

August 24, 2021

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

Re: Case No. 20-417-EL-BGN -In the Matter of the Application of Grover Hill Wind, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Wind-Powered Electric Generation Facility in Paulding County, Ohio.

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

Dear Ms. Troupe:

Attached please find Grover Hill Wind, 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 August 24, 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 24th day of August, 2021.

/s/ Christine M.T. Pirik

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4810-7664-4595 v1 [73809-23]

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Grover Hill Wind,)
LLC for a Certificate of Environmental Compatibility)
and Public Need to Construct a Wind-Powered) Case No: 20-417-EL-BGN
Electric Generation Facility in Paulding County, Ohio)
.

**GROVER HILL WIND, LLC 'S
RESPONSE TO THE SIXTH DATA REQUEST
FROM THE STAFF OF THE OHIO POWER SITING BOARD**

On May 3, 2021, as supplemented on June 7, 2021, Grover Hill Wind, LLC (“Applicant”) filed an application (“Application”) with the Ohio Power Siting Board (“OPSB”) proposing to construct a wind-powered electric generation facility in Paulding County, Ohio (“Project”).

On July 19, 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.

Staff requests that the Applicant’s preliminary geotechnical report response should survey and include: the sites in the Applicant’s July 15th KMZ filing, a representative boring of the proposed substation, boring of any planned metrological towers and borings at each wind turbine site. Staff believes this would provide increased confidence in our analysis and lessen the probability of subsequent delays and/or requests for clarification. As previously stated, the goal is a preliminary geotechnical study that shows samples sufficient to complete the broad picture for the project area, along with a schedule of when the rest of the geotechnical survey work would be done. Staff notes that the Application (pp. 51 and 52) indicates that blasting could “fracture bedrock and potentially impact localized groundwater levels” and “construction activities below the water table could potentially impact groundwater or alter bedrock flowage features that carry ground water.”

Staff recommends, similar to the information required under Ohio Adm.Code 4906-4-08(A)(5)(c), that under the heading *Laboratory Testing* that the test boring logs should include the following information:

- (i) Subsurface soil properties,**
- (ii) Static water level,**
- (iii) Rock quality description,**
- (iv) Per cent recovery**
- (v) Depth and description of bedrock contact**

Staff recommends under the heading *Preliminary Engineering Analysis and Report Preparation* that Staff would need:

- (a) Analysis on specific earthwork considerations for the previously dug sites (i.e. will those sites be dewatered and is the soil bearing capacity reduce at those locations since the excavated sites have had standing water as early as December 2017).
- (b) Analysis on whether construction activities at the turbine locations below the water table could potentially impact groundwater or alter bedrock flowage features that carry ground water.
- (c) Any recommendation for construction practices that mitigate and/or minimize those potential impacts on groundwater and bedrock flowage features.

Specifically, Staff also submits the following data requests to be included with your preliminary geotechnical analysis:

Shallow Bedrock

- 1. Rule 4906-04-08 A(5)(a) asks the Applicant to identify suitability of the site geology and to provide plans to remedy any inadequacies. Page 5 of Exhibit G (Desktop Geohazard Assessment conducted by Westwood) discusses shallow bedrock. It concludes, “The potential for shallow bedrock to affect the project is moderate to high.” Please discuss in further detail what the potential and likely affects to both the project and project area are. And would these affects require plans to remedy inadequacies?
- 2. Page 5 of Exhibit G also indicates that in areas where bedrock is less than 12 feet deep, the rock may be excavated with a “ripper” if it is weathered bedrock, or it could require blasting if it is competent bedrock. Please indicate which turbine locations may require bedrock excavation.
- 3. The recommendation of Westwood for shallow bedrock areas is to conduct coring, lab analyses, and seismic surveys for the purpose of determining “strength of the rock”. Please provide discussion and/or research material with regard to determination of adequate rock strength for supporting turbine foundations. Should the rock strength be found inadequate, would the Applicant abandon the location, abandon and propose to move the turbine location/s, or would other mitigation be expected?

Soils

- 4. Table 1 of Exhibit-G indicates the geohazard expansive soil has been assigned a moderate risk level. However, the ODNr analyses provided within the Applicant’s

response to Staff's 1st data request indicates project area soils have a moderate to high risk shrink-swell potential. Please clarify the discrepancy.

Blasting

5. According to page 9 and at other parts of the Application, Grover Hill Wind, LLC indicates that bedrock will be excavated by blasting, but also anticipates that blasting will not be necessary. Please confirm that Grover Hill Wind, LLC would not use blasting.
6. If Grover Hill Wind, LLC is unable to confirm that it would not use blasting, please indicate on a map the most likely locations where blasting activities may be deemed necessary for construction of the wind farm.
7. If Grover Hill Wind, LLC is unable to confirm that it would not use blasting, please provide the current draft or example blasting plan.

Response: A complete geotechnical investigation has been initiated. The field investigations are scheduled to begin the week of August 30, 2021. It is estimated that the field investigations will last approximately 3 weeks (through September 17, 2021). The lab analysis and report compile are estimated to take an additional 6 weeks to complete (through October 29, 2021). The Applicant anticipates having the completed geotechnical report ready to provide to the OPSB by the first week of November, for review and inclusion in the OPSB staff report. The report will provide answers to the following questions.

Respectfully submitted,

/s/ Christine M.T. Pirik

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Summary: Response to Sixth Data Request from Staff of the Ohio Power Siting Board
electronically filed by Christine M.T. Pirik on behalf of Grover Hill Wind, LLC