

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Republic)
Wind, LLC for a Certificate of Environmental)
Compatibility and Public Need for a Wind-) Case No. 17-2295-EL-BGN
Powered Electric Generating Facility in)
Republic and Sandusky Counties, Ohio.)

REPUBLIC WIND, LLC’S LIST OF ISSUES FOR CROSS-EXAMINATION

On August 19, 2019, the Ohio Power Siting Board’s (“OPSB” or “Board”), through its administrative law judge (“ALJ”), issued an entry that ordered parties to file their lists of issues for cross-examination by September 5, 2019. In the August 19, 2019 entry, the ALJ instructed the parties to list the “specific concerns about which they may be interested in pursuing cross-examination of witnesses at the evidentiary hearing.” Republic Wind, LLC (“Republic”) hereby submits its cross-examination issues list:

1. All aspects of the Staff’s report and investigation including, but not limited to:
 - a. Staff’s investigation and findings regarding aviation;
 - b. Staff’s investigation and findings regarding endangered and threatened species;
 - c. Staff’s investigation and findings regarding Lifeflight;
 - d. Staff’s investigation and findings regarding roads;
 - e. Staff’s investigation and findings regarding safety;
 - f. Staff’s investigation and findings regarding setbacks;
 - g. Staff’s investigation and findings regarding communication systems;
 - h. Staff’s investigation and findings regarding potential noise impacts and Republic’s noise study;
 - i. Staff’s review and investigation regarding the Federal Aviation Administration’s determination of no hazard regarding turbines involved in the project; and

- j. Staff's correspondence and coordination with Ohio Department of Transportation regarding aviation.
- 2. All of Staff's recommended conditions, including but not limited to conditions 18, 20-21, 25-27, 29, 33-36, 40, 42, 49, 52, 56, and 57.
- 3. Republic may pursue cross-examination regarding Murray Energy Corporation's funding of the opposition in this case;
- 4. Republic may pursue cross-examination regarding any filed testimony, including exhibits, of any party to this proceeding including Staff.
- 5. Republic may pursue cross-examination of any party called as a witness to the case regarding matters relevant to this proceeding.
- 6. Republic may pursue cross-examination from any individual subpoenaed to attend this proceeding.
- 7. Republic reserves the right to amend or supplement this issues list. Further, Republic's failure to include an issue on this list does constitute a waiver of Republic's right to cross-examine witnesses on additional issues at the hearing.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon the following parties listed below by electronic mail, this 5th day of September 2019.



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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/5/2019 5:02:11 PM

in

Case No(s). 17-2295-EL-BGN

Summary: Text Republic Wind, LLC's List of Issues for Cross-Examination electronically filed by Teresa Orahoad on behalf of Devin D. Parram