



18 S. Michigan Avenue, 12th Floor
Chicago, IL 60603
June 21, 2018

The Ohio Power Siting Board
180 East Broad Street
Columbus, Ohio 43215

Re: **16-1871-EL-BGN: Icebreaker Wind Facility**

Dear Board Members,

I am Midwest Policy Director for the Environmental Defense Fund (EDF) and I write these comments in support of the above-referenced project.

EDF is a national non-profit membership organization engaged in linking science, economics and law to create innovative, equitable and cost-effective solutions to society's most urgent environmental problems. EDF has over 300,000 members nationwide and has 9,590 members in Ohio. EDF has been active in Ohio working on environmental policies including smart power, climate change, natural gas fracking and sustainable agriculture. EDF also supports state energy policies that reduce greenhouse gas emissions.

In this proceeding, Icebreaker Windbreaker, Inc. seeks approval to build six wind turbines in Lake Erie. This would be the first off-shore wind project in Ohio, and the first freshwater off-shore wind project in the U.S. The wind turbines would each have a nameplate capacity rating of 3.45 megawatts (MW) for a total generating capacity of 20.7 MW. The Facility would generate approximately 75,000 megawatt-hours (MWh) of electricity each year.

The Power Siting Board evaluate projects using the following eight criteria:

- The probable environmental impact of the proposed facility;
- Whether the facility represents the minimum adverse environmental impact, considering available technology and the nature and economics of alternatives;
- The need for any transmission facility;

This is to certify that the images appearing are an accurate and complete reproduction of a hard file document delivered in the regular course of business.
 Date Processed 7/2/18
 technician [signature]

RECEIVED - DOCUMENTS

2018 JUL -2 AM 10:23

PUB 0

- That the facility is consistent with regional plans for expansion of the electric power grid of the electric systems serving Ohio and interconnected systems and that the facility will serve the interests of electric system economy and reliability;
- That the facility will comply with all air and water pollution and solid waste disposal laws and regulations;
- The facility will serve the public interest, convenience, and necessity;
- The facility's impact on the continued agricultural viability of any land in an existing agricultural district; and
- The facility incorporates maximum feasible water conservation practices considering available technology and the nature and economics of various alternatives.

Icebreaker Windpower, Inc. originally applied for approval of this project on February 1, 2017 with a 180-page application and, since that time, has submitted an overwhelming amount of documentation to support its application. We submit that the application and supporting documentation easily meets or exceeds the Power Siting Board's criteria for approving siting projects.

Off-shore wind can be cost-effective because larger turbines can be sited off-shore and the larger turbine blades are capable of generating more electricity. In addition, wind conditions are often more favorable off-shore.

Off-shore wind is well-established in Europe and is gaining momentum in the United States. In 2018 alone, New York, New Jersey and Connecticut announced plans for off-shore wind projects. A recent study, U.S. Job Creation in Offshore Wind, estimates that the industry will eventually produce 500,000 jobs in the United States.¹ Many of these jobs will likely be located in Ohio because we are already a leading manufacturer of wind turbine components and we border the Great Lakes, the largest freshwater body of water in the United States.

These projects will play a key role in reducing U.S. greenhouse gas emissions. These projects take on greater importance now that the federal government may be about to misuse the Defense Production Act to provide illegal, uneconomic subsidies for old coal and gas plants.

Based on the foregoing, EDF respectfully requests that you approve this project.

Very truly yours,



Dick Munson
Midwest Policy Director

¹ BVG Associates, Ltd., *U.S. Job Creation in Offshore Wind* (October 2017), available at: <https://www.northeastwindcenter.org/wp-content/uploads/US-job-creation-in-offshore-wind.pdf>