

**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
LIST OF ISSUES AND CONCERNS FOR CROSS-EXAMINATION**

Pursuant to the April 20, 2018 Entry setting forth the procedural schedule, Ohio Environmental Council ("OEC") and Sierra Club (collectively, the "Environmental Intervenors"), give notice that they may pursue cross-examination on any part of the filed testimony, including exhibits, by any party to this proceeding. The Environmental Intervenors further submit this list of issues and concerns they may pursue upon cross-examination at the adjudicatory hearing set to begin August 6, 2018.

1. Avian, bat and aquatic resources monitoring, including pre- and post-construction monitoring protocols, impact mitigation plans, radar monitoring program and studies, impacts to aquatic life and ecosystems, and the Avian and Bat and the Fisheries and Aquatic Resources Memorandums of Understanding (MOUs).
2. Recommended Ecological Conditions 15 - 26 from the Staff Report filed July 3 2018.
3. Issues related to decommissioning, including Recommended Public Services, Facilities, and Safety Conditions from the Staff Report filed July 3 2018.

The Environmental Intervenors reserve the right to amend or supplement this list of issues based

upon direct testimony and issues raised during cross-examination.

Respectfully Submitted,

/s/Miranda Leppla

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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

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 16-1871-EL-BGN

Summary: Notice Ohio Environmental Council and Sierra Club's List of Issues and Concerns for Cross-Examination electronically filed by Ms. Miranda R Leppla on behalf of Ohio Environmental Council and Sierra Club