

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Fountain )  
Point Solar Energy LLC for a Certificate of )  
Environmental Compatibility and Public Need ) Case No. 21-1231-EL-BGN  
to Construct a Solar-Powered Electric )  
Generation Facility in Logan County, Ohio. )

**DIRECT TESTIMONY OF**

**Matthew LaCount  
Associate Engineer  
Electrical Consultants, Inc.**

**on behalf of  
Fountain Point Solar Energy LLC**

**July 24, 2023**

*/s/ Christine M.T. Pirik*

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*Attorneys for Fountain Point Solar Energy LLC*

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

2           My name is Matthew LaCount. I am an Associate Engineer for Electrical Consultants, Inc.  
3           ("Electrical Consultants"). My business address is 3521 Gabel Road Billings, MT 59102.  
4

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

6           I obtained a Bachelor of Science in Renewable Energy Engineering from Oregon Institute  
7           of Technology in 2017. A copy of my resume is attached to my testimony as Attachment  
8           ML-1.  
9

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

11          I am testifying on behalf of Fountain Point Solar Energy LLC ("Applicant" or "Fountain  
12          Point"),<sup>1</sup> which is seeking to develop the proposed Fountain Point facility ("Project") in  
13          Logan County, Ohio.  
14

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

16          The purpose of my testimony is to provide additional context and support for Attachment  
17          2 to the Second Supplement to the Application filed on August 23, 2022, the  
18          Electromagnetic Fields Memorandum (*See* Applicant Exhibit 3), , that is part of the  
19          Application for a Certificate of Environmental Compatibility and Public Need  
20          ("Certificate") filed with the Ohio Power Siting Board ("Board") by Fountain Point in Case  
21          No. 21-1231-EL-BGN on April 11, 2022, as supplemented on May 16, 2022, and August  
22          23, 2022, and as further supplemented by responses to data requests that were received  
23          from the Board's Staff and filed in the docket ("Application").  
24

25          My testimony, together with the other witnesses testifying for Fountain Point in this case,  
26          supports the Board's approval of Fountain Point's Application and the Joint Stipulation  
27          and Recommendation filed in this case on July 24, 2023 ("Stipulation"), and the issuance  
28          of a Certificate to Fountain Point authorizing it to construct and operate the Project.  
29

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<sup>1</sup>     Fountain Point is an affiliate of Invenergy Solar Project Development LLC ("Invenergy").

1     **5.     Please describe the history of your involvement with the Fountain Point Project?**

2           Electrical Consultants was contacted to provide a Electromagnetic Fields (“EMF”)  
3           Technical Memorandum for renewable based Invenergy projects in May of 2022.  
4           Invenergy has included said memo as a part of the application process for the Fountain  
5           Point Project.

6  
7     **6.     Have you reviewed the Certificate conditions recommended in the Stipulation, which**  
8           **enhance and improve the conditions recommended in the Staff Report of**  
9           **Investigation filed in this proceeding on November 29, 2022?**

10          Yes. I have.

11  
12    **7.     Please summarize the findings of the EMF Technical Memorandum found in the**  
13    **Second Supplement to the Application filed on August 23, 2022.**

14          The EMF Technical Memorandum is a comparison of modeled and known EMF values to  
15          recommended levels set by the International Commission on non-Ionizing Radiation  
16          Protection (“ICNIRP”). The expected maximum EMF levels for a typical generation  
17          project are well below these guidelines. Based on the assessments in the EMF Technical  
18          Memorandum, the Fountain Point Project would not contribute any more EMF than already  
19          existing infrastructure.

20  
21    **8.     Based upon the commitments Fountain Point has made through the Application and**  
22    **as determined in the EMF Technical Memorandum, together with the conditions in**  
23    **the Stipulation, is it possible to determine the nature of the probable environmental**  
24    **impact of the facility?**

25          Yes.

26  
27    **9.     Based upon the commitments Fountain Point has made through the Application and**  
28    **as determined in the EMF Technical Memorandum, together with the conditions in**  
29    **the Stipulation, does the facility represent the minimum adverse environmental**  
30    **impact on those resources?**

31          Yes.

1   **10.   Based upon the commitments Fountain Point has made through the Application and**  
2       **as determined in the EMF Technical Memorandum, together with the conditions in**  
3       **the Stipulation, does the Project serve the public interest, convenience, and necessity?**

4       Yes.

5  
6   **11.   Are your opinions and conclusions in your testimony made with a reasonable degree**  
7       **of professional certainty?**

8       Yes.

9  
10   **12.   Does this conclude your testimony?**

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

**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 24<sup>th</sup> day of July, 2023.

/s/ Christine M.T. Pirik

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**Attachment ML – 1**  
**Matthew LaCount**  
**Resume**

**EXPERIENCE SUMMARY**

Associate Engineer possessing experience in collection system design, distribution system sectionalizing and grounding system analysis. Core competencies encompass:

- Step and Touch Potential Analysis
- Collection System Design
- Ampacity and Loss Analysis
- Coordination and Recloser Settings
- Distribution System Sectionalizing
- Electrical Design and System Modeling

Specific hands-on experience includes the following:

- CDEGS
- Cymcap
- OpenWind
- ASPEN
- WinIGS

Strengths include analytical thinking, critical problem solving and technical design ability.

**APPLICABLE EXPERIENCE****Invenergy – Collection and Substation Grounding Analysis**

Design Engineer responsible for the analysis of step and touch potentials for multiple projects including, Santa Rita East and Beech Ridge II. Duties included operation of the CDEGS grounding software and analysis of the results and mitigations.

**EDF Renewables – Substation Grounding Analysis**

Design Engineer responsible for the analysis of step and touch potentials for multiple substations including, Valentine, Desert Harvest, Almasol, Milligan and more. Duties included operation of the CDEGS grounding software and analysis of the results and mitigations.

**NextEra Energy Resources – 34.5-230 kV Cedar Springs I, II and III Collection Layout and Grounding Analysis**

Design Engineer responsible for the layout design, ampacity analysis, loss analysis, and grounding analysis of all three Cedar Springs Wind projects. Duties included optimization of cable ampacities, operation of Cymcap, and CDEGS software and analysis of the results and mitigations.

**Dick Anderson Construction – 34.5-100 kV Gordon Butte II Grounding Analysis**

Design Engineer responsible for the analysis of step and touch potentials at the WTGs and padmount transformers. Duties included operation of the CDEGS grounding software and analysis of the results and mitigations.

**PROFESSIONAL EXPERIENCE**

Associate Engineer



Responsibilities include preparation of electrical schematics and wiring diagrams, substation and collection system grounding analysis, collection system layout design, ampacity and loss analysis and distribution system protection and sectionalizing.

**EDUCATION**

B.S. Renewable Energy Engineering, Oregon Institute of Technology (2017)

**This foregoing document was electronically filed with the Public Utilities  
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**in**

**Case No(s). 21-1231-EL-BGN**

Summary: Testimony - Direct Testimony of Matthew LaCount electronically filed by  
Christine M.T. Pirik on behalf of Fountain Point Solar Energy LLC.