

April 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. 20-1679-EL-BGN - In the Matter of the Application of Pleasant Prairie Solar Energy LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Solar-Powered Electric Generation Facility in Franklin County, Ohio.

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

Dear Ms. Troupe:

Attached please find Pleasant Prairie Solar Energy LLC's ("Applicant") Response to the Second Data Request from the staff of the Ohio Power Siting Board ("OPSB Staff"). The Applicant provided this response to OPSB Staff on April 16, 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 16th day of April, 2021.

/s/ Christine M.T. Pirik

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4836-0211-3253 v1 [39579-53]

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Pleasant Prairie)
Solar Energy LLC for a Certificate of Environmental)
Compatibility and Public Need to Construct a Solar-) Case No: 20-1679-EL-BGN
Powered Electric Generation Facility in Franklin)
County, Ohio.)

**PLEASANT PRAIRIE SOLAR ENERGY LLC 'S
RESPONSE TO THE SECOND DATA REQUEST
FROM THE STAFF OF THE OHIO POWER SITING BOARD**

On February 19, 2021, Pleasant Prairie Solar Energy LLC (“Applicant”) filed an application (“Application”) with the Ohio Power Siting Board (“OPSB”) proposing to construct a solar-powered electric generation facility in Franklin County, Ohio.

On April 12, 2021, the Staff of the OPSB (“OPSB Staff”) provided the Applicant with OPSB Staff’s Second Data Request. Now comes the Applicant providing the following response to the Second Data Request from the OPSB Staff.

- 1. The Application discusses using a chain link fence. Primary concerns involved with a chain link fence would be potential wildlife displacement and aesthetics. Would the project be able to incorporate options which would minimize either or both of these impacts? If no, please explain why chain link is the only option.**

Response: Yes. Chain link fencing was first proposed as it is a general industry standard configuration around the solar array fields. Upon engaging with local project area landowners and stakeholders such as MetroParks and the Darby Creek Association, it has been clear that there is a desire for the project team to look into utilizing ‘Deer Fencing’ which can be some configuration of woven metal attached to wood posts. The openings in such a woven metal fencing can be potentially bigger than traditional chain link and can also incorporate various ground tunnel attachments to reportedly aid in the small animal crossings like turtles, coyotes, etc.

As shown in Attachment 1 to this response, which includes excerpts from the National Electrical Safety Code (Article 110) and the National Electric Code (Article 110.31

Enclosure of Electrical Installations) that show such utilization of a 'Deer Fence' fence is acceptable and shall be at least 7 feet high. In addition, Attachment 1 shows some example pictures of such "Deer Fence.'

The Applicant is committing to incorporating a 'Deer Fence' configuration, similar to what is shown on the attached, that aids in resolving wildlife access/crossing and viewshed concerns for the Project. This configuration is only applicable at the perimeter of the solar array fields and not the Project substation. The Project substation will have 6-foot tall chain link fence with 1 foot of barbed wire.

2. **4906-4-06(F)(1): Please describe, specifically, how the applicant will notify affected property owners and tenants about its public information and complaint resolution programs at least seven days prior to the start of construction.**

Response: At least seven days prior to the start of construction and at least seven days prior to the start of facility operations, the Applicant will notify via mail affected property owners and tenants, including those individuals who were provided notice of the public information meeting, residents located within one mile of the Project Area, parties to this case, county commissioners, township trustees, emergency responders, airports, schools, and libraries, as well as anyone who as requested updates regarding the Project. These notices, which were included as Attachment 3 to the Applicant's Response to the OPSB Staff's First Data Request filed on March 18, 2021 will provide information about the Project, including contact information and a copy of the Complaint Resolution Plan, which was filed as Exhibit K to Application Exhibit G. During the construction and operation of the Facility, the Applicant shall submit to the OPSB a complaint summary report by the fifteenth day of April, July, October, and January of each year for the first five years of operation. The report shall include a list of all complaints received through the Applicant's complaint resolution process, a description of the actions taken toward the resolution of each complaint, and a status update if the complaint has yet to be resolved.

