

April 20, 2021

Ms. Tanowa Troupe, Secretary
Ohio Power Siting Board
Docketing Division
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3797

Re: Case No. 20-1679-EL-BGN - In the Matter of the Application of Pleasant Prairie Solar Energy LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Franklin County, Ohio.

Response to Fourth Data Request from Staff of the Ohio Power Siting Board

Dear Ms. Troupe:

Attached please find Pleasant Prairie Solar Energy LLC's ("Applicant") Response to the Fourth Data Request from the staff of the Ohio Power Siting Board ("OPSB Staff"). The Applicant provided this response to OPSB Staff on April 20, 2021.

We are available, at your convenience, to answer any questions you may have.

Respectfully submitted,

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

William Vorys (0093479)

Matthew C. McDonnell (0090164)

Dickinson Wright PLLC

[150 East Gay Street, Suite 2400](#)

Columbus, Ohio 43215

(614) 591-5461

cpirik@dickinsonwright.com

wvorys@dickinsonwright.com

mmcdonnell@dickinsonwright.com

Attorneys for Pleasant Prairie Solar Energy LLC

Cc: Grant Zeto
Theresa White
Randal Schumacher
Jon Pawley

Ms. Tanowa Troupe
Pleasant Prairie Solar Energy LLC
Case No. 20-1679-EL-BGN
Page 2

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 in 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 is also being served upon the persons below this 20th day of April, 2021.

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

Counsel:

Kyle.kern@ohioattorneygeneral.gov

Thomas.shepherd@ohioattorneygeneral.gov

Administrative Law Judge:

Jay.agranoff@puco.ohio.gov

4827-8258-5829 v2 [39579-53]

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Pleasant Prairie)
Solar Energy LLC for a Certificate of Environmental)
Compatibility and Public Need to Construct a Solar-) Case No: 20-1679-EL-BGN
Powered Electric Generation Facility in Franklin)
County, Ohio.)

**PLEASANT PRAIRIE SOLAR ENERGY LLC 'S
RESPONSE TO THE FOURTH DATA REQUEST
FROM THE STAFF OF THE OHIO POWER SITING BOARD**

On February 19, 2021, Pleasant Prairie Solar Energy LLC (“Applicant”) filed an application (“Application”) with the Ohio Power Siting Board (“OPSB”) proposing to construct a solar-powered electric generation facility in Franklin County, Ohio.

On April 12, 2021, the Staff of the OPSB (“OPSB Staff”) provided the Applicant with OPSB Staff’s Fourth Data Request. Now comes the Applicant providing the following response to the Fourth Data Request from the OPSB Staff.

1. **Referring to page 3 and Exhibit A of the application, the Pleasant Prairie Solar Energy, LLC proposes a Battery Energy Storage System (BESS) that will inject up to 50 MW into the power grid. What is the anticipated energy storage in kilowatt-hours (kW-h) of the BESS?**

Response: The Applicant submitted BESS specification information within the original Application as at the time a BESS component to the Project was a possibility. The use of BESS is no longer being evaluated by the Applicant and the Applicant is affirming this will not be a component of the Project.

2. **In accordance with, Ohio Admin. Code 4906-4-08 (A)(1), for the BESS please provide a complete copy of the manufacturer's safety manual and any recommended setbacks from the manufacturer.**

Response: The Applicant submitted BESS specification information within the original Application as at the time a BESS component to the Project was a possibility. The use of BESS is no longer being evaluated by the Applicant and the Applicant is affirming this will not be a component of the Project.

3. **Exhibit A mentions fire detection panels and fire suppression agent. Please describe the fire suppression system that the BESS will utilize?**

Response: The Applicant submitted BESS specification information within the original Application as at the time a BESS component to the Project was a possibility. The use of BESS is no longer being evaluated by the Applicant and the Applicant is affirming this will not be a component of the Project.

