

**BEFORE
THE OHIO POWER SITING BOARD**

IN THE MATTER OF THE OHIO POWER)	
SITING BOARD'S CONSIDERATION OF)	
OHIO ADMINISTRATIVE CODE)	CASE NO. 19-778-GE-BRO
CHAPTER 4906-4)	

**INITIAL COMMENTS SUBMITTED
BY JULIA F. JOHNSON**

Thank you for the opportunity to provide comment on the Proposed Rules to establish a consistent and comprehensive protocol for reporting incidents involving wind farm facilities. The rules proposed for comment are welcome additions to the regulatory oversight of industrial wind facilities but further consideration should be given to areas where the rules could be strengthened to give area residents and local governments greater confidence in their effectiveness.

4906-4-10 Notice and reports of incidents involving wind farm facilities,

All Certificates of Approval should articulate the protocol for providing telephone notice and written of incidents and that protocol should be made a Condition of the Certificate.

During a hearing before the Senate Energy and Public Utilities Committee on June 19, 2019, Van Wert County resident Brenda DeLong testified concerning an incident at Blue Creek. Ms. DeLong resides within the footprint of the wind facility and was an eyewitness to blade failure. The area was under a tornado watch on Memorial Day and local law enforcement was called upon to serve as spotters. Residents had understood that under such conditions, turbines would be automatically shut off by sensors in the turbines or manually from a remote operations center. Notwithstanding, during the tornado watch, the turbines continued to rotate.

The protocol for reporting incidents should be expanded to include protocols to prevent blade shear during tornadic events and watches. Such protocol could require that all turbines in an affected area be stopped until the weather condition is cancelled.

In the summer of 2018, a turbine near the DeLong home was struck by lightning between 9:00 and 10:00 a.m. Damage was caused to one of the blades. The turbine continued to rotate until fragments began being thrown from the damaged blade between 2:00 and 3:00 p.m. This would indicate failure of both systems designed to shut the turbine down. A report of investigation may or may not have been subsequently made to the OPSB but a reason why neither safety systems functioned would be important to include in a report not simply that the cause of the incident was a lightning strike.

The Blue Creek damaged turbine spun for 4 hours before it was shut down. Ms. DeLong testified that local emergency personnel and law enforcement were notified by local citizens and were informed they had no authority in the matter and offered no assistance. During this time, the blade began to come apart. Area citizens responded by photographing the area and the debris field with the use of a drone. The Rules should provide a means by which local eyewitness accounts can be considered in the notice provisions with notice provided to an independent third party such as law enforcement and not the developer. Eyewitness

accounts, in the case of Blue Creek, were the only means by which timely evidence was collected and documented. The rules should articulate a process by which this important information can be collected, made a part of the record and archived.

It would also be valuable for OPSB Staff to publicize the date, time and place of their on-site inspection for the purpose of accommodating interviews with eyewitnesses. Leaseholders or persons who have signed easement agreements should not be prohibited by the developer from participating in eyewitness interviews with OPSB staff. This additional input would help OPSB staff in evaluating the developer/operator written report. In addition, public comment on written incident reports filed with the OPSB should be invited and taken into consideration.

While telephone notice at the time of an incident is important, written reports are likewise important to the community. In addition to the required components of the written reports set forth in the proposed rule, a description of the blade fragments should be included. To the extent possible, all fragments should be collected and their weight and position in the debris field should be documented. There should be no arbitrary limit on the size of fragments collected such as was done at Timber Road in 2012 where nothing weighing less than 6.6 lbs was recovered or reported.

CONCLUSION

The proposed rules should be adopted but should be strengthened by the addition of avenues for citizen participation, the public availability of Incident Reports and protocols which are made a condition of Certificates of Approval. In addition, the Rule should incorporate, where appropriate, a protocol for the prevention of blade shear during extreme weather events such as a tornado watch.

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Summary: Comments Initial comments submitted by Julia F. johnson electronically filed by
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