BEFORE THE OHIO POWER SITING BOARD

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In the Matter of the Application of Blossom Solar, LLC for a Certificate of Environmental Compatibility and Public Need

Case No. 22-151-EL-BGN

DIRECT TESTIMONY OF MARK BONIFAS

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

A.1. My name is Mark J. Bonifas. I am a Senior Consultant at Verdantas LLC. My
business address is 6397 Emerald Parkway, Suite 200, Dublin, OH 43016.

4 Q.2. What are your duties as Senior Consultant at Verdantas?

- 5 A.2. As a Senior Consultant, I manage civil engineering, renewable energy, and land 6 development projects in multiple states providing creative strategies to secure funding, 7 meet regulatory requirements, and streamline the due diligence, design, permitting, and 8 construction phases of a project. I manage multi-disciplinary teams, interact with local and 9 state agencies, and lead environmental assessments, remedial actions, and permitting and 10 engineering design for infrastructure at large commercial and industrial sites. I am part of 11 our business development team that focuses on the energy, environmental, and 12 infrastructure markets. Our clients include public and private clients in the energy, 13 healthcare, retail, office, recreational, ecological restoration, commercial, mixed-use, and 14 industrial markets. I also provide technical engineering support for Verdantas's Dublin, Ohio and other offices. 15
- I have managed multiple environmental and engineering studies that support Ohio Power
 Siting Board ("OPSB") applications for wind, solar, and battery storage system projects

and have managed design and construction activities for wind and solar projects that have
 been approved by the OPSB.

3		Finally, I have provided testimony in the following proceedings before the OPSB:
4		Nestlewood Solar (Case No. 18-1546-EL-BGN), Alamo Solar I (Case No. 18-1578-EL-
5		BGN), Angelina Solar I (Case No. 18-1579-EL-BGN), Big Plain Solar (Case No. 19-1823-
6		EL-BGN), Yellowbud Solar (Case No. 20-0972-EL-BGN), Ross County Solar (Case No.
7		20-1380-EL-BGN), Sycamore Creek Solar (Case No. 20-1762-EL-BGN), Dodson Creek
8		Solar (Case No. 20-1814-EL-BGN), Clearview Solar (Case No. 20-1362-EL-BGN), Union
9		Ridge Solar (Case No. 20-1757-EL-BGN), Flint Grid Battery Energy Storage System
10		(Case No. 21-1061-EL-BGN), Harvey Solar (Case No. 21-0164-EL-BGN), Cepheus Solar
11		(Case No. 21-0293-EL-BGN), and Dixon Run Solar (Case No. 21-0768-EL-BGN).
12	Q.3.	What is your educational and professional background?
13		A.3. I have a Bachelor of Science in Civil Engineering from the Ohio State University
14		and have been practicing engineering as an engineering consultant for over 34 years. I
15		have been a registered Professional Engineer in Ohio for 29 years and I am also a registered
16		Professional Engineer in 15 other states. I have been performing civil engineering services

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Q.4.

on renewable energy projects for over 14 years.

On whose behalf are you offering testimony?

- 19 **A.4.** I am testifying on behalf of the Applicant, Blossom Solar, LLC ("Blossom Solar"
- 20 or "Applicant") in support of its application filed in Case No. 22-151-EL-BGN.
- 21 Q.5. What is the purpose of your testimony?

A.5. The purpose of my testimony is to describe the potential traffic and road impacts
 resulting from the Project; explain how the Project will be decommissioned; discuss the

grading activities that will be conducted during construction of the Project; explain the
 Project's impact on stormwater flows during and after construction; explain the Project's
 potential impacts on drain tiles in the Project Area; and describe the geotechnical
 exploration conducted for the Project.

5 **Q.6.**

Were any studies conducted to evaluate the potential impact of the Project on roads and bridges?

7 **A.6**. Yes. Burns & McDonnell prepared a Transportation Assessment for the Project, 8 filed as Exhibit I to the Application, which I have reviewed. The assessment consisted of 9 a preliminary review of the potential routes to be used to access the Project Area during 10 construction, general condition of existing roadway surfaces and approximate roadway widths along these routes, general condition of bridges and culverts, estimated truck trips 11 12 during construction, a summary of the permits required to construct and operate the Project, 13 and conclusions drawn from the assessment. Tasks included a review of publicly available 14 information such as the Ohio Department of Transportation ("ODOT") GIS application 15 Transportation Monitoring Mapping System, as well as conducting a site visit to visually 16 assess the general roadway, bridge, and culvert conditions. Although I was not involved 17 in the development and preparation of the assessment, I have reviewed the Transportation 18 Assessment report in detail, and I agree with the conclusions in the Transportation 19 Assessment.