3. **4906-4-04(A)(1): Please provide a written description of the study area or the geographic boundaries of the area considered for development of the project.**

Response: The study area for the Pleasant Prairie Solar Project is located within approximately 2,424 acres of privately owned lands within Pleasant and Prairie Townships,

Franklin County, Ohio. The Project Area is primarily south of National Pike (U.S. Route 40), east of Darby Creek Drive (County Road 140), north of Kropp Road (County Road 135), and west of Kunz Road. See Application Figure 03-1 Project Area Site Map.

4. **4906-4-04(A)(5): Please provide a written description of the project area(s) selected for evaluation.**

Response: The Applicant located several sites that could potentially host a solar facility. The Applicant selected the subject site for further development because of an overwhelming positive welcome from area landowners and community leaders, few environmental constraints, and positive results from initial transmission studies.

The permanent Project Area and the area in which all of the solar panels and infrastructure will be in and maintained is approximately 1,729 acres within the 2,424 are Study Area.

5. **4906-4-04(B)(2): How many comments were received during the public informational meeting?**

Response: During the Project's virtual public informational meeting, records of comments were kept for further individual and specific follow up and detailed coordination with Project stakeholders. There were approximately 49 web comments submitted with varying degree of subjects and overlap. For the phone component of the virtual public informational meeting, there were approximately 5 comments or questions received and discussed. The Applicant has ongoing outreach efforts with local Project stakeholders and is looking forward to further engagement on Project questions or concerns, as well as design input for aspects such as setbacks, landscape screening, and other design attributes.

6. **Page 58 of the application states there are no source water protection areas associated with the project area. Upon Staff review, it appears that the project area falls within or immediately adjacent to two delineated source water protection areas (SWPAs). To the north, at the proposed substation area is the Ten Mile Inn SWPA. On the east side of the central project area is the Hope Baptist Church SWPA. Please re-evaluate water impact to incorporate consideration of these public water supplies. This should include any special attention given to the assurance that these water resources aren't impacted by the proposed solar farm construction, operation, or decommissioning activities.**

Response: The Applicant notes that, while a portion of the Hope Baptist Church source water protection area (“SWPA”) is within the Project Area, it is actually outside the fence line (area of disturbance) and is not anticipated to be impacted from the construction or operation of the Project.

A portion of the SWPA for the Ten Mile Inn is with the Project Area and a smaller portion (approximately 4.5 acres) is within the fence line of the Project. However, no panels are planned within the SWPA for Ten Mile Inn. The well is setback from the Project Area and separated on the east side of Murnan Road (County Rt 12). The only Project infrastructure planned within the SWPA is the Project substation. It is anticipated the Project will have no impact on the well SWPA as the Project activities are similar to or less than the current agriculture activities that currently occur within the well SWPA.

Additionally, during construction, the Project will follow the site storm water pollution prevention plan (“SWPPP”), as well as the National Pollution Discharge Elimination System (“NPDES”) Construction General Permit (“CGP”) which will include Appendix A Big Darby Creek watershed water quality controls. The Project will maintain permanent stormwater best management practices (“BMPs”) after construction. Also, during construction and operation of the Project, a site-specific Spill Prevention Control and Countermeasure (“SPCC”) Plan will be prepared to ensure procedure and protocols to prevent potential spills and provide procedure and protocols to ensure proper clean-up if a spill were to occur.

7. In Ohio the BESS is often separately owned and operated from the solar farm. Will Pleasant Prairie Solar Energy, LLC construct, own, operate and maintain the BESS?

Response: The Applicant submitted battery energy storage system (“BESS”) specification information within the original Application as at the time a BESS component to the Project was a possibility. However, the use of BESS is no longer being evaluated by the Applicant and the Applicant is affirming this will not be a component of the Project.

8. The Powin Energy BESS lists three size containers, which size(s) is Pleasant Prairie Solar Energy, LLC considering for this project.

