

**BEFORE  
THE OHIO POWER SITING BOARD**

<b>In the Matter of the Application of</b>	)	
<b>Hecate Energy Highland LLC for a</b>	)	<b>Case No. 18-1334-EL-BGN</b>
<b>Certificate of Environmental</b>	)	
<b>Compatibility and Public Need to</b>	)	
<b>Construct a Solar-Powered Electric</b>	)	
<b>Generating Facility in Highland</b>	)	
<b>County, Ohio</b>	)	

**ISSUES LIST OF HECATE ENERGY HIGHLAND LLC**

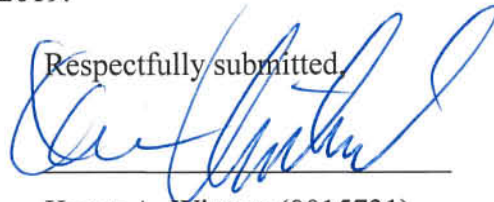
Pursuant to the Administrative Law Judge's January 15, 2019 order entry, Hecate Energy Highland LLC ("Hecate") submits this list of specific issues about which it may be interested in pursuing cross-examination of Staff witnesses relating to certain conditions contained in the March 4, 2019 Staff Report of Investigation. Hecate may also pursue cross-examination of any witnesses appearing on behalf of intervenors in support of or regarding their petitions to intervene. The specific issues concerning the Staff Report of Investigation designated by the applicable condition are as follows:

1. Condition 2, regarding the preconstruction conference.
2. Condition 8, regarding the timing of providing permits or authorizations required by federal or state laws and regulations to Staff.
3. Condition 10, regarding the timing of general construction activities.
4. Condition 15, regarding notification to affected property owners and tenants prior to the start of facility operations.
5. Condition 21, regarding limitations on construction in loggerhead shrike preferred nesting habitat.
6. Condition 22, regarding the requirement to have an environmental specialist on site during construction activities.

7. Condition 23, regarding the notification of Staff, the ODNR, and the USFWS if state or federal listed species are encountered during construction activities.
8. Condition 25, requiring a frac-out contingency plan prior to the use of horizontal directional drilling.
9. Condition 26, regarding the limitations on the clearing of wooded areas.

Finally, Hecate respectfully notes that the map showing the general layout of the Project area currently contained within the Staff Report of Investigation does not include the 95-acre parcel added to the Project footprint. Hecate provided notice to the Board and Staff of this additional parcel along with updated maps on February 20, 2019.

Respectfully submitted,



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**Case No(s). 18-1334-EL-BGN**

Summary: Text Issues List electronically filed by Ms. Karen A. Winters on behalf of Hecate Energy Highland LLC