20 Q.7. What were the conclusions of the Transportation Assessment?

A.7. The Assessment notes that the Project is expected to have minimal impacts on roads, bridges, and culverts; and modest impacts on traffic in the local community during construction. Sufficient infrastructure exists via interstate, state, and local roads to

construct the Project. A final delivery route has not yet been finalized, but it is likely that
delivery of Project components to the Project Area will be either from the Columbus area
(via I-71 N to SR 61) or I-71 to SR 95 through Mt. Gilead. An alternate route would be
from the Cleveland area via I-71 S to SR 30 to SR 598/SR 30. Within the Project Area,
county and township roads and new private gravel access roads will likely be used to
deliver equipment and materials.

7 The vast majority of the vehicles transporting construction equipment, materials, and 8 workers are expected to be below load and dimensional limits. Some oversize/overweight 9 loads may be necessary to deliver certain pieces of equipment (e.g., switchgear, 10 transformers for switchyards and substations) to be installed as part of the Project 11 substation. To the extent an oversize/overweight delivery is required, a special hauling 12 permit will be obtained from the ODOT and/or local jurisdiction, as applicable.

Finally, the Transportation Assessment concluded that the traveling public is likely to experience, at most, minor delays and inconveniences during the construction of the Project. Because this is an agricultural area, heavier use of roadways by local farmers during planting and harvest seasons will need to continue. Blossom Solar will coordinate with the county engineer and the local community to minimize any traffic delays. Prior to construction, a Temporary Traffic Control Plan will be prepared that describes the procedures that will be used to manage traffic during construction.

The Morrow County Commissioners voted unanimously to pass a resolution in favor of Blossom Solar's application to be a qualified energy project ("QEP"). Pursuant to the Project's status as a QEP, Blossom Solar plans to post a road bond or similar surety to ensure the repair of any roads damaged by construction of the Project. The Applicant will

1 work with the local authorities to develop a common understanding for the use and 2 protection of area roads. This is expected to include a road use and maintenance agreement 3 ("RUMA") or a similar arrangement providing that any construction-related damages to 4 roads be expeditiously repaired. The Applicant also plans to work closely with township 5 and county officials, particularly township trustees and the county engineer, to review the 6 Transportation Assessment, further assess the state of the roads once a final route is 7 determined and prior to construction start, and agree on a plan to repair any damage to 8 roads needed to start, or resulting from, construction of the Project. Blossom Solar expects 9 this collaboration to culminate in the execution of a RUMA for the Project.

10 Q.8. What is your overall assessment of the potential traffic and road impacts of the 11 Blossom Solar Project?

12 A.8. Based on my experience with other utility-scale solar projects and review of the 13 Transportation Assessment, I expect minimal effects on the travelling public as a result of 14 the construction of the Project and no effect from the operation of the Project. I would also 15 not expect the construction or operation of the Project to have a negative effect on the 16 condition of any local roadways during construction, especially due to the commitments 17 the Applicant anticipates making for any necessary repairs resulting from its activities. 18 During operation and maintenance of the Project, there will be very little increase in traffic 19 as solar electric generating facilities require minimal oversight. There will be occasional 20 maintenance vehicles and any additional traffic will be negligible. Further, the Applicant 21 will coordinate with the necessary local and state officials, including the county engineer, 22 regarding any temporary road closures, lane closures, road access restrictions, and traffic 23 control necessary for construction and operation of the facility.

Finally, through Condition 7 of the Joint Stipulation, Blossom Solar memorialized its commitment to obtain all necessary transportation permits prior to construction and to also coordinate with appropriate local authorities for traffic control during construction and operation of the Project. Under this condition, Blossom Solar will prepare a final transportation management plan after completion of final Project design and provide it to Board Staff prior to the preconstruction conference. The final transportation management plan will include a completed Transportation Study.

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Q.9. How did the Applicant propose to decommission the Project in the Application?

