

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of)	
Kingwood Solar I LLC for a Certificate of)	Case No. 21-0117-EL-BGN
Environmental Compatibility and Public Need)	

**LIST OF ISSUES OF CONCERNS OF INTERVENORS, THE BOARD OF TRUSTEES
OF XENIA TOWNSHIP, OHIO, THE BOARD OF TRUSTEES OF CEDARVILLE
TOWNSHIP, OHIO, AND THE BOARD OF TRUSTEES OF MIAMI TOWNSHIP, OHIO**

Pursuant to the August 26, 2021 Entry of the Ohio Power Siting Board Administrative Law Judge, Intervenor, the Board of Trustees of Xenia Township, Ohio, the Board of Trustees of Cedarville Township, Ohio, and the Board of Trustees of Miami Township, Ohio (collectively, the “Intervenor”), hereby file their list of issues citing specific concerns about which they may be interested in pursuing cross-examination of witnesses at the December 13, 2021 adjudicatory hearing. By filing this list of issues, Intervenor do not waive their right to explore other issues during cross-examination. The issues of concerns are:

1. Public interest, convenience and necessity of the Kingwood Solar I, LLC Solar Project (the “Project”);
2. The Project’s impact on existing aesthetics and viewshed. The Project will destroy the rural quality of the area. The rural, agricultural nature of the area is a greater public good than the benefits the Applicant alleges will result from the Project;
3. The Project’s impact on local property values;
4. The Project’s impact on local tourism to nearby parks and areas of interest, such as the Little Miami River and watershed, Glen Helen Nature Preserve, John Bryan State Park, Clifton Gorge State Nature Preserve, the Village of Yellow Springs, and the Historic Clifton Mill;

5. The Project does not comply with local zoning ordinances;
6. The Project's impact on vegetation within the Project area;
7. The Project's impact on agricultural land use and production in and around the Project area;
8. The Project's impact on soil and topsoil quality and quantity in the Project area;
9. The Project's effect on surface water contamination, sedimentation, drainage, and erosion in and downstream of the Project area;
10. The Project's effect on local Ohio cultural resources;
11. Presence, aesthetic, and dangers of solar panel glare in the Project area;
12. Project decommissioning in a manner that insures complete land restoration of the Project area without Project-related environmental contamination and blight;
13. Financial security for decommissioning;
14. Impact of extreme weather events, including, but not limited to, tornados, high-wind events, hail, and thunderstorms in and around the Project area;
15. Noise generated by the construction, operation and maintenance of the Project;
16. Project impacts to drinking water and groundwater resources in, around, and downgradient of the Project area;
17. The Project's effect on air and soil temperatures in and around the Project area;
18. The Project's effect on local wildlife; and
19. Local health effects from electro magnetic fields produced by the Project.

Respectfully submitted,

/s/ David Watkins

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was filed electronically with the Ohio Power Siting Board on November 22, 2021. 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 the case.

/s/ David Watkins

David Watkins (0059242)

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in

Case No(s). 21-0117-EL-BGN

Summary: Notice List of Issues of Concern of Intervenors, the Board of Trustees of Xenia Township, the Board of Trustees of Cedarville Township, and the Board of Trustees of Miami Township electronically filed by David Watkins on behalf of XENIA TOWNSHIP TRUSTEES, BOARD OF TRUSTEES OF XENIA TOWNSHIP OHIO TRUSTEES