

**BEFORE
THE OHIO POWER SITING BOARD**

**In the Matter of the Application of
Paulding Wind Farm III for a
Certificate of Environmental
Compatibility and Public Need for the
Timber Road III Transmission Line
with Associated Point of Interconnect
Switchyard in Paulding County Ohio**)
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Case No. 15-1737-EL-BTX

Motion to Intervene of the Ohio Farm Bureau Federation

The Ohio Farm Bureau Federation (“OFBF”) pursuant to Section 4906-2-12 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

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Case No. 15-1737-EL-BTX

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

On October 9, 2015 Paulding Wind Farm III filed a Pre-Application Notification Letter regarding its intention to file an application for a certificate to construct a 138 kV transmission line and associated point of interconnection switchyard in Benton and Harrison Townships, Paulding County, Ohio.

On December 9, 2015 Paulding Wind Farm III LLC filed an application to amend Phase II of the certificate issued in OPSB Case Number 10-0369-EL-BGN. All work on this amendment is detailed in OPSB Case Number 15-2030-EL-BGA. Moreover, Paulding Wind Farm LLC and Paulding Wind Farm III LLC filed an application to amend the certificate issued in OPSB Case Number 09-980-EL-BGN. All work on this amendment is detailed in OPSB Case Number 15-2031-EL-BGA.

As part of this filing the project developers cited that a new transmission line, subject to separate application before the OPSB and identified as Case Number 15-1737-EL-BTX, will be used to deliver electricity from a common substation to reach a single point of interconnection switchyard. The developers explain that this transmission line will improve efficiency and reduce

the power losses that would result if underground collection lines were used to reach a single point of interconnect.

This transmission line project, in conjunction with wind farm development in the area, offers a variety of opportunities – both for the developer and the community. Effective collaboration between the developer, energy service providers, government officials and community stakeholders will be vital to ensure that all potential benefits are realized, and consumers at local, state and regional levels can employ the new transmission line, coupled with 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 4906-2-12 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 4906-2-12(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 Paulding County Farm Bureau, maintain a non-profit organization representing agricultural interests at the state and local levels. Over

190,000 member families belong to the organization state wide, including over 490 families in the Paulding 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 transmission line placement and development. The majority of the potential right of way for this transmission line will be agricultural ground. Farmers want to make sure that construction activities on their property adhere to procedures ensuring soil and water conservation, as well as ensure they have full access to ground within the right of way for crop production and animal husbandry activities. Residents in rural neighborhoods want assurances that environmental setbacks are addressed with effective transmission tower and line placement. Area businesses want to make sure that the project supports generation infrastructure so that all aspects of an energy project enhance 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 transmission line 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. Many of these projects rely on effective transmission line placement. Some of this work spans several decades.

On the local level, OFBF field staff and volunteer leaders with the Paulding County Farm Bureau continue to work with the wind farm developers, government leaders and interested community stakeholders to explore how wind energy development and associated infrastructure 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.

Farm Bureau has been involved in several transmission line projects throughout Ohio. The organization fully understands and appreciates the rules and regulations governing the OPSB evaluation process. OFBF will continue to share their experiences and unique perspective with the Ohio Power Siting Board as it works with others to evaluate this Amendment. 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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Certificate of Service

The undersigned hereby certifies that a true and accurate copy of the foregoing document was served on this 21st day of December 2015 by regular U.S. Mail, postage prepaid, or by electronic mail, upon the persons listed below.

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Summary: Motion Motion to Intervene of the Ohio Farm Bureau Federation electronically filed by Amy M Milam on behalf of Ohio Farm Bureau Federation