Response: The Applicant submitted BESS specification information within the original Application as at the time a BESS component to the Project was a possibility. However, the use of BESS is no longer being evaluated by the Applicant and the Applicant is affirming this will not be a component of the Project.

9. Please update Figure 03-2 (Project Area Map) and other relevant facility mapping to reflect the proposed location of the BESS and provide associated shapefiles.

Response: The Applicant submitted BESS specification information within the original Application as at the time a BESS component to the Project was a possibility. However, the use of BESS is no longer being evaluated by the Applicant and the Applicant is affirming this will not be a component of the Project.

10. Please describe work procedures and safety precautions that will be implemented while working near the existing transmission line.

- **What is the height of the tallest structure at the solar farm including project substation?**

Response: The tallest structure for the Project will be located at the collection substation and those structures are the lightning protection structures, which are anticipated to have a height of 90 to 100 feet.

The Applicant is not pursuing access or construction rights to encroach on any existing utility transmission line easements. If through the development of detailed construction means and methods, it is found that the construction team may need to encroach on an existing easement, the Applicant's construction team will reach out to that transmission owner to coordinate this access and understand the transmission owner's clearance requirements.

11. Please provide an updated decommissioning plan that accounts for the cost to decommission the BESS.

Response: The Applicant submitted BESS specification information within the original Application as at the time a BESS component to the Project was a possibility. However, the use of BESS is no longer being evaluated by the Applicant and the Applicant is affirming this will not be a component of the Project.

12. Please provide an updated decommissioning plan that describes the engineering techniques and major equipment to be used in decommissioning and reclamation of the BESS.

Response: The Applicant submitted BESS specification information within the original Application as at the time a BESS component to the Project was a possibility. However, the use of BESS is no longer being evaluated by the Applicant and the Applicant is affirming this will not be a component of the Project.

13. Referring to Figure A-8 in the Ecological Assessment (Exhibit R), how many water wells are within the project area?

Response: There are a total of 22 wells (16 water wells, 5 monitoring, and 1 livestock) within the Project Area. Of the 22 wells in the Project Area, 7 wells (2 water and 5 monitoring) are within the area of disturbance. The table below shows all water wells within the Project Area and their proximity to planned Project infrastructure.

Even though there is one domestic well within the planned solar array, the Applicant anticipates no impact to well water quality during the operation of the Project. Post construction, the ground will be stabilized with permanent native vegetation, which will support natural ground water recharge. The site will have permanent stormwater BMPs to control and limit potential for flooding and standing water.

Additionally, recent studies have conducted Toxicity Characteristic Leaching Procedure (“TCLP”) tests at mature solar facilities in California and North Carolina, these studies show no toxic chemical leakage from the panels over the life of the project. As noted within the Application, Applicant is committing to only utilizing panels that pass the TCLP test.

<u>Well ID</u>	<u>Well Use</u>	<u>Inside Fence Line (Y/N)</u>	<u>Nearest Infrastructure (Feet)</u>	<u>Nearest Infrastructure</u>	<u>Latitude</u>	<u>Longitude</u>
<u>306486</u>	-	<u>N</u>	<u>1,022 ft</u>	<u>Fence Line</u>	<u>39.91996300</u>	<u>-83.18510500</u>
<u>439924</u>	<u>DOMESTIC</u>	<u>Y</u>	<u>260 Ft</u>	<u>Access Road</u>	<u>39.94297900</u>	<u>-83.20159200</u>
<u>643563</u>	-	<u>N</u>	<u>391 ft</u>	<u>Fence Line</u>	<u>39.90522800</u>	<u>-83.17688600</u>
<u>956206</u>	<u>DOMESTIC</u>	<u>N</u>	<u>153 ft</u>	<u>Fence Line</u>	<u>39.89803000</u>	<u>-83.18320000</u>
<u>672487</u>	-	<u>N</u>	<u>66 ft</u>	<u>Fence Line</u>	<u>39.93422000</u>	<u>-83.20150000</u>

