

BYRON SOLAR, LLC

MINNESOTA PUBLIC UTILITIES COMMISSION

MPUC DOCKET NOS. IP-7041/ GS-20-763, CN-20-764, TL-20-765
OAH DOCKET NO. 82-2500-38038

DIRECT TESTIMONY OF SCOTT WENTZELL

OCTOBER 11, 2022

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II. OVERVIEW

Q. What is the purpose of your Direct Testimony?

A. The purpose of my testimony is to: (1) provide an overview of the Project, including layout and facility design, site and route selection, and stakeholder outreach; (2) discuss Byron Solar’s analysis of the route alternative under consideration; (4) provide Byron Solar’s comments on the Environmental Assessment (“EA”) prepared by the Department of Commerce, Energy Environmental Review and Analysis (“DOC-EERA”) for the Project; and (5) provide Byron Solar’s comments on the Draft Site Permit (“DSP”) and Draft Route Permit (“DRP”).

The information I reference regarding the Project is primarily described in Byron Solar’s Certificate of Need Application (“CN Application”) submitted on August 27, 2021 and Joint Application for a Site Permit and Route Permit (“Joint SP/RP Application”) submitted on August 30, 2021 (together, the “Applications”).

Q. What sections of the Applications are you sponsoring?

A. I am sponsoring the entire CN Application and the entire Joint SP/RP Application.

III. UPDATES TO APPLICATIONS

Q. Have there been any updates to the Applications?

A. Yes. As noted in its February 15, 2022 scoping comments, Byron Solar made a minor change to the collection line route in one area, which is reflected in the updated Maps 1-15 filed with those comments. This minor change results in an adjustment to the Project Area from 1,846.33 acres to 1,847.97 acres.

57 **IV. PROJECT DESCRIPTION & DEVELOPMENT HISTORY**

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Q. Please describe the Project.

A. The Project is proposed to be an up to 200 MW PV solar energy generating facility and associated facilities and a 345 kV high voltage transmission line and associated facilities to be located in Dodge County and Olmsted County, Minnesota.

Q. Why did Byron Solar choose the Project Area as presented in the Applications to build the Project?

A. Byron Solar selected the proposed Project Area due to minimal impact to natural and cultural resources, proximity to the electrical grid and existing transmission infrastructure, strong solar resource, willing landowners, and consistency with existing land uses and local zoning. The Project offers an opportunity to maximize the economic attributes that benefit the local community and deliver an overall cost-competitive energy project.

Q. Please describe the proposed Transmission Line.

A. The proposed Transmission Line will consist of approximately three miles of 345 kV transmission line beginning at the Project substation then traveling generally north and east for approximately three miles to connect to the existing Southern Minnesota Municipal Power Agency (“SMMPA”) Byron Substation in Olmsted County. The Transmission Line will be single-circuit and will use weathering steel monopoles (poles or structures) that generally range in height from 90 feet to 170 feet tall.

Q. Why is the Transmission Line needed?

A. The Transmission Line is needed to interconnect the Solar Facility to the electric grid.

87 **Q. Where will the Project interconnect to the grid?**

88 A. The Project would interconnect to the electrical grid at the existing SMMPA Byron
89 Substation in Olmsted County, Minnesota.

90

91 **Q. What is the status of executing a Generator Interconnection Agreement**
92 **(“GIA”) for the Project?**

93 A. Byron Solar signed a GIA with the Midcontinent Independent System Operator
94 (“MISO”) for the first 100 MW of the Project (queue position J1124), effective date
95 November 24, 2021.

96

97 The remaining 100 MW of the Project are in the Definitive Planning Phase (“DPP”)
98 2020 cycle (queue position J1534). The MISO DPP schedule currently anticipates
99 a GIA execution in April 2023.

100

101 **Q. Has the anticipated schedule for the construction and in-service of the**
102 **Project changed from what was contemplated in the Applications?**

103 A. Yes. As stated in the Joint SP/RP Application, Byron Solar planned to commence
104 construction in late 2023, with operations commencing prior to the end of 2024.
105 However, due to the delays in the permit and interconnection schedules,
106 construction is now anticipated to start in the Third or Fourth Quarter of 2024, with
107 an in-service date in the Fourth Quarter of 2025.

