From: Puco ContactOPSB
To: Puco Docketing

Subject: public comment 19-0778-GE-BRO

Date: Thursday, July 11, 2019 3:45:04 PM

Attachments: OPSB Admin Code changes wind turbines .pdf

**From:** Sherri Lange [mailto:kodaisl@rogers.com]

Sent: Thursday, July 11, 2019 3:29 PM

**To:** Butler, Matthew <matthew.butler@puco.ohio.gov>; Puco Docketing <docketing@puco.ohio.gov>

**Cc:** Rob Van Kirk <rep30@ohiohouse.gov>; Van Kirk, Robert <ROBERT.VANKIRK@OHIOHOUSE.GOV> **Subject:** Submission of support regarding Ohio Administrative Code changes to Reg 4906-4-09 and -10

Dear Mr. Butler,

Please find attached our submission.

Sincerely,

Sherri also on behalf of Suzanne, Al and Tom, Great Lakes Wind Truth

Sherri Lange

CEO, NA-PAW, North American Platform Against Wind Power Executive Director, Canada, Great Lakes Wind Truth VP Canada, Save the Eagles International kodais@rogers.com

www.na-paw.org

*Twitter:* #torwinaction

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Thank you!



na pa

# LETTER OF SUPPORT

July 11, 2019

TO: Mr. Matthew Butler Docketing

Matthew.butler@puco.ohio.gov

docketeing@puco.ohio.gov

C.c. House Leader and Representative Bill Seitz Rep30@ohiohouse.gov

REG: 4906-4-09, 4906-4-10, proposed Changes to Administrative Code, OH

DEAR OPSB/PUCO BOARD, MATTHEW BUTLER, ADJUDICATING PARTIES

On behalf of Great Lakes Wind Truth and associated groups as well as the North American Platform, please accept our appreciation for the anticipated promotion of additional protections for the people of OHIO with respect to increased and harmonized oversight, safety and reporting requirements for industrial wind projects.

We believe these are proactive additions to the Code and are anticipatory of others that may shortly take good from this example. We congratulate the authors of these changes to the Administrative Code proposed to be changed by the OPSB.

We would add that it is not only blade shear that has been experienced in North American projects: Nor is it only fires in the nacelles. Changes to 4906-4-10 suggest that:

incidents include, but are not limited to events such as tower collapse, turbine failure, thrown blade or hub, collector or feeder line failure, damaging ice throw, nacelle fire, or iniury to any person.

Ohio could possibly expect to be no less prone to failures and damages to persons and landscapes, fires, ice throws, blade failures, tower collapses, in proportion to other similar incidents reported worldwide. As Rep Seitz wrote in a memo to then Chair Asim Haque and Senators, March 1<sup>st</sup> 2018:

Enclosed please find a 2015 study of blade shear and ice throw effects of the rapidly increasing occurrence of wind turbine accidents around the world (see p. 152, the second page of the enclosed). The study demonstrates that blade shear fragments can travel 700 meters to 2 kilometers, and ice throw distances range from 100-600 meters. Also of interest is table 1, showing setback distances around the world, the vast majority of which exceed current Ohio law and vastly exceed those proposed by SB 238.

I highly recommend that OPSB staff undergo a careful review of this study as their history demonstrates scant attention to these objects of wind farm development.

While I do not expect those to whom I have enclosed this memo to read the technical details of the study, the first two pages are highly interesting and counsel great caution before Ohio should reduce (or allow local governments to reduce) turbine setbacks.

Sincerely, William J. Seitz Majority Floor Leader Ohio House of Representatives Additionally, accidents involving wind turbine maintenance workers could fall under these Administrative Code changes: Please see this article.

How dangerous is the development, operation and maintenance of the infrastructure for energy production from wind, with its massive equipment, the machinery that it takes to install towers and turbines and <a href="mailto:the frightening">the frightening</a> heights involved?

The article goes on to describe:

Some examples, quoting from Gipe's database:

- A German man was crushed to death by an articulated lorry as he helped quide its driver down a track at a wind farm, an inquest has heard.
- A 19-year-old construction worker has been killed after falling 100ft down the shaft of a windfarm turbine. The worker, thought to be Brazilian, was inside the turbine which was under construction at the Earlsburn windfarm in Touch Hills, near Stirling.
- One dead one injured on Enercon when rotor fixing bolt failed and rotor turned. Required helicopter retrieval from 65-meter tower.
- Three workers have been killed while installing and testing a Sinovel wind turbine in northern China.
- A man has died after being crushed between two cranes at an LM Wind Power blade plant in North Dakota yesterday.
- A man working on building a wind farm nearby Livermore was killed after a bulldozer rolled over on top of him Monday afternoon. Around 1:30 p.m. Monday, the Alameda County Fire Department received reports that a bulldozer driving on N. Vasco Road rolled down the embankment, possibly killing the driver.

