

**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-Powered Electric Generating)
Facility in Seneca and Sandusky Counties,)
Ohio)

Case No. 17-2295-EL-BGN

**REPUBLIC WIND, LLC’S MOTION FOR ISSUANCE OF
SUBPOENAS DUCES TECUM**

Pursuant to Ohio Administrative Code (“OAC”) Rule 4906-2-23, Republic Wind, LLC (“Republic”) respectfully moves the Ohio Power Siting Board (“OPSB”) to issue four subpoenas as set forth below and in the attached Exhibits 1 through 4 to compel the attendance of the persons identified to give testimony at depositions and bring relevant identified documents, in connection with the hearing scheduled to begin in this matter on November 4, 2019.

The persons requested to attend and give testimony are:

1. John Stains
Manager, Airport Programs
Ohio Department of Transportation
2. David Sniffen
Airport Manager
Fostoria Metropolitan Airport
3. Bradley Newman
President, Tiffin Aire, Inc.
Seneca County Airport
4. David Wadsworth
Manager
Sandusky County Regional Airport,

Under OAC 4906-2-23, “the . . . administrative law judge assigned to a case may issue subpoenas, upon their own motion or upon motion of any party of the staff.” Grounds for this Motion are set forth in the accompanying Memorandum in Support.

Respectfully submitted on behalf of
REPUBLIC WIND, LLC



Sally W. Bloomfield (0022038)
Dylan F. Borchers (0090690)
Devin D. Parram (0082507)
Dane Stinson (0019101)
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
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dborchers@bricker.com
dparram@bricker.com
dstinson@bricker.com

**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-Powered Electric Generating)
Facility in Seneca and Sandusky Counties,)
Ohio)

Case No. 17-2295-EL-BGN

MEMORANDUM IN SUPPORT

The Ohio Power Siting Board (“OPSB”) is set to begin its hearing in consideration of Republic Wind, LLC’s (“Republic”) Application for a Certificate of Environmental Compatibility and Public Need for a Wind-Powered Electric Generating Facility in Seneca and Sandusky Counties (the “Certificate”) on November 4, 2019.

In the course of its obligations to provide the OPSB materials in support of its Application for the Certificate, Republic has addressed a number of issues pertaining to aviation. On June 26, 2019, the Federal Aviation Administration issued a Determination of No Hazzard for all 50 of the wind turbines proposed in Republic’s Application. Notwithstanding the FAA Determination of No Hazzard, on September 27, 2019, the Ohio Department of Transportation (“ODOT”) issued a letter providing its determination regarding potential aviation issues posed by the Project. In short, ODOT took issue with 33 of the proposed 50 turbines in the Project. In advancing this determination, ODOT referred to having considered input from the Fostoria, Sandusky, and Seneca airports through their respective managers, who are David Sniffen, David Wadsworth, and Bradley Newman.

To understand and address these items, before or at the hearing, Republic seeks an opportunity to depose the applicable ODOT representative (John Stains, Manager of Airport Programs with ODOT), as well as the three airport managers who contributed to ODOT's analysis.

Permitting these depositions will allow Republic to respond to issues raised by ODOT and the Fostoria, Sandusky, and Seneca airports and to provide information needed at the hearing to support its Application, particularly with respect to the aviation issues affected by ODOT's determination.

OAC Rule 4906-2-23 empowers the administrative law judge of this proceeding to direct issuance of subpoenas duces tecum. As set forth herein, good cause exists for issuance of the requested subpoenas duces tecum, and Republic respectfully requests that the administrative law judge sign the attached subpoenas duces tecum so that Messrs. Stains, Sniffen, Newman, and Wadsworth be compelled to appear and testify at the depositions and bring with them the requested documents.

Respectfully submitted on behalf of
REPUBLIC WIND, LLC



Sally W. Bloomfield (0022038)

Dylan F. Borchers (0090690)

Devin D. Parram (0082507)

Dane Stinson (0019101)

BRICKER & ECKLER LLP

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Columbus, OH 43215-4291

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Facsimile: (614) 227-2390

E-Mail: sbloomfield@bricker.com

dborchers@bricker.com

dparram@bricker.com

dstinson@bricker.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served upon the following parties of record via regular or electronic mail this 25th day of October, 2019.



