

**Case ID - Case Name:** 18-1334-EL-BGN - Hecate Energy Highland Solar Farm  
**Company Name:** Hecate Energy Highland LLC  
**Case Status:** Under Construction  
**Certificate Approved Date:** May 16, 2019  
**Construction Start Date:** January 14, 2022  
**Case Type:** Solar Generation  
**Capacity, Acreage:** 300.0 MW, 3400 acres  
**County(s):** Highland  
**Township(s):** Clay, Whiteoak  
**Report Number:** CI24-18-1334-001R1

### Background

On May 16, 2019, the Ohio Power Siting Board (Board) issued a Certificate of Environmental Compatibility and Public Need (Certificate) to Hecate Energy Highland, LLC (Highland or Certificate Holder) in Case No. 18-1334-EL-BGN for the construction, operation, and maintenance of a 300 megawatt (MW) solar-powered electric generation facility (Project), subject to the conditions set forth in the Stipulation and consistent with the Opinion, Order, and Certificate. Of the 2,800 acres leased, Highland's footprint occupies 1,919 of those acres located in Clay and Whiteoak townships in Highland County. The Project's current developer is D. E. Shaw Renewable Investments (DESRI). The general contractor onsite is SOLV Energy (SOLV). Construction began on January 14, 2022, and is still ongoing, as of the date of this report.

### Summary

On January 22, 2024, Ohio Power Siting Board Staff (Staff) issued Compliance Inquiry Report CI24-18-1334-001<sup>1</sup> (Previous Report). The Previous Report detailed Staff's ongoing coordination with Highland to achieve compliance and laid out expectations to remediate outstanding compliance issues. Staff requested a response to the report be publicly docketed no later than February 20, 2024. Additionally, Staff conducted an onsite Construction Review on February 21, 2024, with representatives from Staff, Ohio Environmental Protection Agency (OEPA) Division of Surface Water, DERSI, and SOLV present.

Based on Highland's February 20 response, Staff examined the following issues during the February 21, 2024, Construction Review:

- Off-road traffic.
- Bare soil stabilization.
- Improperly stored materials and dumpsters.
- Inadequately labeled photographs of remediation efforts.
- Record keeping of stabilization work at de-vegetated, idle areas.

---

<sup>1</sup> [dis.puc.state.oh.us/ViewImage.aspx?CMID=A1001001A24A22B50232A02453](https://dis.puc.state.oh.us/ViewImage.aspx?CMID=A1001001A24A22B50232A02453)

## Findings

- Highland has shown a significant effort to reduce unnecessary off-road traffic by use of snow fence and roping. Staff witnessed these best management practices (BMPs) applied to particularly troublesome areas where workers were either taking shortcuts or running off the shoulder of the access roads.
- Highland has covered a significant area with mulch material in an effort to temporarily stabilize bare soil areas, though there are still significant areas that remain to be stabilized in accordance with the SWPPP.
- Staff found materials and dumpsters staged, generally, in an orderly manner in locations that reduce off-road traffic.
- In Highland's response to the Previous Report, Staff found 3 out of 5 photographs taken after January 22, 2024, to be labeled correctly.
- Staff has yet to receive a complete Straw Mulch Stabilization Log or a record of temporary and permanent soil stabilization work in a weekly monitoring report as requested.

## Recommendations and Requests

- Staff recommends Highland continue to monitor off-road traffic and apply the same BMPs as work progresses across the site.
- For guidance regarding ongoing soil stabilization efforts, please refer to OEPA's February 29, 2024, Construction Stormwater Inspection Summary Letter. Staff recommends materials and dumpsters continue to be handled in a manner that minimizes site soil disruption.
- Staff requests that the location data watermark on all future photos be in degree decimal format.
- As requested in the Previous Report and until further notice, Staff recommends that Highland submit a weekly monitoring report containing a record of temporary and permanent stabilization work, including the Weekly Straw Mulch Log.

## Eric Morrison

Public Utilities Commission of Ohio  
Power Siting Department  
Field Compliance Investigator

### Attachment(s)

Photo 1: Straw mulch stabilization  
Photo 2: Access road shoulder protection, Straw mulch stabilization  
Photo 3: Shortcut elimination

### CC:

Thomas Lindgren, Ohio Attorney General's Office  
Nicholas Walstra, Attorney Examiner  
Sean Gorey, DESRI  
Michael Settineri, Vorys  
Daniel Hoit, OPEA

Photo 1: Straw mulch stabilization



Photo 2: Access road shoulder protection, Straw mulch stabilization



Photo 3: Shortcut elimination



**This foregoing document was electronically filed with the Public Utilities  
Commission of Ohio Docketing Information System on**

**3/11/2024 3:03:37 PM**

**in**

**Case No(s). 18-1334-EL-BGN**

Summary: Report detailing the first response by OPSB Staff to the Certificate holder's reply to Compliance Inquiry CI24-18-1334-001 electronically filed by Eric R. Morrison on behalf of OPSB Staff.