

**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. 22-269-EL-BTX
Transmission Line in Paulding County, Ohio.)

DIRECT TESTIMONY OF

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

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

December 30, 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 transmission line in Paulding County, Ohio.

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

Yes. On May 2, 2022, 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 four supplements to the Application (Applicant Exhibits 2-5), and 4 responses to interrogatories from the Board’s Staff (“Staff”) (Applicant Exhibits 6-11). 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 December 16, 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 12
5 and 14-16.
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 13, and
11 15-16.
12

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

14 Grover Hill proposes to construct an approximately 8.3-mile 138-kilovolt (“kV”) transmission line. This transmission line is associated with the Grover Hill, LLC Wind Farm (Case No. 20-147-EL-BGN) (“Wind Farm”), also located in Paulding County. The Applicant is also developing the Wind Farm, which received a Certificate of Environmental Compatibility and Public Need on December 15, 2022. The Project is designed to deliver power generated by the Wind Farm to the Haviland Substation.
19

20
21 The transmission route will begin at the Wind Farm’s collection substation and terminate at the existing Haviland Substation, which is owned and operated by American Electric Power (“AEP”).
23

24
25 The preferred route for the Project was selected because it was determined to be the most efficient way to deliver electricity generated by the Wind Farm to the regional power grid. In addition, the preferred route also had less environmental, social, and economic impacts. Thus, after taking all factors into consideration, following discussions with local officials and taking into consideration landowner preferences, the Applicant determined that the location of the preferred route for the Project is optimal.
30
31
32

11. What is the general purpose of the Facility?

The primary purpose of the Facility is to deliver up to 150 megawatts (“MWs”) of clean and renewable electricity to the regional electric grid to serve the needs of electric utilities and their customers. This will enable the energy to be transferred to the transmission grid operated by PJM Interconnection, LLC (“PJM”). Once reaching the grid, the electricity will be available for sale in the wholesale market.

12. 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.

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 a public information meeting at Paulding County Ohio State University Extension Hall on April 25, 2022, 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 December 5, 2022?

Yes. 2 people offered sworn testimony. Both testimonials were supportive of the Project.

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

Comments at the local public hearing focused on benefits of the Project and the associated Wind Farm. Comments emphasized how the Project and the associated Wind Farm would provide jobs, greater economic opportunity, and increased revenue for the county, township, and schools.

1 A resident-farmer spoke in favor of the Project, indicating it would be valuable for the
2 economic development and necessary for enabling the associated Wind Farm. The resident
3 also complimented the Applicant's efforts to consult with his farm and adjacent neighbors
4 to optimizing the siting of Project components.

5
6 A representative from the County Economic Development office spoke in favor of the
7 positive economic effects from Project and the associated Wind Farm, noting that the
8 Project would provide an immediate impact to the county and the surrounding Grover Hill
9 community. The additional power carried through from wind farm would further reduce
10 emissions and promote green energy in the county, the region, the state and nationally. He
11 stated that implementing the Project would provide local businesses with additional profits
12 and enable additional revenue for township, school district, county library, county hospital,
13 county jail, senior center, mental health, emergency services, and the county general fund.

14
15 **16. Did you encounter any objections to the Grover Hill Project from the officials in the**
16 **area?**

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

20
21 **17. Please provide the background on the process leading up to the Stipulation and the**
22 **evidentiary hearing.**

23 The Staff issued a Staff Report of Investigation on November 17, 2022 ("Staff Report").
24 The local public hearing was subsequently held on December 5, 2022. The Stipulation,
25 which was signed by the Applicant and Staff was filed on December 16, 2022. The
26 evidentiary hearing will commence on January 12, 2023.

27
28 The Applicant did not detect any major issues or hurdles during Staff's investigation of the
29 Application. We do not have concerns with the Staff Report, as accepted by the proposed
30 Stipulation.

31

1 **18. Have you reviewed the Stipulation that was filed in this docket on December 16, 2022?**

2 Yes.

3
4 **19. Are you aware that the Board must make certain determinations under Ohio Revised**
5 **Code (“R.C.”) 4906.10 before issuing a certificate for the construction, operation, and**
6 **maintenance of a major utility facility?**

7 Yes. My attorney has advised me that there are eight criteria considered by the Board in
8 making its determination for the issuance of a certificate.
9

10 **20. Does the first of these criteria under R.C. 4906.10(A)(1), which requires the Board to**
11 **determine the basis of need for the Facility, apply to the Board’s review of this**
12 **Application?**

13 Yes. This certificate is only necessary if the Wind Farm is constructed, and this Facility
14 will only be constructed if the Wind Farm is constructed. The Project is an integral part of
15 the Wind Farm, and without it, energy would be unable to reach the bulk power system
16 from the Wind Farm.
17

