

**BEFORE THE
OHIO POWER SITING BOARD**

In the Matter of the Application of Firelands Wind,
LLC for a Certificate of Environmental Compatibility
and Public Need to Construct a Wind Powered Electric
Generation Facility in Huron and Erie Counties

Case No. 18-1607-EL-BGN

**ISSUE LIST OF THE BOARD OF COMMISSIONERS
OF ERIE COUNTY, OHIO**

Now comes The Board of Commissioners of Erie County, Ohio, and submits the following nonexclusive issue list identifying areas of specific concerns it may pursue during examination or cross-examination of witnesses at the adjudicatory hearing in this matter.

1. The degree of damage that will be caused to county and township roads and appurtenances and other public property during the construction and ongoing operations of the project.
2. The financial responsibility for damages to county and township roads and appurtenances and other public property during the construction and ongoing operations of the project.
3. The disruption of regular and usual resident transportation and other ordinary daily activities within the project and surrounding areas during the construction and operation.
4. The disruption of regular and usual resident occupational or employment activities within the project and surrounding areas during the construction and operation.
5. The disruption of regular and usual provision of local government services within the project and surrounding areas during the construction and operation, including provision of fire, police, and other safety services.
6. The impact of the construction and operation of the project on the financial condition of the affected local governments.
7. Whether the Applicant contemplates seeking future financial concessions or adjustments from Erie County, including complaints against the valuations of real or personal property subject to taxation by the County.
8. The deleterious effects of the project, during construction and operation of the project, on the health, safety, and welfare of the residents of Erie County.

This provision of this nonexclusive list is not intended to be a waiver by the Intervenor Board of its right to address other issues that may arise during the course of these proceedings, and the Intervenor Board reserves its right to include additional issues upon cross-examination.

Respectfully submitted,

KEVIN BAXTER
Prosecuting Attorney of Erie County

/s/Gerhard R. Gross

Gerhard R. Gross #0072214
Assistant Prosecuting Attorney
247 Columbus Ave., Suite 319
Sandusky, Ohio 44870
Phone: (419) 627-7697
Fax: (419)627-7567
ggross@eriecounty.oh.gov
Attorney for Intervenor Board of
Commissioners of Erie County, Ohio

CERTIFICATE OF SERVICE

The Ohio Power Sitting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to these cases, as filed this August 28, 2020.

/s/Gerhard R. Gross

Gerhard R. Gross (0072214)
Assistant Prosecuting Attorney
Erie County Prosecutor's Office

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/28/2020 12:12:35 PM

in

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

Summary: Notification Erie County Issues List electronically filed by Mr. Gerhard R Gross on behalf of Board of Commissioners of Erie County