

**BEFORE THE OHIO POWER SITING BOARD**

In the Matter of the Application of Firelands Wind,	}	Case No. 18-1607-EL-BGN
LLC for a Certificate of Environmental Compatibility	}	
and Public Need to Construct a Wind Powered Electric	}	
Generation Facility in Huron and Erie Counties	}	

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**ISSUE LIST OF THE BOARD OF  
COMMISSIONERS OF HURON COUNTY, OHIO**

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Now comes The Board of Commissioners of Huron County, Ohio, by and through its undersigned counsel, and submits its issue list identifying specific concerns it may be interested in pursuing during cross-examination of witnesses at the adjudicatory hearing in this matter pursuant to the Administrative Law Judge's entry in this docket of July 13, 2020.

As noted in its Notice to Intervene, filed on September 23, 2019, the Board of Commissioners of Huron County, Ohio intervened on the grounds that: the proposed facility is to be located at least in part in Huron County, Ohio; it has an extensive interest in the proceedings as the elected representatives of the citizens of Huron County, Ohio; that said County's interest is not and cannot be represented by another party, existing or otherwise; that its contribution of presenting to the Board the costs and benefits of the project to the citizens of Huron County, Ohio is essential to a just and expeditious resolution of the issues involved in the proceeding; and that it would not unduly delay the proceeding or unjustly prejudice an existing party.

By submitting this issue list, the Board of Commissioners of Huron, Ohio does not waive its right to explore other issues during cross-examination based upon responses to discovery or pre-filed testimony.

The issue list of Board of Commissioners of Huron County, Ohio is as follows:

1. In the event the project is approved, to what extent will activities during the construction, operation, and possible future decommission of the project,

interfere, harm, damage, or otherwise adversely affect the public roadways, bridges, and/or culverts under the jurisdiction of Huron County, Ohio and the Huron County townships within the project area, and to the extent the applicant will be required to repair and/or restore these public roadways, bridges, and/or culverts to their prior condition.

2. In the event the project is approved, to what extent will activities during the construction, operation, and possible future decommission of said project affect the wildlife and other ecology within the project and surrounding areas.
3. In the event the project is approved, to what extent will activities during the construction, operation, and possible future decommission of said project cause the need for additional safety, rescue, and other emergency response training, as well as create the need for new and/or additional equipment necessary to accomplish the required response to any emergency situation with may arise relative to the project by any and all first responders within the project area.
4. In the event the project is approved, how will the applicant be responsible to ensure that any and all first responders within the project area are properly trained and equipped to enable said first responders to appropriately respond to any emergency situation during the construction, operation, and possible future decommission of the project.
5. Whether the Applicant would agree to an arrangement with Huron County to make service payments in lieu of taxes as provided for in *R.C. section 5727.75*.

Respectfully submitted,  
JAMES JOEL SITTERLY  
Huron County Prosecutor

/s/ Randal L. Strickler

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## **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 on the service list of the docket card who have electronically subscribed to these cases. In addition, the undersigned certifies that a copy of the foregoing document has also been served upon the persons below this 27th day of August, 2020.

*/s/ Randal L. Strickler*

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**Case No(s). 18-1607-EL-BGN**

Summary: Notice Issue List of the Board of Commissioners of Huron County, Ohio  
electronically filed by Mr. Randal L Strickler on behalf of Board of Commissioners of Huron  
County, Ohio