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109 **V. ROUTE DEVELOPMENT AND ALTERNATIVES ANALYSIS**

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111 **Q. In the Applications, Byron Solar identified a proposed route for the**
112 **Transmission Line to connect the Project substation and the existing Byron**
113 **Substation. Is that identified as the Blue Route in the EA?**

114 A. Yes. As noted above, the proposed Blue Route begins at the proposed Project
115 substation located just south of U.S. Highway 14 near 640th St/265th Ave in Dodge
116 County, then travels generally north and east for approximately three miles to
117 connect to the existing SMMPA Byron Substation in Olmsted County. Byron Solar

118 has acquired a 150-foot-wide permanent right-of-way along the Blue Route. Byron
119 Solar has secured 100 percent of the total necessary private easements from
120 landowners for the 52.7 acres of right-of-way required for the Blue Route.

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122 **Q. Please describe the substation site associated with Byron Solar’s proposed**
123 **Route (Blue Route).**

124 A. Byron Solar’s preferred location for the Project substation (as identified in the
125 Applications) is just south of U.S. Highway 14 near 640th St/265th Ave in Dodge
126 County. Byron Solar maintains an option to purchase four to six acres of land
127 where the proposed Project substation will be built.

128
129 **Q. Please describe Byron Solar’s route development process for the**
130 **Transmission Line.**

131 A. When developing the proposed route (Blue Route) for the Transmission Line,
132 Byron Solar analyzed potential routes traveling between the Solar Facility and the
133 existing Byron Substation. As described in the Joint SP/RP Application and Byron
134 Solar’s March 9, 2022 reply comments, several alternative routes were considered
135 but were not feasible due to existing lease agreements held by Dodge County
136 Wind, LLC as well as other encumbrances. Given the land encumbrances, Byron
137 Solar identified an area north of the Solar Facility for routing the Transmission Line.
138 This area takes advantage of parcels that are available north of U.S. Highway 14
139 and west of the Byron Substation, and landowners willing to sign easement
140 agreements to route the Transmission Line through this area.

141
142 In developing the Blue Route, Byron Solar undertook to analyze a number of
143 human and environmental factors to identify a route that best meets the
144 Commission’s routing criteria. The Blue Route is designed to avoid or minimize
145 impacts on residences, the environment, and other sensitive resources. The Blue
146 Route parallels existing transmission and railroad rights-of-way for about one mile
147 and follows field lines for remaining portions of the route. The Blue Route takes
148 into consideration comments and requests from individual landowners.

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Q. The EA includes an analysis of an alternative route (the “Red Route”) and associated alternative substation location. Have you reviewed these alternatives?

A. Yes.

Q. Please describe the substation site associated with the Red Route.

A. If the Red Route is selected, the Project substation would be located in the southeastern portion of the Project Area, in Section 13 of Canisteo Township.

Q. Please describe the Red Route.

A. The Red Route is approximately 4.5 miles long and begins at the alternative substation location in Section 13 of Canisteo Township, traveling east for approximately 0.4 miles, before turning north for approximately three miles, then jogging northwest just south of US Highway 14 for approximately 0.25 miles before proceeding north for approximately 0.6 miles to join with the last 0.25 miles of the Blue Route to enter the Byron Substation from the north.

Q. Does Byron Solar support the Red Route and associated alternative substation site?

A. No. Byron Solar does not support these alternatives because the Red Route is longer than the Blue Route, costlier than the Blue Route, and would result in greater human and environmental impacts.

Q. If the Red Route is selected, how long would the Transmission Line route be?

A. The route would be approximately 4.5 miles long (as compared to the Blue Route’s three-mile length).

178 **Q. What is the estimated cost of the Red Route alternative?**

179 A. The increased length of the Red Route and additional collection lines required for
180 the alternative substation location would result in higher electrical losses and
181 additional capital costs. Specifically, the Project would lose 0.07 percent more
182 energy through these longer collection lines and the longer transmission line. The
183 Red Route alternative would cost approximately \$6.1 million (\$3.2 million more
184 than the estimated cost of the Blue Route). See EA at 32. Accordingly, the Red
185 Route would result in lower energy produced while having similar or greater
186 impacts on surrounding properties. The additional electrical losses conservatively
187 represent in excess of \$650,000 in lost revenue over the life of the Project (in
188 today's dollars).