In 2011 – which happened to be the worst year for wind-energy-related deaths, with 10 of the 76 Gipe had recorded in more than 30 years of record-keeping — the American Wind Energy Association (AWEA) and the U.S. Department of Labor's Occupational Safety and Health Administration (OSHA) announced an alliance with the goals and objectives of standardizing and improving safety and health practices in the industry; developing and maintaining an open line of communication with OSHA to ensure safe practices; assisting OSHA in understanding the safety and health issues

within the wind industry; and ensuring consistent application of safety compliance and enforcement initiatives across the country.

Fires are much more common than generally perceived. According to many, they are TEN TIMES under reported. Reporting should be mandatory. Regrettably, there are few "fire suppression" systems that are suitable, or used, or even installed, and the fires simply "burn out," spewing highly toxic residues from plastics and lubricants that would not be permitted in any other industrial setting.

# https://www.ediweekly.com/overheated-bearings-gearboxes-among-causes-wind-turbine-fires/

Wind turbines often catch fire and burn much more frequently than is reported, a study from the UK and Sweden maintains. Researchers at Imperial College London, Edinburgh University and SP Technical Research Institute of Sweden report that while an average of 11.7 turbine fires are reported annually, more than 117 fires actually occur worldwide.

# https://www.imperial.ac.uk/news/153886/fires-major-cause-wind-farm-failure/

Ice Throw, component Liberation, and other collateral damages, are common, and also are under reported.

A fairly comprehensive glance at "reported," and suggestions about "under reporting" can be found here and here.

A dark side of the wind industry that many media outlets have failed to report on is the thousands of documented cases of serious accidents. These include numerous documented cases of turbines falling over, blades flying off, injuries to workers and the public, and at least 99 reported fatality accidents.

Of the deaths, 67 were wind industry and direct supporters workers or small turbine operators and 32 were public fatalities.

How many tragedies have occurred worldwide is a well-kept secret within the wind industry. In the



United Kingdom alone, however, Renewables UK, an industry trade association, has admitted to 1,500 wind turbine accidents/incidents in the UK alone during the past five years, the London

Telegraph reported <a href="http://www.telegraph.co.uk/news/uknews/8948363/150">http://www.telegraph.co.uk/news/uknews/8948363/150</a>
<a href="mailto:o-accidents-and-incidents-on-UK-wind-farms.html">o-accidents-and-incidents-on-UK-wind-farms.html</a>. Those included 300 injuries and four deaths—in just one small part of the world.

A partial database of accidents, injuries and deaths through December 2011 has been compiled at the Caithness Wind Farm Information Forum: http://www.caithnesswindfarms.co.uk/page4.htm

Additional to blade release, tower collapse accidents, fires, lightening strikes, and ice throw, and the harm as is now evidenced to workers in extremely tight areas, carrying upwards of 60 pounds of equipment, often working long and dangerous hours, falls, strikes, collector line failures, we can also consider and acknowledge regular oil and lubricant spills, which to our knowledge is vastly under assumed, and not reported. Developers routinely clean up blades and towers, often with solvents, as the residue oil and lubricants eventually reach the earth. Why is this not reported as part of routine maintenance? Even our cars cannot have oil changes without a containment system!



We anticipate that the changes to the Administrative Code as suggested below, will effectively move safety issues forward in a timely fashion, and put more oversight pressure on an industry that for too long has "written its own rules." We cannot think of another single industry that has been given this latitude, and for so long.

It is further admirable that neighboring impacted communities, persons, are within the new Code, to be added to the communications to the Board regarding accidents and failures.

We respectfully request that the submissions on these matters to the Board be published annually and made publicly available to ensure accuracy and transparency. Please ensure that the OPSB publish these incident and intervention reports on its website.

Sincerely,

Sherri Lange Suzanne Albright Al Isselhard Tom Wasilewski (Great Lakes Wind Truth)

## **4906-4-09** Regulations associated with wind farms.

For both an economically significant wind farm and a major utility facility consisting ofwind-powered electric generating limits, the application shall state the applicant's commitment to comply with the following regulations and the board shall require that each ofthe following requirements be satisfied.