4. **Please describe the firefighting equipment necessary to extinguish a fire at the BESS.**

Response: The Applicant submitted BESS specification information within the original Application as at the time a BESS component to the Project was a possibility. The use of BESS is no longer being evaluated by the Applicant and the Applicant is affirming this will not be a component of the Project.

5. **Page 31 of the Application indicates a lifespan of the facility of 35 years and Exhibit A indicates a Calendar Life of 15-20 years. What is the anticipated lifespan of the BESS?**

Response: The Applicant submitted BESS specification information within the original Application as at the time a BESS component to the Project was a possibility. The use of BESS is no longer being evaluated by the Applicant and the Applicant is affirming this will not be a component of the Project.

6. **Assuming that wide range of equipment lifespan 15 years versus 35 years, please explain how the BESS would be decommissioned before the solar farm equipment and if that would trigger a electrical collection system redesign?**

Response: The Applicant submitted BESS specification information within the original Application as at the time a BESS component to the Project was a possibility. The use of BESS is no longer being evaluated by the Applicant and the Applicant is affirming this will not be a component of the Project.

7. **Please fully explain what financial assurance mechanism Pleasant Prairie Solar Energy, LLC will employ, and when the funds will be available to perform decommissioning activities. Staff would recommend that the decommissioning funds be posted in the form of a performance bond where the company is the Principal, the insurance company is the Surety, and the Ohio Power Siting Board is the Obligee.**

Response: Pleasant Prairie Solar Energy LLC will employ a surety bond. The surety bond will be active during the life of the Project, starting prior to construction, and will be renewed on a year-by-year basis. The decommissioning funds be posted in the form of a surety bond where the Applicant is the Principal, the insurance company is the surety, and the OPSB is the obligee.

8. Please explain how often the decommissioning costs will be re-evaluated.

Response: Following the Operations Date of the facility, decommissioning costs will be re-evaluated every five years.

9. The decommissioning plan was developed by a professional engineer. Staff would recommend that the Applicant retain an independent, registered professional engineer, licensed to practice engineering in the state of Ohio to periodically estimate the total cost of decommissioning facility, salvage value, and appropriateness of any contingency percentage. Please indicate the Applicant's understanding and commitment to provide this to Staff and indicate when this would be provided.

Response: Yes, the Applicant understands and commits to provide this to OPSB Staff. The Decommissioning Report ("Report") prepared by Stantec Consulting Services, Inc. and included as Application Exhibit Q was reviewed and stamped by a professional engineer registered to practice engineering in the state of Ohio.

The Applicant understands the importance of periodic updates to the Report in order to accurately represent expected decommissioning costs. In addition to providing the initial Report upon Application submittal, the Applicant will provide the OPSB with an updated Report every five years following the Operations Date of the facility.

10. Please explain what possible avoidance, minimization, and/or mitigation measures Pleasant Prairie Solar Energy, LLC will employ during construction for water well locations in the project

Response: For local private well systems, these systems are typically located near residences and Project construction is not anticipated to physically damage private wells or affect well yields. Given that minimal excavation is associated with the Project and pile driving will only occur to depths of 10 to 15 feet below grade, the Applicant does not anticipate impacts to the water supply.

The table below identifies the 22 water wells within the Project Area. There are 7 wells (2 drinking wells and 5 monitoring wells) within the fence line of the Project. The table below identifies the approximate distance to the nearest infrastructure for wells within the fence line. Attachment 1 to this response is a Figure showing the wells within the Project Area and their relation to the planned Project infrastructure.

