

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of	:	
Scioto Farms Solar Project, LLC for a	:	
Certificate of Environmental	:	Case No. 21-0868-EL-BGN
Compatibility and Public Need for a Solar	:	
Facility Located in Pickaway County,	:	
Ohio.	:	

**PREFILED TESTIMONY
OF**

Thomas J. Crawford, PhD, PE

**ON BEHALF OF THE STAFF OF THE
PUBLIC UTILITIES COMMISSION OF OHIO,
POWER SITING DEPARTMENT**

STAFF EX. ____

February 13, 2023

1 1. Q. Please state your name and business address.

2 A. My name is Thomas Crawford, and my business address is 180 East Broad
3 Street, Columbus OH 43215.

4

5 2. Q. By whom are you employed and what is your position?

6 A. I am employed by the Public Utilities Commission of Ohio (PUCO or
7 Commission) as an Electric Energy Specialist within the Power Siting
8 Department.

9

10 3. Q. Please summarize your educational background.

11 A. I received a Bachelor of Science degree in Chemical Engineering, Magna
12 cum Laude, and a Master of Science in Nuclear Engineering from the
13 University of Cincinnati. Additionally, I have received a Master of Science
14 degree in Mechanical Engineering and a Doctor of Philosophy in Mechanical
15 Engineering from Drexel University. I have also taken a number of courses
16 in Computer Science from Franklin University, and I have taken several
17 graduate-level courses in Mechanical Engineering and Nuclear Engineering
18 at The Ohio State University.

1 4. Q. Please summarize your work experience.

1 A. Beginning in August 2020, I was employed by Alpha-Rae Personnel, Inc.
2 and assigned as a contractor to the PUCO. My duties included writing the
3 *Project Description and Need* section of the accelerated Cases and the
4 *Electric Grid* portion of the Staff Report of Investigation for major Solar
5 Facility Projects. I have been working directly with the PUCO since August
6 2021. My duties continue to be the writing of the *Project Description and*
7 *Need* section of the accelerated Cases and the *Electric Grid* section and
8 now the *Wind Velocity* section of the Staff Reports of Investigation for
9 major Solar Facility Projects. From March 2002 until May 2018, I was an
10 Adjunct Instructor and a Tutor in Physics, Engineering Fundamentals, and
11 Natural Science at Columbus State Community College. The Fisher
12 College of Business utilized me as an Adjunct Instructor in Statistics from
13 January 2005 until December 2006. At American Electric Power from
14 December 1984 until February 2002, I was involved in Technical
15 Assessment and Analysis of Nuclear, Coal-fired, and Hydroelectric Plants
16 on the AEP System. These responsibilities involved considerable computer
17 programming, and some additional programming activities involved
18 preparations for what has become known as Y2K. I was also an engineer
19 with the Philadelphia Electric Company doing nuclear core analysis,
20 refueling requirements, control rod sequencing reviews, spent fuel handling
21 and storage, and analysis of radiation shielding requirements from July
22 1978 until August 1981. As a graduate student, in 1981 through 1982, I was

1 an instructor in the Shift Technical Advisor program for the proposed
2 Zimmer Nuclear Station near Cincinnati, Ohio.

3
4 5. Q. Have you testified in prior proceedings before the Ohio Power Siting Board?

5 A. Yes.

6
7 6. Q. What is the purpose of your testimony in this proceeding?

8 A. I served as the Staff Project Lead for the investigation that resulted in the
9 Staff Report of Investigation (Staff Report) which was filed May 10, 2022.

10 I am also sponsoring a portion of the Staff Report of Investigation. I
11 prepared the *Electric Grid* section, the *Wind Velocity* section, and the
12 *Minimum Adverse Environmental Impact* section of the Staff Report.

13
14 7. Q. Please briefly describe this case.

15 A. The Applicant has proposed to develop, construct, and operate a solar
16 powered facility having a nameplate power output of 110 MW to be located
17 in Wayne Township, Pickaway County, Ohio.

18
19 8. Q. Please summarize Staff's investigation that was conducted in this case.

20 A. Staff's investigation included reviewing the application, conducting a site
21 visit to the proposed facility location, acquiring additional information from
22 the Applicant, the public, county commissioners and township trustees,

1 obtaining input from State agencies that comprise the Board, and other
2 relevant state and federal agencies, followed by the preparation of the Staff
3 Report which represents Staff's analysis, conclusions, and
4 recommendations. In this case, Staff recommended denial of the
5 Applicant's request for a certificate of environmental compatibility and
6 public need, due to its inability to establish one of the eight statutory
7 criteria. Specifically, Staff recommends the Board find the Applicant has
8 failed to establish whether the facility would serve the public interest,
9 convenience, and necessity as required under R.C. 4906.10(A)(6).

10
11 9. Q. What was the basis for Staff's recommendation that the Board deny the
12 Applicant's request for a certificate of environmental compatibility and
13 public need?

14 A. Staff found that the Applicant has failed to establish that the facility would
15 serve the public interest, convenience, and necessity as required under R.C.
16 4906.10(A)(6) due to local opposition, including local governmental
17 bodies, including the Board of Pickaway County Commissioners and the
18 Board of Trustees of Wayne Township.

19 10. Q. Are you responsible for any specific conditions in the Staff Report? If so,
20 which ones?

1 A. Yes. I am responsible for Conditions (19) and (20), the output of the
2 Facility and the Interconnection Service Agreement, that were included in
3 the Staff Report of Investigation.
4

5 11. Q. In the event the Board grants a certificate for the project, why is Staff
6 recommending these conditions?

7 A. These conditions are needed to ensure the integrity of the Electrical
8 Interconnection.

9 12. Q. Are you responsible for any other specific conditions in the Staff Report? If
10 so, which ones?

11 A. Yes. I am responsible for the standard Conditions (1), (2), (3), (6), (13),
12 (14), (15), (17), and (18), the installation, construction, commencement of
13 operation, changes in the facility layout, validation of certificate, filing of
14 beginning and completion of construction, and permitting.
15

16 13. Q. Do you have any edits to the Staff Report?

17 A. Yes, the Condition (13) is a duplicate of Condition (6) and it should be
18 omitted.
19

20 14. Q. Does this conclude your testimony?

1 A. Yes, it does. However, I reserve the right to submit supplemental testimony
2 as new information subsequently becomes available or in response to
3 positions taken by other parties.

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing Prefiled Testimony of Thomas J. Crawford, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, Power Siting Department, was served via electronic mail, upon the following parties of record, this 13TH day of February 2023.

/s/ Robert Eubanks

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Summary: Testimony of Thomas Crawford electronically filed by Mrs. Tonnetta Y.
Scott on behalf of OPSB