- (A) Construction, location, use, maintenance, and change.
- (1) Adherence to other regulations. Construction and operation of all proposed wind farms shall be consistent with all applicable state and federal requirements, including all applicable safety, construction, environmental, electrical, communications, and federal aviation administration requirements. Subject to section 4906.13 of the Revised Code, an applicant shall comply with state building code regulations for structures not involved in generation or transmission of electricity.

- **4906-4-10** Notice and reports of incidents involving wind farm facilities.
- (A) Telephone notice of incidents.
- (1) Wind farm operators shall notify the board's executive director or the executive director's designee as well as local law enforcement and first responders on all incidents involving a wind turbine, within thirty minutes after discovery unless notification within that time is impracticable under the circumstances.
- (2) For purposes of this rule incidents include, but are not limited to. events such as tower collapse, turbine failure, thrown blade or hub, collector or feeder line failure, damaging ice throw, nacelle fire, or iniury to any person.
- (B) Written reports regarding incidents.
- (1) Within thirty days after the incident is discovered, a wind farm operator shall submit a written report to the executive director describing the cause of the incident, where ascertainable, and any damage to the wind farm facility or to neighboring properties or persons, on a form provided by the board.
- (2) Each wind farm operator shall also docket, in the wind farm certificate case, a final written report on a form Provided by the board within sixty days after discovery of the incident, unless the wind farm operator:
- (a) For good cause shown, demonstrates more time is needed: and
- (b) Submits interim reports to the executive director at intervals of not more than sixty davs until a final report is docketed.
- (C) Each final written report shall address:
- (1) Cause of the incident:
- (2) Date and time the incident occurred and date and time it was discovered:
- (3) If the incident involved a turbine, the distance between debris and the wind turbine base:
- (4) If the incident involved a turbine, the distance between debris to habitable structures and property lines, and photographs ofthe debris field:
- (5) A narrative description of the incident and actions taken by the wind farm operator. including a timeline of events:
- (6) What, if any, damage occurred to the other wind farm facilities:
- (7) What steps were necessary to repair, rebuild, or replace damage to the wind farm facilities:
- (8) What, if any, personal injury was caused by. or related to. the incident.
- (9) What, if any damage to properties within or adjacent to the wind farm project area was caused by. or related to. the incident:
- (10) What, if any, steps were, or will be. taken to prevent future incidents.
- (D) Staff investigation and restart

(1) Staff shall investigate every incident that results in a report being submitted pursuant to this rule. Except as necessary for public safety, a wind farm operator shall not disturb any damaged facilities or the site of a reportable incident until after staffhas made an initial site visit.

(2) A wind farm operator shall not restart facilities involved in a reportable incident until such restart is approved by the board's executive director or the executive director's designee.

From: Puco ContactOPSB
To: Puco Docketing

Subject: Comment for Case 19-0778-GE-BRO Date: Thursday, July 11, 2019 3:21:49 PM

## To whom it may concern,

My name is Gabrielle Runion. I have been a resident in Bloom township since october of 2007. I married my husband, Steven, on our modest 2+ acre property, in August 2008. We brought our 2 children home to what we thought would be our forever and beyond peaceful country home. With the proposed turbine project Im starting to look to other cities and states to call my forever home. It wasnt that way at first, I was hopeful and welcoming to this project, until a few conversations with the gentlemen trying to get a hold of our neighbors to sign the good neighbor agreements. They had avoided every question i threw at them, as well as told me that my neurological condition should be of no concern, and they are safe. My area has been designated to have 2 of the largest turbines, one to my north, and one directly to my south. I asked how far the ice throws can happen, he responded with "its not a concern for you." I can deal with my HOME being in the middle of an industrial park if the neighbors are tolerable. I dont think getting the answeres of "its none of your concern" should be an acceptable response when peoples livelihoods, health, and pursuit of happiness, are on the line.

The sent backs need to be far enough away to account for a catastrophic failure or you are endangering the lifes of not just humans, but of wildlife, and livestock in the area. The setbacks should also be taking the worst case scenario for ice throw, and collapse. I urge you, if you do, allow my RESIDENTIAL area to become an INDUSTRIAL park to please consider doing so with extreme caution. Our children will one day look back and say what were they thinking, or I need to be mentored by them. The choice is not ours, but yours to make.

