

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of)	
South Field Energy, LLC for a)	
Certificate of Environmental)	Case No. 15-1716-EL-BGN
Compatibility and Public Need to)	
Construct an Electric Generation)	
Facility in Columbiana County, Ohio)	

In the Matter of the Application of)	
South Field Energy, LLC for a)	
Certificate of Environmental)	Case No. 15-1717-EL-BTX
Compatibility and Public Need for a)	
Transmission Line in Columbiana County)	

**REPLY MEMORANDUM IN SUPPORT OF THE PETITION TO INTERVENE OF
COLUMBIANA COUNTY RESIDENT KENNETH JOHNSON AND THE OHIO
VALLEY JOBS ALLIANCE**

I. INTRODUCTION

The Applicant in these cases opposes the Petitions to Intervene of both Columbiana County Resident Kenneth Johnson (“Mr. Johnson”) and the Ohio Valley Jobs Alliance (“OJVA”) (collectively, “Proposed Intervenors”) in an effort to silence all opposition to its proposed 1,100 megawatt natural gas-fired combined cycle electric generating facility (the “Facility”) in Yellow Township, Columbiana County (No. 15-1716-EL-BGN), and the proposed transmission line (the “Transmission Line”) to connect the Facility to the PJM electric grid (No. 15-1717-EL-BTX). In doing so, the Applicant vehemently asserts the purported merits of its underlying Applications in an attempt to divert the Board’s focus from the legitimate and protectable interests that the Proposed Intervenors’ possess with respect to these cases. What the Applicant ultimately hopes to achieve is the development of a record in these proceedings that is completely devoid of any evidence contrary to the Applicant’s narrow pecuniary self-interest,

and thereby remove any impediment (no matter how legitimate) to this Board's quick approval of its Applications.

In opposition to the Petitions to Intervene in these cases, Applicant challenges OJVA's legitimacy and attempts to minimize the interests of both OJVA and Mr. Johnson at stake in these proceedings, suggests that this Board's authority to consider the issues raised by the Proposed Intervenors is highly circumscribed, and baldly asserts—upon pure conjecture and speculation—that the Proposed Intervenors' participation will unduly delay these proceedings. Because each of these arguments is without merit, the Proposed Intervenors respectfully urge this Board to grant their Petition to Intervene in both of these cases.

II. ARGUMENT

A. Standard for Intervention

The Ohio Supreme Court has interpreted R.C. 4903.08(A) and O.A.C. 4906-7-04, the predecessor to current O.A.C. 4906-2-12, as providing that “[a]ll *interested parties* may intervene in [Board] proceedings upon a showing of good cause.” *State ex rel. Ohio Edison Co. v. Parrott*, 73 Ohio St.3d 705, 708 (1995) (citation omitted) (emphasis added). In ruling on a petition to intervene, the Board is to consider: “[t]he nature and extent of the person's interest; [t]he extent to which the person's interest is represented by existing parties; [t]he person's potential contribution to a just and expeditious resolution of the issues involved in the proceeding; and [w]hether granting the requested intervention would unduly delay the proceeding or unjustly prejudice an existing party.” O.A.C. 4906-2-12(B)(1)(a)-(d). See also *In the Matter of the Application of Clean Energy Future—Lordstown, LLC*, No. 14-2322-EL-BGN, slip op. at 2, ¶5 (Ohio Power Siting Bd. July 28, 2015). Because the Proposed Intervenors have

satisfied these conditions for intervention, the Board, for good case shown, should grant the Petitions to Intervene.

B. OJVA And Kenneth Johnson

In its Response to the Petition to Intervene, the Applicant repeatedly questions the legitimacy of OJVA, asserting that it is merely a “pro-coal West Virginia non-profit corporation.” Applicant’s Response to Petitions to Intervene at 1.¹ Contrary to the Applicant’s implications, OJVA is a legitimate non-profit organization with clear interests at stake in these proceedings.

