

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Scioto )  
Farms Solar Project, LLC for a Certificate of )  
Environmental Compatibility and Public Need ) Case No. 21-0868-EL-BGN  
for the Construction of a Solar Powered )  
Electric Generation Facility in Wayne )  
Township, Pickaway County, Ohio. )

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**DIRECT TESTIMONY OF**

**Jennifer Brunty**

**On behalf of**

**Scioto Farms Solar Project, LLC**

**January 30, 2023**

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

**A.1** My name is Jennifer Brunty. I am an Associate and Senior Environmental Scientist for Stantec Consulting Services, Inc. (“Stantec”). My business address is 6920 Professional Parkway, Sarasota Florida 34240.

**Q.2 Please summarize your educational background and professional experience.**

**A.2** I obtained a Bachelor of Science and a Master of Science in Agricultural Operations Management from the University of Florida and a Doctorate in Soil Science from Washington State University. I have over 24 years of experience as an environmental scientist and have been an environmental consultant in the renewable energy sector for over 5 years. I have conducted over 70 solar glare analyses since the fall of 2017. A copy of my resume is attached to my testimony as Attachment A.

**Q.3 On whose behalf are you offering testimony?**

**A.3** I am testifying on behalf of Scioto Farms Solar Project, LLC (“Scioto Farms Solar” or “Applicant”), which is seeking to develop the proposed Scioto Farms Solar facility (“Project”) in Pickaway County, Ohio.

**Q.4 What is the purpose of your testimony?**

**A.4** The purpose of my testimony is to provide additional context, support, and clarification regarding Exhibit M – Glare Hazard Assessment that is part of the Application for a Certificate of Environmental Compatibility and Public Need (“Certificate”), filed by Scioto Farms Solar in Case No. 21-868-EL-BGN on December 13, 2021, as supplemented, and further supplemented by responses to data requests that were received from the Staff of the Ohio Power Siting Board (“Board”) and filed in the docket (“Application”).

My testimony, together with that of the other witnesses for Scioto Farms Solar testifying in this case, supports approval by the Board of Scioto Farms Solar Application for a Certificate to construct the Project.

**Q.5 Please describe the history of your involvement with the Project.**

**A.5** My responsibilities for the Project included conducting a glare analysis for the proposed solar facility.

1 **Q.6 Have you reviewed the Certificate conditions recommended by the Board’s Staff on**  
2 **pages 48 through 55 of their Report of Investigation issued on May 10, 2022 (“Staff**  
3 **Report”)?**

4 **A.6** Yes.

5 **Q.7 Are you aware that the Applicant has accepted the Certificate conditions**  
6 **recommended by the Board’s Staff in the Staff Report and has committed to comply**  
7 **with those conditions as part of its Certificate issued in this case?**

8 **A.7** Yes. That is my understanding.

9 **Q.8 Please describe the methodology that was used to conduct the Glare Hazard**  
10 **Assessment found in Exhibit M of the Application.**

11 **A.8** The Glare Hazard Assessment relies on the web-based ForgeSolar glare hazard analysis  
12 program to analyze the potential for glare from the Project to affect pilots, drivers, and/or  
13 residents near the Project. ForgeSolar is able to account for many variables that can cause  
14 glare, such as the orientation, tilt, height, and reflectance of the PV modules as well as the  
15 resting and maximum tracking angle of the trackers. The program calculates glare  
16 throughout the course of a day as the trackers follow the sun across the sky and considers  
17 the changing angle of the sun throughout the year. The model was used to evaluate the  
18 potential for glare impacts at four airports and two heliports within a ten mile radius of the  
19 Project, for vehicles driving through the Project Area, and for residents adjacent to the  
20 Project. All routes and homes were analyzed using 20-foot panel heights.

21 **Q.9 Please summarize the results of the Glare Hazard Assessment.**

22 **A.9** The Glare Hazard Assessment as supplemented by the Applicant’s February 10, 2022  
23 Response to Staff’s seventh Data Request found that the Project is not expected to cause  
24 glare for pilots landing at any of the four airports within ten miles of the Project Area or  
25 for helicopter pilots hovering at 500 feet over any of the two heliports that are located  
26 within ten miles of the Project Area. Further, the ForgeSolar analysis determined that glare  
27 from the Project is not predicted to occur for drivers of vehicles on five roadways adjacent  
28 to the Project. The 38 residences analyzed using the model are also not predicted to  
29 experience glare from the Project.

1   **Q.10**   Are your opinions and conclusions in your testimony made with a reasonable degree  
2           of professional certainty?

