

**BEFORE  
THE OHIO POWER SITING BOARD**

<b>In the Matter of the Application of</b>	)	
<b>Kingwood Solar I LLC for a Certificate</b>	)	<b>Case No. 21-0117-EL-BGN</b>
<b>of Environmental Compatibility and</b>	)	
<b>Public Need</b>	)	

**NOTICE OF RESPONSES TO DATA REQUESTS FROM  
THE STAFF OF THE OHIO POWER SITING BOARD**

On April 16, 2021, Kingwood Solar I LLC (“Kingwood Solar”) filed an Application for a Certificate of Environmental Compatibility and Public Need with the Ohio Power Siting Board (the “Board”). On July 21, 2021, the Board’s Staff provided Kingwood Solar with Data Requests pertaining to Kingwood Solar’s Application. Attached to this notice are copies of Kingwood Solar’s responses, previously submitted to the Board’s Staff.

Respectfully submitted,

/s/ Nathaniel B. Morse  
Michael J. Settineri (0073369) Counsel of Record  
Anna Sanyal (0089269)  
Nathaniel B. Morse (0099768)  
VORYS, SATER, SEYMOUR AND PEASE LLP  
52 East Gay Street  
P.O. Box 1008  
Columbus, Ohio 43216-1008  
(614) 464-5462  
(614) 719-5146 (fax)  
[mjsettineri@vorys.com](mailto:mjsettineri@vorys.com)  
[nbmorse@vorys.com](mailto:nbmorse@vorys.com)

*Attorneys for Kingwood Solar I LLC*

## **CERTIFICATE OF SERVICE**

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being sent via electronic mail on July 27, 2021 to:

Jodi J. Bair	Jodi.bair@ohioattorneygeneral.gov
Werner L. Margard	Werner.margard@ohioattorneygeneral.gov
<i>Attorneys for Ohio Power Siting Board Staff</i>	

Daniel A. Brown	dbrown@brownlawdayton.com
<i>Attorney for Cedarville Township Trustees</i>	

David Watkins	dw@planklaw.com
Kevin Dunn	kdd@planklaw.com
<i>Attorneys for Xenia Township Trustees</i>	

Lee A. Slone	lee.slone@dinsmore.com
<i>Attorney for Miami Township Board of Trustees</i>	

John E. Hart	jehartlaw@gmail.com
<i>Attorney for In Progress LLC</i>	

Charles D. Swaney	cswaney@woh.rr.com
<i>Attorney for Tecumseh Land Preservation Association</i>	

Jack A. Van Kley	jvankley@vankleywalker.com
<i>Attorney for Citizens for Greene Acres, Inc.</i>	

Thaddeus M. Boggs	tboggs@fbtlaw.com
<i>Attorney for the Greene County Commissioners</i>	

/s/ Nathaniel B. Morse  
Nathaniel B. Morse

**BEFORE  
THE OHIO POWER SITING BOARD**

<b>In the Matter of the Application of</b>	)	
<b>Kingwood Solar I LLC for a Certificate</b>	)	<b>Case No. 21-0117-EL-BGN</b>
<b>of Environmental Compatibility and</b>	)	
<b>Public Need</b>	)	

**KINGWOOD SOLAR’S JULY 27, 2021 RESPONSES  
TO STAFF’S JULY 21, 2021 DATA REQUESTS**

- 1. Does Kingwood Solar LLC anticipate utilizing HDD collection line installation methods on all perennial stream crossings? And if not please explain why and which ones it would not.***

Yes, Kingwood Solar anticipates utilizing HDD or similar techniques for all perennial stream crossings (MM1 & MM18 as identified in Figure DR1-1).

- 2. Kingwood Solar LLC anticipates that based upon final engineering and design, open cut trenching methods may be used to install collection lines for stream crossings and that all impacts will be <0.1 acres and <500 linear feet. Please explain if this is still accurate based on current engineering design, and please provide a total number of stream crossings anticipated for open cut trenching?***

Open-cut trenching may be considered for non-perennial streams only, if water is not present, avoidance of tree clearing is not a factor, and field conditions support such method. A maximum of 7 collection line crossings may be considered for open-cut trenching, and all individual impacts are anticipated to be <0.1 acres and <500 linear feet.

- 3. Kingwood Solar anticipates “9 stream segments being crossed by underground collection lines” (MM1, MM4, MM6, MM17, MM18, MM19, MM20, MM22, MM23). Will any of these “stream segments” be crossed multiple times by collection lines? Or rather, will each “stream segment” be crossed one time totaling 9 stream crossings for the entire project?***

The identified stream segments, as depicted in Figure DR1-1 provided, are expected to be crossed only once each, totaling 9 stream segment crossings for underground collection lines for the entire project.

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

**Commission of Ohio Docketing Information System on**

**7/27/2021 5:23:08 PM**

**in**

**Case No(s). 21-0117-EL-BGN**

Summary: Notice of Responses to Fourth Set of Data Requests from the Staff of the Ohio Power Siting Board electronically filed by Nathaniel Morse on behalf of Kingwood Solar I LLC