Devin D. Parram

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tdougherty@theoec.org

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mkessler7@gmail.com

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-Powered Electric)
Generating Facility in Seneca)
and Sandusky Counties, Ohio.)**

Case No. 17-2295-EL-BGN

SUBPOENA

TO:

John Stains
Manager, Airport Programs
Ohio Department of Transportation
Office of Aviation
2829 W. Dublin-Granville Rd.
Columbus, OH 43235

Upon application of Republic Wind, LLC, you are hereby required to provide deposition testimony and produce records to their counsel, Bricker & Eckler, LLP, in the following proceeding:

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

You are to appear at the offices of Bricker & Eckler LLP, 100 S. Third St., Columbus, Ohio 43215, on October 30, 2019, at 9 a.m. You shall bring with you unredacted originals or accurate unredacted copies of the records listed below that are in the possession, custody, or control of the Ohio Department of Transportation or its subsidiaries, parent companies, or sister companies.

1. Communications (emails, letters, phone logs, etc.) between ODOT Office of Aviation and representatives of Seneca County Airport, Sandusky County Regional, Fostoria Metropolitan Airport, regarding the Republic Wind Farm (OPSB Case 17-2295) and Seneca Wind Farm (OPSB Case 488) including:
 - a. Communications with Bradley W. Newman, Manager, Seneca County Airport.
 - b. Communications with Steve Shuff



- c. Communications with David Sniffen, Airport Manager, Fostoria Metropolitan Airport.
- d. Communications with David Wadsworth, Manager, Sandusky County Regional Airport.
2. Communications with the FAA regarding the turbine proposed by the Application.
3. Studies or analyses prepared by or for ODOT OA, including all work papers underlying the studies or analyses, regarding the effect of the proposed turbines on airport operations for Seneca, Sandusky and Fostoria airports.
4. Documents related to the statements in the Supplement to the Staff Report of Investigation (page 5) that ODOT received "clarification of the objections to the wind turbines from the Seneca County Airport."
5. All prior documents submitted to the Ohio Power Siting Board ("Board") since January 1, 2005, in which ODOT-OA advised the Board whether wind turbines complied with the surface standards in 14 CFR Part 77.

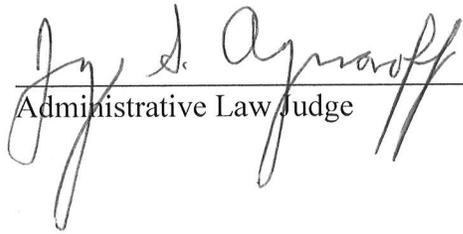
DEFINITIONS

The following definitions apply to the language used in the foregoing document requests:

1. "And" and "or" are both conjunctive and disjunctive and shall be interpreted to call for the most comprehensive information available.
2. "Documents" include but is not limited to all writings, correspondence, memoranda, letters, summaries, notes, reports, studies, manuals, telephone logs, calendars, charts, analyses, papers, contracts, tables, invoices, graphs, books, lists, purchase orders, memoranda of conversations, sample analyses, sample submission forms, laboratory sheets, sketches, photographs, slides, movies, films, videotapes, audiotapes, microfiche, data sheets, chain of custody sheets, manifests, minutes of meetings, jottings, plans, drawings, blueprints, records, permit application records, cards, literature, articles, telegrams, schematics, graphs, tapes, computer printouts, pamphlets, visual aids, and any other document as defined under the Board's rules. "Documents" is defined to the broadest extent permitted by OAC 4906-7-07 and includes, whenever applicable, the originals (absent any original, a copy) of any record of any intelligence or information (whether handwritten, typed, printed or otherwise visually or aurally reproduced) in your possession, custody or control. "Documents" include drafts and all copies which are not identical to the originals, such as those bearing marginal comments, alterations, notes or other notations not present on the original. "Documents" also includes e-mail and any other record in electronic form, including messages deleted or otherwise stored in any database or stored by any internet service provider.
3. "Include" or "including" means including but not limited to.