189
190 **Q. How does the Red Route differ from the Blue Route in terms of human and
191 environmental impacts?**

192 A. The Red Route is approximately 1.5 miles longer than Byron Solar's preferred Blue
193 Route and presents human and environmental impacts that are similar and/or
194 greater than the Blue Route. See, e.g., EA at 14-16. For example, as discussed
195 in the EA, the Red Route:

- 196 • Would require more tree clearing. EA at 88, 93.
- 197 • Is located in proximity to identified active karst features, meaning
198 construction of the alternate substation location and transmission
199 structures in the southern-most area of the Red Route has an
200 increased potential for groundwater contamination. EA at 83.
- 201 • Crosses two platted commercial properties near the Byron
202 Substation, which may make the parcels more difficult to develop.
203 EA at 15, 53.
- 204 • Crosses more wetland areas (4.7 acres) (compared to the Blue
205 Route crossing approximately 0.7 acres). EA at 91.
- 206 • Is located closer to the nearest residence (250 feet). EA at 48.

207 Overall, the Red Route presents no specific benefits as compared to the Blue
208 Route and, for some resources, increases potential impacts.

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Q. Has Byron Solar attempted to obtain land rights from the landowners along the Red Route?

A. As discussed in Byron Solar’s Joint SP/RP Application and its March 9, 2022 reply comments, early in the development process Byron Solar evaluated an alternative route segment (route segment 1) which included a portion of the Red Route. Byron Solar rejected this route segment because it is not feasible due to existing lease agreements along the existing transmission line held by Dodge County Wind, LLC. While all but one of the Dodge County Wind, LLC options along this route have expired, there are also other encumbrances on the land adjacent to the Red Route and in the broader area. Further, regardless of whether the options have expired, it is not guaranteed that Byron Solar would be able to secure the additional leases. Additionally, Byron Solar has met with landowners along the Red Route and learned from those conversations that land along the Red Route is under lease with a different solar project. These encumbrances make it unlikely that Byron Solar could obtain the necessary land rights to construct along the Red Route.

Byron Solar’s proposed Blue Route was voluntarily negotiated with landowners and already follows existing railroad and transmission rights-of-way to the extent practicable.

Q. Based on the information in this record, which route best meets the Commission’s routing criteria (Minn. R. 7850.4100)?

A. Byron Solar’s proposed route (the Blue Route) best meets the Commission’s routing criteria. As illustrated in the Applications and the EA and discussed in my testimony, the Blue Route represents Byron Solar’s effort to identify a route that parallels existing transmission and railroad rights-of-way, follows field lines, avoids residences, minimizes impacts on the environment and affected landowners, and for which Byron Solar has voluntary easements. The Blue Route takes into consideration comments and requests from individual landowners to minimize

239 impacts on their individual parcels. As such, the Blue Route best satisfies the
240 Commission's routing criteria.

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242 VI. ENVIRONMENTAL ASSESSMENT

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244 **Q. Have you reviewed the EA filed by DOC-EERA on September 22, 2022?**

245 A. Yes.

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247 **Q. Do you have any comments concerning the mitigation measures discussed**
248 **in the EA and addressed in the DSP and/or DRP?**

249 A. Yes. The EA discusses a number of mitigation measures Byron Solar has already
250 agreed to and/or incorporated into the design of the Project. For example:

251 • The EA discusses mitigation/minimization measures for aesthetic
252 impacts, such as through shielding the facilities from view by terrain
253 or vegetation. EA at 49-50.

254 ✓ As discussed in depth in the Joint SP/RP Application, Byron
255 Solar has considered the existing landscape and screening
256 (e.g., vegetation) when siting the Project. Additionally, as
257 acknowledged in the EA, Byron Solar completed a glare
258 analysis (included as Appendix F to the EA). Byron Solar also
259 coordinated with adjacent landowners and included a
260 proposed screening plan with the Joint SP/RP Application.

261 • The EA discusses minimizing impacts to land use and zoning
262 through preservation of agricultural land. The EA references several
263 conditions in the DSP/DRP that address preservation of agricultural
264 land, such as the requirement to develop a Vegetation Management
265 Plan ("VMP") (DSP Section 4.3.17), an Agricultural Impact Mitigation
266 Plan ("AIMP") (DSP Section 4.3.18), and a decommissioning plan
267 focused on returning the site to agricultural use at the end of the
268 Project's useful life (DSP Section 9.1). EA at 53-54.

269 ✓ As noted in the EA, Byron Solar has already submitted a draft
270 VMP, draft AIMP, and draft decommissioning plan.

