

July 21, 2021

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

**Re:** Case No. 21-508-EL-BGA, In the Matter of the Application of Madison Fields Solar Project, LLC, for an Amendment to its Certificate Issued in Case No. 19-1881-EL-BGN to Extend the Facility Footprint Within the Project Area.

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

Dear Ms. Troupe:

Attached please find Madison Fields Solar Project, 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 July 21, 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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*Attorneys for Madison Fields Solar Project, LLC*

## 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 21<sup>st</sup> day of July, 2021.

/s/ Christine M.T. Pirik

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**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Madison Fields     )  
Solar Project, LLC for an Amendment to its     )  
Certificate issued in Case no. 19-1881-EL-BGN to     ) Case No. 20-508-EL-BGA  
Extend the Facility Footprint Within the Project     )  
Area.     )

**MADISON FIELDS SOLAR PROJECT, LLC 'S  
RESPONSE TO THE FIRST DATA REQUEST  
FROM THE STAFF OF THE OHIO POWER SITING BOARD**

On May 7 and 10, 2021, as supplemented on June 2, 7, and 22, 2021, Madison Fields Solar Project, LLC (“Applicant”), a wholly-owned subsidiary of Savion, LLC (“Savion”), filed an application with the Ohio Power Siting Board (“OPSB”) for an amendment to its Certificate of Environmental Compatibility and Public Need issued in Case No. 19-1881-EL-BGN (“Certificate”) to extend the Facility Footprint within the Project Area for the construction of the 180-megawatt, solar-powered electric generation facility in Madison County, Ohio (“Amendment Application”).

On July 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. Please clarify the Applicant’s intent to utilize the land included in the amendment. Will the entirety of the additional 925 acres included in the amendment be used to site the Facility?**

**Response:** No, the Applicant will not use all of the additional 925 acres included in the Amendment Application to site the Facility. The intent of the amendment is to provide the most flexibility for siting the final design of the Project. As stated in the Staff Report, committed to in the Stipulation, and approved by the Board in the Initial Application case (See *In re Application of Madison Fields Solar Project, LLC*, Case No. 19-1881-EL-BGN),

additional cultural resource surveys were required before any part of the Facility could extend beyond the Facility Footprint approved under the Certificate. It has yet to be determined which of the 925 acres included in the amendment area will be utilized for final design, but in order to provide the most flexibility for final design of the Project, the Applicant determined it was prudent to complete the necessary cultural resource surveys on the entire 1,932-acre Project Area that was approved in the Certificate. Because of rapidly advancing solar panel technology and fluctuations in module pricing, final model selections must occur close to the start of construction. Only after the models have been selected can final design and engineering determine the precise locations of key components of the Facility. Due to the inability to determine final design until much later in the development process, waiting to complete cultural studies on the exact acreage where the final design might fall outside of the approximately 1,000-acre Facility Footprint that was included in the Initial Application and then submitting an amendment to the OPSB would result in a delay of construction. The Applicant submitted the amendment in an effort to avoid that potential delay and preemptively extend the Facility Footprint to allow for the final design to shift within the 1,932-acre Project Area included in the initial Application. The additional acreage creates flexibility for the dozens of design possibilities that are currently being considered for the Project. Since the Project size is not increasing, each design iteration would only use a portion of the 925-acre included in the Amendment Application.

A map illustrating four of the potential design iterations, two of which have already become obsolete, is provided as Attachment A. The map depicts how small changes in spacing, module size, etc. may shift the design within the Project Area. The most current

design is illustrated in light blue and would require using approximately 260 acres of the 925 acres included in the Amendment Application. The setbacks committed to in the Initial Application, including setbacks from adjacent residences, public road centerlines, existing transmission lines and the cemetery to the east of the Project, have been implemented into all considered designs and will be included in the final design.

Per the conditions of the Certificate, final design will be provided to OPSB no later than 60 days prior to the start of construction.

