DICKINSON WRIGHT PLLC

150 E. GAY STREET, 24TH FLOOR
COLUMBUS, OH 43215-3192
TELEPHONE: (614) 591-5461
FACSIMILE: (844) 670-6009
http://www.dickinsonwright.com

CHRISTINE M.T. PIRIK
CPirik@dickinsonwright.com

February 16, 2021

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

Re: **Case No. 20-1677-EL-BGN -**In the Matter of the Application of Cadence Solar Energy LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Union County, Ohio.

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

Dear Ms. Troupe:

Attached please find Cadence Solar Energy 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 16, 2021.

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

Respectfully submitted,

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)
William Vorys (0093479)
Dickinson Wright PLLC
150 East Gay Street, Suite 2400
Columbus, Ohio 43215
(614) 591-5461
cpirik@dickinsonwright.com
wvorys@dickinsonwright.com

Attorneys for Cadence Solar Energy LLC

Cc: Mark Belamy
Theresa White
Randall Schumacher
Jon Pawley

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 16th day of February, 2021.

/s/ Christine M.T. Pirik
Christine M.T. Pirik (0029759)

Counsel:

robert.eubanks@ohioattorneygeneral.gov
thomas.shepherd@ohioattorneygeneral.gov

Administrative Law Judge:

sarah.parrot@puco.ohio.gov
jesse.davis@puco.ohio.gov

4835-2112-9435 v2 [39579-45]

BEFORE
THE OHIO POWER SITING BOARD

In the Matter of the Application of Cadence Solar Energy LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Union County, Ohio.	)))))	Case No: 20-1677-EL-BGN

CADENCE SOLAR ENERGY LLC 'S
RESPONSE TO THE FIRST DATA REQUEST
FROM THE STAFF OF THE OHIO POWER SITING BOARD

On February 1, 2021, Cadence Solar Energy LLC ("Applicant"), filed an application ("Application") with the Ohio Power Siting Board ("OPSB") proposing to construct a wind-powered electric generation facility in Union County, Ohio.

On February 9, 2021, the Staff of the OPSB ("OPSB Staff") provided the Applicant with OPSB Staff's First Data Request. Now comes the Applicant providing the following response to the First Data Request from the OPSB Staff.

1. The Application says the generation facility will be 275 MW on p2/132 and then 400 MW (175 + 225) on p19/132, please explain the difference.

Response:

The 275-megawatt ("MW") capacity will come from using the 225 MW of queue AD2-093 plus 50 MW of queue AD2-092.

There is the potential for a phased development, in which case a future phase would utilize the remaining megawatts and bring the site to a total of 400 MW.

2. Please provide a month/year estimate for Start of Construction and for In-Service.

Response:

Start of Construction: April 2022

Placed In-Service: September 2023

3. The PJM System Impact Study for AD2-092, section 'Stability and Reactive Power Requirement', page 6/10, says that AD2-092 did not meet the 0.95 lagging power factor requirement, but the plant did meet the 0.95 leading power factor. Please explain measures to be taken to bring the lagging power factor into compliance.

Response:

Per the same section of the report, PJM Interconnection LLC ("PJM") included the direction that an additional 4.32 mega volt amps (reactive) ("Mvar") would be needed to meet the 0.95 lagging power factor requirement. The Applicant will meet the requirements of the future Interconnection Service Agreement or Federal Energy Regulatory Commission ("FERC") Order No. 827 by adding capacitor banks to the high voltage side of the Substation Transformer. The final size of the capacitor banks will be determined during the detailed engineering phase via a load flow study.

4. PJM System Impact Study Report for AD2-092, section 'New System Reinforcements' page 7/10, says "None" required. But in the same Study, the 'Conclusion' section page 8/10, states that the facility will require the installation of a 345-kV breaker, associated equipment, including upgrades to line protection and controls and revenue metering to provide operation reliability and flexibility to the AEP system. Please clarify the need for New System Reinforcements.

Response:

PJM's use of "New System Reinforcements" refers to work scopes needed to mitigate any load flow, short circuit, or stability violations cause by the impact of the project's injection of power. No violations under Generator Deliverability, Multiple Facility Contingency, Steady-State Voltage, or Short Circuit were identified. The item identified under Stability will be addressed during facility design. Therefore, there are no "New System Reinforcements" to consider. The items identified in the conclusion of the report are scopes

for the interconnection facilities at Marysville 345 kilovolt ("kV") to accommodate the interconnection of the Project itself.

5. **The PJM Feasibility Study Report for AD2-092, AD2-093 and AD2-096, section 'Secondary Point of Interconnection…' of page 5/11 reads "install new one (3) circuit breaker 345 kV switching station…". Should that be "install new one (1) circuit breaker 345 kV switching station ..."?**

Response:

PJM allows analysis of up to two points of interconnection in the Feasibility Study before obligating the Project to choose a single point of interconnection ("POI") to move forward in the remaining studies. The secondary POI considered had been a line break of the Marysville – SW Lima 345 kV line. Without an existing substation, the interconnection scope for the secondary POI was to install a new switching station consisting of 3x 345 kV circuit breakers. Ultimately, the Project moved forward with the primary POI of connecting directly to the Marysville 345 kV substation, which requires the addition of 1x 345 kV circuit breaker. Any information related to the secondary POI is irrelevant to the current state of the Project.

6. **The PJM 'Feasibility Study Report for AD2-092, AD2-093 and AD2-096, 'page 8/11 the 'Delivery of Energy Portion of Interconnection Request' lists two contingencies associated with AD2-096, the Energy Storage appliance. Please explain your plans for accommodating these issues. Please explain the meaning of the Contingency #2 Type "Non".**

Response:

The System Impact Studies for these queue positions, which supersede the results of the Feasibility Studies, show that there are no Delivery of Energy Portion issues.

If issues remained in the System Impact Studies, the expectation for mitigation would be curtailment by the operator. This type of scenario does not inherently warrant an upgrade or other direct mitigation. The "Non" contingency type means no contingency, as in the scenario occurs in the base load flow without outages.

However, as stated previously, the System Impact Studies take precedence over the Feasibility Studies, and no Delivery of Energy Portion issues are expected.

Respectfully submitted,

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)
William Vorys (0093479)
Dickinson Wright PLLC
150 East Gay Street, Suite 2400
Columbus, Ohio 43215
(614) 591-5461
cpirik@dickinsonwright.com
wvorys@dickinsonwright.com

Attorneys for Cadence Solar Energy LLC

4825-3579-5675 v3 [39579-45]

Summary: Response to First Data Request from Staff of the Ohio Power Siting Board electronically filed by Christine M.T. Pirik on behalf of CADENCE SOLAR ENERGY LLC