9 A.9. Burns & McDonnell prepared a preliminary Decommissioning Plan and the 10 Applicant submitted it as Exhibit J to the Application, which I have reviewed. The 11 Decommissioning Plan outlines the preparation steps for decommissioning, equipment 12 removal, access road removal, and site reclamation steps. In general, decommissioning 13 will involve the removal of all system components and the restoration of the site to 14 conditions similar to pre-construction (e.g., agricultural or open space, subject to 15 landowner preference).

16 Prior to the start of decommissioning work, the site will be assessed for existing conditions 17 and appropriate stormwater management plans and erosion and sediment control plans will 18 be developed by a demolition contractor. Appropriate permits for decommissioning 19 activities will also be obtained, as necessary. The above-grade steel, aluminum, and copper 20 equipment is expected to have significant scrap value to a salvage contractor, which will 21 offset a portion of the decommissioning costs. All components will be removed to a 22 minimum of 36 inches below grade. Pursuant to Blossom Solar's commitment to 23 Condition 22 of the Joint Stipulation, underground equipment will be removed to the extent

such removal is necessary for future drain tile repairs and installation to be completed. All
 recyclable materials will be recycled to the extent practicable, while all other non recyclable waste materials will be disposed of in accordance with state and federal law. As
 part of decommissioning, all disturbed areas at the site will be returned to as close to
 predevelopment conditions as practicable.

6 Decommissioning and removal of Project structures from the site is anticipated to occur 7 within a six to 12-month timeframe, including approximately two months for planning and 8 permitting activities; approximately three months for demolition; and approximately one 9 month for site restoration. Additional time may be required for post-decommissioning 10 activities, including the monitoring of new vegetation pursuant to Condition 22.

Q.10. Did the Applicant propose financial security for Project decommissioning in the Application?

13 A.10. Yes. In the Application, Blossom Solar indicated that it will maintain a 14 comprehensive package of liability insurance to protect the public in connection with the 15 Project. Throughout the construction, operation, and decommissioning of the Project, the 16 Applicant will maintain insurance against claims and liability for personal injury, death, 17 and property damage arising from the construction, operation, or decommissioning of the 18 Project. At a minimum, the coverage limits of such insurance will be \$1 million per 19 occurrence and \$2 million in the aggregate. Applicant also will maintain umbrella 20 insurance coverage against claims and liability in the amounts of \$10 million per 21 occurrence and \$10 million in the aggregate.

Pursuant to Condition 22 of the Joint Stipulation, the costs of decommissioning will be
 appropriately planned for with the filing of an updated total decommissioning cost estimate

without regard to salvage value. In addition, Condition 22 requires that a performance
bond be posted prior to commencement of construction for the total cost of
decommissioning excluding salvage value. The performance bond will include the
company as principal, the insurance company as surety, and the OPSB as obligee.

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Q.11. What type of grading activities are expected for the Project?

6 **Q.11.** In contrast to other forms of power generation and 7 commercial/industrial/residential development, construction of a solar facility is less 8 intensive, less invasive, utilizes smaller and lighter construction equipment, and is less 9 complex and more repetitive. A solar facility is one of the only types of development 10 where the underlying land can be returned to its original use. In general, limited cut and 11 fill grading (large areas of cut and fill earthwork to change the existing topography) is 12 required for solar energy projects because solar panel racking is designed to accommodate 13 moderate changes in topography and can follow the existing contours of many sites. For 14 Blossom Solar, cut and fill grading may occur in limited areas within the solar panel array 15 area due to localized steep slopes and at the electrical substation. Other areas where topsoil 16 may be stripped and stockpiled (without a change in topography because these areas are 17 small or can follow the existing topography) include private aggregate access roads, 18 inverter stations, temporary construction laydown areas and underground cable trenching. 19 Most of the cabling can be rack-mounted with some collector cables between inverter pads 20 and the substation being buried in trenches or using horizontal directional drilling (HDD) 21 methods, where applicable.

For this Project, some cut and fill grading is anticipated. In areas where cut and fill grading is necessary (to change the existing topography), the topsoil and subsoils will be handled

1 separately and placed to be consistent with pre-construction subsoil and topsoil conditions. 2 In areas where the surface is covered in aggregate during construction (temporary laydown 3 areas), the topsoil will be stockpiled on site to be reused when construction is completed. 4 In areas where the surface is covered in aggregate during operation (private access roads, 5 inverter stations, and electrical substation), the topsoil will be stockpiled or spread on site 6 to be reused when the project is decommissioned. As each portion of installation is 7 completed, areas that may have been compacted will be decompacted, the ground surface 8 will be stabilized with vegetation, and BMPs will remain in place until final stabilization 9 of the Project Area occurs.

