

BEFORE THE
PUBLIC SERVICE COMMISSION
OF MARYLAND

IN THE MATTER OF THE APPLICATION OF *
BIG SPRING SOLAR LLC FOR
A CERTIFICATE OF PUBLIC * Case No.: 9402
CONVENIENCE AND NECESSITY TO
CONSTRUCT A 3.5 MW SOLAR *
PHOTOVOLTAIC GENERATING FACILITY
IN WASHINGTON COUNTY, MARYLAND *
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DIRECT TESTIMONY
OF
THOMAS A. ANDERSON

ON BEHALF OF BIG SPRING SOLAR LLC

December 8, 2015

1 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND TITLE.**

2 A. My name is Thomas A. Anderson, Project Manager, Big Spring Solar LLC, 100
3 Matsonford Road, Radnor, Pennsylvania 19087.

4 **Q. PLEASE DESCRIBE YOUR QUALIFICATIONS.**

5 A. I spent four years in lead development and operations management roles, including three
6 as Chief Operating Officer, for American Capital Energy (ACE), a large-scale
7 commercial and small-scale utility solar PV developer and installer. During this time,
8 American Capital Energy's completed the development, installation, operation and
9 maintenance of more than 25 large-scale commercial and small utility rooftop and ground
10 mount projects in 7 states, ranging in size from <100 kW to 20 MW and totaling more
11 than 65 MW of distributed solar PV installed. Prior to ACE, I was Environmental
12 Directorate manager for Quintetiq North America where I managed 20 to 25
13 environmental geologists and scientists in the development and execution of site
14 characterization and clean up projects at contaminated waste sites. I received a B.S. in
15 Geology/Geography from Denison University and an M.S. in Environmental Science and
16 Engineering from Colorado School of Mines.

17 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?**

18 A. No.

19 **Q. ARE YOU FAMILIAR WITH BIG SPRING SOLAR LLC'S PROJECT IN**
20 **WASHINGTON COUNTY, MARYLAND?**

21 A. Yes. Maryland is a primary focus of my work as a Project Manager at Community
22 Energy. I have been involved in the development of the project since its early stages and I

1 have managed or supported its development in collaboration with a team at Community
2 Energy and our local external consultants. I am well-acquainted with all aspects of the
3 project including site review and assessment, environmental review and approvals, design
4 and layout, Washington County permits, PJM and Potomac Edison/First Energy
5 interconnection studies, and overall project scheduling and planning.

6 **Q. PLEASE PROVIDE SOME BACKGROUND ON BIG SPRING SOLAR, LLC.**

7 A. Big Spring Solar LLC was formed on October 27, 2014, as Big Pond Solar LLC, a
8 wholly-owned subsidiary of Community Energy; the name was subsequently changed to
9 Big Spring Solar LLC on April 14, 2015. Community Energy develops utility-scale
10 renewable energy projects (including with respect to siting, interconnection, permitting,
11 offtake, financing and construction). Community Energy works with several of the
12 nation's largest energy companies to support the development, provide financing, and/or
13 own and operate its utility-scale solar projects.

14 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

15 A. To introduce Pinesburg Solar LLC and to sponsor Sections 1, 2, 3 and 4.A-C, 5.B.2-4,
16 5.B.7, and 5.C-J of Pinesburg Solar LLC's Environmental Review Document (Pinesburg
17 Solar Exhibit ____ (TAA-2)).

18 **Q. ARE YOU FAMILIAR WITH THESE SECTIONS OF THE ENVIRONMENTAL**
19 **REVIEW DOCUMENT?**

20 A. Yes.

1 **Q. PLEASE EXPLAIN FOR THE RECORD WHY THE TIMELY ISSUANCE OF A**
2 **FINAL CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY IS**
3 **ESSENTIAL FOR THE BIG SPRING SOLAR LLC PROJECT.**

4 A. Big Spring Solar LLC must obtain revenue from the sale of the Renewable Energy
5 Credits from the project in order to secure financing with a targeted date to begin
6 receiving such revenue in early-fall of 2016. As a result, any delays in the project that
7 extend the start of construction and operation may compromise the financing for the
8 project. It is our goal to align the project construction and interconnection to receive all
9 necessary local and state approvals and engineering documents by early spring of 2016 so
10 that the project can begin operation by early-fall 2016. We hope to begin construction by
11 early summer of 2016.

12 **Q. WHEN MUST THE FINAL CPCN BE ISSUED TO ALLOW CONSTRUCTION**
13 **TO BEGIN EARLY-SUMMER 2016?**

14 A. Big Spring Solar LLC is committed to meeting the operation target of fall of 2016 and we
15 estimate that an April 2016 issuance is necessary to allow for sufficient time to allow
16 construction to begin during early summer of 2016.

17 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

18 A. Yes.