BEFORE THE OHIO POWER SITING BOARD

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

NO PRAIRIE SOLAR, LLC'S LIST OF ISSUES

Subsequent to the filing of Pleasant Prairie Solar Energy, LLC's (Applicant) application to the Ohio Power Siting Board (Board) on February 19, 2021 for a certificate of environmental compatibility and public need concerning Applicant's proposed Pleasant Prairie Solar project (Project), the Board issued an Entry establishing the procedural schedule in the case. The May 11, 2021 Entry directed interested parties to file on or before July 30, 2021 a list of issues about which they may be interested in pursuing at the August 16, 2021 evidentiary hearing. Pursuant to that Entry, No Prairie Solar LLC submits the following list of issues:

- The placement of hundreds of acres of solar panels and fences surrounding the No Prairie Solar Members' (Members) properties and on the public roads near the Members' properties and the Applicant's commitments for planting vegetation barriers between the solar project structures and equipment and Members' properties to minimize visual impacts;
- 2. The placement of vegetation barriers in the setbacks between the Project area and neighboring properties;
- 3. The glare to be observed from the solar arrays, including the daily

- and seasonal changes to glare;
- 4. The specific locations for the solar panels, night lights, and other Project components, including whether the components are appropriately placed, and sufficiently installed;
- 5. The setbacks proposed between the neighboring properties (including the Members' properties) and the Project's fences and other components;
- 6. The identification, protection, and repair of public drainage tiles that are damaged by the Project's construction;
- 7. The existing storm water drainage patterns that protect the Members' land from being flooded by runoff from the Project area;
- 8. The Application's impact on incorporate drainage improvements previously planned for in the area by the Franklin County Engineers Office ("Foley Ditch Project");
- 9. The noise from the Project's components;
- 10. The noise from the Project during the construction phase, including but not limited to, pile driving and site preparation work;
- 11. The testing and mitigation for potential well water contamination from installed systems and structures related to the Project, including the provision of financial assurance or bonding for future testing and remediation;
- 12. The evaluation, mitigation, and preparation for site equipment fire and other emergency events;
- 13. The financial assurance or bonding for decommissioning, fire,

- flood, tornado or other catastrophic events;
- 14. The impact of the Project on residential property values;
- 15. The nature of the probable environmental impact of the Project pursuant to R.C. 4906.10(A)(2);
- 16. Whether the Project represents the minimum adverse environmental impact, considering the state of available technology and the nature and economics of the various alternatives, and other pertinent considerations pursuant to R.C. 4906.10(A)(3);
- 17. Whether the Project will serve the public interest, convenience, and necessity pursuant to R.C. 4906.10(A)(6);
- 18. Whether the Applicant complied with the public information program requirements set forth in Ohio Adm.Code 4906-3-03;
- 19. Relevant issues that may be raised by Applicant, Staff, or any other parties to the proceeding through written testimony or at the evidentiary hearing.

No Prairie Solar hereby reserves the right to amend or supplement this list of issues. Additionally, No Prairie Solar's failure to include an issue on the above list does not constitute a waiver of No Prairie Solar's right to cross-examine witnesses on additional issues at the evidentiary hearing in this matter.

Respectfully submitted,

/s/ Kimberly W. Bojko

Kimberly W. Bojko (0069402) (Counsel of Record) Angela Paul Whitfield (0068774) Jon Wygonski (0100060) Carpenter Lipps & Leland LLP

280 North High Street, Suite 1300

Columbus, Ohio 43215 Telephone: (614) 365-4100

Email: bojko@carpenterlipps.com
 paul@carpenterlipps.com
 wygonski@carpenterlipps.com
 (willing to accept service by email)

Counsel for No Prairie Solar, LLC

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio'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 the case. In addition, the undersigned hereby certifies that a copy of the foregoing document also is being served via electronic mail on July 30, 2021 upon the parties of record.

/s/ Kimberly W. Bojko
Kimberly W. Bojko

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/30/2021 2:42:54 PM

in

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

Summary: Notice No Prairie Solar, LLC's List of Issues electronically filed by Mrs. Kimberly W. Bojko on behalf of No Prairie Solar, LLC