OVJA is a public interest organization whose primary mission is to support good paying jobs in the Ohio Valley including in Ohio and West Virginia. Affidavit of James Russell Thomas (“Thomas Affidavit”), the Secretary-Treasurer of OVJA, at ¶2 (attached hereto). It has 242 individual members —137 residing in Ohio and 76 in West Virginia—who are residents, property owners, taxpayers, users of outdoor recreational facilities, and electric utility ratepayers in the Ohio Valley region, including Columbiana County, Ohio. Thomas Affidavit at ¶¶3-4. Mr. Johnson, who serves as a director of OVJA, is one of OVJA’s eighteen members residing in Columbiana County. Thomas Affidavit at ¶¶3.

OVJA’s members, and particularly those in and around Columbiana County, will be significantly impacted by the Facility and Transmission Line. Thomas Affidavit at ¶4. OJVA

¹The Applicant implies that OVJA is somehow illegitimate because it has not registered to do business in Ohio. See Applicant’s Response to Petitions to Intervene at 9. A nonprofit corporation is not, however, required to register with the Secretary of State unless it “exercise[s] its corporate privileges in this state in a continual course of transactions” R.C. 1703.27. See also *State ex rel. Physicians Comm. for Responsible Medicine v. Ohio State Univ. Bd. of Trustees*, 108 Ohio St.3d 288, 292, 2006-Ohio-903 at ¶20 (foreign nonprofit corporation that has “no office or employees in Ohio” and has engaged in only “rare and sporadic” “financial transactions in the state,” is not required to register to do business in Ohio prior to commencing public records litigation).

and Mr. Johnson have sought to intervene in these proceedings to ensure that the Board has a full, complete, and accurate record upon which it can base its findings and determination in these proceedings. *Id.* OVJA's membership, and especially those residing in Columbiana County, including Mr. Johnson, will be impacted by the predicted environmental impacts of the proposed Facility, particularly air pollutant emissions that will be dispersed over a wide-ranging geographical region, both in Columbiana County and nearby areas in other counties in Ohio and in West Virginia. Thomas Affidavit at ¶5.

OVJA's members, including Mr. Johnson, also reside in areas that will be served with electrical power generated from the Facility. Thomas Affidavit at ¶6. Thus, OVJA's membership has legitimate concerns with the generation of electricity in the Ohio Valley region, including the protection and promotion of existing affordable and reliable coal-fired generation, which has provided thousands of jobs throughout the region for many years. *Id.*

Part and parcel of those interests is ensuring that the Applicant has the financial and operational capabilities to manage and maintain the Facility so that Ohio Valley electric generating systems are protected for the long-term. Thomas Affidavit at ¶¶7-8. So too is ensuring that the proposed Facility complies with all environmental laws and permit requirements and that all water, recreational, and natural resources are protected. Thomas Affidavit at ¶8. OVJA has participated, and continues to participate, in other permitting and siting proceedings for natural gas plants in West Virginia and has offered expert testimony and reports addressing environmental impacts of proposed facilities, including analyses of air emissions and air quality. Thomas Affidavit at ¶9.

Mr. Johnson is a director and member of OVJA. He is a lifelong resident of Columbiana County, and seeks to intervene in these proceedings in his personal capacity. Both Mr. Johnson

and OJVA have real and substantial interests in these proceedings, and the dispositions herein may, as a practical matter, impair or impede their ability to protect those interests.

Contrary to the Applicant's arguments herein, OVJA's interests in this case are very similar to the interests of other public interest organizations that the Board has allowed to intervene in its proceedings. As noted in the Petitions to Intervene, the Board has often granted intervention in wind farm cases to the Ohio Farm Bureau Federation, which describes itself as a statewide non-profit organization with resident, farm, and small business members in each of the state's counties, which members "have an interest in effective wind energy development, wind leasing agreements, and assurances that project construction activities adhere to applicable soil and water conservation and air quality standards, as well as other environmental considerations." *In the Matter of the Application of 6011 Greenwich Windpark, LLC*, No. 13-990-EL-BGN, slip op. at 1-2, ¶¶3-4 (Ohio Power Siting Bd. March 10, 2014) (emphasis added). This Board has repeatedly permitted the Federation to intervene without identifying its individual members and describing the specific interests that will be affected by the proposed facilities, both of which the Applicant in these cases now asserts is necessary. See Applicant's Response to Petitions to Intervene at 10-11.

