

**BEFORE
THE OHIO POWER SITING BOARD**

**In the Matter of the Application
of the 6011 Greenwich Windpark, LLC
for a Certificate to Site Wind-Powered
Electric Generation Facilities in Huron
County, Ohio**

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Case No. 13-990-EL-BGN

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,

/s/ Chad A. Endsley

Chad A. Endsley (0080648)

Chief Legal Counsel

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

On December 23, 2013 6011 Greenwich Windpark, LLC filed an application for a Certificate of Environmental Compatibility and Public Need (“Certificate”) to build a wind farm project. The facility will be located within approximately 4600 acres of leased land in Greenwich Township in Huron County, Ohio.

According to the application, the facility would consist of approximately 25 wind turbines, with all associated infrastructure, including underground collection lines, access roads, electrical connection system, substations, construction staging area, meteorological towers and an operation and maintenance facility. The applicant will utilize a commercial wind turbine model with generation capacity of approximately 2.4 megawatts (“MW”); giving the facility a maximum generating capacity of 60 megawatts.

The general purpose of the facility 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 facility will deliver power to a single interconnection point on the Greenwich to South Greenwich 69 Kilovolt (“kv”) Transmission Line owned by American Electric Power. The electricity generated by the facility will be transferred to the

transmission grid operated by PJM Interconnection, LLC (“PJM”) for sale at wholesale or under a power purchase agreement.

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.

OBBF Should be Granted Intervention as a Party of Record

Pursuant to Section 4906-7-04 of the OAC, OBBF moves to intervene in this proceeding as a full party of record. OBBF 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 Huron County Farm Bureau, maintain a non-profit organization representing agricultural interests at the state and local levels. Over 208,000

member families belong to the organization state wide, including over 1300 families in the Huron 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 Huron 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 6011 Greenwich Windpark, 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,

/s/ Chad A. Endsley

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Chief Legal Counsel

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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 9th day of January 2014 by electronic mail, upon the persons listed below.

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/9/2014 2:37:59 PM

in

Case No(s). 13-0990-EL-BGN

Summary: Motion to Intervene electronically filed by Mr. Chad A Endsley on behalf of Ohio Farm Bureau Federation, Inc.