

**BEFORE
THE OHIO POWER SITING BOARD**

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

ICEBREAKER WINDPOWER INC.'S LIST OF ISSUES

On February 1, 2017, as supplemented, Icebreaker Windpower, Inc. (“Applicant”) filed an application with the Ohio Power Siting Board (“OPSB”) for a certificate of public convenience and necessity (“Application”) to construct a 6-turbine demonstration wind-powered electric generation facility on Lake Erie, off the shore of Cleveland, in Cuyahoga County, Ohio.

By entry issued April 20, 2018, the OPSB established the procedural schedule in this matter and directed that the OPSB staff issue its report of investigation (“Staff Report”) by July 3, 2018, and that parties file their list of issues (“Issues List”) about which they may be interested in pursuing cross-examination of witnesses at the adjudicatory hearing by July 10, 2018. Upon review of the Staff Report, the Applicant hereby submits the following issues for possible cross-examination at the evidentiary hearing:

1. Staff Report Condition 10: Engineering drawings.
2. Staff Report Conditions 17 and 20: Fisheries and aquatic monitoring protocol.
3. Staff Report Pages 24-25 and Conditions 18-19, 21-23: Avian and bat monitoring protocol.
4. Staff Report Condition 24: Adaptive management.
5. Staff Report Condition 26: Ecological surveys.
6. Staff Report Condition 30: Communications systems.
7. Staff Report Condition 31: Decommissioning.

The Applicant, by providing this Issues List, is not waiving its right to address other issues and reserves its right to include additional issues upon cross-examination of OPSB staff and/or intervenor witnesses.

Respectfully submitted,

/s/ Christine M.T. Pirik

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July 10, 2018

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 these cases. In addition, the undersigned certifies that a copy of the foregoing document is also being served upon the persons below this 10th day of July, 2018.

/s/ Christine M.T. Pirik

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

Summary: Notification of Icebreaker Windpower Inc.'s List of Issues electronically filed by Christine M.T. Pirik on behalf of Icebreaker Windpower Inc.