If you do decide to move forward with the wind project, please, please use caution in protecting those that may be able to vote, but do not get a say in matters that will be forever life altering for them. Once the turbines are built there is no "we should have or could have" and WE are the ones who will have to deal with improper set backs, noise, flicker, blade / ice throws, and the constant worry of these huge machines outside our doors. I will most likely have to move and I will most likely be looking to out of state to find my peace and quiet, as my health issues demand it.

Please protect us who do mot have a say.

Thank you for your time. Gabrielle Runion Bloom Township From: Puco ContactOPSB
To: Puco Docketing

Subject: Comment for Case 19-0778-GE-BRO Date: Thursday, July 11, 2019 3:21:53 PM

We have great concern as to the protocol when incidents happen concerning wind turbines. One would think it should include the people in the area that were affected, local law enforcement, local officials as well as the turbine companies. This would be the only way to get the real story as to what had happened. We would think the OPSB would want as much info as possible for the good of the people who may have been affected and not a one sided story. Thank you

Thomas and Shelley Smith Reed Township, Seneca County

From: Ohio Power Siting Board
To: Puco Docketing

Subject: Public Comment for Case 19-0778-GE-BRO [ ref:\_00Dt0GzXt.\_500t0KFDc1:ref ]

**Date:** Thursday, July 11, 2019 3:18:03 PM

To: contactopsb@puc.state.oh.us

Cc: rep91@ohiohouse.gov; rep42@ohiohouse.gov; rep83@ohiohouse.gov;

rep46@ohiohouse.gov; rep17@ohiohouse.gov; rep85@ohiohouse.gov;

rep01@ohiohouse.gov; rep30@ohiohouse.gov; rep18@ohiohouse.gov;

rep08@ohiohouse.gov; rep29@ohiohouse.gov; rep94@ohiohouse.gov;

rep86@ohiohouse.gov; rep57@ohiohouse.gov; rep36@ohiohouse.gov;

rep15@ohiohouse.gov; rep61@ohiohouse.gov; rep06@ohiohouse.gov;

rep33@ohiohouse.gov; rep27@ohiohouse.gov; rep60@ohiohouse.gov; rep07@ohiohouse.gov

**Subject:** Fwd: Comment for Case 19-0778-GE-BRO

# To All:

This letter is to voice my concerns regarding

proposed new rules for wind farm developments in Ohio. We in Ohio are in the midst of highly contested debate on our future energy sources. At this point it is way too early for our State leaders to announce that, above the shouts, they have heard enough and that they have made up their minds. Regarding wind turbines, perhaps it would be fair to for leaders to say they won't be rushed or pushed before the debate has ended. An alternative position is that all development be put on hold or moratorium until sufficient time has passed. Time is needed to allow everyone a chance to better understand the issues. The concept of efficiently building wind farms to replace existing power generators is being challenged on a National as well as a global scale. There is an enormous amount of evidence that cast doubt on the efficiency of wind farms as opposed to nuclear, hydro and natural gas as our best bridge to a future with clean energy. In the State of Ohio, the voices of wind farm opposition are faced with government imposed timelines that limit the use of emerging economic and scientific data. Given that such data is still forthcoming, it would be reasonable to allow it more time to help us all understand where true efficiencies exist.

Proponents of wind farms wish to limit the use of forthcoming data as a means to build their product before the tax credits expire or before the general public opposition gains any more strength.

I maintain a belief that we should not be in a rush to allow such a massive transformation of our current power sources. That transformation will dramatically change our land and divert our tax money to a highly contested alternative. Giving a greenlight to the wind industry at this point is extremely premature. Tapping the brakes on further wind farm construction for another year is certainly not going to harm the wind industry nor the residents of Ohio. New Information and technology has and will continue to work in Ohio's favor. As an analogy, we're all glad we didn't take out a 30 year lease on the first cell phone to hit the market. Pushing the issue to finality because we have arbitrary time limits on the debate is unfair and illogical. The wind farm opposition is growing rapidly. I propose that the OPSB acknowledge that fact and that they act accordingly by not silencing Ohioans with timelines. Respectfully,

Gene Thompson 265 East CR 16 Tiffin OH.



ref:\_00Dt0GzXt.\_500t0KFDc1:ref

To: <u>Puco Docketing</u>

**Subject:** public comment 19-0778-GE-BRO [ ref:\_00Dt0GzXt.\_500t0KFDio:ref ]

**Date:** Thursday, July 11, 2019 3:24:32 PM

#### To: OPSB Public comments on 19-0778-GE-BRO

Since it has now become obvious that turbine blade throws do happen in Ohio, and blade throw rules are being implemented by the OPSB, it would seem a few further steps are prudent and necessary to adequately protect public safety

Turbine setbacks are designed to keep the machines at a safe distance. With the new information documenting blade throws with pieces weighing several pounds traveling several hundred feet farther than the minimum setback distances defined in the ORC as of 7-11-2019 it would seem imperative that the OPSB require new turbines be built using setback distances allowing for such events.