10 Q.12. Have you reviewed Condition 21 in the Joint Stipulation filed on February 3, 2023?

11 Q.12. Yes. This condition was drafted as a result of consultations with the OPSB and 12 personnel from the Ohio Department of Agriculture. Through this condition, the Applicant 13 is making various commitments including conserving topsoil and subsoil and minimizing 14 soil-related impacts to the Project Area. These commitments will benefit the land if it is 15 returned to agriculture after decommissioning of the Project. For example, Blossom Solar 16 has committed to creating an Agricultural Protection Plan and file it on the public case 17 docket. The Plan will be comprised of the following elements: (1) a collection of baseline 18 data establishing pre-construction topsoil conditions for the agricultural areas in the Project 19 Area; (2) a goal limiting grading to only 5% of the agricultural lands within the Project 20 Area, with a firm limit of 20% of the agricultural lands within the Project Area; (3) maps 21 and geospatially referenced data for planned areas of grading, agricultural lands within the 22 Project Area, and planned locations of topsoil stockpile areas; and (4) best management 23 practices ("BMPs") for preserving agricultural land. For purposes of Condition 21, grading

is defined as earthmoving activities incidental to building roads, equipment pads, 1 2 substations, and laydown yards, installing buried electric lines and drain tile, excavating 3 stormwater basins, performing soil removal activities, soil filling activities, and cut-and-4 fill activities, but not routine ground disturbance incidental to installing piles, fences, poles 5 for electric lines, vegetation, landscaping, temporary erosion and sediment controls, 6 performing soil sampling, geotechnical investigations, archeological investigations, 7 disking topsoil to promote the growth of vegetation, and raking, smoothing ruts, or 8 otherwise creating a smooth and safe work surface.

9 In my experience, earth moving activities such as cut-and-fill grading, if performed 10 correctly, and particularly in conjunction with best practices outlined in Condition 21, will have limited impact on the ability of the soils to support growth of vegetation including 11 12 agricultural crops. Although the disturbance of the soil from earthwork activities does 13 diminish the health of the soil as compared to soil that is not disturbed, if performed 14 correctly cut and fill activities should not substantially reduce future vegetation or crop 15 health. In addition, where only topsoil is stripped to construct temporary laydown areas, 16 and private aggregate access roads and inverter stations, properly restoring these areas by 17 decompacting the subsoil, replacing the stripped topsoil and establishing soil stabilization 18 such as vegetation will have a very similar impact to the soils as agricultural tilling.

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Q.13. Is Condition 21 in the public interest?

A.13. Yes. Based on my experience, the topsoil and subsoil conservation practices the Applicant is committing to will further minimize the impact of the Project on future agricultural productivity and general soil health. These conservation practices will be implemented during construction, operation, and decommissioning activities and will

allow monitoring of soil health through all phases of the project's lifecycle. Further,
 capturing the baseline data of the topsoil prior to construction will give Blossom Solar
 adequate, site-specific data to provide a reference point for testing after decommissioning
 to ensure the soils are returned to the site-specific pre-construction conditions.

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Q.14. In your opinion and based upon your experience, what will be the impact of the Project on stormwater flows during construction and after construction?

7 A.14. As I explain above, the Project is not anticipated to require substantial grading or 8 ground disturbance and therefore, in my experience, I would not expect significant changes 9 in stormwater flows during construction. As outlined in the Application and Exhibit K to 10 the Application (Stormwater Assessment), which Burns & McDonnell prepared and I have reviewed, as is typical of similar land development projects, erosion and sediment control 11 12 BMPs will be installed prior to the start of, and maintained throughout, construction to 13 minimize any potential detrimental effects due to stormwater runoff from the site. Erosion 14 and sediment control BMPs implemented during initial site preparation activities and 15 throughout construction, such as silt fence, construction entrances, temporary sediment 16 traps, and temporary or permanent seeding, as applicable and needed, will help stabilize 17 soils, filter sediments, and reduce stormwater runoff rates and volumes at the site.

After construction, a significant portion of the Project Area (up to approximately 1,070 acres) will be converted from tilled agricultural land use to a permanently vegetated land use. This will result in nearly 100% vegetated ground cover in the entire Project Area and this land use change will result in a reduction in rate of stormwater runoff leaving the Project Area.

