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June 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. 20-1679-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 Sixth 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 Sixth Data Request from the staff of the Ohio Power Siting Board ("OPSB Staff"). The Applicant provided this response to OPSB Staff on June 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 June, 2021.

/s/ Christine M.T. Pirik
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Administrative Law Judge:

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David.hicks@puco.ohio.gov

4813-0608-3308 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-Powered Electric Generation Facility in Franklin County, Ohio.	)))))	Case No: 20-1679-EL-BGN

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

On February 19, 2021, as supplemented on April 7 and 21, 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 June 1, 2021, the Staff of the OPSB ("OPSB Staff") provided the Applicant with OPSB Staff's Sixth Data Request. Now comes the Applicant providing the following response to the Sixth Data Request from the OPSB Staff.

1. What is the proposed total length of access roads?

Response: Per Application Exhibit R (Ecological Impact Plan) filed on February 19, 2021, up to approximately 22.1 miles of pervious stone base access roads.

2. What is the proposed total length of collection lines?

Response: Per Application Exhibit R (Ecological Impact Plan) filed on February 19, 2021, up to approximately 38.36 miles of buried cable.

3. Specifically, what are the proposed minimum setbacks from non-participating residences and property lines.

Response: The greater of 100 feet from non-participating boundary lines, or 300 feet from residences. Additionally, per the Supplemental Response to the Second and Third Data Requests from OPSB Staff filed on May 12, 2021, the Applicant has committed to an additional 100-foot setback along the Kuhlwein Road and Murnan Road corridors.

4. Please summarize any coordination competed to date with the OEPA and USACE on water quality permitting.

Response: At this time no formal coordination has occurred with the Ohio Environmental Protection Agency ("OEPA") or the United States Army Corp of Engineers ("USACE"). Upon receipt of the Certificate from the OPSB the Applicant will file an application with the OEPA for a National Pollution Discharge Elimination System ("NPDES") Construction General Permit ("CGP") as the Project will have over 1 acre of land disturbance. Specifically, the Applicant is obligated to the requirements of the OEPA's NPDES with Appendix A, which has specific requirements for Projects within the Big Darby Creek Watershed.

As there are no anticipated impacts to wetlands and waterbodies, the Project will not need to seek any permits through the USACE or OEPA under Section 404 and Section 401of the Clean Water Act.

5. Is the applicant able to provide any updates on which water quality permits may be required?

Response: At this time no water quality permits are needed as the Project will not impact any wetlands or waterbodies.

6. Please provide an estimate in cubic yards of the amount of solid waste that would be produced during construction.

Response:

Pre-Construction

The Project Area is rural in nature and consists primarily of agricultural crop fields. It is anticipated that agricultural fields will be cleared of crops at the time of site development. Any remaining woody vegetation debris (minimal) generated by the pre-construction site clearing and grubbing activities will be chipped and either used or composted within the Project Area. If this is not feasible, woody debris will be properly disposed of at an authorized solid waste disposal facility. No hazardous waste will be generated as part of Project pre-construction activities.

Construction

The Project will generate minimal non-hazardous solid waste during construction activities. This waste will consist primarily of plastic, wood, cardboard, metal packing/packaging materials, construction scrap, and general refuse. Any solid waste generated at the Project's construction sites and other work areas will be reused, recycled, or disposed of in accordance with local requirements. Dumpsters will be placed at the construction laydown areas, construction office trailers, restrooms, and parking areas during construction. Any waste not reused or recycled will be disposed of at an authorized solid waste disposal facility, as needed. No hazardous waste will be generated as part of Project construction.

Operations

Project operations will not result in any significant generation of non-hazardous solid waste, and will not require acquisition of waste generation, storage, treatment, transportation, and/or disposal licenses or permits. If minimal non-hazardous waste is generated for disposal, it would be accumulated in small amounts in appropriate trash receptacles and disposed of at an authorized solid waste disposal facility. No hazardous waste will be generated as part of Project operations.

7. In reviewing Figure 08-1, oil and gas well locations in particular, it appears the Applicant didn't account for a plugged oil and gas well near Alton Road. API #34049600090000. Please confirm the existence of this well by revising the application accordingly. Also, please include the distance of this well from the nearest proposed solar equipment.

