

BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application)
of Champaign Wind, LLC, for a)
Certificate to Construct a)
Wind-Powered Electric Generating)
Facility in Champaign County, Ohio)

Case No. 12-0160-EL-BGN

DIRECT TESTIMONY OF FEREIDOUN SHOKOUHI, CHAMPAIGN COUNTY ENGINEER

Q. Please provide your full name and any professional degrees and certifications you have achieved.

My name is Fereidoun Shokouhi, and I have a B.S in Civil Engineering and a B.S. in Mining from the University of Missouri-Rolla and I am licensed by the State of Ohio as a Professional Engineer and a Professional Surveyor. I have earned several certifications in my twenty-seven years of experience.

Q. What is your current position?

I am currently the Champaign County Engineer.

Q. How long have you held this position?

I have held the position for eighteen years and will be retiring at the end of my term this year.

Q. How would you calculate an adequate bond or financial assurance?

We need to first determine if the roads and bridges are sufficient for the loads and usage in constructing the project and require improvement of the roads and bridges that are deficient and set that a portion of the cost, maybe 15%, of the total costs will be used for the gap in our estimation of damage to the roads and bridges.

Q. What do you consider in setting the amount of a bond or financial assurance for road and bridge damage?

First, I believe in the reverse of the theory "if you break it, you fix it". We want the roads and bridges fixed, or improved, before construction so that they do not "break". It is a proactive approach. We know what is going to be brought over the road and we know what the roads can handle so the roads should be improved if deficient for the use. Therefore, this should minimize the amount of the bond or financial assurance.

The transportation route is also a large part of the consideration for financial assurance. The proposed route needs to utilize the minimum amount of roads possible and, therefore, cause the minimal amount of damage. In considering the transportation route for this project, we also want the project to utilize first the state and U.S. routes, then the county roads and finally the township roads in order to reduce the damage to the roads in the Champaign County. However, most of the turbines will ultimately travel over the township roads to their final destination. We certainly want to avoid more urban areas, such as Mechanicsburg, Woodstock or Urbana, as those roads have much more infrastructure underneath the roadways which would be impacted, such as water or sewer lines. However, that is an issue for each village or city, but we would make our information available to those municipalities.

The transportation route may also impose widening of roadways or increasing the radius of intersections. However, some of these improvements may also involve restoring the roadways to their original width or radius which is sometimes forgotten in calculation of costs.

Q. *In your opinion, what causes damage to the roads and bridges?*

Damage is caused by illegal or restrictive load weight and also in repetitive legal loads over the roads and bridges in the Champaign County.

Q. *What terms of agreement are you willing to consider for road issues within Champaign County?*

After development of transportation plan and review of the condition of the roads and bridges in the plan, we develop a letter of understanding which should set forth how, when and who will be doing any improvement or any repair of damage to our roads and bridges. Additionally, the letter of understanding shall set forth notification of when construction for repair will occur and setting forth parameter of time for repair as well as when the bond can be taken to pay for repair due to non-performance. We will designate a contact person at the engineer's office and we will want a contact person for the developer in order to coordinate as efficiently and effectively as possible.

It is imperative that the local entity assumes no liability for damage caused by the project nor cause by poor repair of damage of the roads and bridges, as well flagging, etc. Additionally, the developer will be responsible for all aspects of the project, including responsibility for its subcontractors.

During and after construction of the project, the road will be reviewed by our office and such inspection time will be paid for by the developer.

Q. *Has the Ohio Power Siting Board staff ever contacted your for your opinion regarding road issues?*

No, not to date, in this project nor in the prior project for Champaign County.

Q. *Has the developer ever contacted you for your opinion regarding road issues?*

Yes, many times and I have stated to the developer's representatives what I have stated herein. Basically, I want to have after the project what I had before the project, meaning I want my roads to be in the same condition during and after the project as before the project.

Q. *Do you have any information whether this project will be done in conjunction with the prior project improved?*

It is my understanding that the developer may improve a road and it may be utilized by both projects, but I have not received final proposed transportation plans for either project.

Some issues may need to be addressed if the project is going to be constructed at a different time than the prior project, such as time for leaving improvements that need to be removed to restore the road to its original condition, etc.

Q. *What is your role in this siting process?*

My role is solely to protect the county's roads and bridges pursuant to my statutory authority.

Q. *Do you believe that a bond or financial assurance is necessary for roads and bridges?*

Yes. It is a good practice to ensure timely repair of our roads. When there is a risk of loss of public funds, it is necessary to protect county and township funds by requiring an adequate bond or other financial assurance.

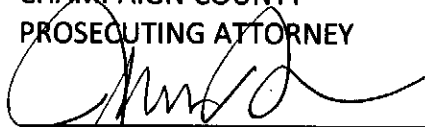
Q. *What amount of bond or financial assurance would you require for damage to roads and bridges in decommissioning?*

What it takes to construct the project is the same, for roads and bridges, to decommission the project. Therefore, the estimated cost of construction on roads

and bridges should be equal to the amount designated for decommissioning, at future value.

Respectfully submitted,

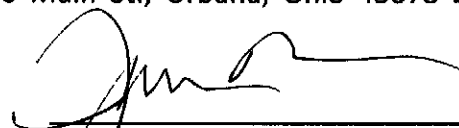
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was sent to Miranda R. Leppla, Esq., Vorys, Sater, Seymour & Pease, 52 East Gay Street, P.O. Box 008, Columbus, Ohio 43216-1008, to Chad A. Endsley, Esq., Ohio Farm Bureau Federation, 280 N. High Street, P.O. Box 182383, Columbus, Ohio 43218-2383, to Christopher A Walker, Esq., Van Kley & Walker LLC, 137 North Main Street, Suite 316, Dayton, Ohio 45402, Stephen Reilly and Devin Parram, Assistant Attorneys General, Public Utilities Section, 180 East Broad Street, 6th Floor, Columbus, Ohio 43215-3793 and Kurt P. Helfrich, Philip B. Sineneng and Ann B. Zallocco, Thompson Hine LLP, 41 South High Street, Suite 1700, Columbus, OH 43215-6101 and to Gil S. Weithman, City of Urbana Law Director, 205 S Main St., Urbana, Ohio 43078 by electronic service, this 5th day of November, 2012.


Jane A. Napier (0061426)

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Case No(s). 12-0160-EL-BGN

Summary: Testimony of Fereidoun Shokouhi, Champaign County Engineer electronically filed by Jane A. Napier on behalf of Champaign County Board of Commissioners and Union Township Board of Trustees and Urbana Township Board of Trustees and Goshen Township Board of Trustees