Well ID	Well Use	Inside Fence Line (Y/N)	Nearest Infrastructure (Feet)	Nearest Infrastructure	Latitude	Longitude
306486		N	1,022 Ft	Fence Line	39.91996300	-83.18510500
439924	DOMESTIC	Y	260 Ft	Access Road	39.94297900	-83.20159200
643563		N	391 Ft	Fence Line	39.90522800	-83.17688600
956206	DOMESTIC	N	153 Ft	Fence Line	39.89803000	-83.18320000
672487		N	66 Ft	Fence Line	39.93422000	-83.20150000
762115	DOMESTIC	N	9 Ft	Collection line	39.93367000	-83.20254000
2033569	MONITOR	Y	0 Ft	Solar Array	39.91155800	-83.18794900
995302	DOMESTIC	N	71 Ft	Fence Line	39.94066600	-83.18848300
962816	DOMESTIC	Y	0 Ft	Solar Array	39.92617000	-83.18807000
2040374	COMMERCIAL	N	344 Ft	Fence Line	39.94909000	-83.19255000
452624		N	286 Ft	Fence Line	39.87568100	-83.17703300
463620		N	100 Ft	Fence Line	39.93355900	-83.19342700
2033570	MONITOR	Y	0 Ft	Solar Array	39.91155800	-83.18794900
2033571	MONITOR	Y	0 Ft	Solar Array	39.91155800	-83.18794900
2033573	MONITOR	Y	0 Ft	Solar Array	39.91155800	-83.18794900
511026		N	426 Ft	Fence Line	39.89191000	-83.16953000
661342		N	567 Ft	Fence Line	39.94904000	-83.19828000
930734	AGRIC/IRRIG	N	780 Ft	Collection line	39.91801000	-83.18535000
613035		N	158 Ft	Fence Line	39.91260800	-83.18469400
2076444	DOMESTIC	N	215 Ft	Fence Line	39.94617000	-83.19244000
860738	DOMESTIC	N	1,164 Ft	Fence Line	39.91972000	-83.18417000
2033572	MONITOR	Y	0 Ft	Solar Array	39.91155800	-83.18794900

11. Please indicate any wind loading precautions or wind equipment ratings that will be included in the final project design.

Response: A wind loading study from the tracker manufacturer will be included in structural design packages. High wind velocities can be mitigated by increased foundation size and changes to the racking configuration, for example, a 2-in-portrait module configuration versus a 1-in-portrait module configuration.

12. Do the trackers under consideration have a stow mode?

Response: Yes, the trackers under consideration have a stow mode.

13. Will the emergency action plan for the project referenced on page 51 of the Application be provided to OPSB Staff prior to the preconstruction conference?

Response: Yes, the emergency response plan for the Project will be provided to OPSB Staff prior to the preconstruction conference.

14. Please provide the current draft emergency action plan or an example emergency action plan.

Response: Included within the response to the OPSB Staff's Second Data Request, filed on April 16, 2021, the Applicant included the Emergency Response Plan for the Hardin Solar Energy Center projects, which may be used as a template for the Pleasant Prairie Solar Emergency Response Plan.

15. For the O&M building, would Pleasant Prairie Solar Energy, LLC install modern, efficient water fixtures for all water usage, and regular maintenance to keep water fixtures in proper working order?

Response: Yes, the Applicant will install modern, efficient water fixtures in the operations and maintenance ("O&M") building and is committed to completing the prescribed water fixture maintenance.

16. Does Pleasant Prairie Solar Energy, LLC anticipate cleaning of the solar panels with water. How often would these be cleaned on an annual basis?

Response: The Applicant does not anticipate cleaning the solar panels with water. The Project would achieve cleaning of the panels from rainfall and snow.

17. What is the approximate volume of water that would be required to clean the solar farm?

Response: 0 gallons.

18. Please provide a map of at least 1:24,000 scale that identifies the proposed facility, all agricultural land, and separately all agricultural district land existing at least sixty days prior to submission of the application located within the project area boundaries. Where available, distinguish between agricultural uses such as cultivated lands, permanent

pastureland, managed woodlots, orchards, nurseries, livestock and poultry confinement areas, and agriculturally related structures.

