

FILE

BEFORE
THE OHIO POWER SITING BOARD

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In the Matter of the Application
of Champaign Wind, LLC,
to Amend a Certificate Issued
in Case No. 08-666-EL-BGN

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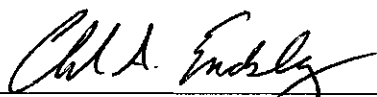
PUCO
Case No. 13-360-EL-BGA

Motion to Intervene of the Ohio Farm Bureau Federation

The Ohio Farm Bureau Federation ("OFBF") pursuant to Section 4906-7-04 of the Ohio Administrative Code ("OAC"), 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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**BEFORE
THE OHIO POWER SITING BOARD**

**In the Matter of the Application
of Champaign Wind, LLC,
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Case No. 12-0160-EL-BGA

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

On March 19, 2013 Champaign Wind, LLC filed an application to amend a Certificate of Environmental Compatibility and Public Need ("Certificate") for the Buckeye I Wind Farm in Ohio Power Siting Board ("OPSB") case number 08-666-EL-BGN. In the application the company proposes to shift a large portion of the project's collection line system and all three construction staging areas to the same locations and areas proposed for the Buckeye II Wind Farm in case No. 12-160-EL-BGN.

According to the application, the company is proposing to amend the Project's collection line design and the location and size of three construction staging areas; relocate the project substation on the same parcel; relocate four turbine access roads and construct one new access road. The Applicant recently obtained land control of additional acreage allowing it to improve the project's design by shifting collection lines from overhead public right-of-ways to underground locations on leased private property. In addition, the Applicant has decided to relocate and resize all three construction staging areas and relocate the substation on the same parcel so that the same construction staging areas and substation may be used for both the Buckeye I project and Buckeye II project. Four access roads will require relocation as a result of

the collection line design, staging area shift and substation shift and one new access road will be constructed.

The eastern and southern construction staging areas and substation are within the same parcels as previously located, but are being shifted slightly to accommodate landowner requests. The western construction staging area is being moved 1.3 miles west. The western construction staging area relocation was selected after analyzing component delivery routes, which indicated this location was preferred to the previous one. The substation is shifting by 1,000 feet center to center, with the shift putting the substation 1,227 feet from the nearest non-participating residence versus 1,531 feet as originally designed. The Buckeye I project and the Buckeye II project will both utilize the same construction staging areas and the substation. All relocated construction staging areas, access roads and the substation will be located in active agricultural fields. The new access road will also be located in active agricultural fields, but will have limited, temporary forest impacts of 0.14 acres. Also, the buried collection lines are located in approximately 93% active agricultural or other disturbed land.

Given these changes, the company is submitting this Petition to the Board for its review and approval of these project design changes. Because the proposed changes in the facility will not result in a material increase in any environmental impact of the facility nor cause a substantial change in the location of any of the Project's turbines, Champaign Wind, LLC is requesting that the Board approve this Petition without the necessity of an evidentiary hearing.

The general purpose of Buckeye Wind I and Buckeye Wind II is to produce wind powered electricity that will maximize energy production from wind resources within the project area in order to deliver clean, renewable electricity to the Ohio bulk power transmission system to serve the needs of electric utilities and their customers. The electricity generated by the facility will be transferred to the transmission grid operated by PJM Interconnection, LLC ("PJM"). The

electricity generated by this facility will be for sale at wholesale under a power purchase agreement.

These projects offer a variety of opportunities – both for the developer and the community. Previous applications approved by the OPSB detail 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.

Rule 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 the Champaign County Farm Bureau, 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 1400 families in the Champaign 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 was involved with 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. The organization continues to help citizens and local leaders in several areas of the state create working groups to discuss and address wind energy development issues and concerns.

On the local level, OFBF field staff and volunteer leaders with the Champaign County Farm Bureau work 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 represents farm, small business and residents. It utilizes its extensive policy development process to generate stakeholder dialogue that includes a variety of groups with varied interests and concerns.

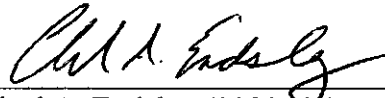
OFBF will be able to share their experiences and unique perspective with the Ohio Power Siting Board (“OPSB”) as it works with others to evaluate this case. The organization fully understands and appreciates the rules and regulations governing the OPSB evaluation process concerning the Certificate of Environmental Compatibility and Public Need sought by Champaign 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 12th day of April 2013, by regular U.S. Mail, postage prepaid, or by electronic mail, upon the persons listed below.

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