

February 9, 2021

Ms. Tanowa Troupe, Secretary
Ohio Power Siting Board
Docketing Division
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3797

Re: Case No. 20-1362-EL-BGN - In the Matter of the Application of Clearview Solar I, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Champaign County, Ohio.

Response to First Data Request from Staff of the Ohio Power Siting Board

Dear Ms. Troupe:

Attached please find Clearview Solar I, LLC's ("Applicant") Response to the First Data Request from the staff of the Ohio Power Siting Board ("OPSB Staff"). The Applicant provided this response to OPSB Staff on February 9, 2021.

We are available, at your convenience, to answer any questions you may have.

Respectfully submitted,

/s/ Christine M.T. Pirik

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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 in 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 is also being served upon the persons below this 9th day of February, 2021.

/s/ Christine M.T. Pirik

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4847-5261-9738 v1 [85890-4]

In the Matter of the Application of Clearview Solar I, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Champaign County, Ohio.)
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) Case No: 20-1362-EL-BGN
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Response: Applicant understands and makes this commitment. This commitment will be formalized as part of the Final Decommissioning Plan to be submitted to Staff for review prior to the start of construction.

Gen-tie line

3. **Please update Figure 2 (Map of Aerial View of Project Area) to reflect the location of the 138 kV gen-tie line and provide associated shapefiles.**

Response: The Gen-tie will be located within the approximately 10-acre area identified on Figure 2 as “Substation Parcel” and through which DP&L’s existing Transmission Line passes. The Gen-tie will be a very short transmission line, likely only 100-200 feet in length that will deliver power from the Substation to the Utility Substation, which will be constructed by DP&L. Because the precise location and configuration of the Utility Substation within the Substation Parcel is not yet known, neither are the precise locations of the Substation or the Gen-tie. Therefore, updating Figure 2 to include the location of the Gen-tie within the Substation Parcel, and providing the associated shape files for that location, is not possible at this time because the location has not yet been determined. If useful to Staff, Figure 2 could be updated at this time to reflect in the map “key” that the Gen-tie will be located within the Substation Parcel. Once the project is through the PJM Facility Study phase, which is likely to be later this year, the Applicant will be able to provide an update on this topic.

4. **Please provide the following information for the 138 kV gen-tie line:**

- a. **Tower designs, pole structures, conductor size and number per phase, and insulator arrangement.**

Response: Regarding towers, Applicant expects that the Gen-tie will be suspended between two dead-end structures, one located at the Substation and one located at the Utility Substation. Applicant does not currently believe that, based on its expected length, the Gen-tie will require additional poles. Applicant does not at this time know the conductor size, number of phases and insulator arrangement for the Gen-tie, but will

include these details in the Final Site Plan to be submitted to Staff prior to the start of construction.

b. Base and foundation design.

Response: See above regarding dead-end structures.

c. Cable type and size, where underground.

Response: At this time, Applicant does not expect that any part of the Gen-tie will be underground.

d. Other major equipment or special structures.

Response: None.

- 5. Is the gen-tie line within one hundred feet of an occupied residence or institution? If yes, please provide the calculated electric and magnetic field strength levels at one meter above ground, under the conductors and at the edge of the right-of-way for (i) Winter normal conductor rating, (ii) Emergency line loading, and (iii) Normal maximum loading.**

Response: No, the Gen-tie will not be within 100 feet of an occupied residence or institution. The Gen-tie will be within the Substation Parcel and the Substation Parcel is not within 100 feet of an occupied residence or institution.

Manufacturer Information

- 6. Referring to page 10 and 11 of the Application, what solar panel manufacturers are Clearview Solar I, LLC considering for this project?**

Response: Applicant is considering the use of a number of manufacturers for the project. For reasons of business confidentiality, Applicant prefers not to identify the manufacturers under consideration. The manufacturer that Applicant ultimately selects will be identified in the Final Site Plan to be submitted to Staff prior to the start of construction. However, as further stated below, the Applicant commits that the chosen solar panel manufacturer equipment will follow the applicable industry codes.

7. **Does Clearview Solar I, LLC anticipate using more than one solar panel manufacturer for this project?**

Response: Applicant does not anticipate using models produced by more than one manufacturer, but has not excluded that possibility.

