

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON
ELECTRIC GENERATION AND TRANSMISSION SITING

IN THE MATTER OF:

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| THE ELECTRONIC APPLICATION OF BRIGHT MOUNTAIN SOLAR, LLC FOR A CERTIFICATE OF CONSTRUCTION FOR AN UP TO 80 MEGAWATT MERCHANT ELECTRIC SOLAR GENERATING FACILITY AND RELATED NONREGULATED TRANSMISSION LINE OF APPROXIMATELY 4 MILES IN PERRY COUNTY, KENTUCKY PURSUANT TO KRS 278.700 AND 807 KAR 5:110 |)))))))) | CASE NO. 2022-00274 |
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APPLICANT BRIGHT MOUNTAIN SOLAR, LLC’S
HEARING WITNESS LIST

Comes now Applicant Bright Mountain Solar, LLC (“Bright Mountain”), by and through counsel, pursuant to 807 KRS 5:001, Section 6(2) and other applicable law, and hereby gives notice of its intent to make the following witnesses available for examination at the hearing for this matter scheduled for February 6, 2024.

Andrew House, Region Manager, Development, at Avangrid Renewables, LLC (“Avangrid”) and lead developer for the Bright Mountain Solar Project (“Project”), will be available to provide testimony generally in sponsorship of Bright Mountain’s Application (filed September 15, 2023), compliance with notice requirements, responses to the Electric Generation and Transmission Siting Board (“Siting Board”) Staff’s initial and supplemental requests for information (filed October 19, 2023 and December 22, 2023, respectively), and its Response to Consultant’s Report (filed January 19, 2024). He will also be available to provide testimony more specifically regarding Application Tabs 1-11 and Exhibits and Attachments thereto, portions of Tab 12 (Site Assessment Report, “SAR”) (specifically SAR Exhibits B (Legal Property Descriptions),

C (Preliminary Facility Layout), H (Visibility Assessment Technical Memorandum) and J (Decommissioning Plan)), Tab 13 (Description of the Proposed Electric Transmission Line Appurtenances), and Tab 14 (Compliance with National Electric Safety Code)) in combination with other listed witnesses.

Nautasha Gupta, EI, Senior Project Engineer at Avangrid, will be available to provide testimony generally on topics related to design, engineering, and layout of solar projects generally and as pertaining to Bright Mountain, solar project construction practices generally and as pertaining to Bright Mountain, and portions of the Application, including the SAR, specifically regarding SAR Exhibits C (Preliminary Facility Layout), D (Preliminary Geotechnical Engineering Report), F (Traffic and Dust Study), and I (Solar Glare Analysis Report), as well as the attachments to and narrative regarding the subjects of those exhibits. She can also provide testimony regarding Applicant's responses to Board Data Requests and the Consultant's Report on these same topics.

Sean Hollowell, Project Manager at Environmental Design & Research ("EDR") and lead consultant for the Project, will be available to provide testimony regarding the preparation of the Application and SAR generally, and specifically SAR Exhibits A (Real Estate Adjacent Property Value Impact Report), C (Preliminary Facility Layout), E (Preliminary Hydrologic and Hydraulic Evaluation), H (Visibility Assessment Technical Memorandum), and Tabs 13 (Description of the Proposed Electric Transmission Line, Route, and Appurtenances), and 15 (Cumulative Environmental Assessment).

Mark Bastasch, Principal Acoustical Engineer at Jacobs, will be available to provide testimony regarding sound and noise impacts of the Project and regarding SAR Exhibit G (Sound Assessment). Mr. Bastasch can also provide testimony relative to sound-related topics as contained in Applicant's responses to Board Data Requests and the Consultant's Report.

Each above-listed witness can also provide testimony regarding data request responses and proposed mitigating measures in their listed subject areas.

Attached hereto are the curriculum vitae of Bright Mountain's third-party expert witnesses, Sean Hollowell and Mark Bastasch.