Similarly, the Board allowed intervention to three "citizens groups"—the National Resources Defense Council, the Ohio Environmental Council, and the Sierra Club—in a case involving a proposed Meigs County coal-fired power plant. The Board allowed the groups to intervene after finding that their "members who reside in Meigs County . . . would be directly affected by the proposed facility," *In the Matter of the Application of American Municipal Power—Ohio, Inc.*, No. 06-1358-EL-BGN, slip op. at 3 (Ohio Power Siting Bd. Dec. 4, 2007), because they "would be adversely impacted by air and water pollution from the facility, the

mining and transport of coal for the plant and the disposal of waste from the plant” and would “be adversely impacted by the global warming that would be exacerbated by the proposed facility.” *Id.*, slip op. at 1, ¶4. See also *In the Matter of the Application of Columbia Gas of Ohio, Inc.*, No. 11-3534-GA-BTX, slip op. at 2-3, ¶¶8-11 (Ohio Power Siting Bd. Dec. 21, 2011) (granting motion to intervene of Sierra Club which claimed that “its local members have a longstanding relationship with the Wetlands Park [beneath which the proposed pipeline would run] and wish to preserve the Wetlands Park from potential harm presented by the pipeline”).²

OJVA’s and Mr. Johnson’s interests are directly and substantially implicated in these proceedings. Their interests are not now adequately represented by the other participants herein—to the contrary, the Applicant opposes the intervention of OVJA and Mr. Johnson precisely to prevent their interests, and the interests of Ohio residents they protect, from being represented in these proceedings. Clearly, prohibiting the intervention of OVJA and Mr. Johnson will preclude creation of the required full and complete record necessary for the Board to make informed, legitimate determinations. Their participation will contribute to a just and expeditious resolution of these cases without causing delay or prejudicing any of the parties

²The Applicant asserts that only groups with “established environmental interests”—such as the Sierra Club and the Natural Resource Defense Council—are eligible to intervene to protect those interests. See Response to Petition to Intervene at 9. This position finds no support in the Board’s precedent and would effectively preclude any relatively new public interest organization—like OVJA, which was recently formed to protect such interests in a discrete region or localized area—from intervening in proceedings before the Board. See *In the Matter of the Application of Buckeye Wind LLC*, No. 08-666-EL-BGN, slip op. at 2-3, ¶6 (Ohio Power Siting Bd. July 31, 2009) (grating motion to intervene of a nonprofit organization “formed to address issues related to the placement of wind turbines in” the county because it had “a direct and substantial interest in [the] matter, in light of the potential visual, aesthetic, safety, and nuisance impact the proposed project may have on its members’ real property and the community”); *In the Matter of the Application of Champaign Wind, LLC*, No. 12-160-EL-BGN, slip op. 3-6, ¶¶19-23, 25 (Ohio Power Siting Bd. Aug. 2, 2012).

herein. The Proposed Intervenors, therefore, respectfully urge this Board to grant their Petitions to Intervene in these case.

B. Factors Relevant In This Board's Decision

In its Response to the Petitions to Intervene, the Applicant repeatedly suggests that the OJVA advances nothing but “broad” interests in these proceedings and avers that many of the claimed interests are inappropriate considerations for this Board. See, e.g., Applicant’s Response to Petition to Intervene at 5-6 (concerns with “grid reliability” and natural gas availability are “remote”); Applicant’s Response to Petitions to Intervene at 6 (concern with future natural gas supply “has no relationship to the Board’s evaluation of the Applications”); Applicant’s Response to Petitions to Intervene at 8 (compliance with requirements for environmental permits is “irrelevant” because such permits will be at issue in other regulatory proceedings). The statutory provisions that guide this Board’s decision, however, mandate otherwise.