4. "You " means yourself as Manager of Airport Programs and the Ohio Department of Transportation.
5. "Relating to" means directly or indirectly mentioning, describing, referring to, pertaining to, being connected with, or reflecting upon the stated subject matter.
6. Where the context herein makes it appropriate, each singular word shall include its plural and each plural shall include its singular.
7. Each of the following words include the meaning of every other listed word: "each," "all", and "any."

Dated at Columbus, Ohio, this 24th day of October 24, 2019.



Administrative Law Judge

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-Powered Electric)
Generating Facility in Seneca)
and Sandusky Counties, Ohio.)**

Case No. 17-2295-EL-BGN

SUBPOENA

TO:

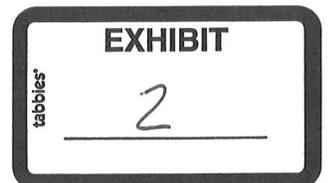
David Sniffen
Airport Manager
Fostoria Metropolitan Airport
4495 N. Seneca County Rd. 25
Fostoria OH 44830

Upon application of Republic Wind, LLC, you are hereby required to provide deposition testimony and produce records to their counsel, Bricker & Eckler, LLP, in the following proceeding:

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

You are to appear at the offices of Bricker & Eckler LLP, 100 S. Third St., Columbus, Ohio 43215, on October 31, 2019, at 1 p.m. You shall bring with you unredacted originals or accurate unredacted copies of the records listed below that are in the possession, custody, or control of you or the Fostoria Metropolitan Airport

1. Communications (emails, letters, phone logs, etc.) between ODOT Office of Aviation and representatives of Seneca County Airport, Sandusky County Regional, Fostoria Metropolitan Airport, regarding the Republic Wind Farm (OPSB Case 17-2295) and Seneca Wind Farm (OPSB Case 488) including:
 - a. Communications with Bradley W. Newman, Manager, Seneca County Airport.
 - b. Communications with Steve Shuff
 - c. Communications with David Wadsworth, Manager, Sandusky Regional Airport.



2. Communications with the FAA regarding the turbines proposed by the Application.
3. Studies or analyses prepared by or for ODOT OA, including all work papers underlying the studies or analyses, regarding the effect of the proposed turbines on airport operations for Seneca, Sandusky and Fostoria airports.
4. Studies or analyses prepared by or for the airport, including all work papers underlying the studies or analyses, regarding the effect of the proposed turbines on airport operations.
5. All documents used to form the positions taken in your letter dated August 1, 2019 (attached).
6. All written objections provided to ODOT or FAA regarding each turbine location.

DEFINITIONS

The following definitions apply to the language used in the foregoing document requests:

1. "And" and "or" are both conjunctive and disjunctive and shall be interpreted to call for the most comprehensive information available.
2. "Documents" include but is not limited to all writings, correspondence, memoranda, letters, summaries, notes, reports, studies, manuals, telephone logs, calendars, charts, analyses, papers, contracts, tables, invoices, graphs, books, lists, purchase orders, memoranda of conversations, sample analyses, sample submission forms, laboratory sheets, sketches, photographs, slides, movies, films, videotapes, audiotapes, microfiche, data sheets, chain of custody sheets, manifests, minutes of meetings, jottings, plans, drawings, blueprints, records, permit application records, cards, literature, articles, telegrams, schematics, graphs, tapes, computer printouts, pamphlets, visual aids, and any other document as defined under the Board's rules. "Documents" is defined to the broadest extent permitted by OAC 4906-7-07 and includes, whenever applicable, the originals (absent any original, a copy) of any record of any intelligence or information (whether handwritten, typed, printed or otherwise visually or aurally reproduced) in your possession, custody or control. "Documents" include drafts and all copies which are not identical to the originals, such as those bearing marginal comments, alterations, notes or other notations not present on the original. "Documents" also includes e-mail and any other record in electronic form, including messages deleted or otherwise stored in any database or stored by any internet service provider.
3. "Include" or "including" means including but not limited to.
4. "You" means yourself as Manager and the Fostoria Metropolitan Airport.
5. "Relating to" means directly or indirectly mentioning, describing, referring to, pertaining to, being connected with, or reflecting upon the stated subject matter.