Respectfully submitted,



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Counsel for Bright Mountain Solar, LLC



Sean Hollowell is a Project Manager, Environmental, with a background in environmental geography and geospatial data. Sean graduated from Ohio University with a Bachelor of Arts in Environmental Studies, a Bachelor of Arts in Geography, a minor in Spanish, and a certificate in Geographic Information Science. His thesis project examined the relationship between social vulnerability to wildfire and the wildland-urban interface. Sean also has experience working on environmental research in Ohio and providing geospatial support for a variety of projects. As a Senior Environmental Analyst, Sean assists with the preparation of permit applications for renewable energy projects in the Midwest, including to the Ohio Power Siting Board (OPSB). Sean's contributions include economic impact analyses and related socioeconomic impact reports, technical research and writing, report preparation, geospatial analysis, and mapping. Sean works with other environmental professionals, GIS and visualization specialists, landscape architects, engineers, and planners.

Education

- Bachelor of Arts, Double Major Geography and Environmental Studies, Ohio University, Honors Tutorial College, Athens, OH, 2021

Certifications

- Certificate in Geographic Information Science, Ohio University
- FAA Part 107 Remote Pilot License (Small UAG, 2022)

Employment History

- Project Manager, Environmental, Environmental Design & Research, Landscape Architecture, Engineering & Environmental Services, D.P.C., Columbus, OH, Jan. 2024 - Present
- Senior Environmental Analyst, EDR, Columbus, OH, Jan. 2022 - 2023
- Environmental Analyst, EDR, Columbus, OH, May - Dec. 2021
- Research Assistant, Sustainable Land and Water Resources REU, Salish Kootenai College, Pablo, Montana, 2020
- Research Assistant, Climate Policy and Resilience, Voinovich School of Leadership and Public Service, Athens, Ohio, 2019 - 2020
- GIS Technician, Voinovich School of Leadership and Public Service, Athens, Ohio, 2018 - 2019

Project Experience

Bright Mountain Solar, Perry County, KY - Lead preparation of the application for construction certificate to the Kentucky State Board on Electric Generation and Transmission Siting. Conducted socioeconomic analysis and prepared the subsequent report for this solar facility proposed to be located on the former site of a surface coal mine.

Mink Solar, Defiance, and Paulding Counties, OH - Conducted socioeconomic analysis and prepared the subsequent Socioeconomic Report for inclusion with the OPSB Certificate Application.

Springwater Solar, Franklin, and Madison Counties, OH - Conducted socioeconomic analysis and prepared the subsequent Socioeconomic Report for inclusion with the OPSB Certificate Application. Assisted with the preparation of OPSB Certificate Application for this 155 MW project.

Powell Creek Solar, Putnam County, OH - Assisted with the preparation and submission of the Amendment to the OPSB Certificate Application. Also provided GIS support for post-Certificate Application filing tasks, conducted technical review of GIS datasets, and created maps and figures in support of the Certificate Application. Assisted with permit compliance leading up to and following the start of construction for the project.

Chipmunk Solar, Pickaway County, OH - Conducted socioeconomic analysis and prepared the subsequent report for inclusion with the OPSB Certificate Application. Prepared figures and wrote portions of the Certificate Application. Provided GIS and on-site field support for the Certificate Application.

Flint Grid Battery Storage, Licking County, OH - Conducted socioeconomic analysis and prepared the subsequent report. Prepared figures and wrote portions of the Certificate Application. Provided GIS support for the Certificate Application.

Circleville Solar, Pickaway County, OH - Conducted socioeconomic analysis and prepared the subsequent report for inclusion with the OPSB Certificate Application. Provided expert testimony in the hearing to support the socioeconomic report.

Wild Grains Solar, Van Wert County, OH - Researched and wrote portions of the OPSB Certificate Application, including assembling all GIS data and preparing figures. Conducted socioeconomic analysis and prepared the subsequent report. Assisted with data collection in the field and conducted impact analyses.

Dixon Run Solar, Jackson County, OH - Conducted socioeconomic analysis and prepared the subsequent report for inclusion with the OPSB Certificate Application. Prepared figures and wrote portions of the Certificate Application. Provided GIS and on-site field support for the Certificate Application.

Cepheus Solar, Defiance County, OH - Wrote and edited portions of the socioeconomic report, including preparing figures, making calculations, and performing the JEDI model analysis. Conducted a new JEDI model analysis for an update to the report. Provided GIS support for the Certificate Application.