R.C. 4906.10(A) provides, in pertinent part, as follows:

The board ***shall not grant a certificate*** for the construction, operation, and maintenance of a major utility facility, either as proposed or as modified by the board, ***unless it finds and determines all of the following***:

(1) The basis of the need for the facility if the facility is an electric transmission line or gas pipeline;

(2) The ***nature of the probable environmental impact***;

(3) That the facility represents the ***minimum adverse environmental impact***, considering the state of available technology and the nature and economics of the various alternatives, and other pertinent considerations;

(4) In the case of an electric transmission line or generating facility, that ***the facility is consistent with regional plans for expansion of the electric power grid of the electric systems*** serving this state and interconnected utility systems and that ***the facility will serve the interests of electric system economy and reliability***;

(5) That *the facility will comply with Chapters 3704., 3734., and 6111. of the Revised Code and all rules and standards adopted under those chapters and under sections 1501.33, 1501.34, and 4561.32 of the Revised Code.* * * *

(6) That *the facility will serve the public interest, convenience, and necessity;*

(7) In addition to the provisions contained in divisions (A)(1) to (6) of this section and rules adopted under those divisions, what its impact will be on the viability as agricultural land of any land in an existing agricultural district established under Chapter 929. of the Revised Code that is located within the site and alternative site of the proposed major utility facility. * * *

(8) That *the facility incorporates maximum feasible water conservation practices* as determined by the board, considering available technology and the nature and economics of the various alternatives.

(emphasis added).

Thus, while the Applicant suggests that air and water pollution permit requirements are “irrelevant” in this proceeding because these issues will be addressed in proceedings on the applications for such permits, the statute that governs these proceedings commands this Board to consider compliance with such requirements. Indeed, the General Assembly has expressly directed the Board to consider “the nature of the probable environmental impact,” R.C. 4906.10(A)(2), whether the Facility “represents the minimum adverse environmental impact, R.C. 4906.10(A)(3), and whether the Facility will comply with, *inter alia*, “Chapters 3704. [Air Pollution Control], 3734. [Solid and Hazardous Wastes], and 6111. [Water Pollution Control] of the Revised Code and all rules and standards adopted under those chapters and under section[] 1501.33 [Applying for Permit for Major Increase in Withdrawal of Waters of State],” R.C. 4906.10(A)(5). These, in turn, require the Board to consider the Facility’s compliance with state and federal environmental regulations, such as the New Source Performance Standards for

greenhouse gases, 40 CFR Part 60, Subpart TTTT, and state Maximum Available Control Technology regulations, O.A.C. 3745-31-28.

The Board must also consider whether the Facility “incorporates maximum feasible water conservation practices.” R.C. 4906.10(A)(8). The Applicant proposes to take from .9 to 7.6 mgd of water from the Buckeye Water District for the Facility’s cooling tower and on-site water requirements, Application at 6, 9, ensuring that the Facility will be a major user of the area’s water supply, impacting, all of the area’s users of water. Yet, there is no basis to ensure that such a supply of water is reliably available over the operational life of the facility or that this use is consistent with maximum feasible water conservation practices. See R.C. 4906.10(A)(8).

These environmental issues—which the General Assembly requires the Board to consider—are, therefore, highly relevant in these cases. The proposed Facility is a 1,100 MW natural gas-fired combined cycle, dual fuel, electric generating facility. It will not only be a “major utility facility” under R.C. 4906.01(B), but also is will be a new “major stationary source” subject to review under the Federal Prevention of Significant Deterioration Program under 40 CFR 52.21 and Ohio regulations. The proposed Facility will emit significant amounts of virtually all regulated air pollutants, including CO, SO₂, NO_x, particulates (PM, PM₁₀ and PM_{2.5}), VOCs, greenhouse gases (CO₂ and CO_{2e}), and Hazardous Air Pollutants, most notably formaldehyde. The Facility is subject to full PSD review, including Best Available Control Technology, ambient air quality, and air quality modeling.

