

**BEFORE THE
OHIO POWER SITING BOARD**

In the Matter of the Application of Icebreaker)	
Windpower, Inc. for a Certificate to Construct a)	Case No. 16-1871-EL-BGN
Wind-Powered Electric Generation Facility)	
in Cuyahoga County, Ohio.)	

**OHIO ENVIRONMENTAL COUNCIL AND SIERRA CLUB'S
MEMORANDUM IN SUPPORT OF ICEBREAKER WINDPOWER, INC.'S
MOTION TO REESTABLISH THE PROCEDURAL SCHEDULE**

Ohio Environmental Council ("OEC") and Sierra Club submit this Memorandum in Support of Icebreaker Windpower, Inc.'s Motion to Reestablish the Procedural Schedule. For the reasons that follow, the OEC and Sierra Club support reestablishing the procedural schedule in this case and expeditiously moving the process forward.

The OEC and Sierra Club are committed to fighting climate change by reducing our reliance on fossil fuels here in Ohio. We advocate strongly for more renewable energy development in order to meet Ohio's growing need for emission-free energy, and to mitigate the causes of climate change. The Icebreaker offshore wind project ("Project Icebreaker") represents an innovative effort to demonstrate the potential for development of wind resources right here in Ohio, allowing our state to meet more of Ohioans' electricity demand through renewable energy resources. The OEC and Sierra Club intervened in this matter in order to ensure proper siting of this demonstration project and strike the right balance between siting a renewable energy facility with minimum negative impacts to air, land, water, and public health. It is vital that the siting process is rigorous and thorough, and equally important that the process is transparent and fair, so that Project Icebreaker can serve as sound precedent for future wind proposals in Lake Erie.

To that end, continued delay of Project Icebreaker's Application is no longer appropriate. The OEC and Sierra Club believe that requiring submission of the Memoranda of Understanding related to

Fisheries and Aquatic Resources and the Avian and Bat monitoring plan by the Board prior to deeming the Application complete, along with additional requested information, was reasonable and appropriate. Further, the OEC and Sierra Club appreciate the opportunity to review the information provided by the Applicant in January 2018 relating to pre-construction radar technology monitoring protocol (the "Diehl Report"). Yet, additional safeguards, conditions and mitigation measures can be worked out during the Application process and then required by the Board in order for the Project to proceed where a certificate is granted. Importantly, additional conditions and requirements are determined in part with input from intervening stakeholders--an opportunity the OEC and Sierra Club welcome.

The OEC and Sierra Club recognize the increased complications that come along with siting the first-ever offshore wind project in Ohio. There are several difficulties, including pre- and post-construction monitoring in an aquatic setting, that are matters of first impression for the OPSB and Staff since Project Icebreaker is the first of its kind in Ohio. However, the OEC and Sierra Club also recognize that our need to find new and innovative ways of producing clean energy must be balanced with our desire to have each and every piece of information available before moving forward on a new approach to wind energy, and why a demonstration project like this makes the most sense. Project Icebreaker is a small scale demonstration project--just six turbines--that Ohio will be able to analyze and learn from. The OEC and Sierra Club believe that the information currently supplied by the Applicant provides a workable frame from which to craft recommendations that ensure a proper balance between siting offshore renewable energy and protecting our ecosystems and public health, and one that includes partnerships with various organizations so that Project Icebreaker is studied and analyzed to ensure any future projects will be even better.

The Applicant has supplied all the information requested by Staff and discovery is ongoing, permitting the parties to request additional information necessary to make determinations about the safety and viability of the six turbine demonstration project. Therefore, the OEC and Sierra Club submit this Memorandum in Support of Icebreaker's Motion to Reestablish the Procedural Schedule and request

that the schedule be reestablished without delay. The OEC and Sierra Club look forward to working together to fashion a rigorous siting process that ensures the necessary balance between protecting our ecosystems and developing clean, carbon-free electricity for Ohioans.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this filing will be electronically served via the Ohio Power Siting Board's e-filing system and via email on all parties referenced in the service list of the docket.

/s/ Miranda Leppla

Miranda Leppla

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Summary: Motion Ohio Environmental Council and Sierra Club's Memorandum in Support of Icebreaker Windpower, Inc.'s Motion to Reestablish The Procedural Schedule (FAX) electronically filed by Docketing Staff on behalf of Docketing