- **The map on Figure 08-5 only refers to rural zoned land. The map required for 4906-4-08 (E)(1) should include land used as agricultural land not just zoned for that purpose.**

Response: Please see Attachment 1 to the Applicant's response to OPSB Staff's First Data Request filed on March 18, 2021, which provides the information requested as provided by the participating landowners for the voluntary, landowner application based program Current Agricultural Use Value ("CAUV") and also shows there are no Agricultural District Lands located within the Project Area or the Study Area per the Franklin County Auditor's Office. Of the 2,424 acres within the Study Area, 2,186 acres are enrolled in the CAUV program, with 1,729 acres being within the Project Area.

- 19. Table 6 states there are 2328.64 acres of agricultural land. How many of those acres if any are agricultural district land? If there are acres of agricultural district land, how many parcels are those acres on?**

Response: Per response to Question 18, coordination with the Franklin County Auditor's Office reflects that there are no Agricultural District lands within the Project Area.

- 20. Are the agricultural fields impacted by the project currently irrigated?**

Response: In the center of the Project Area there is approximately 650 acres that is predominantly used for sod production. During dry periods, these fields may utilize an above-ground pivot irrigation system. There is no underground irrigation system in the Project Area.

- 21. On page 96, you state, "The Applicant will avoid, where possible, drainage tiles and will repair all drain tile mains that are impacted during decommissioning." When you say "decommissioning" do you mean "construction"?**

Response: The statement on page 96 of the Application narrative should be revised to read "[t]he Applicant will avoid, where possible, drainage tiles and will repair all drain tile mains that are impacts during construction and/or decommissioning." See also Application Exhibit K, which sets forth the Drain Tile Mitigation Plan both during construction and decommissioning.

22. **Please update Figures 5-1, 5-2, 5-3, 5-4, 7-1, 7-2, 7-3, and 7-4 of the noise report with noise sensitive receptors differentiated between participating and non- participating receptors.**

Response: Please see Attachment 2 to the Applicant's Response to the OPSB Staff's First Data Request filed on March 18, 2021, which is the updated and revised Application Exhibit N, the Sound Analysis conducted by Hankard Environmental, Inc., dated March 12, 2021 ("Sound Analysis"). That Attachment 2 supersedes and replaces Application Exhibit N that was filed with the Application on February 19, 2021.

23. **Please provide a table with receptors, participation status, modeled sound pressure level, and receptor location.**

Response: Please see Attachment 2 to the Applicant's Response to the OPSB Staff's First Data Request filed on March 18, 2021, the revised Sound Analysis with participating and non-participating information now differentiated within Tables B-1 and C-1.

24. **Please update table 4-3 to include L90, L50, L10 levels.**

Response: Please see Attachment 2 to the Applicant's Response to the OPSB Staff's First Data Request filed on March 18, 2021, the revised Sound Analysis with these levels included in table 4-3.

25. **Please provide a KMZ file with facility fence line, panel locations, inverter locations, participating and non- participating receptors, substation location, and isophone lines.**

Response: The KMZ files have been provided to the OPSB Staff as a part of the Applicant's Response to the OPSB Staff's First Data Request filed on March 18, 2021.

26. **In the ODNr coordination letter dated December 7, 2020, the OSRP states the project is within the watershed of the Big Darby Creek State and National Scenic River. The OSRP lists recommendations in the letter, will you be implementing all of these recommendations? Please explain.**

Response: Pleasant Prairie is committed to minimizing and reducing impacts where possible. We have or will be able to incorporate most of the recommendations including:

- We have conducted an environmental resources survey, including delineation of wetlands and streams.
- Preserve large forest stand areas and have limited tree clearing to small (less than 1 acres) forest stands and narrow historical wind rows of trees within the area of disturbance.

- Preserve existing streams within the Project Area
- We are in coordination with Metro Parks on buffer vegetation.

The Ohio Scenic Rivers Program (“OSRP”) requested a potential recreational trail connection to Metro Park and Hellbranch Meadows areas. As the Project is sited on private property and does not have owner approval or will not carry insurance for public access, the Applicant will not be designing or constructing a public recreational trail as part of this Project. However, the Project fence does not encompass the entire Project Area and is set in smaller blocks, and there is a gap in the central portion of the Project that Metro Parks could utilize for a trail if desired.