Moreover, although Applicant incorrectly argues that only individuals residing “within the footprint” of the proposed Facility have standing to intervene, see Applicant’s Response to Petitions to Intervene at 11, that argument proves nothing with respect to the Petitions to Intervene here—the pollutant dispersion area “footprint” of the proposed Facility will cover not

just Columbiana County (and OVJA’s 18 members residing there), but also significant parts of Ohio outside Columbiana County and even parts of West Virginia. All residents within this area, not just those who own property within the proposed Facility’s real property footprint or adjacent thereto, will be affected by the Facility’s emission of air pollutants and discharge of pollutants into area waters, which will impact wetlands, rivers, and other protected water bodies. In addition, the Facility will be a major user of the area’s water supply, and its operation and construction will impact wildlife habitats, conservation, and recreation areas, all of which must be considered by the Board. See *In the Matter of the Application of Buckeye Wind LLC*, No. 13-360-EL-BGA, slip op. at 5-6, ¶¶12-14 (Ohio Power Siting Bd. Nov. 21, 2013) (granting motion of proposed intervenors who claimed that the wind project would have “potential impacts” on “their residences, **land, roads, and community**”) (emphasis added).

Finally, and contrary to the Applicant’s argument, the Board is expressly required by statute to consider whether the Facility “is consistent with regional plans for expansion of the electric power grid of the electric systems serving this state and interconnected utility systems” and whether “the facility will serve the interests of electric system economy and reliability.” R.C. 4906.10(A)(4). The proposed Facility is but one of a number of proposed large gas-fired electric generation facilities in Ohio and West Virginia. The proliferation of such competing facilities—facilities that rely on natural gas as a single source of fuel—presents substantial issues as to whether such single-fuel-source electricity generation can and will adequately and reliably serve Ohio’s future electricity demand in an unpredictable energy environment. While natural gas currently is abundantly available and prices are at historically low levels, an unbalanced short-term commitment to gas-fired electric generation is detrimental to Ohio’s long-term economic interests and the reliability of Ohio’s electric generation system. These risks are

exacerbated by volatile fluctuations in natural gas supplies and prices. Future electric generation sources, especially new-entry base-load generation sources, must be subject to a reasoned, balanced, and long-view Ohio energy policy—a policy decision that, contrary to the Applicant’s argument, the General Assembly has committed to this Board’s sound judgment to implement in the best interest of all Ohio electric consumers.

C. Intervention Will Not Delay These Proceedings

The Applicant also assert that OVJA’s and Mr. Johnson’s intervention will cause unnecessary delay in these proceedings. This argument, too, is without merit. The Applicant’s suggestion that the Proposed Intervenors’ participation in these proceeding will cause unnecessary delay is nothing more than pure conjecture and speculation. The Proposed Intervenors have agreed to abide by all Board deadlines. They will present their information and evidence in a clear and succinct matter. The Proposed Intervenors’ participation will not, therefore, cause any undue delay.

What the Applicant clearly hopes to create, contrary to governing Ohio statutes and regulation, is a streamlined OPSB certification proceeding in which it encounters no opposition—all as evidenced by its opposition to intervention (at least by any party that will challenge its self-interested assertions) with arguments that seek to shore-up the alleged merits of its Applications. In doing so, the Applicant seeks to have the Board focus on the purported merits of its assertions of environmental compatibility and public need at this early stage of these proceedings and without the participation of any party who may submit evidence that contradicts or calls into question the Applicant’s unchallenged assertions. The Appellant’s ultimate object is clear: to create a partial, one-sided record that consists of no evidence other than that offered by the Applicant and its allies—those whose intervention Applicant apparently does not oppose, see

Applicant's Response to Petitions to Intervene at 14—which, in turn, will compel the Board to reach determinations that are contrary to the myriad interests that controlling Ohio statutes and regulations compel this Board to consider. Such manipulated and pre-ordained determinations, based upon a “whitewashed” record, would constitute an abdication of this Board's vital responsibility to hear and examine the evidence proffered by all materially-affected parties before the Board makes its determinations.

III. CONCLUSION

For the foregoing reasons, and for the reasons set forth in Proposed Intervenors' Memorandum in Support of their Petitions to Intervene, OVJA and Mr. Johnson respectfully request the Board to grant their Petitions To Intervene in these cases.

Respectfully submitted,

/s/ John F. Stock

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CERTIFICATE OF SERVICE

The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 28th day of March 2016.

