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**BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

4 Application for Grant County Solar, LLC to Construct a New
5 Solar Electric Generation Facility located near Potosi and Docket No. 9804-CE-100
6 Harrison Townships, in Grant County, Wisconsin

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SURREBUTTAL TESTIMONY OF PAUL CALLAHAN

13 **Q. Are you the same Paul Callahan that filed rebuttal testimony in this proceeding?**

14 A. Yes.

15 **Q. What is the purpose of your surrebuttal testimony?**

16 A. I am responding to certain portions of the rebuttal testimony filed by Grant County
17 Intervenors (“GCI”) witnesses Daniel and Connie Cray, and Brianna Eisentrout Frear and
18 Henry Frear related to stray voltage testing.

19 **Q. The GCI witnesses express concern about the potential impact of stray voltage**
20 **resulting from the Project. (Rebuttal-GCI-Cray-2-3; Rebuttal-GCI-Frear-6-7). Will**
21 **Grant County Solar conduct stray voltage testing at each agricultural confined**
22 **operation within one-half mile the Project?**

23 A. As Grant County Solar has stated in the Application, direct testimony and rebuttal
24 testimony, Grant County Solar does not anticipate issues regarding stray voltage as a result
25 of the Project. Stray voltage issues are generally caused by improperly grounded and/or
26 isolated electrical circuits found in older buildings, factories, or barns. Grounding for the
27 Project PV arrays will be designed and certified by a licensed electrical engineer according
28 to current applicable electric code requirements.

1 Despite the substantially low risk of the Project causing stray voltage, as set forth
2 in Section 5.13.7.4 of the Application, the adopted Direct Testimony of Grant County Solar
3 Witness Rafael Guzman, and my rebuttal testimony, consistent with Wis. Admin. Code
4 § PSC 128.17, which addresses stray voltage testing for large wind facilities, and the
5 Commission’s recent decisions on the issue in the Two Creeks Solar and Point Beach Solar
6 proceedings (*see* Docket No. 9696-CE-100, *Application for a Certificate of Public*
7 *Convenience and Necessity of Two Creeks Solar, LLC to Construct a Solar Electric*
8 *Generation Facility, to be Located in Manitowoc and Kewaunee Counties, Wisconsin,*
9 *Final Decision, issued April 18, 2019 (PSC REF#: 364423) (“Two Creeks Solar Final*
10 *Decision”)* p. 38; *see also* Docket No. 9804-CE-100, *Application for a Certificate of Public*
11 *Convenience and Necessity of Point Beach Solar, LLC to Construct a Solar Electric*
12 *Generation Facility, to be Located in Manitowoc County, Wisconsin, Final Decision,*
13 *February 12, 2020 (PSC REF#: 383720) (“Point Beach Solar Final Decision”)* pp. 21, 38),
14 Grant County Solar will conduct pre- and post-construction stray voltage testing at any
15 confined animal operation located within 0.5 mile of the Project Site in coordination with
16 the local distribution utility. The Project Site, rather than the “project area” or “Project
17 Study Area” is the appropriate focus of any such testing and is consistent with reference to
18 “facility” in Wis. Admin. Code § PSC 128.17, given that the Project facilities will be within
19 the Project Site. Grant County Solar will provide the results of the stray voltage testing to
20 Commission staff.

21 In the highly unlikely event that a stray voltage problem attributable to the
22 construction and operation of the Project is discovered, Grant County Solar will work with
23 the local distribution utility and agricultural facility owner to rectify any such issue.

1 **Q. The GCI witnesses assert that stray voltage testing should be conducted periodically**
2 **“within a 2 mile area” of the Project. (Rebuttal-GCI-Cray-2-3; Rebuttal-GCI-Frear-**
3 **6-7.) How do you respond?**

4 A. I disagree with the assertions of the GCI witnesses. As stated above, conducting pre- and
5 post-construction stray voltage testing at any confined animal operation located within 0.5
6 mile of the Project Site in coordination with the local distribution utility is consistent with
7 Wis. Admin. Code § PSC 128.17 and prior Commission decisions. (Two Creeks Final
8 Decision, p. 38; Point Beach Solar Final Decision, pp. 21, 38). Moreover, such testing as
9 proposed by Grant County Solar provides an even greater safeguard than that recently
10 approved by the Commission in the Paris Solar proceedings, where the Commission
11 approved stray voltage testing at each agricultural confined animal operation within 300
12 feet of the project infrastructure. (See Docket No. 9801-CE-100, *Application for a*
13 *Certificate of Public Convenience and Necessity of Paris Solar Farm, LLC to Construct a*
14 *Solar Electric Generation Facility in the Town of Paris, Kenosha County, Wisconsin*, Final
15 Decision, December 29, 2020 (PSC Ref #: 402226), pp. 21-22, 42.) No record evidence
16 has been presented to justify requiring periodic stray voltage testing within a 2 mile area,
17 as the Crays suggest.

18 **Q. Does this conclude your prefiled surrebuttal testimony?**

19 A. Yes, it does.