Response: This well is plugged and abandoned and below grade (covered by active agricultural area). The Well is located on parcel #1165754839, which is an easement parcel and outside the Project fence line; see Attachment 1 that includes a revision to Figure 08-1. Attachment 1 replaces and supersedes Figure 08-1 that was filed with the Application on February 19, 2021. The well is 244 feet south of the fence line and 1,500 feet east of the planed easement through the parcel.

8. Figure 08-3 illustrates that the northern portion of the project area contains highly erodible soils or slopes in excess of 12 percent. Please describe what special considerations will be given to these areas.

Response: These areas will be avoided as they are associated with wetlands, for the areas outside of the wetland avoidance area, these soil conditions no longer exist as this area was level and tilled and is current used for agriculture row crops.

9. Page 8 of Exhibit D (Preliminary Geotechnical Report by Terracon) provides an analysis of contributary risk components. On the subject of soil conditions, the summary indicates the native surface layer (12-18" thick) is not considered suitable for subgrade support or reuse as fill material. How will these unsuitable soils be managed? Will material be brought in from off-site to ensure foundation integrity throughout the footprint of the project? And if so, please provide a volume estimate for these materials and a summary of the expected construction traffic due to the "imported soils". Page 33 of the geotechnical report indicates native soils appear suitable or engineered fill use. Please clarify.

Response: Terracon recommends that the native surface layer, which is generally any excess materials consisting of organic matter, remnant crop vegetation, and tilled soils, be stripped and temporarily stockpiled and be re-spread across the site and used in landscaped areas after completion of grading operations. These soils could be reused for future agricultural use after Project decommissioning. The geotechnical recommendation is directed for the instance of use/needed subgrade support or engineered fill, the Project will still have and use this native surface layer of topsoil at grade for the establishment of native plantings. This topsoil and the use of native plantings with longer root systems aid in delivering organic material to soil depths throughout the life of the project. Additionally, the Project is committed to return the land back to its current state through decommissioning, this would include providing applicable topsoil for agricultural use at grade upon decommissioning.

10. On the subject of liquefaction, Terracon recommends further studies to investigate deeper soil zones. Please provide Staff with a summary of plans to conduct this work.

Response: The context of this recommendation was broad and for instances where structural systems end up being engineered below the preliminary geotechnical boring depths and/or at deeper soil zones (unlikely). The borings encountered medium dense to dense granular soils with groundwater in some of the borings. Loose to very loose

granular soils with high groundwater conditions have the potential for liquefaction when subjected to ground vibrations associated with earthquakes. The borings encountered mostly medium dense or better granular soils within the depths explored. Based on Terracon's review of local geology, the Applicant does not expect loose granular soils below the depths explored during our exploration. However, actual subsurface conditions beneath the obtained boring depths explored are unknown at this time. Additional explorations to deeper depths (100 feet or bedrock) at a few locations across the site could be performed to confirm the absence of these loose to very loose soils (not expected to be required and will be flushed out with actual project engineered design).

11. Page 39 of the geotechnical report recommends an 8-12" aggregate base for light duty maintenance vehicles, specifying these access roads are not meant for construction traffic, which will require a significantly thicker section. Please indicate how the access roads for construction traffic will be designed.

Response: Project construction means, methods, and sequencing will be such that construction vehicles will have the appropriate surface to operate on based on state licensed engineer stamped design drawings, including temporary configurations of access roads to meet the needs of construction traffic and vehicles. Final Project configurations and elements built, inspected, and approved that are provided to the owner of the solar facility, including final access roads, will meet the needs of the final intended use. If the construction access roads require additional measures to create a stable subgrade for heavy traffic associated with construction trafficking, measures such as chemical stabilization with lime, cement or other suitable agent, undercut and replacement (with or without geogrid) with dense graded aggregate to create a stable subgrade, etc. In addition to these measures, a thicker aggregate section could be required to support the construction traffic also. These temporary means and methods measures could be removed and decommissioned at the time of final access road installation or final project decommissioning.