Harvey Solar, Licking County, OH - Collected and assembled GIS data for use in the OPSB Certificate Application. Researched and wrote portions of the Certificate Application and prepared figures.

Tymochtee Solar, Wyandot County, OH - Researched local wind speeds, conducted wind velocity analysis, and assisted with assembling responses to OPSB staff data requests.

Dodson Creek Solar, Highland County, OH - Reviewed Certificate Application and provided edits before final submission to OPSB.

Wetland Conservation Education Program, Flathead Reservation, MT - Developed ArcGIS Online Story Maps and other web applications to showcase wetland conservation programs on the Flathead Reservation.

Tax Parcel Redrawing, Columbiana County, OH - Assisted in digitizing updated tax parcel boundaries using archived reference maps for Columbiana County.

Mark Bastasch, P.E., INCE Bd. Cert.

PRINCIPAL ACOUSTICAL ENGINEER/PROJECT MANAGER

Education

M.S., Environmental Engineering, William Marsh Rice University, Houston, Texas, 1997

B.S. (cum laude), Environmental Engineering, Cal Poly San Luis Obispo, California, 1994

Professional Registrations

Professional Acoustical Engineer: Oregon (No. 58990AC)

Professional Environmental Engineer: Oregon (No. 58990EN)

Professional Civil Engineer: Oregon (No. 58990PE)

Board Certified, Institute of Noise Control Engineering (INCE Bd. Cert.)

Memberships and Affiliations

Institute of Noise Control Engineering

Acoustical Society of America

International Wind Turbine Noise Conference, Organizer

US National Committee Technical Advisory Group (TAG) to the TC88, IEC 61400 Wind Turbines Sound Standard Working Group

US TAG TC43/SC1 representative of ISO/TC 43/SC 1/WG 6 (ISO 9613-2)

Acoustical Society of America Wind Turbine Standard Working Group

IEA Wind Task 39: Quiet Wind Turbine Technology Participant

American Wind Energy Association (AWEA)/CanWEA Expert Panel on Wind Turbine Sounds, Organizer

Areas of Expertise

- Specializes in sound measurements, modeling, and control for power, energy, industrial, and transportation clients.
- Appointed by Oregon State Board of Examiners for Engineering and Land Surveyors to develop and grade the Professional Engineering (P.E.) exam in Acoustics. Oregon was the only state to issue a P.E. in Acoustics.
- Has prepared acoustical analyses and expert testimony for more than 15,000 megawatts (MW) from gas-fired power facilities and more than 5,000 MW from wind generation facilities.
- Experienced in analyzing sound levels for no-build and build alternatives; supporting feasibility, design, and siting analyses of industrial, high-tech, and data center facilities; and preparing sound and vibration impact assessment reports.

Relevant Experience

Mark has more than 20 years of experience conducting acoustical evaluations and working with multimedia environmental permitting and design teams. Mark is one of approximately 20 individuals nationwide who holds an Acoustical P.E. and is also Board Certified by the Institute of Noise Control Engineering. His acoustical permitting and design experience extends throughout the United States power and infrastructure sectors, and he has supported multiple domestic and international design and engineer, procure, construct (EPC) efforts in full compliance with applicable regulatory limits. Internationally, he served as lead acoustical consultant on Australia's largest coal seam, gas-fueled, air-cooled, combined-cycle power plant and domestically on Power Engineering's Best Gas-fired Project for 2013 (the Empire Generating Project in Rensselaer, New York).

Mark's work on wind energy has been cited by officials from Oregon to Maine. He was acknowledged by the Oregon Health Authority for providing technical input to their "Strategic Health Impact Assessment on Oregon Wind Energy Developments" and has been an invited speaker to organizations such as the Consensus Building Institute, Midwest Energy Bar Association, Law Seminars International, the U.S. Department of Energy's (USDOE) Wind Powering America, the International Energy Agency/USDOE National Renewable Energy Laboratory, National Wind Coordinating Council, American Wind Energy Association, and USDOE's New England Wind Energy Education Project, in addition to speaking at international conferences.

Representative Projects

Project Manager and Lead Acoustical Engineer; Prevailing Wind Project; Confidential Client; South Dakota. Led the compliance monitoring at intervenor locations consistent with permit requirements. Report was accepted by SDPUC, whose reviewer noted it was "executed to the highest professional standards" and that the team went "above and beyond."

