

**OHIO POWER SITING BOARD**

**IN THE MATTER OF THE )  
APPLICATION OF THE OHIO STATE )  
UNIVERSITY FOR A CERTIFICATE OF )  
ENVIRONMENTAL COMPATIBILITY )  
AND PUBLIC NEED FOR A COMBINED )  
HEAT AND POWER MAJOR UNIT ) CASE NO. 19-1641-EL-BGN  
FACILITY IN FRANKLIN COUNTY, )  
OHIO ON THE CAMPUS OF THE OHIO )  
STATE UNIVERSITY )**

**INTERVENOR SIERRA CLUB’S LIST OF ISSUES FOR CROSS-EXAMINATION**

Pursuant to Administrative Law Judge Entry dated May 22, 2020, setting the procedural schedule in the above-captioned matter, Intervenor Sierra Club hereby submits the following list of issues citing specific concerns about which Sierra Club may be interested in pursuing cross-examination of Staff and The Ohio State University witnesses at the adjudicatory hearing:

1. The nature of the probable environmental impact of the proposed facility.
2. Whether the proposed facility represents the minimum adverse environmental impact, considering the state of available technology and the nature and economics of the various alternatives, and other pertinent considerations.
3. Whether the proposed facility will serve the public interest, convenience, and necessity.
4. Whether The Ohio State University (“OSU”)’s stated need for increased energy reliability and resiliency from generation sources on campus is sufficiently founded in past campus energy performance.
5. The adequacy and accuracy of OSU’s and Ohio State Energy Partner (“OSEP”)’s analysis of campus energy, heating, and cooling needs.
6. The relationship between the construction of the proposed facility and OSU’s and/or OSEP’s proposed campus microgrid.

7. Whether and to what extent OSU and/or OSEP considered or performed feasibility analysis of alternative generation resources, including, but not limited to, on- and off-site solar and wind generation, geothermal technology, and energy storage.
8. The accuracy and adequacy of OSU's and/or OSEP's assessments of the cost, feasibility, and carbon emissions associated with alternative generation resources, including but not limited to, on- and off-site solar and wind generation, geothermal technology, and energy storage.
9. Whether and to what extent OSU and/or OSEP considered or performed feasibility analysis of conversion from steam to hot water to provide its heating needs, and the costs and benefits of performing such a conversion with or without the proposed facility.
10. The adequacy and accuracy of OSU's and OSEP's analysis and claims regarding carbon emissions attributable to the future operation of the proposed facility and of purported carbon emission reductions as a result of its construction and use.
11. The present and future cost, availability, and environmental impacts of fuel for the proposed facility, including but not limited to those associated with the extraction of fuel, and the adequacy and accuracy of OSU's and OSEP's analysis and assumptions regarding the same.
12. McCracken retirement plans and feasibility of retirement with and without the proposed facility and/or alternative generation and heating resources.
13. The need for, timing of, and costs associated with future maintenance and repair of OSU's current steam heating system.

14. Communications with the Ohio Environmental Protection Agency regarding, and the basis for, OSU's and OSEP's reliance on the exemption for non-profit educational institutions at OAC 3745-31-13(D).
15. The respective control of OSU and OSEP over operations of the proposed facility.
16. The nature, quantity, and effects of air pollutant emissions from the proposed facility; the adequacy and accuracy of OSU's analysis and representations of those emissions; and the technology OSU proposes to use to limit or otherwise control those emissions.
17. The qualifications and experience of OSU's witnesses.

Dated: July 1, 2020

Respectfully Submitted,

/s/ Megan Wachspress

Megan Wachspress (admitted pro hac vice)

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was served by electronic mail this 1st day of July, 2020, to the following:

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Summary: Text Sierra Club's list of issues for cross examination electronically filed by Mr. Tony G. Mendoza on behalf of Sierra Club