BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of)	
Alamo Solar I, LLC)	
for a Certificate of Environmental)	Case No. 18-1578-EL-BGN
Compatibility and Public Need)	

ISSUES LIST OF ALAMO SOLAR I, LLC

Pursuant to the Administrative Law Judge's April 3, 2019 entry, Alamo Solar I, LLC ("Alamo") submits this issues list citing specific concerns about which it may be interested in pursuing cross-examination of Staff witnesses relating to certain conditions contained in the May 28, 2019 Staff Report of Investigation. In addition to the specific concerns identified below in the Staff Report of Investigation, Alamo may also pursue cross-examination of any witnesses appearing on behalf of any intervenor in support of or regarding any issue identified in their petitions or notices to intervene, or with respect to any testimony or evidence presented by any witnesses. The specific issues concerning the Staff Report of Investigation designated by the applicable condition are as follows:

- Condition 8, regarding the timing of the submission of permits and authorizations to Staff.
- 2. Condition 15, regarding the potential measures to address the aesthetic and lighting impacts of the facility.
- 3. Condition 23, regarding the limitations on the clearing of wooded areas.
- 4. Condition 27, regarding the placement of a megawatt limitation as a condition in the certificate.
- 5. Any recommendations or statements in the Staff Report of Investigation regarding anti-glare coating, visual screening, fencing, or landscaping, including any recommendations or statements at page 12.

- 6. Any recommendations or statements in the Staff Report of Investigation related to plantings or vegetation in areas between solar panels, including any recommendations or statements at page 19.
- 7. Any recommendations or statements in the Staff Report of Investigation related to compliance with safety standards for commercial scale solar farms, including any recommendations or statements at page 29.

Respectfully submitted,

/s/ MacDonald W. Taylor

Michael J. Settineri (0073369), Counsel of Record MacDonald W. Taylor (0086959)
VORYS, SATER, SEYMOUR AND PEASE LLP 52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
(614) 464-5462
(614) 719-5146 (fax)
mjsettineri@vorys.com
mwtaylor@vorys.com

Attorneys for Alamo Solar I, LLC

CERTIFICATE OF SERVICE

The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 6th day of June 2019.

/s/ MacDonald W. Taylor

Werner Margard werner.margard@ohioattorneygeneral.gov

Dylan Borchers dborchers@bricker.com

Kathryn West kwest@prebco.org

W. Joseph Scholler jscholler@fbtlaw.com

Thaddeus Boggs tboggs@fbtlaw.com

Chad Endsley cendsley@ofbf.org

Leah Curtis lcurtis@ofbf.org

Amy Milam amilam@ofbf.org

Jack Van Kley jvankley@vankleywalker.com

Chris Walker cwalker@vankleywalker.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

6/6/2019 4:33:22 PM

in

Case No(s). 18-1578-EL-BGN

Summary: Notice of List of Issues from Alamo Solar I, LLC electronically filed by Mr. MacDonald W Taylor on behalf of Alamo Solar I, LLC