Q.15. What permits will the Applicant be required to obtain related to stormwater management during construction?

3 A.15. In compliance with the Ohio Water Pollution Control Act (R.C. Chapter 6111), 4 dischargers of stormwater from construction activities are authorized by the Ohio 5 Environmental Protection Agency ("OEPA") to discharge stormwater from the site to 6 surface waters of the state in accordance with the General Permit Authorization for Storm 7 Water Discharges Associated with Construction Activity Under the National Pollutant 8 Discharge Elimination System ("NPDES"), OEPA Permit No. OHC000005, effective 9 April 23, 2018 ("General Permit"). Construction projects disturbing one or more acres of 10 land need to file a Notice of Intent ("NOI") for coverage under the General Permit. The General Permit requires that a project-specific Stormwater Pollution Prevention Plan 11 12 ("SWPPP") be prepared prior to filing the NOI.

13 To meet NPDES requirements and Joint Stipulation Condition 28, a qualified professional 14 experienced in the design and implementation of standard erosion and sediment controls, 15 and a stormwater management design engineer will utilize the final Project layout to 16 develop a SWPPP. The SWPPP will identify potential sources of pollution that may 17 reasonably be expected to affect the quality of stormwater discharges associated with 18 construction activities. The SWPPP will also describe and ensure the implementation of 19 BMPs that reduce pollutants in stormwater discharges during construction and pollutants 20 associated with the post-construction land use. Examples of BMPs that may be 21 implemented include silt fence, construction entrances, temporary sediment traps, and 22 temporary or permanent seeding, as applicable and needed. The SWPPP will also include 23 requirements for inspection of BMPs until the site is stabilized following construction. The

post-construction stormwater management for the Project will meet the requirements of the
 General Permit and incorporate the Ohio EPA's Guidance on Post-Construction Storm
 Water Controls for Solar Panel Arrays.

4 Q.16. Will there be an adverse impact to stormwater flows after the Project is constructed? 5 In my opinion, no. Notably, the Federal Emergency Management Agency's Flood A.16. 6 Insurance Rate Map primarily shows the Project Area as within Zone X (areas of minimal 7 flooding and outside the 100-year flood areas). Further, the measures discussed in the 8 Application should adequately manage post-construction stormwater flows, including the 9 stabilization of the ground surfaces by establishing and maintaining vegetation amongst 10 and around the panel arrays utilizing deep-rooted native plant species, as well as pollinator-11 friendly plantings. I would expect post-construction stormwater flows to have reduced 12 runoff flow and quantity, and improved runoff characteristics (i.e., reduction of sediment 13 load, nutrients and other stormwater contaminants) when compared to an agricultural field 14 (similar to pre-construction conditions) due to permanent vegetation maintained in and 15 around the Project Area. Although the solar panels are impervious, the areas between and 16 under the panel arrays will remain largely pervious and vegetated. Only a very small 17 percentage of the Project Area for the ancillary equipment (e.g., inverters and substation 18 pads) and access roads are anticipated to be considered impervious areas. In my opinion, I expect the Project to have less stormwater runoff flow and quantity from the Project Area, 19 20 increased infiltration, and improved stormwater quality after the Project is constructed than

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the current agricultural land uses in the Project Area.

Based on my experience, the post-construction reduction in stormwater runoff rate and quantity, and improved stormwater quality is typical of utility-scale solar projects where agricultural or disturbed land surfaces are converted to permanent vegetative cover.

4 Q.17. How will Blossom Solar protect and, if necessary, repair drain tile in the Project

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Area?

6 **A.17.** As further explained in Exhibit AA of the Application (Drain Tile Assessment), 7 which Burns & McDonnell prepared and I have reviewed, Blossom Solar will document 8 benchmark conditions of surface and subsurface drainage systems prior to construction, 9 including the location of laterals, mains, grassed waterways, and countv 10 maintenance/repair ditches. To accomplish this, Blossom Solar will coordinate with public resources, and participating and adjacent landowners to accurately identify as many drain 11 12 tile locations as possible. A composite map of existing drain tile will be assembled and 13 considered during preparation of the final engineering plans. Identified locations of drain 14 tile will be avoided or rerouted when possible.