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

20 Yes. The Application, as supplemented, addresses all of the subject matter areas necessary
21 for the Board to determine the nature of the probable environmental impact of the Facility.
22 The Application includes detailed surveys, assessments, and reports related to probable
23 socioeconomic impacts, ecological impacts, and public services, facilities, and safety. The
24 Application narrative and exhibits, along with subsequent supplements and interrogatory
25 responses, provide the information necessary to determine the probable impacts.
26

27 **22. Does the Application, as agreed to through the Stipulation, enable the Board to**
28 **determine that the Facility represents the minimum adverse environmental impact,**
29 **considering the state of available technology and the nature and economics of the**
30 **various alternatives, and other pertinent considerations?**

1 Yes. Grover Hill's commitment to comply with all commitments in the Application and
2 the conditions set forth in the Stipulation supports a determination that the Facility
3 represents the minimum adverse environmental impact, considering the state of available
4 technology and the nature and economics of the various alternatives, and other pertinent
5 considerations.
6

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

12 Yes. The regional plans for expansion of the electric power grid of the electric systems
13 serving the state are determined by PJM Interconnection, LLC ("PJM"). PJM performed
14 studies analyzing the proposed Facility, its proposed interconnection point, and the related
15 impacts on the electric power grid, as well as for compliance with PJM and North American
16 Electric Reliability Corporation ("NERC") reliability criteria. Interconnection of the
17 proposed Wind Farm to the bulk power system was previously reviewed by Staff in the
18 context of the Wind Farm application (Case No. 20-417-EL-BGN). The PJM System
19 Impact Studies and Feasibility Studies show that the Facility is consistent with the regional
20 plans for expansion of the electric power grid serving Ohio and the interconnected utility
21 systems, and that the proposed Facility will serve the interest of the electric system's
22 economy and reliability.
23

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

29 Yes. The Application, as supplemented, addresses air pollution topics, revealing that the
30 proposed Project would not produce air pollution through emissions. The Application
31 addresses solid and hazardous waste, revealing that the proposed Project would not produce

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

3
4 **25. 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 of topics such as, but not limited to, the following:

- 8 • The positive socioeconomic impacts of the Project;
9 • The guarantee for liability insurance;
10 • A complaint resolution process; and
11 • Coordination with Paulding County on a road use agreement.

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

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

18 Yes. The Application, as supplemented, specifies that approximately 3.36 acres of
19 agricultural land will be permanently disturbed by the Project.¹ Of those acres, the Facility
20 will permanently impact approximately 0.21 acres of land enrolled in an Agricultural
21 District.² The repurposed land could be restored for agricultural use after the Project is
22 decommissioned.

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

28 Yes.
29

¹ Applicant Ex. 5, Table 7.

² *Id.*

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

3 Yes. Counsel for all parties were invited to all settlement negotiations. Representatives of
4 the parties involved in the deliberations leading to the Stipulation were aware of and
5 knowledgeable about the issues addressed in the Stipulation.
6

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

8 Yes. The Stipulation ensures that the Project will represent the minimum adverse
9 environmental impact for both construction and operations, considering the state of
10 available technology, and the nature and economics of the various alternatives, as well as
11 other pertinent considerations. The construction and operation of the Facility provide
12 benefits to the public interest.
13

14 The Applicant estimates that construction and operation of the Project, as well as the Wind
15 Farm, will increase employment in the area. The transmission line will not be constructed
16 unless the associated Wind Farm is constructed. Therefore, the increase in tax revenues as
17 a result of Project will be the same as those anticipated from the Wind Farm. The proposed
18 Wind Farm and the Project will have a significant positive impact on the local tax base,
19 including local school districts and other taxing districts that service the area where the
20 Facility and proposed Wind Farm are to be located. The proposed transmission line will
21 make few, if any, demands on local government services. Therefore, payments made to
22 local governments will be net positive gains and represent an important economic benefit
23 to the local area. Through construction jobs, operation and maintenance, and additional
24 revenue, the Project represents a significant benefit to the public interest. Through
25 construction jobs, operation and maintenance, and additional revenue, the Project and the
26 associated Wind Farm represents a significant benefit to the public interest.
27

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

30 No.
31

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

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

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

8 Yes. The Applicant is appreciative of efforts Staff made in reviewing the Application,
9 including all supplements to the Application, which culminated in the issuance of the Staff
10 Report.
11

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

13 Yes. However, I reserve the right to update my testimony to respond to any further testimony
14 submitted in this case.
15

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 30th day of December 2022.

/s/ Matthew C. McDonnell

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Summary: Testimony - Direct Testimony of Alex Daberko electronically filed by Mr.
Matthew C. McDonnell on behalf of Grover Hill Wind, LLC