

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF MARYLAND

IN THE MATTER OF THE APPLICATION OF \*  
CHERRYWOOD SOLAR I, LLC FOR A \*  
CERTIFICATE OF PUBLIC CONVENIENCE \* Case No.: 9477  
AND NECESSITY TO CONSTRUCT A 202 MW \*  
SOLAR PHOTOVOLTAIC GENERATING \*  
FACILITY IN CAROLINE COUNTY, \*  
MARYLAND \*

\* \* \* \* \*

**DIRECT TESTIMONY**  
**OF**  
**CYRUS TASHAKKORI**  
ON BEHALF OF CHERRYWOOD SOLAR I, LLC

June 1, 2018

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

2    A.    My name is Cyrus Tashakkori. I am the President of Open Road Renewables. My  
3       business address is 1105 Navasota St, Austin, TX 78702.

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

5       I am the President and a founding member of Open Road Renewables, a privately-owned  
6       renewable energy developer focused on the development of utility-scale clean energy  
7       projects in the United States. I was previously a Vice President and founding member of  
8       Pioneer Green Energy, which successfully developed over 1000 MWs of renewable  
9       energy projects. Prior to that, I worked at two renewable energy focused companies, first  
10      at Airtricity, developing wind farms, and later at E.ON Climate & Renewables,  
11      developing wind and solar farms.

12      I have a Master's Degree in Business Administration and a Master's in Public Affairs  
13      from the University of Texas at Austin and a Bachelor of Science and Public Policy at the  
14      University of North Carolina in Asheville.

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

16    A.    Yes. I provided testimony on behalf of Great Bay Solar I, LLC in Case No. 9380.

17   **Q.    ARE YOU FAMILIAR WITH CHERRYWOOD SOLAR I, LLC'S PROJECT IN**  
18       **CAROLINE COUNTY, MARYLAND?**

19    A.    Yes. I have been involved in the development of Cherrywood Solar Project (the  
20       "Project") since its inception. I have managed or supported its development in  
21       collaboration with a team at Open Road Renewables and our external consultants. I am

1 well-acquainted with all aspects of the Project, including site review and assessment,  
2 environmental review and approvals, design and layout, local permits, PJM and  
3 Delmarva Power and Light (“DPL”) interconnection studies, and overall project  
4 scheduling and planning.

5 **Q. PLEASE PROVIDE SOME BACKGROUND ON CHERRYWOOD SOLAR I,**  
6 **LLC.**

7 A. Cherrywood Solar I, LLC is a wholly-owned subsidiary of Open Road Renewables.

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

9 A. To introduce Cherrywood Solar I, LLC and to sponsor the portions of Cherrywood Solar  
10 I, LLC’s updated Environmental Review Document not sponsored by Dane S. Bauer. I  
11 also provide additional information related to the current status of the review of the  
12 Project by Caroline County, and provide an updated preliminary site plan and landscape  
13 buffer plan for review.

14 **Q. ARE YOU FAMILIAR WITH THE SECTIONS OF THE ENVIRONMENTAL**  
15 **REVIEW DOCUMENT YOU ARE SPONSORING?**

16 A. Yes.

17 **Q. IS THE INFORMATION CONTAINED IN THOSE SECTIONS TRUE AND**  
18 **ACCURATE TO THE BEST OF YOUR INFORMATION, KNOWLEDGE AND**  
19 **BELIEF?**

20 A. Yes.

21 **Q. PLEASE SUMMARIZE HOW THE PROJECT HAS BEEN REVIEWED BY**  
22 **CAROLINE COUNTY TO-DATE.**

23 A. The original conception of the Project was first introduced to Caroline County staff  
24 during preliminary planning inquiries in early 2016, prior to the Project’s initial

transmission application to the PJM queue, and County staff and leadership have been informed of the Project's progress in various capacities through the present date.

On January 17, 2018, I along with other representatives of the Applicant held a pre-application meeting with County staff to introduce the Project application and seek feedback and input on the permitting process. Subsequently, Cherrywood submitted site and stormwater plans along with the ERD for review by the Caroline County Technical Advisory Committee ("TAC") and the Caroline County Planning Commission ("PC"). On March 30, 2018, the TAC reviewed the Project's site and stormwater plans and provided feedback, which we incorporated into an updated submittal to the PC. On April 9, 2018, the PC reviewed the project site and stormwater plans and provided feedback which we incorporated into updated plans. On May 2, 2018, County staff and Commissioners attended a public hearing, at which I presented an overview of the Project and various county residents shared their views on the Project. On May 9, 2018, the PC reviewed the updated site and stormwater plans and provided a few more comments which have been incorporated and/or addressed in this submittal.

**Q. HAS THE PROJECT BEEN MODIFIED AS A RESULT OF THIS REVIEW PROCESS?**

A. Yes, it has.

**Q. PLEASE DESCRIBE THE MODIFICATIONS.**

A. The modifications to the Project are as follows:

- The tentative substation area has been identified on Tax Map 15 Parcel 66;

- 1 • The wetlands locations/blue line ditches have been modified by ECS based on  
2 their discussions with Caroline County (Mr. Joe Miller) and incorporated into the  
3 DBF base plans;
- 4 • Various homes previously avoided in the ERD have since been incorporated into  
5 the project, and the most recent site plan shows these areas available for solar  
6 panel installation;
- 7 • Minor revisions to entrance roads have been incorporated;
- 8 • Minor revisions to landscape buffer locations have been incorporated; and
- 9 • Proposed landscape buffer details have been included for the 4 options proposed  
10 to Caroline County.

11 Also, as part of our outreach to neighboring landowners, we engaged in a negotiation  
12 with a neighboring landowner to address a concern about the impact of the Project on  
13 their property. This negotiation resulted in agreement to enter into a purchase option on  
14 their property, referenced as Property 17 in the revised ERD, in order to incorporate that  
15 parcel into the Project layout.

16 As **Attachment A** to my direct testimony I have included an updated preliminary site  
17 plan for the Project, which incorporates all changes resulting from the Caroline County  
18 review process to-date. In addition, as **Attachment B** to my direct testimony, I have  
19 included a landscape buffer plan, which also incorporates feedback from the Caroline  
20 County review process. The Applicant will sponsor supplemental direct testimony in the  
21 event either of these plans change during this proceeding as a result of the continuing  
22 Caroline County review process.

1 **Q. IS THERE ANY ADDITIONAL INFORMATION IN THE UPDATED ERD THAT**  
2 **YOU WOULD LIKE TO SUMMARIZE?**

3 A. Yes. In April 2018 we received an in-depth economic impact report from the Jacob  
4 France Institute at the University of Baltimore which examined the economic impact of a  
5 150 MW version of the Project on 1000 acres, including a comparison of the economic  
6 impact of the project net of the current economic impact of current activities on the same  
7 parcels. The study identified substantial local and state positive economic impacts that  
8 can be expected from construction and operation of the Project, including a significant  
9 annual contribution to Caroline County's budget. This study is included as Appendix 16  
10 to the updated ERD.

11 **Q. DO YOU HAVE ANY ADDITIONAL INFORMATION ABOUT THE PROJECT**  
12 **THAT YOU WOULD LIKE TO PROVIDE?**

13 A. Yes. The Applicant has engaged in a partnership with Caroline County Public Schools to  
14 sponsor \$2,500 college scholarships for four Caroline County high school seniors  
15 focusing on STEM degrees. Four scholarships were awarded on May 29 and 30, 2018  
16 and the Applicant has committed to renewing the scholarship annually should the Project  
17 be successful.

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

19 A. Yes.