<u>Well ID</u>	<u>Well Use</u>	<u>Inside Fence Line (Y/N)</u>	<u>Nearest Infrastructure (Feet)</u>	<u>Nearest Infrastructure</u>	<u>Latitude</u>	<u>Longitude</u>
<u>762115</u>	DOMESTIC	N	9 ft	Collection Line	<u>39.93367000</u>	<u>-83.20254000</u>
<u>2033569</u>	MONITOR	Y	0 Ft	Solar Array	<u>39.91155800</u>	<u>-83.18794900</u>
<u>995302</u>	DOMESTIC	N	71 ft	Fence Line	<u>39.94066600</u>	<u>-83.18848300</u>
<u>962816</u>	DOMESTIC	Y	0 Ft	Solar Array	<u>39.92617000</u>	<u>-83.18807000</u>
<u>2040374</u>	COMMERCIAL	N	344 ft	Fence Line	<u>39.94909000</u>	<u>-83.19255000</u>
<u>452624</u>	-	N	286 ft	Fence Line	<u>39.87568100</u>	<u>-83.17703300</u>
<u>463620</u>	-	N	100 ft	Fence Line	<u>39.93355900</u>	<u>-83.19342700</u>
<u>2033570</u>	MONITOR	Y	0 Ft	Solar Array	<u>39.91155800</u>	<u>-83.18794900</u>
<u>2033571</u>	MONITOR	Y	0 Ft	Solar Array	<u>39.91155800</u>	<u>-83.18794900</u>
<u>2033573</u>	MONITOR	Y	0 Ft	Solar Array	<u>39.91155800</u>	<u>-83.18794900</u>
<u>511026</u>	-	N	426 ft	Fence Line	<u>39.89191000</u>	<u>-83.16953000</u>
<u>661342</u>	-	N	567 ft	Fence Line	<u>39.94904000</u>	<u>-83.19828000</u>
<u>930734</u>	AGRIC/IRRIG	N	780 ft	Collection Line	<u>39.91801000</u>	<u>-83.18535000</u>
<u>613035</u>	-	N	158 ft	Fence Line	<u>39.91260800</u>	<u>-83.18469400</u>
<u>2076444</u>	DOMESTIC	N	215 ft	Fence Line	<u>39.94617000</u>	<u>-83.19244000</u>
<u>860738</u>	DOMESTIC	N	1,164 ft	Fence Line	<u>39.91972000</u>	<u>-83.18417000</u>
<u>2033572</u>	MONITOR	Y	0 Ft	Solar Array	<u>39.91155800</u>	<u>-83.18794900</u>

14. What is the distance between the solar farm equipment and nearest water well within the project area?

Response: As shown of the above chart, there is 1 water well (well ID 962816) within the planned solar array. There is additional monitoring wells (Well ID 2033569-2033573) within the solar array as well.

15. Please explain how Pleasant Prairie Solar Energy, LLC will, during the detailed engineering phase, minimize any potential damage from high wind velocities by proper structural design of the project support equipment at sufficient depths based on the site-specific soil conditions to preclude any adverse influence from high wind velocities.

Response: American Society of Civil Engineers (“ASCE”) 7-16 is the standard by which dead, live, soil, flood, earthquake, and wind loads are determined for structural design across the United States. Per ASCE 7-16 Risk Category I, design wind speeds are 100 miles per hour (“mph”) in Franklin County, Ohio. By solar industry standards, this wind velocity is covered by basic tracking system design. Adjusting the design of the solar facility would not be anticipated until 140 mph is reached. In the unlikely event such high winds do

occur, the wind loading study from the tracker manufacturer will take into consideration any necessary mitigation measures.

A wind loading study from the tracker manufacturer will be included in structural design packages. High wind velocities can be mitigated by increased foundation size and changes to the racking configuration, for example, a 2-in-portrait module configuration versus a 1-in portrait module configuration.

