BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of)	
Firelands Winds, LLC for a Certificate of)	Case No. 18-1607-EL-BGN
Environmental Compatibility and Public)	
Need to Construct a Wind-Powered Electric)	
Generation Facility in Huron and Erie)	
Counties, Ohio)	

KEVIN ERF AND TOM YINGLING'S LIST OF ISSUES AND CONCERNS FOR CROSS-EXAMINATION

Pursuant to the July 13, 2020 Entry setting forth the procedural schedule, Kevin Erf and Tom Yingling give notice that they may pursue cross-examination on any part of the filed testimony, including exhibits, by any party to this proceeding. Mr. Erf and Mr. Yingling further submit this list of issues and concerns they may pursue upon cross-examination at the adjudicatory hearing set to begin October 5, 2020.

- 1. Issues relating to shadow flicker, noise, and property values.
- 2. Issues relating to bat and bird mortality.
- 3. Issues relating to the effects of wind turbines on local agriculture.

Mr. Erf and Mr. Yingling reserve the right to amend or supplement this list of issues based upon direct testimony and issues raised during cross-examination.

Dated: August 27, 2020

Respectfully submitted,

/s/ Hillary Aidun Hillary Aidun (PHV-21990-2020) Sabin Center for Climate Change Law

Columbia Law School 435 West 116th St. New York, NY 10027 hwa2108@columbia.edu Counsel for Kevin Erf and Tom Yingling **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 electronic mail on all parties referenced in the service list

of the docket.

Dated:

August 27, 2020

/s/ Hillary Aidun Hillary Aidun (PHV-21990-2020)

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in

Case No(s). 18-1607-EL-BGN

Summary: Notice of List of Issues for Cross-Examination electronically filed by Ms. Hillary W. Aidun on behalf of Erf, Kevin Mr. and Yingling, Tom Mr.