

1
2
3 **BEFORE THE**
4 **PUBLIC SERVICE COMMISSION OF WISCONSIN**
5

6
7
8 Application for a Certificate of Public
9 Convenience and Necessity of Grant County
10 Solar, LLC to Construct a Solar Generation
11 Facility, to be Located in Grant County,
12 Wisconsin.

Docket No. 9804-CE-100

14
15 **SURREBUTTAL TESTIMONY OF DANIEL AND CONNIE CRAY**
16
17 **GRANT COUNTY INTERVENORS**
18

19
20 **Q: Please state your name and address.**

21 A: We are Daniel Cray, and Connie Cray, husband and wife, and we live adjacent to the
22 project area at 5491 Lone Elm Road, Potosi, Wisconsin.

23 **Q: Are you the same Crays who submitted Direct and Rebuttal Testimony in this**
24 **docket?**

25 A: Yes, we are.

26 **Q: Is this your Surebuttal, regarding the testimony of other witnesses in this docket?**

27 A: Yes. We'd like to begin with our concerns about impacts of stray voltage on our farm
28 and cattle. Paul Callahan testifies that Grant County Solar is amenable to stray voltage
29 testing and process similar to that of the Two Creeks Order, p. 38, and Point Beach p. 21
30 and 38. However, we do not agree with Callahan's limitation of focus to "Project Site"
31 and expect the PSC's stray voltage condition to require a broader "project area" or
32 "Project Study Area" as was done with the Commission's Order for NextEra's Two

1 Creeks project, because like all impacts, Stray Voltage associated with the project can
2 reach beyond the strict “Project Site” boundaries. See Rebuttal, Grant County Solar-Paul
3 Callahan-7; see Commission Order (selected pps 21-22) Ex.-Grant County Intervenors-
4 Cray-15.

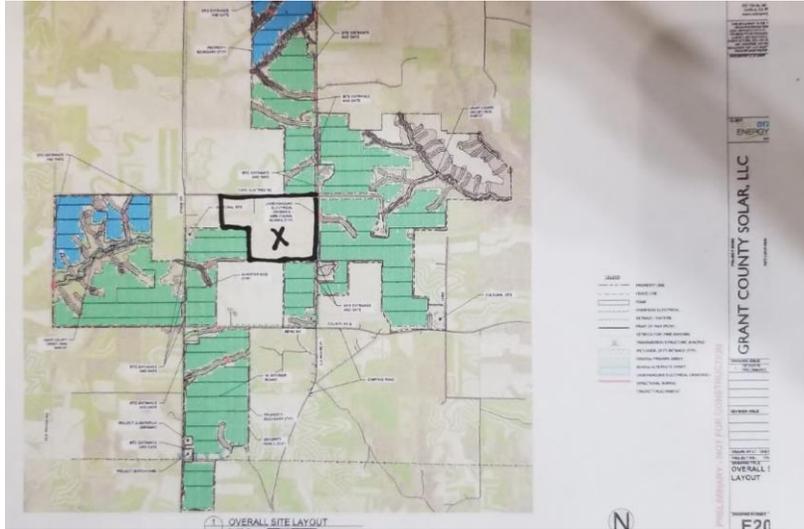
5 **Q: How have the Applicants and DNR addressed your concerns about water?**

6 A: We are particularly concerned about construction and operational impacts on water,
7 particularly stormwater runoff, and intrusion into the existing area system that would
8 affect our farm. Particularly concerning is the Rebuttal testimony of NextEra’s Paul
9 Callahan and Valerie Locker, regarding the DNR’s Tekler regarding waterways,
10 wetlands, and the impact of construction and operation on stormwater drainage into our
11 waterways and wetlands.

