

BEFORE
THE OHIO POWER SITING BOARD

In the Matter of the Application of)
Champaign Wind, LLC, for a)
Certificate to Install Electricity) Case No. 12-0160-EL-BGN
Generating Wind Turbines in)
Champaign County)

**MEMORANDUM SETTING FORTH LIST OF ISSUES FOR CROSS-EXAMINATION
BY CITY OF URBANA, OHIO**

Pursuant to the Administrative Law Judge’s Entry of August 2, 2012, setting a procedural schedule, the City of Urbana, Ohio ("the City"), by its legal representative, submits the following list of issues for the Ohio Power Siting Board and the Administrative Law Judge to consider for testimony at the adjudicatory hearing scheduled to commence November 8, 2012. The Entry set a deadline of October 15, 2012 for parties to file lists of issues. As of this date, the City has not yet been granted intervener status but is filing this memorandum to comply with the ALJ’s order. The City states the following issues are questions of specific concern to the City which must be developed through cross-examination of witnesses to adequately protect the City’s interests:

A. CareFlight Operations

How will the turbines in the project area affect CareFlight operations stationed at the City-owned Grimes Field? The OPSB Staff Report, filed October 10, 2012, proposes a “medical needs service plan” (Condition 70) that would “assure immediate shut downs” for turbines during CareFlight responses to emergencies such as car crashes in the project area, but the Staff Report does not recognize that turbine towers create a navigable airspace obstruction even when shut down to avoid turbulence. How will this issue be addressed by Champaign Wind as it has not yet contacted CareFlight in spite of Staff instructions to do so?

B. Potential Interference with Emergency Communications

Will the turbines interfere with emergency communications for first responders with CareFlight and the Urbana Fire Division with respect to base and field (mobile) units?

Will the turbines create interference with radio traffic between pilots and Grimes Field? The OPSB Staff Report, on page 35 and as part of Condition 53, acknowledges potential interference with radio and microwave signals. Does Champaign Wind plan to conduct a Fresnel Zone analysis for the Yankee Hill Road signal booster tower for 911 dispatch services, which is located inside the project area? How does Champaign Wind plan to address problems with interference between base and field radio units?

C. Urbana Fire Division Responses to Turbine Sites

How does Champaign Wind plan to equip and train the Urbana Fire Division for responses to turbine site emergencies and what will be the economic impact of the facility on the fire division's operations? As noted in the City's Petition for Leave to Intervene, Urbana is the only city in Champaign County with a full-time professional fire-fighting and emergency medical service. As Champaign Wind proposes to operate the facility with just seven full-time support personnel (see Application Ex. G, page 11), any emergencies at these turbine sites would necessarily require UFD first responders, with mutual aid from other local volunteer departments.

Condition 42 addresses coordination by Champaign Wind with local fire departments during construction, while Condition 43 addresses such planning for the operation of the facility once constructed. But the OPSB report does not recommend Champaign Wind provide specialized training or equipment or funding to local firefighters or paramedics. Three years ago, OPSB staff acknowledged rural first responders lack the resources to deal with such specialized

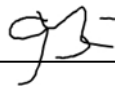
emergencies (See Buckeye Wind testimony of Andrew Conway, November 19, 2009).
Moreover, if CareFlight is unable to fly within the turbine project area, UFD and other local ambulance crews may be responsible for more ground-based transports. How does Champaign Wind plan to address these issues?

D. Other Airport Operations

How will the proposed installations affect other airport operations at the City-owned Grimes Field? The OPSB Staff Report recommends notification of pilots through affected flight service stations (Condition 67) and requirements for lighting of the towers (Condition 66) but does not address the impact of the project on annual events such as the gathering of experimental and antique aircraft (the Mid-East Regional Fly-In, or “MERFI”) and a hot-air balloon festival. As hot-air balloons and ultra-lights/micro-lights tend to travel with the prevailing winds, how much risk will turbines pose to those flights? Will the city lose tourism revenue generated by these events if Champaign Wind does not minimize such risks?

For the foregoing reasons, the City of Urbana requests the Ohio Power Siting Board approve this list of issues timely submitted for cross-examination by the City of Urbana in the matter of the application of Champaign Wind LLC.

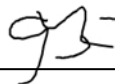
Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that, on October 15, 2012, a copy of the foregoing Memorandum was served by electronic mail on Howard Petricoff (mhpetricoff@vorys.com); Michael J. Settineri (mjsettineri@vorys.com); Miranda Leppla (mrleppla@vorys.com); Stephen Howard (smhoward@vorys.com); and Gretchen Petrucci (glpetrucci@vorys.com); Champaign County Assistant Prosecutor Jane Napier (jnapier@champaignprosecutor.com); Jack Van Kley (jvankley@vankleywalker.com) and Christopher Walker (cwalker@vankleywalker.com); Stephen Reilly (Stephen.Reilly@puc.state.oh.us), Devin Parram (Devin.Parram@puc.state.oh.us); Kurt P. Helfrich (Kurt.Helfrich@ThompsonHine.com); Philip B. Sineneng (Philip.Sineneng@ThompsonHine.com); Ann B. Zallocco (Ann.Zallocco@ThompsonHine.com); Maureen Brennan (MBrennan@bakerlaw.com); Sally Bloomfield (sbloomfield@bricker.com); and Chad Endsley (cendsley@ofbf.org).



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