The Applicant anticipates using a NEXTracker SPT, or similar system. Manufacturer specifications for the NEXTracker system, as well as for Soltec and ATI systems, which may also be used, are provided in Application Exhibit A.

Respectfully submitted,

/s/ Christine M.T. Pirik

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Attorneys for Pleasant Prairie Solar Energy LLC

Security fencing requirements from electrical codes:

Excerpt from National Electrical Safety Code (NESC):

110. General requirements

A. Enclosure of equipment

1. Types of enclosures

Rooms and spaces in which electric supply conductors or equipment are installed shall be so arranged with barriers, such as fences, screens, partitions, or walls, to form an enclosure as to limit the likelihood of entrance of unauthorized persons or interference by them with equipment inside. Entrances not under observation of an authorized attendant shall be kept locked. An installed barrier may be satisfied with any one of the following:

- a. Fence fabric, not less than 2.13 m (7 ft) in height.
- b. A combination of 1.8 m (6 ft) or more of fence fabric and an extension utilizing three or more strands of barbed wire to achieve an overall height of the fence of not less than 2.13 m (7 ft).
- c. Other types of construction, not less than 2.13 m (7 ft), that present equivalent barriers to climbing or other unauthorized entry.

Excerpt from National Electrical Code (NEC) (p.51):

For installations other than equipment as described in 110.31(D), a wall, screen, or fence shall be used to enclose an outdoor electrical installation to deter access by persons who are not qualified. A fence shall not be less than 2.1 m (7 ft) in height or a combination of 1.8 m (6 ft) or more of fence fabric and a 300 mm (1 ft) or more extension utilizing three or more strands of barbed wire or equivalent. The distance from the fence to live parts shall be not less than given in Table 110.31.

Informational Note: See Article 450 for construction requirements for transformer vaults.

Fence options and cost effectiveness

The following table is an excerpt from VerCauteren, Kurt C.; Lavelle, Michael J.; and Hygnstrom, Scott, "Fences and Deer-Damage Management: A Review of Designs and Efficacy" (2006). USDA National Wildlife Research Center – Staff Publications. 99.

Table 1. Comparison of a variety of fences for managing damage caused by deer and their characteristics including: cost (including labor), efficacy, longevity, and maintenance.

Fence type	Cost/m (\$)	Height (m)	Efficacy (%)	Longevity (yrs)	Maintenance
Woven wire	10.00–15.00	2.40	90–99	30–40	Low
Welded wire	10.00–15.00	2.40	90–99	20–30	Low
Chain link	>20.00	2.40	90–99	30–40	Low
Poly. mesh	15.00–20.00	2.40	90–99	10–20	Medium
Poly. rope 9	5.00–10.00	1.82	70–80	15–25	High
Mod. WW 3 HT ^a	5.00–10.00	2.40	80–90	20–30	Medium
Poly. snow ^b	5.00–10.00	2.12	80–90	15–25	Medium
Offset HT	2.00–5.00	1.05	60–70	20–30	High
Slanted 7 HT ^c	2.00–5.00	1.50	70–80	20–30	High
Penn St. 5 HT	2.00–5.00	1.12	70–80	20–30	High
Poly. tape 2 ^d	<2.00	0.90	60–70	5–15	High
Baited electric	<2.00	1.12	80–90	10–20	High

^a Modified woven-wire fence with 3 strands of high-tensile wire above.

^b Polypropylene snow fence.

^c Slanted 7-strand high-tensile wire.

^d Two-strand poly-tape.

Landscape and Aesthetics

The following two photos show eight-foot woven wire “deer fence” or “agricultural fence” around a solar array at the North Star facility in MN.



The following photo shows a solar array surrounded by similar chain link and barbed wire fencing to that described by Two Creeks:



The following photo shows similar chain link and barbed wire fence against a forest habitat:



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Summary: Response to Second Data Request from Staff of the Ohio Power Siting Board electronically filed by Christine M.T. Pirik on behalf of Pleasant Prairie Solar Energy LLC