

BEFORE THE OHIO POWER SITING BOARD

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| In the Matter of the Application of Ross County Solar, LLC for a Certificate of Environmental Compatibility and Public Need. |))))) | Case No. 20-1380-EL-BGN |
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ISSUES LIST OF ROSS COUNTY SOLAR, LLC

Pursuant to the Administrative Law Judge’s January 20, 2021 Entry, Ross County Solar, LLC (“Ross County Solar” or “Applicant”) submits this issues list citing specific concerns about which it may be interested in pursuing cross-examination of Staff witnesses relating to certain conditions contained in the March 22, 2021 Staff Report of Investigation (“Staff Report”). In addition to the specific concerns identified below in the Staff Report, Ross County Solar may also pursue cross-examination of any witnesses appearing on behalf of any intervenor in support of or regarding any issue identified in their petitions or motions to intervene, or with respect to any testimony or evidence presented by any witnesses. The specific issues concerning the Staff Report, designated by the applicable condition, are as follows:

1. Condition 4, regarding the timing of the separate construction conferences, submission of the final project design, and reference to karst topography.
2. Condition 5, regarding the submission of final geotechnical evaluation.
3. Condition 8, regarding the timing of the submission of copies of permits and authorizations to Staff.
4. Condition 9, regarding the jurisdiction of local, state, or federal agencies and their enforcement of applicable rules and regulations.
5. Condition 10, regarding the contents of the start of construction and start of facility operations notices.

6. Condition 11, regarding the submission of the fire protection, safety, and medical emergency plan(s).
7. Condition 14, regarding the landscape mitigation and lighting plans submitted by the Applicant.
8. Condition 15, regarding identifying areas where pile driving cannot occur between 7:00 a.m. and 9:00 a.m.
9. Condition 16, regarding the submission of an updated noise study to account for the selected inverters and substation transformer.
10. Condition 17, regarding the repair of damage drain tiles.
11. Condition 18, regarding mitigation measures to be implemented if any listed threatened or endangered plant or animal species or suitable habitat are encountered prior to construction.
12. Condition 20 and 21, regarding avoiding the preferred nesting habitat types for the northern harrier and the upland sandpiper.
13. Condition 22, regarding the role of the environmental specialist.
14. Condition 24, regarding the Applicant obtaining all necessary transportation permits.
15. Condition 25, regarding the status of water wells.

Respectfully submitted,

/s/ Anna Sanyal

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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 this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 13th day of April 2021.

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Summary: Notice List of Issues electronically filed by Ms. Anna Sanyal on behalf of Ross County Solar, LLC