8. **Referring to page 3 of the application, the Applicant indicates that it will select from a well-known group of top tier providers. Will Clearview Solar I, LLC select a solar panel that is listed as a Bloomberg New Energy Finance tier 1 solar panel supplier/manufacturer? If no, is there any other standard that Clearview Solar intends to use in its selection of manufacturer(s)?**

Response: Assuming BloombergNEF is still issuing its quarterly PV Module Tier 1 List at the time Applicant selects the manufacturer for the project and does not substantially change its methodology for creating the list, Applicant will select a manufacturer from that list.

9. **Referring to Exhibit B of the Application, is Clearview Solar I, LLC committing to using solar panels and equipment that will be compliant with applicable UL, IEEE, NEC, NESC, and ANSI listings?**

Response: Except to the extent any provision may be inconsistent with Ohio or other applicable law, Applicant commits to using solar panels and other components that comply with the most recent versions of the National Electric Code (also referred to as National Fire Protection Association [“NFPA”] 70) published by the NFPA, the National Electric Safety Code (also referred to as American National Standards Institute ([“ANSI”] Standard C2) published by Institute of Electrical and Electronics Engineers (“IEEE”), and other consensus industry standards applicable to components of the project that are published by the above organizations (UL, IEEE, and ANSI).

10. **Referring to page 32 of the Application, have the solar panels under consideration by Clearview Solar I, LLC passed the US EPA’s Toxicity Characteristic Leaching Procedure (TCLP) test?**

Response: Models of solar panels under consideration by Applicant have been tested under and passed TCLP. As noted in the Application (p. 32), Applicant believes that most models

of solar panel used in the U.S. pass TCLP. Applicant has not yet identified, however, all of the models of solar panel that it may use for the Project, and many newer models may not yet have been tested. Any model of solar panel that Applicant uses for the Project and that is disposed of as part of the decommissioning of the Project, however, will be disposed of only in accordance with applicable state and federal law, including the federal Resource Conservation and Recovery Act administered by U.S. Environmental Protection Agency (“EPA”) and Ohio EPA (and under which the TCLP test is the test method relevant to the appropriate method of disposal).

Visual Resources

- 11. In reference to Ohio OAC 4606-4-08 have you conducted a review of existing plans, policies, and regulations of the communities within the study area, and do you have a list of all references to identified visual resources or other indications of the visual preferences of the community?**

Response: Applicant did review the Champaign County Comprehensive Plan (2020 Update) and the Adams Township Zoning Code. In addition, in response to this request, Applicant also reviewed the prior Comprehensive Plan--Champaign County Comprehensive Plan for Unincorporated Areas (March 2004)--which the current Comprehensive Plan notes it is intended to update, not replace. There are no references to identified visual resources in these plans and regulations. The visual preferences of the community as expressed in these plans include a broad theme of preserving the rural character, including its scenic beauty, of areas outside of incorporated limits. This theme is expressed primarily as the desire to preserve agricultural land from permanent conversion to high density uses, particularly urban/suburban sprawl outside incorporated areas. This includes, but is not limited to, growth from the Columbus and Dayton metropolitan areas, which is beginning to change the rural character of some unincorporated areas. As noted in the Application, Applicant believes that the Project is consistent with the themes of preserving rural character and views. The Project will be temporary and serve to preserve farmland for future use (Application, p. 67) and feature perimeter landscaping designed to harmonize the low-lying solar panels within the existing landscape (Application, p. 75 and Exhibit Y).

Cultural Resources

12. **In the application, you state you expect the archaeology field work to be completed in late March/early April and the final report and concurrence with SHPO to happen in the summer of 2021? Is this still the anticipated timeline? If so, approximately when during the summer do expect to have final concurrence with SHPO?**

Response: Applicant continues to believe that this schedule is realistic. Applicant does not have a specific expectation of when during the summer the State Historic Preservation Office (“SHPO”) SHPO concurrence is expected, although it is hoped it will be by the end of June.

13. **If you expect to have final concurrence with SHPO in the summer of 2021, do you plan on finalizing an MOU or Programmatic Agreement with SHPO before the staff report due, if we estimate a mid-April to mid-May staff report due date?**

Response: Yes.

Respectfully submitted,

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

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Summary: Response to First Data Request from OPSB Staff electronically filed by Christine M.T. Pirik on behalf of Clearview Solar I, LLC