Respectfully submitted,

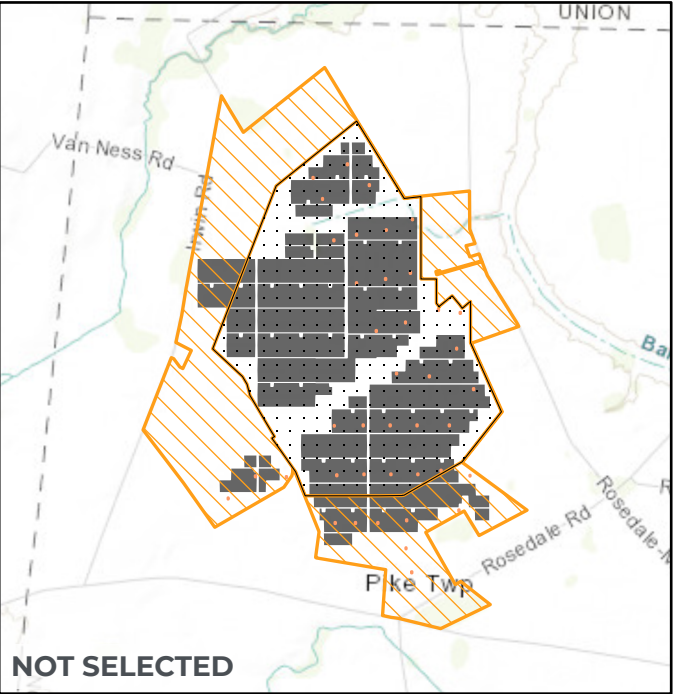
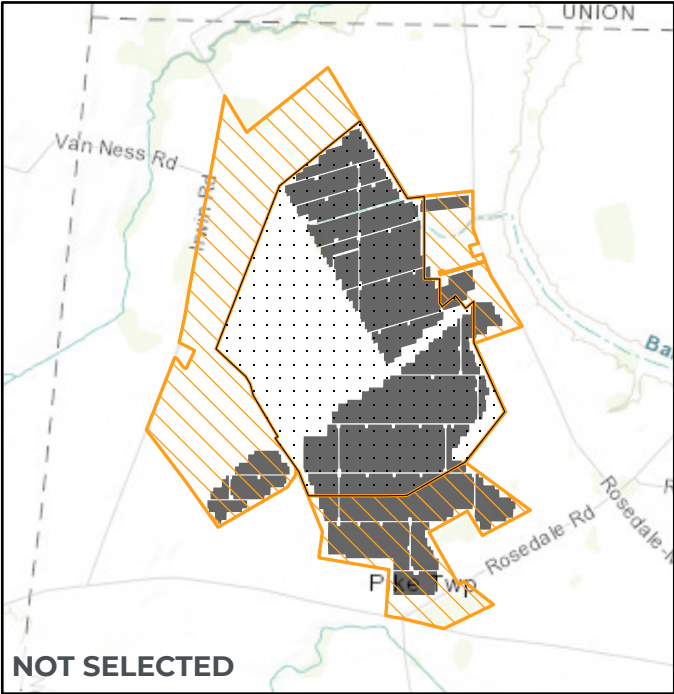
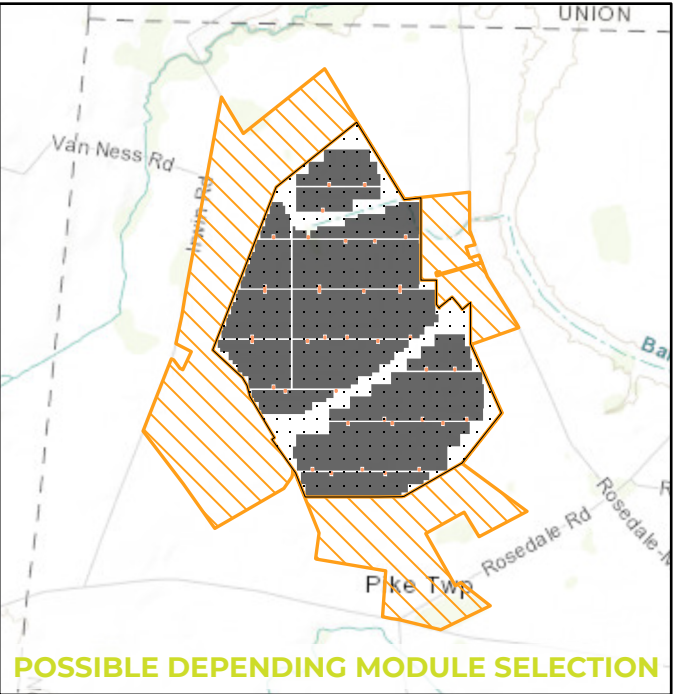
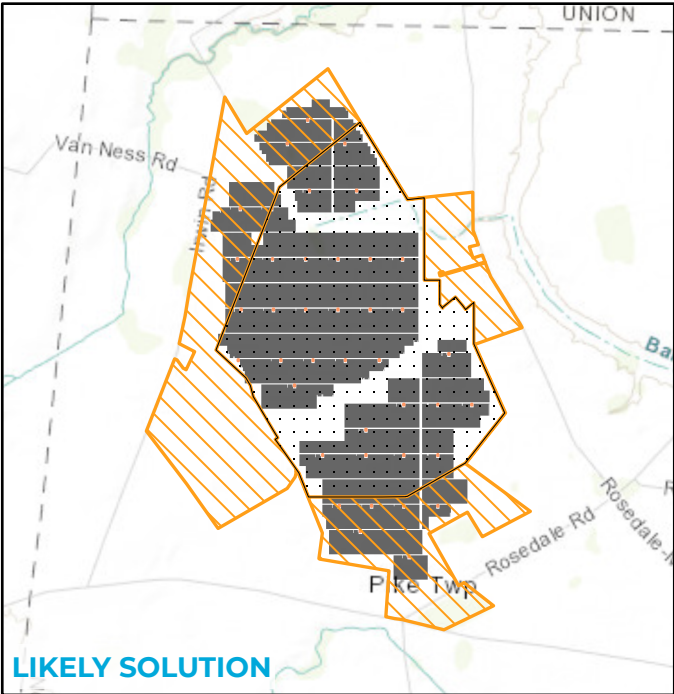
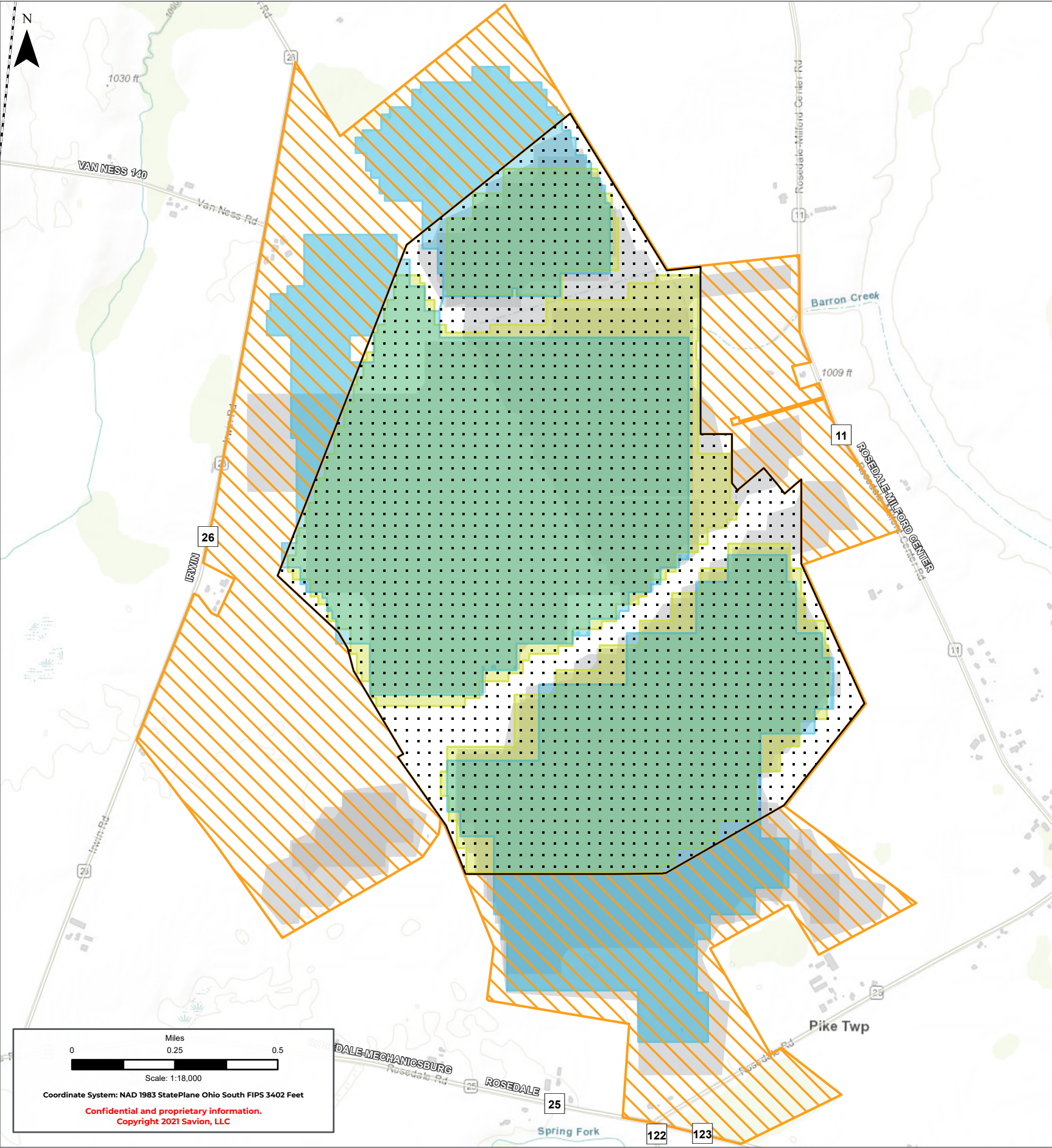
/s/ Christine M.T. Pirik  
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***Attorneys for Madison Fields Solar Project, LLC***

## **Attachment A**

### Map Illustrating Potential Design

MADISON FIELDS SOLAR PROJECT



- AMENDMENT AREA
- CERTIFICATED FACILITY FOOTPRINT
- PANEL LAYOUT OPTIONS
  - LIKELY SOLUTION
  - POSSIBLE DEPENDING ON MODULE SELECTION
  - NOT SELECTED

PROJECT: <b>MADISON FIELDS</b>	
DEVELOPER: <b>SAVION, LLC</b>	ENGINEER: <b>JOSHUA CRUMPLER</b>
DATE: <b>7/15/2021</b>	SCALE: <b>1 INCH : 1,500 FEET</b>
NOTES:	
SHEET: <b>OPSB - MADISON FIELDS AMENDMENT</b>	

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

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**in**

**Case No(s). 21-0508-EL-BGA**

Summary: Response to First Data Request From Staff of the Ohio Power Siting Board  
electronically filed by Christine M.T. Pirik on behalf of Madison Fields Solar Project, LLC