution control;**
22 **permitting for a major increase in withdrawal of waters; and aeronautical**
23 **requirements?**

24 Yes. The Application, as supplemented, addresses air pollution topics, revealing that the
25 proposed Project would not produce air pollution through emissions. The Application
26 addresses solid and hazardous waste, revealing that the proposed Project would not produce
27 solid or hazardous waste, and will not result in water pollution. Further, the Project
28 complies with the aeronautical requirements.

29
30 **25. Does the Application, as agreed to through the Stipulation, enable the Board to**
31 **determine that the Facility will serve the public interest, convenience, and necessity?**

1 Yes. The Application addresses public interest, convenience, and necessity through
2 discussion and analysis of topics such as, but not limited to, the following:

- 3 • The positive socioeconomic impacts of the Project;
- 4 • The guarantee for liability insurance;
- 5 • A decommissioning bond ensuring the financial means to remove the equipment
6 and return the land to substantially its current condition;
- 7 • A complaint resolution process; and
- 8 • Coordination with the Latty Township and Paulding County on the road use
9 agreement.

10 Discussion of these topics, as well as others, as presented in the Application, enables the
11 Board to determine that the facility will serve the public interest, convenience, and
12 necessity.

13
14 **26. Does the Application, as agreed to through the Stipulation, enable the Board to**
15 **determine the Facility's impact on the viability as agricultural land?**

16 Yes. The Application, as supplemented, specifies that approximately 18.5 acres of
17 agricultural land will be permanently disturbed by the Project. Of those acres, the Facility
18 will permanently impact approximately 8.3 acres of land enrolled in an Agricultural
19 District. The repurposed land could be restored for agricultural use after the Project is
20 decommissioned.

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

26 Yes.

27
28 **28. Do you believe that the settlement was the product of serious bargaining among**
29 **capable, knowledgeable parties?**

1 Yes. Counsel for all parties were invited to all settlement negotiations. Representatives of
2 the parties involved in the deliberations leading to the Stipulation were aware of and
3 knowledgeable about the issues addressed in the Stipulation.
4

5 **29. Do you believe the settlement, as a package, benefits the public interest?**

6 Yes. The Stipulation ensures that the Project will represent the minimum adverse
7 environmental impact for both construction and operations, considering the state of
8 available technology, and the nature and economics of the various alternatives, as well as
9 other pertinent considerations. The construction and operation of the Facility then provide
10 benefits to the public interest.
11

12 Public interest will also be met through the positive economic impacts construction and
13 operation of the facility produce in the region. The construction and operation of the wind
14 Facility will employ approximately 84 onsite workers during construction and 8 ongoing
15 workers for the life of the Project. Jobs that will be created by the proposed Facility will
16 include approximately 92 workers who will be directly employed to construct and
17 subsequently operate and maintain the wind farm. In addition, other jobs will be created
18 that play a supportive role. Turbine manufacturing and supply chain industries could in
19 turn generate an additional 276 jobs across the state of Ohio over the course of Facility
20 construction. In addition, Facility construction could induce demand for 144 jobs statewide
21 through the spending of additional household income. In addition to jobs and earnings, the
22 construction of the Facility is expected to have a positive impact on economic output, a
23 measurement of the value of goods and services produced and sold by backward-linked
24 industries. Economic output provides a general measurement of the amount of profit earned
25 by manufacturers, retailers, and service providers connected to a given project. The value
26 of economic output associated with Facility construction is estimated to be \$79.12 million.
27 These impacts will reverberate throughout the local community. Through construction
28 jobs, operation and maintenance, and additional revenue, the Project represents a
29 significant benefit to the public interest.
30

1 **30. To your knowledge, does the settlement package violate any important regulatory**
2 **principle or practice?**

3 No.
4

5 **31. Why do you believe the Stipulation should be accepted?**

6 The Stipulation strikes an appropriate balance that provides a path forward for the Facility
7 to be constructed and to operate while ensuring that the Facility represents minimum
8 adverse impact, considering the state of available technology and the nature and economics
9 of the various alternatives, and other pertinent considerations.
10

11 **32. Do you have any other comments?**

12 Yes. The Applicant is appreciative of efforts Staff made in reviewing the Application,
13 including all supplements to the Application, which culminated in the issuance of the Staff
14 Report.
15

16 **33. Does this conclude your testimony?**

17 Yes. However, I reserve the right to update my testimony to respond to any further testimony
18 submitted in this case.
19

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 12th day of October 2022.

/s/ Christine M.T. Pirik

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Summary: Testimony - Direct Testimony of Alex Daberko electronically filed by
Christine M.T. Pirik on behalf of Grover Hill Wind, LLC