6. Where the context herein makes it appropriate, each singular word shall include its plural and each plural shall include its singular.
7. Each of the following words include the meaning of every other listed word: "each," "all," and "any."

Dated at Columbus, Ohio, this 24th day of October 24, 2019.



Administrative Law Judge

Date Aug. 1, 2019

RE: 2018-WTE-5607-OE

It has come to my attention that the Bloomville location was erroneously reported as Bloomfield. While Bloomfield does not impact us, certainly Bloomville may, so I am petitioning to reopen the study. The basis for my petition is No.1: Location change and No. 2: The uncertainty of the impact to the FZI airspace of said location change.

RE: 2018-WTE-11674-OE
2018-WTE-11675-OE
2018-WTE-11677-OE
2018-WTE-11681-OE
2018-WTE-11682-OE
2018-WTE-11683-OE
2018-WTE-11685-OE
2018-WTE-11687-OE
2018-WTE-11691-OE
2018-WTE-11706-OE
2018-WTE-11720-OE
2018-WTE-11722-OE

The minimum vectoring altitude for Fostoria Metropolitan Airport (FZI) by Toledo Approach is 2400 ft MSL, which coincides with the initial approach altitude of the GPS 27 approach. Frequently, the need to do the approach procedure is mitigated by the availability of doing the approach visually. On the surface it seems this is just a convenience issue, however, safety comes to the forefront, especially during the winter months. An aircraft approaching FZI, as a destination, is able to reduce the time spent in IMC icing conditions because Toledo Approach is able to vector to final and ultimately descend the aircraft to 2300 ft MSL for the approach leg between ROPPE and SNIFN. Additionally, Bowling Green State University (BGSU) has 20+ aircraft that they use for instruction, including instrument instruction. Because of the instrument approaches available at FZI, the university uses the facility extensively for their instrument students. Any altitude increase to the instrument approaches requires them to spend more time in the icing conditions. Since 1971, the City of Fostoria has put significant effort and resources into the facility and surrounding airspace and is not in favor of relinquishing airspace protection, no matter how insignificant it may seem, to those who do not use the facility.

Respectfully Submitted,
Dave Sniffen,
Airport Manager
Fostoria Metropolitan Airport

BEFORE THE OHIO POWER SITING BOARD

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

SUBPOENA

TO:

Bradley W. Newman
President, Tiffin Aire Inc.
Seneca County Airport
1778 U.S. Route 224
Tiffin, Ohio 44883

Upon application of Republic Wind, LLC, you are hereby required to provide deposition testimony and produce records to their counsel, Bricker & Eckler, LLP, in the following proceeding:

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

You are to appear at the offices of Bricker & Eckler LLP, 100 S. Third St., Columbus, Ohio 43215, on October 31, 2019, at 11 a.m. You shall bring with you unredacted originals or accurate unredacted copies of the records listed below that are in the possession, custody, or control of you or the Seneca Country Airport.

- 1. Communications (emails, letters, phone logs, etc.) between ODOT Office of Aviation and representatives of Seneca County Airport, Sandusky County Regional, Fostoria Metropolitan Airport, regarding the Republic Wind Farm (OPSB Case 17-2295) and Seneca Wind Farm (OPSB Case 488) including:
a. David Wadsworth, Manager, Sandusky Regional Airport.
b. Communications with Steve Shuff
c. Communications with Dave Sniffen, Airport Manager, Fostoria Metropolitan Airport.

