

In the Matter of the Application of **HARDIN**
WIND ENERGY LLC for an Amendment to its)
Certificate to Install and Operate a Wind-Powered)
Electric Generation Facility in Hardin County,) Case No. 14-1030-EL-BGA
Ohio)

Pursuant to Ohio Administrative Code (“OAC”) Rule 4906-7-12(B)(1), Hardin Wind Energy LLC (“Hardin”) respectfully submits a reply to the Ohio Power Siting Board (“Board”) in response to the Petition for Leave to Intervene and Request for Hearing (“Petition”) and Memorandum in Support, filed in the above-captioned proceeding by Mid-Ohio Energy Cooperative, Inc. (“Mid-Ohio”) and W.A.T.C.H. TV Company (d/b/a WATCH Communications) (“WATCH”) on June 17, 2014 and June 27, 2014, respectively. While Hardin does not oppose either Petition, Hardin submits this reply for the following reasons: first, to indicate to Mid-Ohio and WATCH that Hardin’s Application addresses potential impacts to Mid-Ohio’s and WATCH’s operations and, secondly, to reiterate Hardin’s commitment to working with Mid-Ohio and WATCH to address their concerns.

On June 5, 2014, Hardin initiated this proceeding by filing an Application for a Second Amendment to its Certificate to Install and Operate a Wind-Powered Electric Generation Facility in Hardin County, Ohio (“Second Amendment”). On June 17, 2014, Mid-Energy Ohio filed its Petition. WATCH filed its Petition on June 27, 2014. Hardin does not oppose either Petition filed pursuant to OAC Rule 4906-7-04.

I. REPLY TO PETITIONS BY MID-OHIO AND WATCH

In their respective Petitions, Mid-Ohio and WATCH each express concerns about Hardin's proposed wind project's impact to microwave signals transmitted by Mid-Ohio and WATCH. Specifically, Mid-Ohio "is concerned that Hardin's proposed turbines will interfere with Mid-Ohio's 11 Ghz microwave radio systems and its 900 Mhz omni-directional non-licensed sites used to control its down line distribution equipment."¹ Similarly, WATCH "is concerned that Hardin's proposed turbines will interfere with WATCH's 6 Ghz microwave paths and its 2.5 Ghz point to multi-point operations in Hardin County."²

A. Hardin's Application contains studies and analysis to demonstrate the proposed turbines should not adversely affect the primary microwave paths of Mid-Ohio and WATCH or Mid-Ohio's omni-directional LMR system.

As indicated in Table 08-03 of the Second Amendment, Hardin has located the wind turbine sites so that no portion of a wind turbine blade would pass through FCC-licensed microwave paths or the two primary paths owned by WATCH and the two primary paths owned by Mid-Ohio, under the conservative assumptions that the microwaves are operating at the Worst Case Fresnel Zone ("WCFZ") along their full length.

Attachment 08-01 of the Second Amendment contains a report by Comsearch to assess the potential impact of the proposed project to Mid-Ohio's systems. In sum, Comsearch reported that the land mobile radio ("LMR") systems used by Mid-Ohio in the project area are unaffected by the wind turbines. Even so, Comsearch recommended a conservative approach of not installing any turbines within 77.5 meters of any LMR sites so as to avoid any possible impact to the systems. All of Hardin's proposed turbine sites exceed this recommendation.

¹ "Mid-Ohio Energy Cooperative, Inc.'s Petition for Leave to Intervene," Case No. 14-1030-EL-BGA (June 17, 2014), at page 3.

² "W.A.T.C.H. TV Company's Petition for Leave to Intervene," Case No. 14-1030-EL-BGA (June 27, 2014), at page 4.

The Second Amendment acknowledges the revised turbine locations could affect transmissions to some of WATCH TV's subscribers and recommends these be addressed on a case-by-case basis.

B. Hardin is committed to working with Mid-Ohio and WATCH to address their concerns.

Hardin values a good working relationship with Mid-Ohio and WATCH. Mid-Ohio participated in Hardin's initial certificate application case,³ and both parties participated in Hardin's first amendment application to its certificate.⁴ In that case, Hardin worked with Mid-Ohio and WATCH to craft a Stipulation that included conditions specifically addressing the concerns raised by Mid-Ohio and WATCH.⁵ Hardin stands ready to work closely with Mid-Ohio and WATCH to achieve an outcome satisfactory to all parties.

II. CONCLUSION

For all the foregoing reasons, Hardin has no objection to intervention by the Mid-Ohio and WATCH, and Hardin reiterates its commitment to work with both parties in this process.

Respectfully submitted on behalf of
HARDIN WIND ENERGY LLC



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³ See *In the Matter of the Application by Hardin Wind Energy, LLC for a Certificate of Environmental Compatibility and Public Need for the Hardin Wind Farm*, Case No. 09-479-EL-BGN.

⁴ See *In the Matter of the Application of Hardin Wind Energy LLC for an Amendment to its Certificate to Install and Operate a Wind-Powered Electric Generation Facility in Hardin County, Ohio*, Case No. 11-3446-EL-BGA.

⁵ See "Stipulation and Recommendation," Case No. 11-3446-EL-BGA (Aug. 8, 2011).

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Reply to Petition to Intervene and Request for Hearing has been served upon the following parties listed below by electronic mail, this 2nd day of July 2014.



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Summary: Reply of Hardin Wind Energy LLC in Response to the Petitions for Leave to Intervene electronically filed by Teresa Orahod on behalf of Sally Bloomfield