BEFORE

THE OHIO POWER SITING BOARD

In the Matter of the Application of **HARDIN WIND ENERGY LLC** for an Amendment to its Certificate to Install and Operate a Wind-Powered Electric Generation Facility in Hardin County, Ohio.	))))	Case No. 14-1030-EL-BGA

MID-OHIO ENERGY COOPERATIVE, INC.'S
PETITION FOR LEAVE TO INTERVENE

Pursuant to Ohio Admin. Code § 4906-7-04(A)(2), Mid-Ohio Energy Cooperative, Inc. ("Mid-Ohio") respectfully petitions the Ohio Power Siting Board (the "Board") for leave to intervene in the above-captioned proceeding. As set forth in the attached Memorandum in Support, Mid-Ohio has a real and substantial interest in this proceeding. Its interests are not adequately represented by any other party to this matter, and its participation will contribute to a just and expeditious resolution of the issues and questions presented. Further, Mid-Ohio's participation will not unduly delay the proceedings or cause undue prejudice to any party.

Accordingly, Mid-Ohio respectfully requests that the Board grants its petition pursuant to Ohio Admin Code § 4906-7-01.

Respectfully submitted,

MID-OHIO ENERGY COOPERATIVE, INC.

By: /s/ Philip B. Sineneng

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MEMORANDUM IN SUPPORT OF PETITION FOR LEAVE TO INTERVENE

I. BACKGROUND

On June 9, 2014, Hardin Wind Energy LLC ("Hardin") filed an application for a second amendment to the March 22, 2010 Certificate of Environmental Compatibility and Public Need (the "March Order"), issued pursuant to Ohio Admin. Code 4906-17 in connection with a 300-megawatt wind-powered electric generation facility in Hardin County, Ohio (the "Wind Project"). Hardin's proposed second amendment seeks approval for a new model of wind turbine and an updated layout of the Wind Project, among other things.

Mid-Ohio Energy Cooperative, Inc. ("Mid-Ohio") is a member-owned distribution electric utility serving over 8,900 meters in portions of ten Ohio counties, including Hardin County. Mid-Ohio relies on a combination of licensed and unlicensed radio systems to transmit communications between its central control room located in Kenton, Ohio and critical points along the distribution system, including 13 distribution substations. About 90% of the Wind Project will be situated within Mid-Ohio's certified territory.

Although Mid-Ohio does not object to the Wind Project, it is concerned that the Wind Project, as currently planned, will include turbines that interfere with the licensed microwave

signals transmitted by Mid-Ohio. Specifically, Mid-Ohio is concerned that Hardin's proposed turbines will interfere with Mid-Ohio's 11 Ghz microwave radio systems and its 900 Mhz omni-directional non-licensed sites used to control its down line distribution equipment. Without its participation in these proceedings, Mid-Ohio risks having its valid and legitimate interests compromised. These are interests that only Mid-Ohio can assure are adequately heard and represented. Furthermore, allowing Mid-Ohio to participate at this critical juncture will assist the Board and spare Hardin from incurring unnecessary expenses in the future to correct a misguided course of action that can be avoided now.

II. ARGUMENT

The Board or an administrative law judge may consider the following when considering petitions to intervene:

(a) The nature and extent of the petitioner's interest;

(b) The extent to which the petitioner's interest is represented by existing parties;

(c) The petitioner's potential contribution to a just and expeditious resolution of the issues involved in the proceeding; and

(d) Whether granting the requested intervention would unduly delay the proceeding or unjustly prejudice an existing party.

See Ohio Admin. Code § 4906-7-04(B). As fully set forth below, Mid-Ohio exceeds each of these criteria.

A. Because The Wind Project May Significantly Interfere With Mid-Ohio Business Operations And Service To Its Customers, Mid-Ohio Has A Significant, Vested Interest In The Outcome Of This Proceeding.

Mid-Ohio is concerned that (a) the data transmitted between its control tower center and substations, which are critical for electric grid reliability and public safety, will be adversely affected by the location and operation of Hardin's turbines, (b) Hardin's turbines will interfere

with Mid-Ohio's 11 Ghz microwave systems and its 900 Mhz omni-directional non-licensed sites, and (c) Hardin's turbines will cause additional interference with Mid-Ohio's communication systems. Such interference threatens to disrupt the electric grid, and may interrupt service to thousands of homeowners and businesses. Indeed, the magnitude of the potential avoidable permanent interference with Mid-Ohio's data transmissions as the result of the locations of Hardin's turbines would be insurmountable, resulting in loss of critical services to Mid-Ohio's members/customers, adverse impact on the "Smart Grid" systems, potential danger to Mid-Ohio's employees, and extraordinary expense to re-engineer Mid-Ohio's systems to remain operational. With all that it has at stake, there can be no doubt that Mid-Ohio has a bona fide vested interest in the outcome of this proceeding.