OSRP also requested the creation of habitat connections with native vegetation between existing wetlands on the Project site and to wetlands on Metro Park Property to provide for wildlife migration corridors. The Project is primarily sited in agricultural land avoiding any significant stands of native vegetation and avoids impacts to delineated wetlands within the Project Area. Furthermore, the Applicant has recently investigated the use of ‘Deer Fencing’ in lieu of traditional chain link fencing with barbed wire around the panel array areas. The Applicant has found that the use of ‘Deer Fencing’, that is perceived to be more wildlife friendly and aesthetically more ‘rural’, to be an acceptable use for the Project that aligns with the National Electric Code and the National Electric Safety Code. The Applicant has committed to using ‘Deer Fencing’ around the solar array field areas. The Applicant will continue to coordinate with MetroParks and other stakeholders on buffer vegetation around the Project fence line.

27. **Will you be partnering with the OSRP? And will you be notifying the OSRP with additional planning information and construction dates for this project as they recommend?**

Response: At this time the Applicant will not be entering in a formal partnership with the OSRP. However; the Applicant will coordinate with OSRP regarding the Project and any further design input, as well as continue to work to coordinate with Metro Parks, and the Darby Creek Association and will provide these as well as other local stakeholders with planning information and construction schedule for the Project.

28. **Breeding has already been documented in the area for four bird species. Please confirm suitable habitat for these species will be avoided altogether by the project during and after construction.**

Response: There is not suitable habitat for the four (4) species (least bittern, northern harrier, sandhill crane, upland sandpiper) within the area of disturbance, which is primarily active cultivated crop or sod farmland. As noted in the Ohio Department of Natural Resources' ("ODNR") letter, which is included in Application Exhibit B, least bittern and sand hill crane are primarily wetland-dependent species, there are very limited wetlands within the Project Area and even less within the area of disturbance. Northern Harriers and upland sandpipers prefer grass lands, the Project Area is primarily cultivated crop and sod farmland with limited pasture/grasslands. As a precaution, the Applicant will mow and conduct site preparation outside the combined April 1 to September 1 nesting period.

Respectfully submitted,

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

William Vorys (0093479)

Matthew C. McDonnell (0090164)