3   **A.10**   Yes.

4   **Q.11**   Does this conclude your testimony?

5   **A.11**   Yes. However, I reserve the right to update my testimony to respond to any further  
6           testimony, reports, and/or evidence submitted in this case.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing *Testimony of Jennifer Brunty* was served this 30<sup>th</sup> day of January 2023 via electronic mail upon the following parties of record.



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## Jennifer Brunty Ph.D., PMP

Senior Environmental Scientist  
25 years of experience · Sarasota, Florida

Dr. Jennifer Brunty is a senior environmental scientist with nearly 25 years of experience in wetland mitigation, water resources management, regulatory permitting, and compliance. Jennifer's current responsibilities include critical environmental and regulatory permitting issues analyses; wetland delineations; local, state and federal permitting of environmental restoration, development and solar energy projects; feasibility studies; and glare analyses for solar energy projects. She has worked for clients in multiple sectors including energy, transportation, agriculture, commercial and residential development, and municipal/state government. Her areas of experience range from water resource program implementation to federal, state and local wetland permitting, and management of a large-scale wetland mitigation program. She has also conducted over 80 glare analyses for solar projects to determine if viewers in the vicinity would be impacted by glare from solar panels.

### Multiple Projects | Senior Scientist

Conducted critical issues analysis for nine potential solar photovoltaic generating facilities in multiple counties in Georgia, Arkansas, Mississippi, Louisiana, and Florida. Provided reports evaluated critical permitting and development issues related to a variety of disciplines including: land use; jurisdictional waters; floodplains; NPDES construction stormwater permitting; rare, threatened and endangered species; spill prevention, control and countermeasures; potentially contaminated soil or groundwater; cultural and historic resources; potential air quality concerns; and applicable local government requirements.

### Moody Air Force Base Glare Hazard Analysis | Senior Scientist

Solar glare hazard analysis conducted using Sandia National Laboratories Solar Glare Hazard Analysis Tool (SGHAT) to determine whether a proposed solar farm located approximately 2 miles from the base would cause glare hazards to air force base operations. The study determined the potential impacts for flight operations at the base and over surrounding areas. Potential mitigating measures for glare found for flight maneuver locations were investigated.

### Solar Farm Glare Hazard Analysis | Allan and Auglaize Counties, Ohio | Senior Scientist

Solar glare hazard analysis conducted using ForgeSolar Analysis Tool to determine whether a proposed solar farm would cause glare to pilots or control towers for nearby airports or residences. The study also analyzed potential glare for drivers along adjacent roadways.

### Solar Farm Glare Hazard Analysis | Marion County, Ohio | Senior Scientist

Solar glare hazard analysis conducted using ForgeSolar Analysis Tool to determine whether a proposed solar farm would cause glare to pilots or control towers for nearby airports or residences. The study also analyzed potential glare for drivers along adjacent roadways.

### Solar Farm Glare Hazard Analysis | Davidson County, North Carolina | Senior Scientist

Solar glare hazard analysis conducted using ForgeSolar Analysis Tool to determine whether a proposed solar farm would cause glare hazards to pilots landing at the Davidson County Airport. The study also analyzed potential glare for viewers from twenty-two homes adjacent to the project site.

### Solar Farm Glare Hazard Analysis | Campbell County, Virginia | Senior Scientist

Solar glare hazard analysis conducted using ForgeSolar Analysis Tool to determine whether a proposed solar farm located approximately 1000 feet from a local airport would cause glare hazards pilots using the airport. The study also analyzed potential glare for drivers along adjacent roadways and a select homes and other viewing locations. Produced report and coordinated with client to provide technically accurate language for County presentations.

### Solar Farm Glare Hazard Analysis | Sheboygan County, Wisconsin | Senior Scientist

Solar glare hazard analysis conducted using ForgeSolar Analysis Tool to determine whether a proposed solar farm would cause glare to pilots or control towers for five nearby airports/heliports. The study also analyzed potential glare for 31 homesites and for drivers along adjacent roadways.

### Solar Farm Glare Hazard Analysis | Grant County, Wisconsin | Senior Scientist

Solar glare hazard analysis conducted using ForgeSolar Analysis Tool to determine whether a proposed solar farm would cause glare to pilots or control towers for one nearby airport, 128 residences and one church. The study also analyzed potential glare for drivers along adjacent roadways.

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**Case No(s). 21-0868-EL-BGN**

Summary: Text Direct Testimony of Jennifer Brunty on behalf of Scioto Farms Solar Project, LLC electronically filed by Teresa Orahoad on behalf of Sommer Sheely