

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Ohio Power Siting)
Board’s Consideration of Ohio Admin. Code) Case No: 19-778-GE-BRO
Chapter 4906-4.)

**AMERICAN WIND ENERGY ASSOCIATION
WORKSHOP COMMENTS
AUGUST 14, 2020**

Good morning. My name is Andrew Gohn, and I appreciate the opportunity to offer comments today on behalf of the American Wind Energy Association. AWEA is the national trade association for the U.S. wind industry, the largest source of renewable energy in the country. We represent 1,000 member companies, 120,000 jobs in the U.S. economy, and a nationwide workforce located across all 50 states. AWEA serves as a powerful voice for how wind works for America. Members include global leaders in wind power and energy development, turbine manufacturing, and component and service suppliers.

AWEA thanks the Ohio Power Siting Board for the opportunity to provide additional input on these proposed rules as revised. We have not actively participated in the review of Rule 4906-4-10 to date but are glad to add our voice to offer recommendations regarding certain proposed elements of the Rule. We greatly appreciate the active engagement of the Board’s staff, and their hard work in coming forward with this modified proposal.

AWEA agrees with stakeholders who have questioned the basis for the proposed Rule to apply retroactively, but we will respect the OPSB’s August 7 guidance limiting this workshop discussion to the text of the proposed revisions to the Rule. Therefore, AWEA’s comments will focus on two specific issues raised in the proposed revisions.

First, in the event of any incident described in subsection (A)(2), subsection (D)(3) would seem to condition the approval of any facility restart on “verification from a licensed professional engineer that the damaged property has been repaired and that it is safe to restart the damaged property”. Broadening this requirement, to allow for verification to be provided by equipment manufacturers as well, may better protect public safety because, manufacturers are often more familiar with relevant facility equipment and how to ensure safe operation of that equipment. Allowing the use of “qualified representatives of equipment manufacturers” who specialize in facility equipment and systems can provide the reassurance of expert, third-party input on safety considerations in the wake of a reportable incident. Ensuring that wind farm operations specialists maintain that flexibility is also important to avoiding unnecessary costs and ensuring reliable affordable energy to consumers.

Second, AWEA recommends modifying subsection (D)(4) to allow a wind farm operator to restart wind farm property three business days after verifying any necessary equipment repairs, rather than seven calendar days. In cases where the Board sees no good cause to otherwise suspend restart, this change would provide a reasonable amount of time for OPSB staff to review the final written report and identify any issues, while ensuring that wind farm operators can get back to providing energy for consumers in Ohio and the region.

AWEA appreciates and shares the commitment of the OPSB to safe operation of power generating equipment. We are proud that wind energy continues to be one of the safest ways to generate power. AWEA appreciates the opportunity to offer comment on this important issue and thanks the Board for your consideration.

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Summary: Comments August 14, 2020 Workshop Comments - Andrew Gohn electronically filed by Heather A Chilcote on behalf of The Ohio Power Siting Board