Project Manager and Lead Acoustical Engineer; Confidential Client; Southern United States. Led the preliminary acoustical analysis, development of sound contour figures, and drafted permit conditions for this proposed solar facility to support tight public hearing schedule. Proposed permit conditions were accepted without modification.

Lead Acoustical Engineer; Madras Solar Energy Facility, Confidential Client; Oregon. In addition to completing Exhibit X (Noise) of the December 2019 Application for Site Certificate to the Oregon Energy Facility Siting Council (EFSC) for this solar and battery storage facility, led the ambient monitoring and predictive sound modeling that enabled the project's Site Certificate to be issued in the summer of 2021.

Lead Acoustical Engineer; Roundhouse Wind Project; Confidential Client; Wyoming. Acoustical and permitting support during the permitting of this 300-MW wind energy project. Phase I included 82 turbines (225 MW) and a 19-mile-long, 230-kilovolt transmission line. Provided predictive sound modeling and support for all necessary state and local permits, including public involvement activities and expert testimony at state and county hearings.

Lead Acoustical Engineer; Boardman Solar Energy Facility; Confidential Client; Oregon. Acoustical and permitting support for the 800-acre, 75-MW Boardman Solar Energy Facility. Tasks included preparation of Exhibits X (Noise) and AA (Electric Transmission Line) of an Application for Site Certificate to EFSC. Original scope included an analysis of ambient sound and predictive modeling; however, we developed an approach that allowed us to successfully avoid ambient monitoring/fieldwork, which saved the client money. A Site Certificate was granted for the project on February 23, 2018.

Project Manager and Lead Acoustical Engineer; Confidential Project. Led the preparation of acoustical and shadow flicker analysis and participated in strategy development, prepared written testimony, in-person expert testimony and public hearing support in coordination with permitting staff and legal counsel.

Lead Acoustical Engineer; Multiple Projects, IL. Provided comprehensive acoustical permitting services related to siting and licensing process for wind and solar projects. Tasks included modeling of proposed and amended projects, preparation of regulatory filings, assistance with expert testimony and evaluation of potential equipment.

Lead Acoustical Engineer; South Fork Wind Farm; Confidential Client; Offshore Massachusetts, Rhode Island, and New York. Subject matter expert on sound evaluations and documentation. Conducted senior technical review of sound-related impact analysis focusing on in-air sound from the proposed construction and operation activities.

Acoustical and Shadow Flicker Analysis, Confidential Wind Project. Provide acoustical and shadow flicker analysis to support the repowering of this existing wind project and subsequent permit filings.

Acoustical and Shadow Flicker Due Diligence Review, Confidential Project. Provided comprehensive review of acoustical and shadow flicker studies and permit conditions to support client's evaluation of a permitted wind project.

Lead Acoustical Engineer; Confidential Project; MN. Provided acoustical evaluation including development of sound monitoring protocol for State review and approval, subsequent operational sound monitoring and regulatory filing for this 150-MW wind project.

Lead Acoustical Engineer; Confidential Project; IL. Provided comprehensive acoustical permitting services related to siting and licensing process for this 300-MW wind project. Tasks included modeling of proposed and amended projects, preparation of regulatory filings and expert testimony.

Lead Acoustical Engineer; Confidential Project; OH. Provided comprehensive acoustical permitting services related to Ohio Power Siting Boards siting and licensing process for this 300-MW wind project. Tasks included collection and evaluation of ambient sound level information, modeling of proposed and amended projects, preparation of regulatory filings and multiple regulatory meetings.

Senior Technical Consultant; North Sky River Wind Energy Facility; Confidential Client; Kern County; California. Provided technical analysis and review to support the acoustical analysis and permitting of the development of a 250-MW wind project.

Lead Acoustical Engineer; Multiple Projects; Confidential Client; Contra Costa and Alameda Counties, California. Responsible for supporting acoustical analysis and associated related regulatory submittals for NextEra Energy Resources (NextEra) on the repowering of the Altamont Wind Resource Area in the Eastern Bay Area.