2. Communications with the FAA regarding the turbines proposed by the Application.
3. Studies or analyses prepared by or for ODOT OA, including all work papers underlying the studies or analyses, regarding the effect of the proposed turbines on airport operations for Seneca, Sandusky and Fostoria airports.
4. Studies or analyses prepared by or for the airport, including all work papers underlying the studies or analyses, regarding the effect of the proposed turbines on airport operations.
5. All documents used to form the positions taken in your letter dated April 11, 2018 (attached).
6. All written objections provided to ODOT or FAA regarding each turbine locations.
7. All documents to the FAA or ODOT-OA that clarify its objections to the Republic Wind Farm turbines after August 1, 2019.

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4. "You" means yourself as Manager or the Seneca County Airport.

5. "Relating to" means directly or indirectly mentioning, describing, referring to, pertaining to, being connected with, or reflecting upon the stated subject matter.
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Dated at Columbus, Ohio, this 24 day of October 24, 2019.



Administrative Law Judge



April 11, 2018

Mr. Paul Holmquist
Specialist, Air Traffic Certification Branch
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Re: Aeronautical Study No. 2017-WTE-9117-OE

Mr. Holmquist:

Tiffin Aire, Inc./Seneca County Airport (16G)/Citizens who base their aircraft at 16G, submits the following comments in response to the Federal Aviation Administration's (FAA) Aeronautical Study No. 2017-WTE-9117-OE.

We, the aforementioned, are concerned about the impact of the proposed wind turbine project near Bellevue, OH. These wind turbines pose a threat to the safety and efficiency of the airspace in the large area where they are planned to be constructed. Two notable impacts have become apparent. First being the impact to the NDB RWY 24 approach at the Seneca County Airport (16G). This approach is the only ground-based approach to this runway and raising the minimums decreases the efficiency of the airport by requiring pilots to have better weather for landing. The second impact is to the amount of VFR traffic to 16G that is unfamiliar with the area. Seneca County Airport is also home to a popular propeller overhaul shop that draws customers from a large geographic area. The proposed turbines will be an additional obstruction and hazard to these transient pilots, as well as local pilots who use the area for training operations.

We appreciate the opportunity to submit comments on this proposed obstruction and urge the FAA to issue a finding of hazard to air navigation based on the impacts to the safety and efficiency to the aviation community and airspace of and around Sandusky Regional Airport (S24) and Seneca County Airport (16G).

Respectfully Submitted,

Bradley W. Newman, President
Tiffin Aire, Inc.

BEFORE THE OHIO POWER SITING BOARD

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

SUBPOENA

TO:

David Wadsworth
Manager
Sandusky County Regional Airport
1500 County Road 220
Clyde, Ohio 43410

Upon application of Republic Wind, LLC, you are hereby required to provide deposition testimony and produce records to their counsel, Bricker & Eckler, LLP, in the following proceeding:

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2. Communications with the FAA regarding the turbines proposed by the Application.
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4. Studies or analyses prepared by or for the airport, including all work papers underlying the studies or analyses, regarding the effect of the proposed turbines on airport operations.
5. All documents upon which you base your opposition to construction of the wind turbines proposed by Republic Wind Farm.
6. All written objections provided to ODOT or FAA regarding each turbine location.

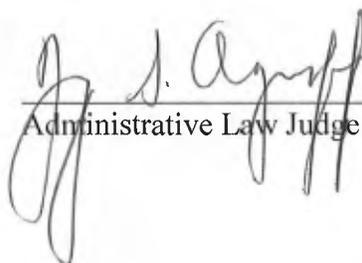
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3. "Include" or "including" means including but not limited to.
4. "You" means yourself as Manager and the Sandusky County Regional Airport.

5. "Relating to" means directly or indirectly mentioning, describing, referring to, pertaining to, being connected with, or reflecting upon the stated subject matter.
6. Where the context herein makes it appropriate, each singular word shall include its plural and each plural shall include its singular.
7. Each of the following words include the meaning of every other listed word: "each", "all", and "any."

Dated at Columbus, Ohio, this 24th day of October 24, 2019.



Administrative Law Judge

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/25/2019 7:59:37 AM

in

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

Summary: Motion of Republic Wind, LLC for Issuance of Supoenas Duces Tecum electronically filed by Teresa Orahood on behalf of Devin D. Parram