

Exhibit No.:
Issue: Conservation
Witness: Michael Speerschneider
Type of Exhibit: surrebuttal testimony
Sponsoring Party: Wind on the Wires
File No.: ET-2018-0063

MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. ET-2018-0063

SURREBUTTAL TESTIMONY

OF

MICHAEL SPEERSCHNEIDER

SUBMITTED ON BEHALF OF

WIND ON THE WIRES

JUNE 8, 2018

1 **1. INTRODUCTION**

2 **Q: Please state your name, job title, and business address.**

3 **A:** My name is Michael Speerschneider, and I am Senior Director for Permitting Policy
4 and Environmental Affairs for the American Wind Energy Association (“AWEA”).
5 My business address is 1501 M St NW, Suite 1000, Washington DC, 20005.

6

7 **Q: For whom are you testifying?**

8 **A:** I am testifying on behalf of Wind on the Wires.

9

10 **Q: Have you testified in proceedings in front of the Public Service Commission**
11 **(“PSC”) before?**

12 **A:** I have not testified before the PSC.

13

14 **Q: What is your background and educational experience?**

15 **A:** I have covered wildlife and wind issues for nearly 15 years. I worked for a wind
16 energy developer and operator from 2003 to 2016, heading up permitting and
17 environmental compliance for EverPower Wind Holdings. Since April of 2017, I
18 have worked at AWEA, working permitting and wildlife issues on behalf of our
19 member companies. I hold two bachelor of science degrees from the University
20 of Pittsburgh, in physics and environmental studies. I also hold two master of
21 science degrees from the Massachusetts Institute of Technology in Technology
22 and Policy, and in Materials Science and Engineering.

23

24 **Q: What is the purpose of your testimony?**

25 **A:** I respond to the rebuttal testimony of Geoff Marke, that was submitted on behalf
26 of the Office of the Public Counsel. My testimony explains why current
27 conservation protocols agreed upon by a wind developer and U.S. Fish and
28 Wildlife (USF&W) are reasonable and the Commission should reject Mr. Marke's
29 recommendation to establish pre-site selection and post-construction mortality
30 monitoring policies for all wind projects in Missouri.

31

32 **Q: Have you reviewed the rebuttal testimony of Geoff Marke?**

33 **A:** Yes.

34

35 **Q: What about his testimony do you take issue with?**

36 **A:** Mr. Marke recommends that the Commission establish pre-site selection and post-
37 construction mortality monitoring policies for all wind projects in Missouri.
38 Developers of wind energy projects work with the Missouri Department of
39 Conservation and the USF&W (USFWS) to develop protocols to assess risk to
40 species and habitat and to implement appropriate mitigation if there is potential for
41 impact to species and/or habitat.. The protocols are developed for each specific
42 wind farm, and are influenced by the terrain, birds and animals native to the area
43 around the wind farm, among other factors. This process is outlined in the USFWS
44 Wind Energy Guidelines (WEGs). The WEGs were adopted by the USFWS in
45 2012 based on recommendations from a Federal Advisory Committee created by
46 the Secretary of the Department of Interior in 2007. The Federal Advisory

47 Committee was comprised of 22 members, include representative from the wind
48 industry, tribes, federal and state resources agencies and national environmental
49 organizations. AWEA fully endorses the WEGs and its members have committed
50 to following the WEGs.

51
52 Mr. Marke's proposed pre-site selection and post-construction policies are overly
53 general and attempt to apply a one-sized fits all solution in contradiction to the
54 WEGs process that focuses on site-by-site evaluation and assessment. Not all of
55 the conditions listed in Mr. Marke's testimony are relevant to every site, and the
56 conditions pull from a variety of federal and state processes that are not always
57 applicable to wind energy project development in Missouri.

58

59 **Q: When a wind developer and USF&W establish an approach to evaluating**
60 **potential wildlife impacts, what does that typically entail?**

61 **A:** There are a number of steps to evaluating wildlife impacts that are appropriate
62 when developing a wind farm. A very brief description is included here:

63 1) Initiate site selection and desktop review. Common to tiers I and II of the WEG
64 process, a developer will gather known data about a particular site. This
65 includes information about habitats and species presence that may be
66 sensitive. For example, known or potential presence of a state or federally
67 protected species would be identified and mitigation options considered.

68 2) Tier II studies include field surveys based on potential/known presence of
69 species or habitat. This process allows developers and agencies to better

70 understand the nature, use and extent of potential habitat or species of interest.

71 It also can result in identification of certain minimization or mitigation options.

72 3) If a species or habitat of concern is present AND there is potential for impact,
73 it may trigger a higher level of planning. For example, if there is a species
74 protected by the US Endangered Species Act or the Bald and Golden Eagle
75 Protection Act, the developer must work with the USFWS to appropriately
76 address those issues.

77 4) The WEGs also stipulate that developers will conduct post-construction
78 mortality monitoring (Tier IV in the WEGs). This will allow the project operator
79 to ascertain if the level of impact predictive in pre-construction studies was
80 correct.

81 The WEGs also include a number of Best Management Practices related to Site
82 Construction and Operation, Retrofitting and Repowering, and Decommissioning.

83

84 **Q: Does this conclude your testimony?**

85 **A:** Yes.

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri) Case No. ET-2018-0063
for Approval of 2017 Green Tariff)

AFFIDAVIT OF MICHAEL SPEERSCHNEIDER

I, Michael Speerschneider, being duly sworn, declare under oath as follows:

1. My name is Michael Speerschneider. I am Senior Director of Permitting Policy and Environmental Affairs for the American Wind Energy Association.

2. Attached hereto is my surrebuttal Testimony, labeled as *Surrebuttal Testimony of Michael Speerschneider Submitted on Behalf of Wind on the Wires* that consists of a cover page, 4 pages of questions and answers, and schedule MS-1.

3. The aforementioned documents were prepared by me or under my direction and control.

4. I have personal knowledge of the facts set forth in those documents.

5. If I were to be asked under oath the same questions posed therein, including my schedules, I would provide the same answers contained therein.

6. The answers provided in the attached testimony, including my schedules, are true and correct to the best of my knowledge and belief.

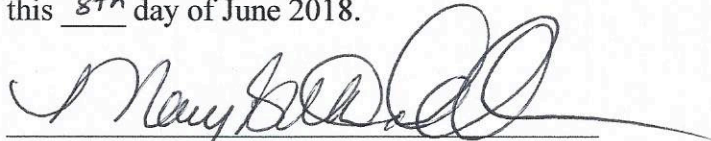
Further, affiant sayeth naught.


Michael Speerschneider

STATE OF PA

COUNTY OF Chester

Subscribed and Sworn or Affirmed before me
this 8th day of June 2018.


Notary Public

**Commonwealth of Pennsylvania-Notary Seal
Mary Beth DeAbreu, Notary Public
Chester County
My commission expires June 29, 2018
Commission number 1036534**