B. No Other Party Is Adequately Representing Mid-Ohio's Interest In This Proceeding.

Since learning about the Wind Project, Mid-Ohio and Hardin representatives, including its engineers and consultants, have collaborated to resolve their competing concerns over the Wind Farm. Although Mid-Ohio genuinely appreciates Hardin's verbal and written assurances that they are taking Mid-Ohio's concerns seriously, neither Hardin nor any other party to this proceeding have interests that are fully aligned with that of Mid-Ohio, or are even similarly situated as Mid-Ohio. For this reason, Mid-Ohio is the only party capable of adequately representing its interests in this proceeding.

C. Mid-Ohio's Participation Will Allow The Board To Make A Fully Informed Decision.

Mid-Ohio's participation will ensure that the Board has complete, accurate information before rendering its decision on the proposed amendment. Mid-Ohio's involvement will facilitate a just and expeditious resolution of the outstanding issues. Mid-Ohio can provide

Hardin with ARC Map files, which depict all of Mid-Ohio's point-to-point equipment and omni-directional equipment, the transmit power for each of Mid-Ohio's transmission sites, the associated receiver sensitivity, a copy of the operations manual for Mid-Ohio's MDS 900 Mhz radios, and the antennae heights for the omni-directional system. Mid-Ohio can further corroborate, or adjust as necessary, the location and coordinates of every Mid-Ohio structure that may be jeopardized by the Wind Farm in order to ensure an accurate analysis of the Wind Farm's potential impacts. Because the Board should be aware of all ramifications of the potential obstructions to make a fully informed decision, Mid-Ohio should be allowed to intervene in this proceeding.

D. No Undue Prejudice Or Delay Will Be Caused By Allowing Mid-Ohio To Intervene In The Proceeding.

Granting Mid-Ohio's petition will not cause undue prejudice or delay. Instead, it will spare Hardin unnecessary delay in the future. First, construction of the facility has not yet begun. By taking the time now to plan the layout of the Wind Project carefully, Hardin can avoid making costly corrections in the future. Given the steps that Hardin needs to take in completing the review and approval process, Hardin will not bear any undue burden or expense by taking the necessary actions now to eliminate interference with Mid-Ohio's communication systems.

On the other hand, Mid-Ohio will suffer significant harm and prejudice if Hardin is allowed to proceed without Mid-Ohio's participation. Turbines placed without proper consideration of Mid-Ohio and its customers may interfere with Mid-Ohio's radio systems that carry Automated Meter Infrastructure ("AMI") Data. That data provides real-time outage and blink reports and allows for communications between Mid-Ohio's offices and its customers. That interference further puts the safety of Mid-Ohio's employees at risk by compromising the

reliability of Supervisory Control and Data Acquisition communications. It also jeopardizes point-to-point radios that are used for substation video surveillance camera systems, alarm and event notification systems, weather station data, load management control systems and intrusion detection systems. Finally, turbines positioned without due regard for Mid-Ohio threatens high speed connections which allow for the establishment of "Hot Spots" relied upon by Mid-Ohio crews to access office servers from the immediate vicinity of the Substations, thereby increasing productivity and safety. With all that is at risk and the prejudice that Mid-Ohio will undoubtedly suffer, Mid-Ohio exceeds the fourth prong of Ohio Admin. Code § 4906-7-04(B).

III. CONCLUSION

For the foregoing reasons, Mid-Ohio respectfully requests that the Board grant its Petition for Leave to Intervene and allow Mid-Ohio to participate in these proceedings.

Respectfully submitted,

MID-OHIO ENERGY COOPERATIVE, INC.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Mid-Ohio Energy Cooperative, Inc.'s Petition for Leave to Intervene* was served by electronic and first class mail, postage prepaid, on the parties on this 17th day of June 2014.

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Summary: Motion to Intervene electronically filed by Mr. Philip B Sineneng on behalf of Mid-Ohio Energy Cooperative, Inc.