When a property owner signs a wind lease or a setback waiver they are relinquishing their rights to the protection that the setback distance provides to their property. But, members of the public who come onto the property (repair persons, delivery persons, landscape contractors, visitors etc) will not be aware that they are entering a hazardous area.

Other areas which are open to the public and are hazardous in any way are required to be clearly marked with high visibility signage and most times with secure fencing designed to keep the public safe. Even a residential swimming pool requires protection. It is a complete disregard for the safety of the public that wind turbines are not require to establish and maintain such protection.

At over 600 feet tall and operating at over 4000 horsepower these machines are not safe for unauthorized persons to be near. They should not be allowed to operate in open spaces without warnings and protection installed to keep members of the public a safe distance away. That distance can only be defined as farther than recorded blade throw shrapnel currently on file. No other industry would be allowed to operate machinery in open spaces without such protection.

Public Safety requires that new rules requiring fencing at a safe distance and high visibility signage be implemented by the Ohio Power Siting Board for wind projects as indeed they are requirements at any other kind of generating facility with moving machinery.

Jim Feasel
Tiffin OH

ref:\_00Dt0GzXt.\_500t0KFDio:ref

To: <u>Puco Docketing</u>

**Subject:** public comment 19-0778-GE-BRO [ ref:\_00Dt0GzXt.\_500t0KF8mf:ref ]

**Date:** Thursday, July 11, 2019 11:44:34 AM

I live in Seneca County, Eden Towhship where Seneca Wind wants to install 77 industrial wind turbines in a 5-township rural area. I absolutely believe that wind companies should be required to report any incidents of bade failure, gearbox failure, or failure of the underground cables connecting the turbines to the local substation. This is simply good operating sense. I am a non-participating property owner and oppose Seneca Wind's project for various reasons. If this project is approved, the very least the OPSB can do is insist on construction practices that are inspected and approved and to insist on requiring reports of "failures" of these industrial units that have the potential to injure the general public.

Jan Sampson 6305 S Township Road 151 Tiffin, Ohio



ref:\_00Dt0GzXt.\_500t0KF8mf:ref

To: <u>Puco Docketing</u>

**Subject:** public comment 19-0778-GE-BRO [ ref:\_00Dt0GzXt.\_500t0KF9E7:ref ]

**Date:** Thursday, July 11, 2019 11:47:39 AM

# Dear OPSB,

I was unable to attend the blade shear workshop held in Columbus on April 30, 2019 but did watch the webcast. I commend you for soliciting and listening to input on this important topic. As is true for many of us who may be impacted by these giant Industrial Wind Projects, I was unaware and shocked that many of the proposed changes were not already in place. Given the documented instances of blade shear cases nationally and internationally as well as in every existing Industrial Wind Project in Ohio, in only seems logical, practical and common sense to implement mandatory reporting criteria for these and all other types of potential safety hazards with the intent of preserving public safety, preventing future incidents and ensuring proper and safe restarts. One of your objectives as the sole governing body of these projects is the safety of Ohio residents. The proposed rule changes are a step in that direction.

My wife and I live in the footprints of the proposed Emerson Creek Industrial Wind Project in Huron County.

Thank you.

William Kaltenbach

ref:\_00Dt0GzXt.\_500t0KF9E7:ref

From: <u>Butler, Matthew</u>
To: <u>Puco Docketing</u>

Subject: Public comment for 19-0778-GE-BRO Date: Thursday, July 11, 2019 9:38:27 AM

From: Patricia Didion <didionpa@gmail.com> Sent: Thursday, July 11, 2019 8:36:46 AM

**To:** Butler, Matthew

**Subject:** Case Record 19-0778-GE-BRO

Re: OPSB Consideration of Ohio Administrative Code Chapter 4906-4

# **Dear Members of the Ohio Power Siting Board:**

We have reviewed the proposed rules for reporting incidents involving the industrial wind turbines. We are in favor of them. We see that once a wind operator is notified of an incident that a staff member from the OPSB would also be notified. That staff member would also come to the scene of the incident. We believe that is a good plan.