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Field Energy LLC for a Certificate of)	
Environmental Compatibility and Public)	Case No. 15-1717-EL-BTX
Need for a 345kV Transmission Line in)	
Columbiana County, Ohio)	

AFFIDAVIT OF JAMES RUSSELL THOMAS

STATE OF WEST VIRGINIA)	
)	
MARSHALL COUNTY)	s.s.

Affiant, being first duly cautioned and sworn, states as follows:

1. Affiant is James Russell Thomas. Affiant resides at 107 Nauvoo Ridge Road, Glen Easton, West Virginia. Affiant is Secretary-Treasurer and a board member of the Ohio Valley Jobs Alliance, LLC ("OVJA").
2. OVJA is a corporation, incorporated in West Virginia in May 2015. OVJA is a public interest organization whose primary mission is to support good paying jobs in the Ohio Valley, including in Ohio and West Virginia.
3. OVJA has 242 members; 137 members reside in Ohio and 76 members reside in West Virginia. Eighteen (18) of OVJA's members reside in Columbiana County, Ohio. OVJA's membership is comprised of individuals who are residents, property owners, taxpayers, users of outdoor recreational facilities, and electric utility ratepayers in the Ohio Valley region.

4. OVJA's members are impacted by the proposed South Field Energy ("South Field") natural gas generation plant and transmission line (the "South Field Facilities"). Their primary interest in these proceedings is to ensure that the Ohio Power Siting Board has a full, complete, and accurate record concerning the impacts that the proposed South Field Facilities will have upon the financial, ecological, environmental, and energy reliability interests of OVJA's member. The OPSB needs such a complete record to be developed in these proceedings so that its findings will be accurate and sound and its ultimate determination regarding South Field's applications will address the legitimate interests of all impacted parties.

5. OVJA's members are impacted by the projected environmental effects of the proposed South Field Facilities, particularly air pollutant emissions that are projected to be dispersed over a wide-ranging geographical area, including Columbiana County, and in other counties in Ohio and West Virginia.

6. OVJA's members also reside in part of the region that is to be served with electric power generation from the South Field Facilities. OVJA's members are concerned with electric generation in the Ohio Valley region. Their interests include protecting and promoting existing coal-fired generation and the jobs that have supported families in the region for generations. OVJA's members have a vital interest in ensuring electric generation facilities serving the Ohio Valley region produce electricity that is both economical and reliable.

7. OVJA members also are concerned with the financial capability and operational capability of South Field to construct, operate and maintain the Facility in an appropriate manner.

8. OVJA's interests include ensuring that the proposed South Field Facilities comply with all environmental laws and permitting requirements, that Ohio Valley electric generating

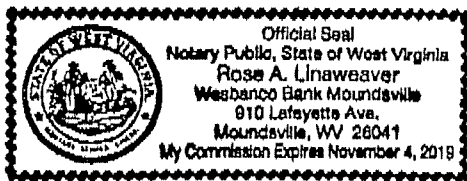
systems are protected for the long-term economy and reliability of electric generation, that all financial assurance and capability requirements are met, and that all affected water, recreational, and natural resources are adequately protected in these proceedings.

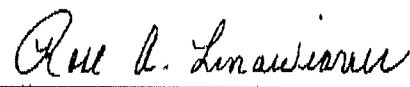
9. OVJA has participated in other permitting and siting proceedings for natural gas plants in West Virginia and has offered expert testimony and reports addressing environmental impacts of proposed facilities, including analysis of air emissions and air quality. OVJA's participation in this proceeding will serve to produce a full, complete, and accurate record that will enable the Board to make a just and appropriate determination in these proceedings.

Affiant further saith naught.


James Russell Thomas

Sworn to and subscribed in my presence this 25th day of March, 2016.




Notary Public

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in

Case No(s). 15-1716-EL-BGN, 15-1717-EL-BTX

Summary: Reply Memorandum in Support of the Petition to Intervene of Columbiana County Resident Kenneth Johnson and the Ohio Valley Jobs Alliance electronically filed by John F Stock on behalf of Johnson, Kenneth and Ohio Valley Jobs Alliance