

**From:** [Matthew Butler](#)  
**To:** [Puco Docketing](#)  
**Subject:** comment for 20-1605 [ ref:\_00Dt0GzXt.\_500t0comVW:ref ]  
**Date:** Friday, November 27, 2020 8:41:34 AM

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From: Dave Conine  
Subject: LightsourceBP Solar Project  
20-1605-EL-BGN

Having attended meetings put on by both LightsourceBP and our local group, I would like to add my input to the Ohio Power Siting Board to be used in their review of this project. This input is based on both my personal feelings as well as what I have heard from the community in the public meetings.

I believe there are 5 main points that need to be addressed in regards to this project and they are 1) the approval process and its timing 2) the physical layout of the farm 3) the impact of the farm on the wildlife and environment 4) the concern that this project will not meet its 30 year life expectancy and what happens when Lightsource decides to pull the plug before the 30 years are up and 5) the tax implications of the project including the granting of the PILOT status. I would like to address these subjects individually below.

The approval process and timing seem to be on a fast track and seems to benefit the developer. With the community only learning about this project 30-45 days ago, it appears that we are only a few weeks away from being subjected to a 5,000 page application that will be so full of legalize that the average person will not be able to understand it. It appears that our local township and county representatives know little of this project and honestly would not even be aware of it if the community members had not gotten wind of it first. I believe the project should not be where it is at and should be stopped until a complete 3D layout is available for the community to review and better understand the project.

This 3D layout should be based on guidance from the Ohio Power Siting Board and not by what LightsourceBP thinks will best benefit them. The biggest concern I have and hear in these meetings is that this project is being proposed in a highly residential area and its construction will negatively impact the life style and property values of the effected homeowners. I would suggest as a minimum that the OPSB establish minimum offsets (300'-450') from the road & residential property, fencing requirements, etc. before this project can even get to the layout/approval process. These parameters should not be coming from the developer, they should be guided by the OSPB. If LightsourceBP can't live with the state's requirements then they can decide not to pursue the project. This layout is extremely important as show and tell is always an effective tool and eliminates the fear of the unknown. It is imperative that this 3D model be completed ASAP with input from the OPSB. No further work should be done until this layout meeting the state guidelines is complete and available to the community.


In regards to the projects effect on the wildlife, I would recommend that the developer include unfenced wildlife lanes in each square block so that the wildlife can move freely across the fields without being forced onto the local roads. I know they are leaving wooded areas and wetland as they are which is good, but the animals need to have access to these areas and be able to move around. This is obviously a major concern of the local community that I do not feel that LightsourceBP has properly addressed. I am fairly comfortable with the minimal environmental impact from the solar cells themselves, but it doesn't hurt that the OSPB makes this a major part of their approval process.

The ability of this project to actually live a 30 year project life is another big item and a

personal concern of mine. There is no doubt that the current federal tax credits is an important part of the feasibility of this project and as I understand it they are currently scheduled to end in 2022. I am sure that LightsourceBP expects these to be extended, as I do also with the emphasis on alternative energy, but it is important that we understand what happens to the project if they are not extended or significantly reduced. It is also a concern as to what happens when the solar cells being used here become obsolete due to a technological advancement that increase the efficiency of a solar farm. This is very likely as the pace of technology improvement is going at breakneck speed in this century. Will it make sense to update all of the cells in the Birch project or will it be cheaper for Lightsource to abandon the project here and build a new farm elsewhere. I understand that they are setting \$500,000 aside for the decommissioning of the farm but this seems extremely low for a project with a \$337M initial investment and an annual operating cost of \$4.6 million. Is the \$500K the right number and does the OPSB have the power to make sure the farm is properly decommissioned if they decide to abandon the project before 30 years?

The final issue is the taxes to be paid to the local community and the possible use of the PILOT program as an alternative tax vehicle. I do not feel that the local trustees and commissioners understand this process and it should not be LightsourceBP explaining it to them. I feel it is the duty of the State (OPSB) to educate the commissioners, trustees and local residents on this process. The pros and cons of each scenario with actual project numbers should be presented to the community.

I understand and appreciate the need for alternative energy when it is economically competitive with our current sources. My main concern is that the OPSB has given all the power to the developer and is simply here to rubber stamp it when complete. The OPSB should be just as involved with asking the tough questions of LightsourceBP in advance of their submission and I do not see this happening.

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Summary: Public Comment filed on behalf of Dave Conine submitted via website electronically filed by PUCO Docketing on behalf of Docketing