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Before  
The Ohio Power Siting Board

2009 JUL 14 11:12:00

In the Matter of the Application )  
of Hardin Wind Energy LLC for a )  
Certificate to Site a Wind- )  
Powered Electric Generation )  
Facility in Hardin County, Ohio. )

PUCO

Case No. 09-479-EL-REN

**Motion to Intervene of the Ohio Farm Bureau Federation**

Now comes the Ohio Farm Bureau Federation (OFBF) pursuant to Section 4906-7-04 of the Ohio Administrative Code (OAC), and moves to intervene in the above docket as a full party of record. OFBF has a real and substantial interest in this matter for the reasons set forth in the accompanying memorandum of support.

Wherefore, for the reasons stated below, OFBF requests that its motion for intervention be granted and that it be made a full party of record.

Respectfully Submitted,



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**Memorandum in Support of Motion to Intervene  
of the Ohio Farm Bureau Federation**

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On July 10, 2009, Hardin Wind Energy LLC filed an application for a Certificate of Environmental Compatibility and Public Need for the Hardin Wind Farm in Hardin County, Ohio. According to the application, the proposed project consists of 120 General Electric (GE) 2.5 MW model XLI wind turbines or 200 GE 1.5 MW model XLE wind turbines. The wind farm will interconnect to the regional electrical system through the construction of a substation adjacent to the transmission lines that cross through the project area.

The general purpose of the project is to produce clean, renewable, reliably priced, low cost electricity to the Ohio bulk power transmission system. The electricity generated by the wind farm will be integrated into the transmission grid operated by the PJM for sale to energy service providers and/or utilities serving farm, small business, residential and industrial customers located in rural, suburban and urban communities.

This project offers a variety of opportunities – both for the developer and the community. The application details a variety of economic benefits, as well as adherence to a number of environmental safeguards. Effective collaboration between the developer, energy service providers, government officials and interested citizens will be vital to ensure that all potential benefits are realized, and consumers at local, state and regional levels can employ the completed wind farm as a tool to help control energy costs.

## **OFBF Should be Granted Intervention as a Party of Record**

Pursuant to Section 4906.7.04 (B), OAC, OFBF moves to intervene in the above docket as a full party of record. OFBF has a real and substantial interest in this matter for the reasons set forth herein.

Rule 4906.7.04 (B) of the OAC states:

The board or the administrative law judge shall grant petitions for leave to intervene only upon a showing of good cause.

(1) In deciding whether to permit intervention under this paragraph, the board or the administrative law judge may consider:

- (a) The nature and extent of the person's interest.
- (b) The extent to which the person's interest is represented by existing parties.
- (c) The person's potential contribution to a just and expeditious resolution of the issues involved in the proceeding.
- (d) Whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice an existing party.

The Ohio Farm Bureau Federation (OFBF) and its member county Farm Bureaus, including Hardin County maintain a non-profit organization representing agricultural interests at the state and local levels. Over 230,000 member families belong to the organization state wide, including over 1300 families in the Hardin County Farm Bureau. Many Farm Bureau members are involved in farm and agribusiness activities - food processing, commodity processing/conditioning/handling, biofuel production and greenhouse operations. Some members are involved in larger scale industries and manufacturing while others have small business enterprises - restaurants, cleaners and other services. All are residential energy consumers.

Farm Bureau members have a keen interest in effective wind energy development. Along with enhancing their income, farmers engaged in wind leasing agreements want to make sure that construction activities being conducted on their property adhere to procedures ensuring soil and water conservation as well as air quality. Residents in the rural

neighborhoods want assurances that environmental considerations – setbacks, noise standards, shadow flicker and other factors – are addressed with effective turbine placement. Area businesses want to make sure that incorporation of a wind facility in the community enhances local commerce and economic development. In short – OFBF has extensive experience gathering input, addressing the needs of and representing farm, small business and rural residents concerning energy development. This perspective cannot be provided by another existing party.

On the state level, OFBF has worked with utilities, energy service providers, the Public Utilities Commission of Ohio, other government agencies and interested citizen/consumer groups to explore and implement new strategies and technologies to help control energy costs. Some of this work spans several decades.

Moreover, OFBF is a charter member of the Ohio Department of Development – Ohio Wind Working Group, representing farm and rural residential energy consumers in this stakeholder process. OFBF representatives have held key positions in action teams helping create effective wind energy development policies for use by Ohio's state and local government leaders. These activities included working with wind developers, as well as ensuring that issues and concerns surfaced by a variety of citizen's groups with varied interests and concerns were included in constructive dialogue during the process.

On the local level, OFBF field staff and volunteer leaders with the Hardin County Farm Bureau worked with wind developers, government leaders and interested citizen/consumer groups to explore how wind energy development should be addressed at the local level. Again, Farm Bureau represented farm, small business and residents in a stakeholder process that included a variety of groups with varied interests and concerns.

Accordingly, Farm Bureau will be able to share their experiences and unique perspective with the OPSB as it works with others to evaluate this case. Moreover, Farm Bureau fully understands and appreciates the rules and regulations governing the OPSB evaluation process concerning the Certificate of Environmental Compatibility and Public

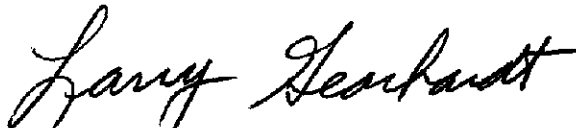
Need sought by Hardin Wind Energy LLC in these proceedings. OFBF's participation in this process will not cause undue delay, will not unjustly prejudice any existing party and will contribute to the just and quick resolution of issues and concerns raised.

Given the diverse, yet unique interests of its members, experience with energy development issues and support for collaboration, the Ohio Farm Bureau Federation submits that good cause exists to grant it leave for intervene in this proceeding.

**Conclusion**

Wherefore, for the reasons explained above, the Ohio Farm Bureau Federation requests that its motion to intervene be granted and that it be made a full party of record.

Respectfully Submitted,



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**Certificate of Service**

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served on this 13<sup>th</sup> day of July, 2009 by regular U.S. Mail, postage prepaid, or by electronic mail, upon the persons listed below.

  
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