271 ✓ As discussed in the Applications, normal agricultural activities
272 can continue within portions of the Project not converted to
273 solar panels, access roads, and fencing. Joint SP/RP
274 Application at 86. Additionally, after the useful life of the Solar

275 Facility, the current agricultural land use could be restored by
276 removing the Project components as outlined in Section 5.4
277 of the Joint SP/RP Application and the draft decommissioning
278 plan.

279 • The EA discusses mitigation of noise impacts through compliance
280 with the Minnesota noise standards (Minnesota Rules 7030.0010 –
281 7030.0080) and limiting construction and maintenance activities to
282 daytime hours to the extent practicable. EA at 57; see also DSP
283 Section 4.3.7 and DRP Section 5.3.5.

284 ✓ Byron Solar analyzed noise impacts in the Applications. As
285 discussed in the Applications, Byron Solar will limit
286 construction and maintenance activities to daytime hours to
287 the extent practicable. The Project is expected to comply with
288 the Minnesota noise standards.

289 • Snowmobile Trail 302 passes through the Solar Facility site and will
290 need to be re-routed around the site. EA at 59.

291 ✓ As the EA acknowledges, Byron Solar is coordinating with the
292 local snowmobile association to relocate Snowmobile Trail
293 302 outside of the Solar Facility.

294 • The EA discusses mitigating potential impacts to transportation by
295 obtaining necessary permits from and coordinating with the
296 appropriate road authorities. EA at 62. The EA also noted that the
297 task force recommended that the Solar Facility be set back a
298 sufficient distance to allow agricultural equipment to pass on local
299 roadways. EA at 78; see also DSP Section 4.3.22 and DRP Section
300 5.3.13 (addressing road-related mitigation measures).

301 ✓ As discussed in the Applications, Byron Solar will obtain
302 necessary road-related permits from the appropriate road
303 authority and will coordinate as required by the DSP and DRP.

304 ✓ The Project is designed with a 50-foot setback from road
305 centerline to nearest solar array.

306 • The EA discusses multiple mitigation measures related to public
307 safety, such as design and construction of the Project in compliance
308 with applicable electric codes, following industry standard safety
309 procedures during and after construction, and fences to prevent
310 unauthorized access. See EA at 62-63, 74.

- 311 ✓ The Transmission Line will be designed to meet the minimum
312 requirements as set forth by the National Electric Safety Code.
313 Joint SP/RP Application at 15.
- 314 ✓ As stated in the Applications, construction will comply with
315 local, state, and federal regulations regarding installation of
316 the Project facilities and standard construction practices.
317 Further, established industry safety procedures will be
318 followed during and after construction of the Project; these
319 include clear signage during all construction activities and
320 fencing of Project facilities to prevent public access. Joint
321 SP/RP Application at 51.
- 322 ✓ Byron Solar has also committed to developing an emergency
323 response plan that outlines local contacts (first responders
324 and internal operation and maintenance staff) and emergency
325 procedures for evacuation, fire response, extreme weather,
326 injury, and criminal behavior. Joint SP/RP Application at 51.
- 327 • The EA discusses mitigation measures related to the presence of
328 karst in the Project Area, including following best management
329 practices for construction in karst areas and stormwater
330 management and avoiding construction activity and placement of
331 Project infrastructure within at least 150 feet of documented active
332 karst features. EA at 85.
- 333 ✓ Byron Solar has committed to avoiding construction activity
334 and locating of Project facilities within a 100-150-foot buffer
335 around karst features. The Project as proposed by Byron
336 Solar (including the Blue Route) complies with the 150-foot
337 buffer around active karst features. However, as noted
338 above, due to the Red Route’s proximity to identified active
339 karst features, construction of the alternate substation
340 location and transmission structures in the southern-most
341 area of the Red Route has an increased potential for
342 groundwater contamination. See EA at 83.
- 343 **Q. The EA states that “Section 9.2 requires removal of all project-related**
344 **infrastructure. This condition is consistent with Dodge County’s**
345 **performance standard and is more restrictive than the removal of facilities**
346 **to a depth of 48 inches as described in the applicant’s draft**
347 **decommissioning plan.” EA at 54. What is your response?**

