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Before
The Ohio Power Siting Board

In the Matter of the Application of)
Black Fork Wind Energy, LLC for a)
Certificate to Install Numerous)
Electricity Generating Wind)
Turbines in Crawford and Richland)
Counties, Ohio)

Case No. 10-2865-EL-BGN

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.

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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On March 10, 2011, Black Fork Wind LLC filed an application for a Certificate of Environmental Compatibility and Public Need for the Black Fork Wind Energy Project. The project area includes portions of Auburn, Jackson, Jefferson and Vernon Townships in Crawford County and Plymouth, Sandusky and Sharon Townships in Richland County.

According to the application, the facility will have a maximum nameplate capacity of up to 200 megawatts (MW). The applicant is considering a variety of wind turbine generator models, ranging in generation capacity from 1.6 MW to 3.0 MW, and the completed project will consist of no more than 91 wind turbines. In addition, the facility will include access roads, electrical transmission/collection lines, a construction staging area, a concrete batch plant, a substation and an operation & maintenance facility.

The substation will collect renewable energy generated by the project and deliver these resources through a new transmission line that American Electric Power (AEP) proposes to build, own, and install on the open position of their existing transmission infrastructure in the project area. This line will deliver the generation directly into the transmission grid operated by PJM Interconnection LLC (PJM).

The project is designed to produce clean, renewable, reliably priced, low cost electricity to the Ohio bulk power transmission system. Generation will be integrated into the transmission grid 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 of the OAC, OFBF moves to intervene in this proceeding as a full party of record. OFBF has a real and substantial interest in this matter for the reasons set forth herein.

Section 4906-7-04(B) of the OAC states:

(B) 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 and its member county Farm Bureaus, including Crawford and Richland Counties maintain a non-profit organization representing agricultural interests at the state and local levels. Over 214,000 member families belong to the organization state wide, including over 1100 families in the Crawford County Farm Bureau and over 1800 in the Richland 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 on their property adhere to procedures ensuring soil and water conservation as well as air quality. Residents in 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 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 citizens groups to explore strategies and introduce new technologies to help consumers and communities control energy costs. Some of this work spans several decades.

OFBF is a charter member of the Ohio Department of Development - Ohio Wind Working Group. Farm Bureau leaders represented farm, small business and residential energy consumers. They held key positions in action teams, helping create effective wind energy development policies for consideration by state and local government leaders. These activities included facilitating constructive dialogue between a variety of stakeholders with diverse interests concerning wind energy development.

On the local level, OFBF field staff and volunteer leaders with the Crawford and Richland County Farm Bureaus 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.

OFBF will be able to share their experiences and unique perspective with the OPSB as it works with others to evaluate this case. The organization fully understands and appreciates the rules and regulations governing the OPSB evaluation process concerning the Certificate of Environmental Compatibility and Public Need sought by Black Fork Wind LLC. 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 to intervene in this proceeding.

Conclusion

For the reasons set forth 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 22nd day of March 2011 by regular U.S. Mail, postage prepaid, or by electronic mail, upon the persons listed below.


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