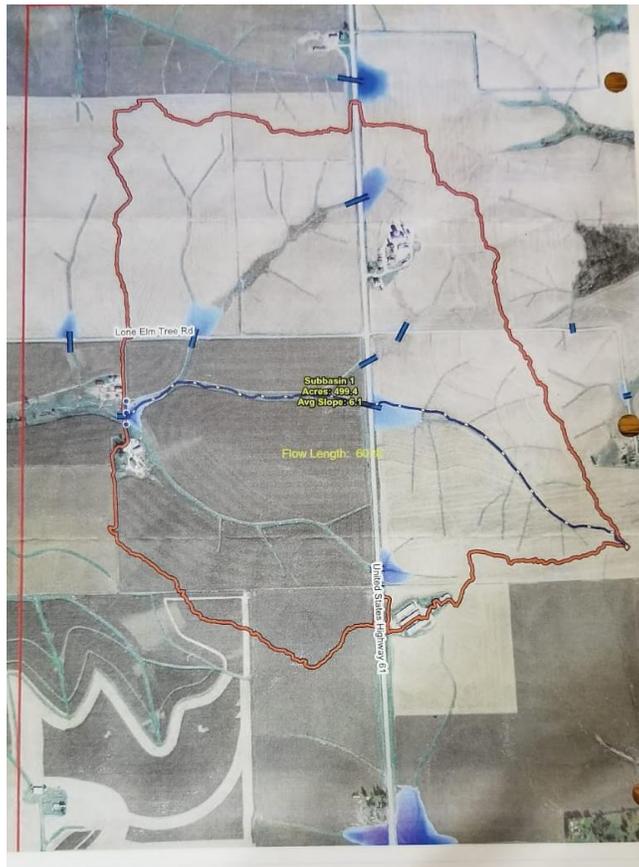
12 For instance, in Direct Testimony, Tekler testifies that “none of the wetlands or
13 waterways within the project area are proposed to be impacted” (p. 3) and in Rebuttal,
14 Callahan testifies that Grant County will implement “construction activity measures” that
15 Tekler recommends. Callahan testifies regarding drainage and stormwater runoff, as does
16 Locker, more extensively. Locker starts by testifying regarding need for a WPDES,
17 which means that the project is expected to have discharge increased over present
18 conditions, and that a permanent stormwater basin will be constructed. Rebuttal-Grant
19 County Solar-Locker-7-8, using much of the same language as Callahan.

20 PSC witness Tomaszewski, in Direct Testimony refers to soil erosion and storm
21 water runoff as an issue for the Badger Hollow project. Direct-PSC-Tomaszewski-8. A
22 permit amendment was requested and approved for additional stormwater drainage pond
23 and erosion control. Ex.-Grant County Intervenors-Cray-14. This appears to be

1 verification that impacts are greater than anticipated, and there is no reason to believe it
2 would not also be a problem for the Grant County Solar Project. Again, please see our
3 previously filed map with waterways marked:



4



5
6

Ex.-Grant County Intervenor-Cray-11.

Surrebuttal-Grant County Intervenor-Cray-3

1 The project has not avoided these sensitive areas, and there is a high probability that our
2 farm will be affected with erosion and drainage issues as with Badger Hollow.

3 We are not convinced that our concerns about wetland, waterways, stormwater
4 drainage, erosion, and water quality have been taken into account. We ask that NextEra
5 and the DNR review our testimony, and the maps we have presented. Direct-Grant
6 County Intervenors-Cray-6-7; Ex.-Grant County Intervenors-Cray-6; Rebuttal-Grant
7 County Intervenors-Cray-3-4; Ex.-Grant County Intervenors-Cray-11(also above).

8 Once again, this project has not avoided sensitive areas and the project's impacts
9 will extend beyond the project's boundaries, likely to our land.

10 **Q: Are there other areas of Rebuttal testimony you'd like to bring up:**

11 A: Yes. Locker specifically brought up viewshed from our property, and Frears as well, in
12 her rebuttal. Rebuttal-Grant County Solar-Locker-16-17; Application-Grant County
13 Solar-Appendix K. Locker testifies that "although PV arrays would be visible and
14 identifiable while in close proximity, due to the rolling topography, in broader, more
15 long-distance views, the project is likely to appear mostly absorbed into the existing
16 agricultural landscape." Id. However, we live "in close proximity." We also walk and
17 drive cars and equipment through this area "in close proximity." The photos are not
18 representational of life "in close proximity" to this project.

19 Locker indicates the view was determined from points indicated on the exhibit. In
20 reference to Points #3 and #4, Locker states Point #4 was "taken from the public right-of-
21 way of Lone Elm Tree Road, facing south towards the property" and Locker indicates the
22 panel arrays will be visible within the background. This surmises that Locker is standing
23 on the road, looking at our home. We do not stand on Lone Elm Tree Road as Locker did.

1 We live in our house and work on our farm. Our true view shed will be looking at panel
2 arrays covering Areas 6, 7, 8 and 10 on the Locker map. There will be very little
3 topographic depression that limits that view. In reference to Point #3 as marked on
4 Locker Exhibit 7, again Locker is viewing our home from the highway looking at our
5 home and again, we do not stand on the highway looking at our house. EVERY sunrise
6 and sunset from our home will be on horizons covered with solar panels. Every day for
7 the rest of our lives, as long as we live here, that will be our view.

8 **Q: Does this conclude your Surrebuttal testimony?**

9 **A: Yes, it does.**