Respectfully submitted,

/s/ Christine M.T. Pirik

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4813-0601-7772 v3 [39579-53]

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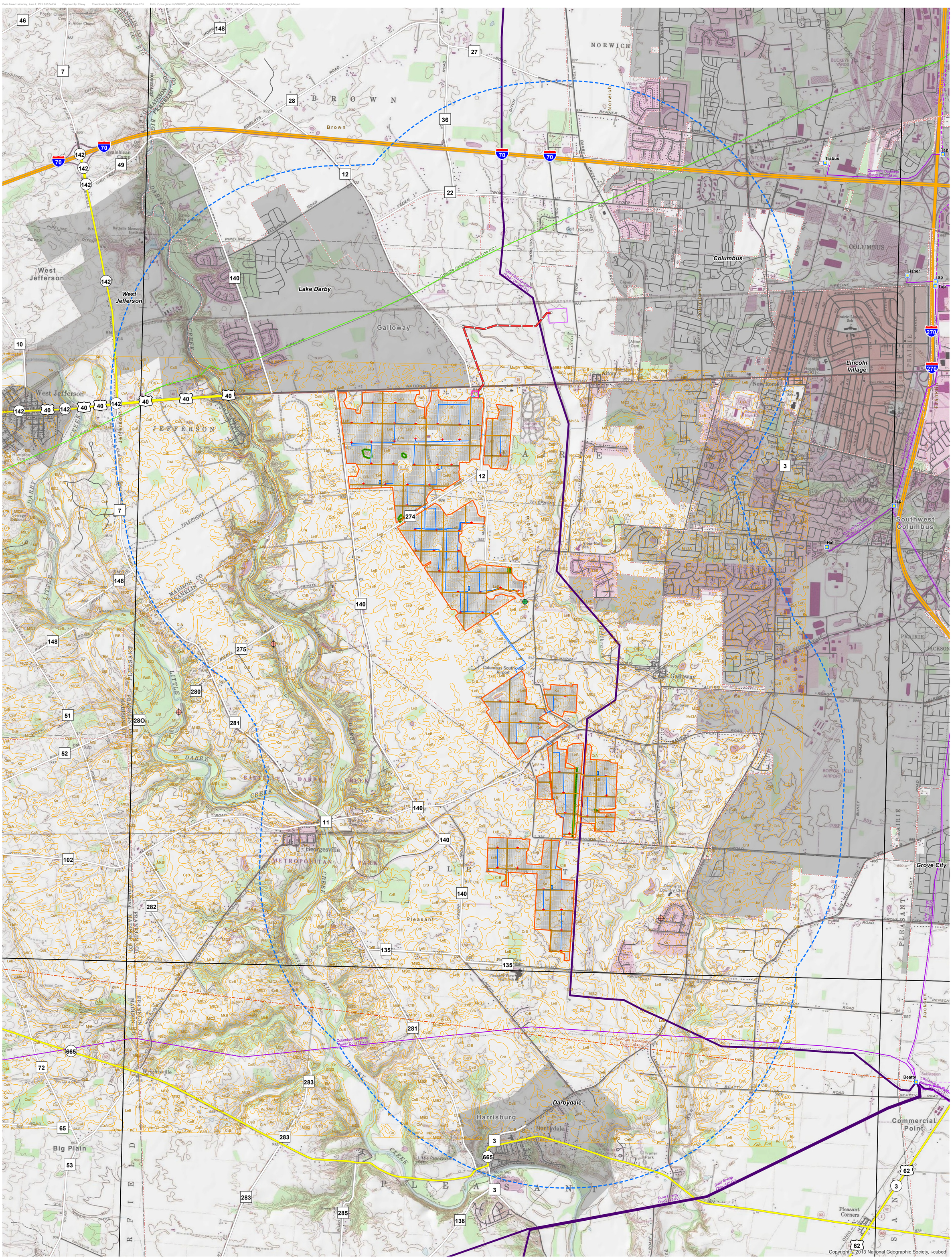

Legend

Project Layout
- Fencline
- Collection
- Inverter
- Access Road
- Transmission Line
- Modules
- Substation
- POI Switchyard
- O&M Building
- MET Tower
- Landscaping

Well Location
- Dry hole
- Plugged water supply

Natural Gas Pipeline
- 13" - 24"

- Substation Location

Transmission Line
- Under 100 kV
- 100 - 161 kV
- 345 - 500 kV
- Proposed Transmission Line

Road Classification
- Interstate Highway
- US/State Route
- County Road
- Local Road
- Dirt/Unpaved Road

- 2 Mile Study Area
- Township
- Municipal Boundary
- Soil Block

1,500 0 1,500
Feet

Geological Features Map

Pleasant Prairie Solar Energy Center | Franklin County, Ohio

Rev. 01
June 07, 2021

Invenergy

Summary: Response to Sixth 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