

FILE

BEFORE
THE OHIO POWER SITING BOARD

Re: Case No. **14-1557-EL-BGA**

In the matter of the Application of Hardin Wind LLC to amend its certificate issued in case No. 13-1177-EL-BGN


PETITION TO INTERVENE

Pursuant to OAC rule 4906-7-04, I, William Campbell, respectfully petition the Ohio Power Siting Board for leave to intervene in the above proceeding. The reasons in support of intervention are set forth in the accompanying Memorandum in Support.



William E Campbell
9523 Heron Way
Belle Center, OH 43310

RECEIVED-DOCKETING DIV
2014 OCT 10 AM 10:37
PUCO

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business
Technician  DATE RECORDED

OCT 10 2014

MEMORANDUM IN SUPPORT

I respectfully petition the Ohio Power Siting Board for leave to intervene in the proceeding initiated by Hardin Wind LLC requesting approval to amend its certificate per case **14-1557-EL-BGA**. This case amends the original certificate (13-1177-EL-BGN) approved by the Board March 17, 2014. Rule 4906-7-04(A)(2) provides that persons may petition for leave to intervene by:

- (a) Preparing a petition for leave to intervene setting forth the grounds for the proposed intervention and the interest of the petitioner in the proceedings.
- (b) Filing said petition within thirty days after the date of the required public notification.

A. The nature and extent of my interest.

I am currently a property owner living in a high-end residential development adjoining the project area and within less than two-thirds of a mile of the nearest turbine. The development's entrance, clubhouse, swimming pool, and other facilities are within one-half mile of the nearest turbine, a condition which will have a significant negative impact on both our property value and the development's desirability. As such, Hardin Wind has failed to adequately evaluate the degradation of property values within the proposed project area and fails to accurately identify our property for purposes of impact assessment.

Please note the following is set forth in the original application case No. 13-1177-EL-BGN:

Hardin Wind's map identifying Landscape Similarity Zones is inaccurate, showing our property as "forested" rather than "developed".

Pursuant to documents filed in amendment case 14-1557-EL-BGA, Hardin Wind's Agricultural Resources Map (figure 8-3) is inaccurate, showing our property as "cropland" rather than residential, and lacks the necessary detail to differentiate. This is significant, given Hardin Wind's acknowledgment of disparate impacts on various zones within the project area. The failure to properly identify our residential development as such negatively impacts our property value to a much greater degree than agricultural parcels.

In addition, Exhibit D, Amended Figure 5 of the amended application (water quality/floodplain) is inaccurate, showing our property in a 100 year flood plain. A revision to the flood plain map has been submitted by the developer and is currently pending.

B. The extent to which the person's interest is represented by existing parties.


My interests are not represented by existing parties in the proceeding.

C. My potential contribution to a just and expeditious resolution of the issues involved in the proceeding.

It is my desire to address only the concerns set forth in this memorandum while seeking an expeditious resolution for all parties.

D. Granting the requested intervention will not unduly delay the proceeding or unjustly prejudice an existing party.

I am prepared to promptly address the issues raised herein without unduly delaying or unjustly prejudicing an existing party.



William E Campbell
9523 Heron Way
Belle Center, OH 43310

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Petition to Intervene and Memorandum in Support was served this 10th day of October, 2014 via first class mail, postage prepaid, upon the following:

M. Howard Petricoff
Michael J. Settineri
Miranda Leppla
Vorys, Sater, Seymour and Pease LLP
52 E Gay St. PO Box 1008
Columbus, OH 43216-1008

Thomas G. Lindgren
Steven Beeler
Assistant Attorneys General
Public Utilities Section
Office of Ohio Attorney General Mike DeWine
180 E Broad St. 6th Floor
Columbus, OH 43215

Chad Endsley
Ohio Farm Bureau Federation
280 N. High St.
P.O. Box 182383
Columbus, OH 43218

Joe Grant
20616 US Hwy 68N
Belle Center, OH 43310

Zachary Kravitz
Mark Yurick
Taft, Stettinius & Hollister LLP
65 E State St, Suite 1000
Columbus, OH 43215


William E Campbell