When it is not possible to identify drain tile locations, the next priority will be to identify damaged drain tile and repair it. Drain tile can be repaired by excavating to uncover the damaged area, repairing the damaged tile, and backfilling the excavation. Such work can be done with a small excavator capable of working between the rows of solar panels.

Communication and collaboration with adjacent landowners will be ongoing as part of preconstruction design, and during construction and operation as it relates to drain tiles in areas where drain tiles or outlets extend outside the Project Area boundary. Damaged drain tile can be identified by the presence of water flowing out of the ground or ponding in an unexpected location which can occur within the Project Area or on adjacent land. When

repairing tiles in a county maintenance/repair ditch, the County Engineer will be notified
 of such repairs.

Drain tile repair is a common occurrence in agricultural communities and USDA NRCS –
 Construction Specification OH-9 – Subsurface Drain Investigation, Removal, and Repair (January 2017) provides guidance for tile repair and removal during construction activities
 where subsurface drain tile is present.

7 In addition, Condition 20 of the Joint Stipulation requires that Blossom Solar avoid, where 8 possible, or minimize to the extent practicable, any damage to functioning field drainage 9 systems and soils resulting from construction, operation, and/or maintenance of the facility. 10 It also requires that damaged field tile systems be promptly repaired or rerouted to at least 11 original conditions or modern equivalent to ensure proper drainage. If the affected 12 landowner agrees to not have the damaged field tile system repaired, they may only do so 13 if the field tile systems of adjacent landowners remain unaffected by the non-repair of the 14 landowner's field tile system, and the damaged field tile does not route directly onto or into 15 an adjacent parcel. Finally, a map of discovered and repaired drain tile systems will be 16 filed in the case docket once construction is complete. In my opinion, this approach is 17 appropriate and consistent with industry practice at this time.

18 Q.18. What is your overall assessment of the potential impact of the Project on drain tile?

A.18. Based on my experience, utility-scale solar projects are being successfully designed
 and constructed throughout the Midwest on agricultural land where drain tile is common.
 Unknown drain tile locations can present a challenge, but one that can be overcome through
 a well-coordinated program of research, preliminary mapping, physical investigation,
 locating, surveying, design, and appropriate repair procedures. My understanding is that

the Applicant will undertake such a program to ensure that neither the Project Area itself
nor adjacent properties are negatively impacted by damage to existing drain tile networks.
Based on my experience, I do not believe the Project will have an adverse impact on
subsurface drainage within the Project Area or adjacent properties. Additionally,
Condition 20 of the Joint Stipulation will further ensure that impacts to drain tile within
the Project Area are minimized and any impacts to drain tile outside the Project Area are
promptly addressed and repaired.

8 Q.19. Was a geotechnical study completed for the Blossom Solar Project?

9 A.19. Yes. Terracon completed a Preliminary Geotechnical Engineering Report, which 10 was submitted with the Application as Exhibit N, and which I have reviewed. Twelve 11 exploratory borings, drilled to a maximum depth of 20 to 50 feet below existing site grades, 12 were conducted. One boring, B-2, was drilled to a depth of 50 feet. Boring B-12 was 13 drilled to a depth of 23.5 feet. The remaining 10 borings were drilled to a depth of 20 feet. 14 Bedrock was not encountered in any of the borings except B-12 at a depth of 23.5 feet. 15 Based on this report, the site appears suitable for utility-scale solar development using steel 16 piles as foundations for the racking for the solar panels.

As part of its final engineering and design of the Project, and pursuant to commitments made in the Application and in Conditions 33, 34, and 35 of the Joint Stipulation, Blossom Solar will conduct additional geotechnical studies in the Project Area to confirm the Preliminary Geotechnical Exploration Report's findings. The additional geotechnical studies will include additional soil boring locations, additional soil testing, data to evaluate and design roads, assign a seismic site classification that is applicable to the Ohio Building Code, and a pile load testing program. The final geotechnical study will be provided to Staff at least 30 days before the preconstruction conference. Based on the commitments
 made by Blossom Solar and the existing site geology, it is my opinion that the Project can
 be constructed at the planned location.

4 Q.20. Does this conclude your direct testimony?

5 **A.20.** Yes, it does.

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served via electronic mail on February 27, 2023 upon all persons/entities listed below:

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<u>/s/ Anna Sanyal</u> Anna Sanyal

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Summary: Testimony Direct Testimony of Mark Bonifas electronically filed by Ms. Anna Sanyal on behalf of Blossom Solar, LLC