348 A. While the language of Section 9.2 of the DSP does not reference a depth of
349 removal limitation, decommissioning and restoration measures are governed by
350 the “most recently filed and accepted decommissioning plan”. See DSP Section
351 9.1. Byron Solar’s draft decommissioning plan provides that all underground
352 cables and conduits will be removed to a depth of four feet as specified in the lease
353 agreements; facilities deeper than 48 inches may remain in place to limit
354 vegetation and surface disturbance. Byron Solar’s draft decommissioning plan
355 was prepared in accordance with DOC-EERA’s Recommendations on Review of
356 Solar and Wind Decommissioning Plans.¹ In addition to being the industry
357 standard and included in other recent decommissioning plans for wind and solar
358 facilities reviewed by the Commission,² the 48-inch depth of removal limitation
359 results in less impacts and is consistent with lease agreements with landowners.
360 Leaving facilities deeper than 48 inches in place limits vegetation and surface
361 disturbance and reduces the risk of mixing topsoil and subsurface soils. Leaving
362 cables deeper than 48 inches in place will not impact future farming operations –

¹ DOC-EERA Recommendations on Review of Solar and Wind Decommissioning Plans, Docket No. E-999/M-17-123).

² *In the Matter of the Application of Red Rock Solar, LLC for a Site Permit for the up to 60-MW Red Rock Solar Project in Cottonwood County*, Site Permit Application Appendix D (Decommissioning Plan), MPUC Docket No. IP7014/GS-19-620 (eDocket No. [202011-168174-10](#)); *In the Matter of the Application of Xcel Energy for a Site Permit for the up to 460 MW Sherco Solar Project in Sherburne County*, Site Permit Application Appendix H (Decommissioning Plan), MPUC Docket No. E-002/GS-21-191 (eDocket No. [20214-173142-01](#)); *In the Matter of the Application of Plum Creek Wind Farm, LLC for a Site Permit to Construct a 414 MW Large Wind Energy Conversion System in Cottonwood, Murray and Redwood Counties, Minnesota*, Supplemental and Amended Site Permit Application, Appendix H (Revised Decommissioning Plan) (eDocket No. [20208-166258-10](#)); *In the Matter of the Application for a Site Permit Amendment to Decommission the Existing Chanarambie and Viking Wind Facilities and Construct the 120-Megawatt Northern Wind Facility in Murray County, Minnesota*, Compliance Filing (Decommissioning Plan), MPUC Docket No. IP7046/WS-20-860, (eDocket No. [20224-184435-04](#)); see also Site Permit for a Large Wind Energy Conversion System, MPUC Docket No. IP7013/WS-19-619 (eDocket No. [20229-189351-09](#)) (Section 11.2 specifying removal to a depth of four feet).

363 in fact, removing such facilities would be likely to have a more significant impact
364 on future farming operations due to the potential for soil mixing, compaction and
365 overall disturbance. The cables that would remain in the ground are not energized
366 and there are no safety concerns. Further, the 48-inch depth of removal limitation
367 is consistent with Byron Solar’s leases with landowners, who could have
368 negotiated removal regardless of depth but chose not to do so. Finally, without
369 this depth of removal limitation, decommissioning and restoration would take
370 considerably longer and be significantly more expensive.

371
372 Byron Solar’s proposed change to Section 9.2 of the DSP to reflect these
373 comments is provided below.

374
375 **Q. The EA also notes that “The permit condition [Section 9.1] does not**
376 **prescribe what financial assurance instruments [c]an be used to ensure that**
377 **decommissioning funds are available; Dodge County limits financial**
378 **assurance instruments to secure decommissioning costs to performance**
379 **bonds or cash escrow, while the draft decommissioning plan describes a**
380 **wider range of financial assurance options.” EA at 54. What is your**
381 **response?**

382 A. As acknowledged by the EA, Section 9.1 of the DSP does not limit the type of
383 financial assurance that may be used, thereby recognizing the need for flexibility.
384 Byron Solar agrees that no changes to Section 9.1 are warranted.

385
386 **VII. DRAFT SITE PERMIT**

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388 **Q. Have you reviewed the DSP attached as Appendix C to the EA filed by DOC-**
389 **EERA on September 22, 2022?**

390 A. Yes.

391
392 **Q. Do you have any comments concerning the DSP?**

393 A. Yes.

394

395 **Q. Section 4.3.8 of the DSP requires in part that the permittee consider input**
396 **pertaining to visual impacts from landowners and land management**
397 **agencies. Do you have any comments?**

398 A. Byron Solar agrees to – and has – considered input pertaining to visual impacts
399 from landowners and adjacent residences. However, the reference to “land
400 management agencies” is vague and unnecessary. Accordingly, the phrase “and
401 land management agencies” should be removed from this condition as follows:

402 The Permittee shall consider input pertaining to visual impacts
403 from landowners ~~and land management agencies~~. The
404 Permittee shall use care to preserve the natural landscape,
405 minimize tree removal and prevent any unnecessary
406 destruction of the natural surroundings in the vicinity of the
407 Project during construction and operation.

