

BEFORE THE  
OHIO POWER SITING BOARD

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

**LIST OF CROSS-EXAMINATION ISSUES OF THE CITY OF WILLARD**

Now comes the City of Willard, Ohio, by and through its undersigned counsel, and gives notice of its intent to cross-examine witnesses on issues regarding the use of roadways through the City for construction and maintenance of the turbines; the resulting wear and tear on the roadways and how the City would be compensated for that; and issues regarding whether any restrictions will be put on aviation in the area due to the location of the turbines. The City does not waive the right to address additional issues on cross examination as they arise in the course of the proceedings.

Respectfully Submitted,

/s/ Heather Niedermeier Heyman  
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## 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 on 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 has also been served upon the persons listed below this 28<sup>th</sup> day of August, 2020.

/s/ Heather Niedermeier Heyman  
Heather Niedermeier Heyman #0089270  
City of Willard Law Director

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**This foregoing document was electronically filed with the Public Utilities**

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

Summary: Notice Notice of List of Cross Examination Issues of the City of Willard  
electronically filed by Heather N Heyman on behalf of The City of Willard