Lead Acoustical Engineer; Rising Tree Wind Energy Project; Confidential Client; Kern County, California. Prepared acoustical analysis and associated regulatory filings to support an up-to-200-MW wind energy facility in Kern County comprising Rising Tree Wind Energy and Addison Energy Wind Projects. Projects required Environmental Impact Reports and Conditional Use Permits from Kern County Planning Department.

Lead Acoustical Engineer, Glenrock - Rolling Hills Wind Energy Project; Converse County, Wyoming. Prepared acoustical analysis to support the successful ISA permit prepared for the Glenrock-Rolling Hills 237-MW wind farm project.

Lead Acoustical Engineer; Confidential Project; California. Provided comprehensive acoustical permitting services consistent with local and California Environmental Quality Act requirements. Tasks included collection and evaluation of ambient sound level information, modeling of proposed and amended projects, preparation of regulatory filings.

Lead Acoustical Engineer; Wind Project; Confidential Client; SD. Provided technical assistance including acoustical modeling related to layout development and permitting of proposed wind project.

Acoustical Lead, Wild Horse Wind Energy Project, Kittitas County, Washington. Acoustical technical lead for Horizon Wind Energy (formally Zilkha Renewable Energy) application to the Washington ESFEC for the 140-turbine project.

Acoustical Lead, Kittitas Valley, Central Washington. Acoustical technical lead for the successful filing of an application to the Washington Energy Facility Site Evaluation Council for a 121-turbine wind energy project.

Acoustical Engineer; Empire Generating Project; Rensselaer, New York. Comprehensive acoustical analysis, design, specification, and compliance assessment of the new 535-MW combined-cycle Empire Generating Plant) engineered and constructed by us. The project, formerly known as BESI Corp, was named the Best Gas-Fired Project by Power Engineering in 2013. The project underwent extensive permitting under New York's Article X, which required detailed analysis during the bid, design, construction, and compliance phases undertaken by us.

Lead Acoustical Engineer; Troutdale Energy Center; Confidential Client; City of Troutdale, Oregon. Provided technical analysis and prepared Exhibit X (Noise) for the project's EFSC Application for Site Certificate exhibits and developed the preliminary Draft Proposed Order for a 650-MW, natural gas-fired power plant project including both combined-cycle and simple-cycle turbines and associated 3-mile transmission line in urban Troutdale. Provided subsequent expert witness support and testimony to support contested case proceeding.

Representative Publications and Presentations

"Developing an American (ANSI) standard for the prediction of wind turbine sound levels" InterNoise. August 2022.

"Hot Topics in Acoustics." InterNoise. August 2021.

"Regulating and predicting wind turbine sound in the U.S." Kaliski, Bastasch and O'Neal. InterNoise. August 2018.

Moderator, Conference Organizer, and Instructor "Introduction to Acoustics" at INCE-Europe Wind Turbine Noise 2017. Rotterdam, Netherlands. May 2017.

Plenary Speaker. Acoustics 2016. "Wind Turbine Sound: Past, Present and Future" Brisbane, Australia. November 2016.

Wind Turbine Noise Topic Organizer. InterNoise 2014. Melbourne, Australia. November 2014.

Instructor: "Introduction to Acoustics" INCE-Europe Wind Turbine Noise 2013. Denver, Colorado. August 27, 2013.

"Criteria." *Wind Turbine Noise*. Bowdler & Leventhall, editors. Multi-Science Publishing Co. Ltd. ISBN 978-1-907132-30-8. January 2012.

"AWEA/CanWEA Expert Sound Panel and Wind Turbine Sound Regulations." University of Tokyo, Tokyo, Japan. September 12, 2011.

"Wind Turbine Sound." Consensus Building Institute Workshop of Facilitating Wind Energy Siting, Harvard Law School, Cambridge, MA, March 23-25, 2011.

"Wind Turbine Sound and Health – An Expert Panel Review." American Wind Energy Association, Windpower 2010, Dallas, TX, May 24-27, 2011.

"Wind Turbine Noise." American Wind Energy Association Wind Power Project Siting Workshop, Milwaukee, WI, February 28 – March 2, 2007.

"Wind Turbine Noise – An Overview." Bastasch, M., et al. Journal of the Canadian Acoustical Association. June 2006. Vol. 34 No. 2.