Dickinson Wright PLLC

150 East Gay Street, Suite 2400

Columbus, Ohio 43215

(614) 591-5461

cpirik@dickinsonwright.com

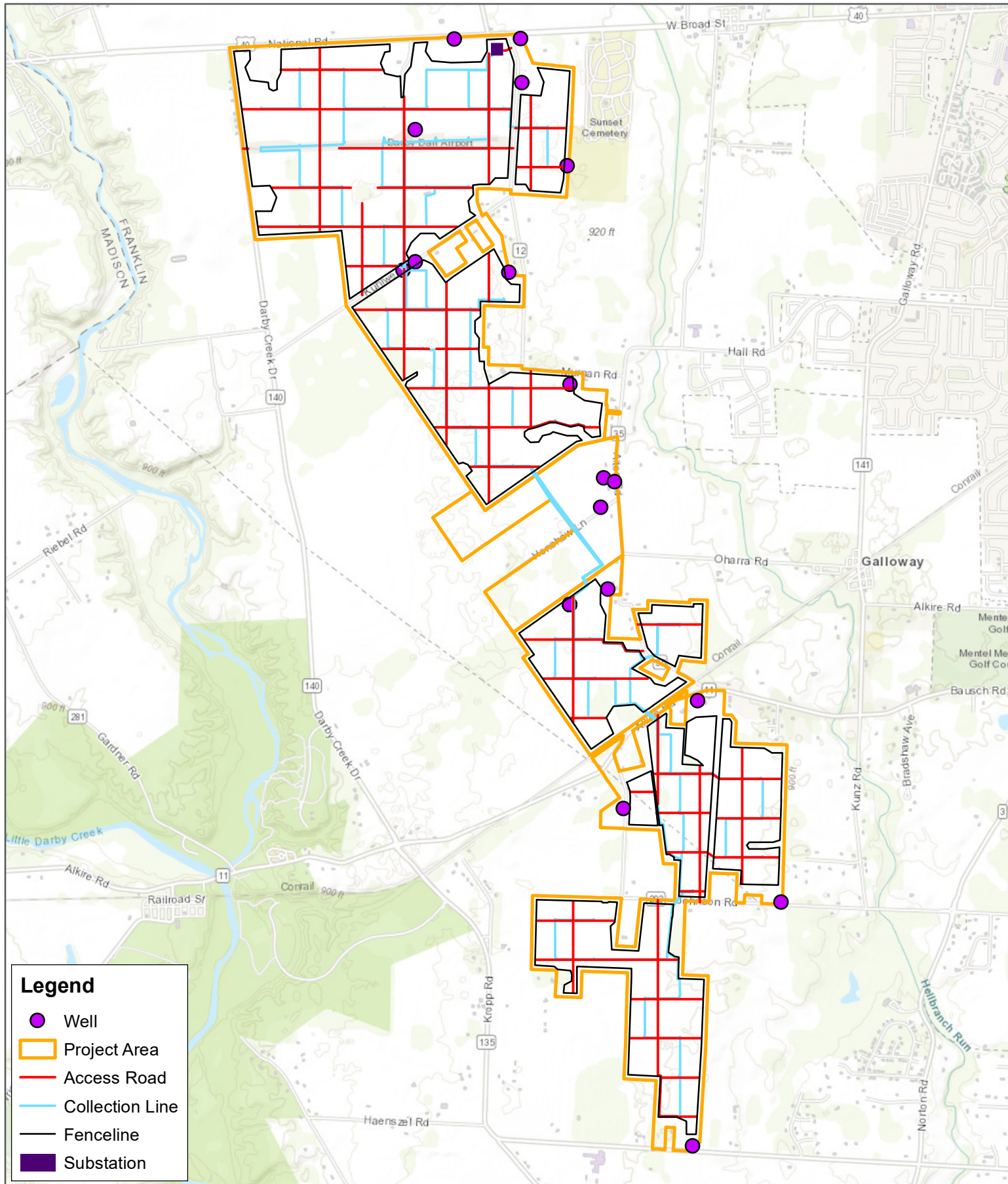
wvorys@dickinsonwright.com

mmcdonnell@dickinsonwright.com

Attorneys for Pleasant Prairie Solar Energy LLC

Attachment 1

Figure Wells within Project Area



This map and all data contained within are supplied as is with no warranty. Cardno Inc. expressly disclaims responsibility for damages or liability from any claims that may arise out of the use or misuse of this map. It is the sole responsibility of the user to determine if the data on this map meets the user's needs. This map was not created as survey data, nor should it be used as such. It is the user's responsibility to obtain proper survey data, prepared by a licensed surveyor, where required by law.

Date Created: 4/15/2021 Date Revised: 4/15/2021 File Path: S:\GIS\Invenery\Pleasant Prairie Solar Project\MXD\Wells in Project Area.mxd
GIS Analyst: Peter Marney

Wells in Project Area Pleasant Prairie Solar Project Franklin County, Ohio



121 Continental Drive, Suite 308
Newark, DE 19713 USA
Phone (+1) 302-395-1919 Fax (+1) 302-395-1920
www.cardno.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

4/20/2021 2:54:50 PM

in

Case No(s). 20-1679-EL-BGN

Summary: Response to Fourth Data Request from Staff of the Ohio Power Siting Board electronically filed by Christine M.T. Pirik on behalf of Pleasant Prairie Solar Energy LLC