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May 17, 2021

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215-3793

Re: Case # 21-0117-EL-BGN (Kingwood Solar I, LLC Application for Certificate of Environmental Compatibility)

Ladies and Gentlemen:

Enclosed please find four copies of Tecumseh Land Preservation Association's Motion to Intervene in referenced matter, and a stamped, self-addressed return envelope. If I have enclosed sufficient copies, please return a file-stamped copy to me.

Thank you for your attention to this matter. If you need anything further in connection with this filing, please telephone me at 937-207-5297.

Sincerely yours,

Charles D. Swaney
Charles D. Swaney

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THE OHIO POWER SITING BOARD

**In the Matter of the Application of
Kingwood Solar I, LLC for a Certificate of
Environmental Compatibility and Public
Need to Construct a Solar-Powered Electric
Generation Facility in Greene County,
Ohio**

Case No. 21-0117-EL-BGN

Motion to Intervene of Tecumseh Land Preservation Association

Tecumseh Land Preservation Association (also known as Tecumseh Land Trust or "TLT"), an Ohio nonprofit corporation with a principal place of business in Greene County, Ohio, pursuant to Section 4906-2-12 of the Ohio Administrative Code ("OAC") moves to intervene in the above docket as a full party of record. As set forth in the accompanying memorandum in support, TLT has a real and substantial interest in this matter that is not represented by existing parties. TLT's involvement will contribute to a just and expeditious resolution of the issues involved in the proceeding and will not unduly delay the proceedings or unjustly prejudice an existing party.

Respectfully Submitted,



Charles D. Swaney (#0018328)

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THE OHIO POWER SITING BOARD

**In the Matter of the Application of
Kingwood Solar I, LLC for a Certificate of
Environmental Compatibility and Public
Need to Construct a Solar-Powered Electric
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**Memorandum in Support of Motion to
Intervene of Tecumseh Land Preservation
Association**

Pursuant to Section 4906-2-12 of the Ohio Administrative Code ("OAC"), Tecumseh Land Preservation Association ("TLT") moves to intervene in this proceeding as a full party of record based upon the following:

I. TLT has a real and substantial interest that is not represented by existing parties.

TLT is a nonprofit Ohio corporation organized and operated for the purpose of preserving land and water resources in Greene County, Clark County, and surrounding areas in southwest Ohio. It accomplishes this mission by holding conservation/agricultural easements on over 30,000 acres of farmland in southwest Ohio. Most of the soils within these protected properties are considered prime by USDA Natural Resource Conservation Service.

In the three townships where the Kingswood Solar Array is proposed we hold easements on 6,237 acres of land, including the 1,000 acre Glen Helen Nature Preserve and several farms that are adjacent to the proposed development. We are particularly concerned about impacts of the proposed utility scale solar array to prime soils and farmland productivity, and the short and long term impacts to the agricultural economy at the state and local levels.

Many TLT members are involved in farming and agribusiness activities, including food processing, commodity processing/conditioning/handling, biofuel production, and greenhouse operations. All our members are residential energy consumers and have an interest in effective renewable power installations that do not negatively impact the excellent soil and water resources in the area.

TLT also collaborates regularly with local, state, and federal governments on planning for balanced land use, protection of irreplaceable resources such as clean water, and restoration of natural habitat that supports water and soil restoration.

Farmers engaged in solar leasing agreements want to make sure that construction activities on their property adhere to procedures ensuring soil and water conservation. While a facility might be accommodated at one specific location, the surrounding topography, landforms, conservation practices, and subsurface drainage systems link a number of locations and land holdings together. Construction and landform modifications for an energy facility and related infrastructure could impact conservation strategies over a wider area. Residents in rural neighborhoods want assurances that environmental considerations – setbacks, noise, traffic, aesthetic and other factors – are addressed with effective facility design and placement. Area businesses want to make sure that a solar facility in the community enhances local commerce and economic development.

TLT does not intervene in this proceeding in support or opposition to the project at hand. Rather, our concerns lie in ensuring that if a project of this nature goes forward, both participating and nonparticipating landowners and their land are protected and have appropriate recourse for needed repairs or remediation.

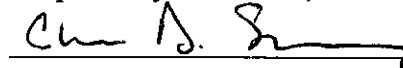
II. TLT's involvement will contribute to a just and expeditious resolution of the issues involved, and will not unduly delay the proceedings or unjustly prejudice any party.

TLT fully understands and appreciates the rules and regulations governing the OPSB evaluation process. TLT's interests lie in ensuring appropriate consideration of drainage infrastructure, soil conservation, and best practices for remediation on agricultural land. TLT will share its experiences and perspective with the Ohio Power Siting Board as it works with others to evaluate this Application. TLT's timely intervention and participation in this process will not cause undue delay, will not unjustly prejudice any existing party, and will contribute to the just and quick resolution of the issues.

Given the diverse, yet unique, interests of its members, its experience with best practices for farmland preservation and restoration, and support for collaboration, TLT submits that good cause exists to grant it leave to intervene in this proceeding.

WHEREFOR, for the reasons set forth above, Tecumseh Land Preservation Association asks that its Motion to Intervene be granted.

Respectfully Submitted,



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