408

409 **Q. Section 4.3.31 of the DSP addresses security fencing for the Solar Facility.**
410 **Do you have any comments?**

411 A. Yes. The fencing currently proposed in the Joint SP/RP Application is
412 appropriately protective of wildlife, including deer, and supported by the record.
413 Byron Solar’s proposed fencing was designed in accordance with the Minnesota
414 Department of Natural Resources’ (“MDNR”) 2016 *Guidance for Commercial Solar*
415 *Projects* and appropriately balances visual impacts to neighboring properties with
416 wildlife impacts. Joint SP/RP Application at 132. Byron Solar proposes to modify
417 Section 4.3.31 as follows to be consistent with the condition imposed in the recent
418 Louise Solar docket (Docket No. IP-7039/GS-20-647):

419 The Permittee shall design the security fence surrounding the
420 solar energy generating system to minimize the visual impact
421 of the Project. ~~W~~while maintaining compliance with the
422 National Electric Safety Code, ~~T~~the Permittee shall develop
423 a final fence plan for the specific site that is within the

424 [parameters laid out in the 2016 Commercial Solar Siting](#)
425 [Guidance and is done in coordination](#)e with [EERA and](#) the
426 DNR. ~~to further refine the appropriate fence design, identify~~
427 ~~ways to preclude wildlife entanglement in the security fence,~~
428 ~~and to ensure adequate deer escape technology.~~ The [final](#)
429 [fence plan](#) Permittee shall [be](#) submitted ~~the results of the~~
430 ~~coordination~~ to the Commission as part of the site plan
431 pursuant to Section 8.3.

432
433 These changes are not only consistent with the Commission’s approach in recent
434 dockets, but also provides for a flexible approach that requires Byron Solar to
435 continue working with the MDNR and DOC-EERA to design a fence that suits the
436 needs of the Project while affording due consideration to agency
437 recommendations.

438
439 **Q. Section 9.2 of the DSP pertains to final site restoration. Do you have any**
440 **comments regarding this condition?**

441 A. Yes. As I discussed above, while the language of Section 9.2 of the DSP does not
442 reference a depth of removal limitation, decommissioning and restoration
443 measures are governed by the “most recently filed and accepted decommissioning
444 plan”. See DSP Section 9.1. To eliminate confusion, Byron Solar proposes adding
445 the following language to the first sentence of Section 9.2:

446
447 Upon termination of operation of the Project, the Permittee
448 shall have the obligation to dismantle and remove from the
449 site all solar panels, mounting steel posts and beams,
450 inverters, transformers, overhead and underground cables
451 and lines, foundations, buildings, and ancillary equipment [in](#)
452 [accordance with the most recently filed and accepted](#)
453 [decommissioning plan](#).

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VIII. DRAFT ROUTE PERMIT

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Q. Have you reviewed the Draft Route Permit attached as Appendix D to the EA filed by DOC-EERA on September 22, 2022?

A. Yes.

Q. Do you have any comments concerning the Draft Route Permit?

A. Yes.

Q. Section 5.3.6 of the DRP requires in part that the permittee consider input pertaining to visual impacts from landowners and land management agencies. Do you have any comments?

A. Similar to comments above on the DSP, Byron Solar agrees to consider input pertaining to visual impacts from landowners, but the reference to “land management agencies” is vague. Accordingly, the phrase “and land management agencies” should be removed from this condition as follows:

The Permittee shall consider input pertaining to visual impacts from landowners ~~and land management agencies~~ prior to final location of structures, rights-of-way, and other areas with the potential for visual disturbance. The Permittee shall use care to preserve the natural landscape, minimize tree removal and prevent any unnecessary destruction of the natural surroundings in the vicinity of the Project during construction and maintenance. The Permittee shall work with landowners to locate the high-voltage transmission line to minimize the loss of agricultural land, forest, and wetlands, and to avoid homes and farmsteads. Structures shall be placed at a distance, consistent with sound engineering principles and system reliability criteria, from intersecting roads, highways, or trail crossings.

IX. CONCLUSION

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488 **Q. Does this conclude your Direct Testimony?**

489 A. Yes.

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