BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of Clean Energy Future-Oregon, LLC for a Certificate of Environmental Compatibility : and Public Need for an Electric Generating Facility in Oregon, Lucas, County, Ohio.

Case No. 17-530-EL-

Alter and A

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ISSUE LIST OF OREGON CLEAN ENERGY, LLC

Pursuant to the Administrative Law Judge's entry in this docket of June 28, 2017, Oregon Clean Energy, LLC ("OCE") submits its issue list identifying specific concerns it may be interested in pursuing during cross-examination of witnesses at the evidentiary hearing in this matter. As noted in its petition for leave to intervene filed July 24, 2017, OCE is not opposed, in principle, to the Clean Energy Future-Oregon, LLC ("CEF-O") project that is the subject of this application. However, in view of the proximity of the site of the project to its own generating facility, the Oregon Clean Energy Center, OCE is concerned that the construction and operation of the proposed CEF-O facility may adversely impact the operation of the Oregon Clean Energy Center if conditions are not attached to the requested certificate to address these areas of concern. By submitting this issue list, OCE does not waive its right to explore other issues during crossexamination based on CEF-O's responses to discovery or the prefiled testimony of CEF-O or staff witnesses.

1. Whether, and to what extent, will activities during the construction of CEF-O facility interfere with the operation of the Oregon Clean Energy Center?

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- 2. Whether, and for what purpose, will CEF-O seek to install facilities above, through, or under the OCE property upon which the Oregon Clean Energy Center is located.
- 3. Whether the means by which CEF-O obtains gas supply for its proposed generating facility will reduce or pose a threat to the pipeline pressure OCE requires to operate the Oregon Clean Energy Center?
- 4. Whether, and to what extent, will the arrangements for water supply and wastewater disposal adversely impact OCE in connection with the operation of the Oregon Clean Energy Center?
- 5. Whether emissions from the proposed CEF-O generating facility will adversely affect the ability of the Oregon Clean Energy Center to comply with its permitted emission levels?

Respectfully submitted,

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Attorney for Oregon Clean Energy, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been served upon the following parties by electronic mail this 13th day of September 2017.

Barth E. Royer

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