We would like to see an additional provision stating that the people directly involved in these incidents, those observing them take place, or living nearby be allowed and encouraged to also report their observations, concerns or damages to the OPSB.

When providing for the well-being and safety of residents, homes and properties it seems that one should not rely on just the wind operator's report. All of the reports should be reviewed including those described above, those from law enforcement, first responders and subsequent participants.

In addition, it would be great if our county commissioners, related law enforcement or other county officials would receive the follow up reports.

We are also definitely in favor that the wind companies comply with all local, state and federal building codes with everything they do and build. Our home and farmlands are very close to the industrial sized turbines.

There is also an electrical station and several overhead power lines planned very close by. Many of the state and township roads we frequently use are also close to many more turbines. Building and construction codes must be observed!

The safety, health and well being of the people should be of prime concern. Set backs need to be much longer. There have been instances in Ohio where debris has been thrown farther than the established setbacks.

As citizens of Ohio and the United States, we should be allowed to vote on whether these huge industrial sized wind turbines are placed in our homeland, our townships and counties!

# Thank you for your kind consideration of these very important matters.

Sincerely, Patricia & Alvin Didion 4765 Williams Road Bellevue, Ohio 44811

To: <u>Puco Docketing</u>

**Subject:** public comment 19-0778-GE-BRO [ ref:\_00Dt0GzXt.\_500t0KFAKY:ref ]

**Date:** Thursday, July 11, 2019 10:58:37 AM

Thank you to the members of the Ohio Power Siting Board (OPSB) and staff for providing this forum to allow participation by Ohio's residents in rule-making decisions that impact our daily lives.

I am writing in support of the OPSB's proposed change to OAC rule 4906-4-09 requiring applicants for the construction & operation of wind farms to comply with Ohio's building code regulations. This is an important step in ensuring the safety of Ohio's residents, and it is appreciated.

I also support the addition of OAC rule 4906-4-10 requiring operators of wind farm facilities to provide notice to the OPSB & local law enforcement and first responders within thirty minutes of discovering an incident involving a wind turbine. In addition to the requirements proposed in 4906-4-10, I would like to see a requirement to notify local residents in the event of an incident involving a wind turbine, and a second notice prior to that wind turbine being restarted. This could be accomplished by allowing residents to sign up for email notifications for incidents involving wind turbines within a selectable distance from a given address entered by the resident.

Thank you for your time and consideration.

Kevin Goshe

Tiffin, Ohio 44883

ref:\_00Dt0GzXt.\_500t0KFAKY:ref

To: <u>Puco Docketing</u>

**Subject:** public comment 19-0778-GE-BRO [ ref:\_00Dt0GzXt.\_500t0KFCdT:ref ]

**Date:** Thursday, July 11, 2019 11:02:07 AM

### To Whom it May Concern,

As a landowner in the footprint of the Seneca Wind project, I have strong reservations against the "notice and reports of incidents involving wind farm facilities" proposed rule change language. There is too much gray area in the language of reporting incidents involving a wind turbine. With as tall as these proposed structures are, they are an extreme hazard to Seneca County residents. How can we rely on the wind farm companies such as SPower to report all incidents when they have used shady tactics thus far? They went as far as trying to coerce my elderly family members into signing contracts, telling them that their neighbor wanted a wind turbine and couldn't build it and get the money they "desperately" needed unless my parents signed up as well. That couldn't have been further from the truth, as our neighbor was actually part of the group suing to get out of their expired contracts. The language "unless notification within that time is impracticable under the circumstances" is very concerning. They could use any excuse with this language.

Please take the concerns of citizens in Seneca County into account when reviewing the language of the proposed rule changes. Thank you for your time.

Sincerely,

#### **Katie Heckerd Wells**

Associate Director of Annual Giving, The Ohio State University Graduate Student in the MA Public Policy & Management program at The Ohio State University John Glenn College of Public Affairs Franklin County Resident Seneca County Landowner



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This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

7/11/2019 4:32:51 PM

in

Case No(s). 19-0778-GE-BRO

Summary: Public Comment (10) received via website electronically filed by Docketing Staff on behalf of Docketing.