

150 E. GAY STREET, 24[™] FLOOR COLUMBUS, OH 43215-3192 TELEPHONE: (614) 591-5461 FACSIMILE: (844) 670-6009 http://www.dickinsonwright.com

CHRISTINE M.T. PIRIK CPirik@dickinsonwright.com

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 Fourth 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 Fourth 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,

<u>/s/ Christine M.T. Pirik</u> Christine M.T. Pirik (0029759) (Counsel of Record) Terrence O'Donnell (0074213) William V. Vorys (0093479) Matthew C. McDonnell (0090164) Dickinson Wright PLLC 150 East Gay Street, Suite 2400 Columbus, Ohio 43215 Phone: (614) 591-5461 cpirik@dickinsonwright.com todonnell@dickinsonwright.com wvorys@dickinsonwright.com McDonnell@dickinsonwright.com

Cc: Jim O'Dell Theresa White Randall Schumacher Jon Pawley Ms. Tanowa Troupe Grover Hill Wind, LLC Case No. 20-417-EL-BGN

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 Christine M.T. Pirik (0029759)

Counsel:

werner.margard@ohioattorneygeneral.gov

Administrative Law Judge:

greta.see@puco.ohio.gov david.hicks@puco.ohio.gov

4822-4112-5616 v1 [73809-23]

BEFORE THE OHIO POWER SITING BOARD

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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

Case No: 20-417-EL-BGN

GROVER HILL WIND, LLC 'S RESPONSE TO THE FOURTH 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 June 29, 2021, the Staff of the OPSB ("OPSB Staff") provided the Applicant with

OPSB Staff's Fourth Data Request. Now comes the Applicant providing the following response

to the Fourth Data Request from the OPSB Staff.

1. Please see attached images for reference. The attached Grover Hill Locations image depicts turbine locations as presented in the application. The OHPO Turbine Location Question image illustrates turbine locations as supplied to the Ohio Historic Preservation Office by the Applicant's cultural resources consultant. (Note: the red turbine location dot in the center does not correspond to the green surveyed area and it does not show a circular-shaped surrounding area of potential effects.) When superimposed, the images' locations do not align. As such, Staff is concerned that this misalignment might lead to incorrect information that could affect the OHPO's review. For the attached images, verify the correct proposed turbine location(s) and provide an illustration of the surrounding cultural resources survey depicting the area of potential effects studied.

Response: Cultural resource investigations for the Grover Hill Wind Farm were initated in August of 2018 with the compilation of the Background Literature Review. This review included the archival investigation of the Proposed Grover Hill Project Area and a 15-mile surrounding buffer. This report was updated in October of 2019 and was included as Application Exhibit Q that was filed on May 3, 2021.

Archaeological reconnaissance surveys were initiated in June of 2020 and were completed in April of 2021. A report summarizing the results of the archaeological survey was compiled and submitted to State Historic Preservation Office ("SHPO") on May 12, 2021 (SHPO Project No. 2020-PAU-47772 – Phase I Archaeological Investigations for the Grover Hill Wind Farm, Latty Township, Paulding County, Ohio). An architectural reconnaissance survey was initiated in February of 2021. A report summarizing the results of the architectural survey was compiled and submitted to SHPO on April 12, 2021 (SHPO Project No. 2020-PAU-47772 – History/Architecture Reconnaissance Survey for the Grover Hill Wind Farm, Latty Township, Paulding County, Ohio). On June 4, 2021, SHPO issued a letter concurring with the results of both the archaeological and architectural survey results.

Iterative design efforts undertaken both prior to and during the execution of the archaeological survey caused some of the proposed turbine site locations to be either abandoned or altered. If the proposed turbine site was abandoned or altered prior to the initiation of the archaeological survey, no survey was conducted at that location. If the proposed turbine site was abandoned following the completion of the archaeological survey, the surveyed turbine site, and associated infrastructure routes to that abandoned turbine site were included in the final report issued to the SHPO in order to memorialize the archaeological survey, the altered site location, and associated infrastructure routes to that altered turbine site was altered following the same area of potential effect defined for the new location.

In the images provided, the red dots indicate proposed turbine site locations that have been abandoned or altered. Those abandoned prior to the initiation of the archaeological survey were not subject to the survey and are not included in the study area survey corridors presented. Those abandoned or altered following the initiation or completion of the archaeological survey will not be located at a point comparable to the current, proposed turbine sites presented in the Application and do not represent a misalignment but a design iteration that is memorialized in the Project documentation. The study area map provided as Figure 4 in the Application presents a comprehensive image of all areas of potential effects that have been physically investigated during on-site archaeological reconnaissance survey. This includes all of the area of potential effect defined for the current turbine array design and areas surveyed in support of previously but now abandoned segments of the Project.

2. For the entire proposed project, provide shapefiles and illustrations/maps that depict all areas of potential project disturbance superimposed over studied cultural resources areas of potential effects.

<u>Response</u>: Attached please find Attachment A that provides the illustrations and maps. The Application has also provided the shapefiles to OPSB Staff.

Respectfully submitted,

<u>/s/ Christine M.T. Pirik</u> Christine M.T. Pirik (0029759) (Counsel of Record) Terrence O'Donnell (0074213) William V. Vorys (0093479) Matthew C. McDonnell (0090164) Dickinson Wright PLLC 150 East Gay Street, Suite 2400 Columbus, Ohio 43215 Phone: (614) 591-5461 Email: cpirik@dickinsonwright.com todonnell@dickinsonwright.com wvorys@dickinsonwright.com mmcdonnell@dickinsonwright.com (Counsel agrees to receive service by email.)

Attorneys for Grover Hill Wind, LLC

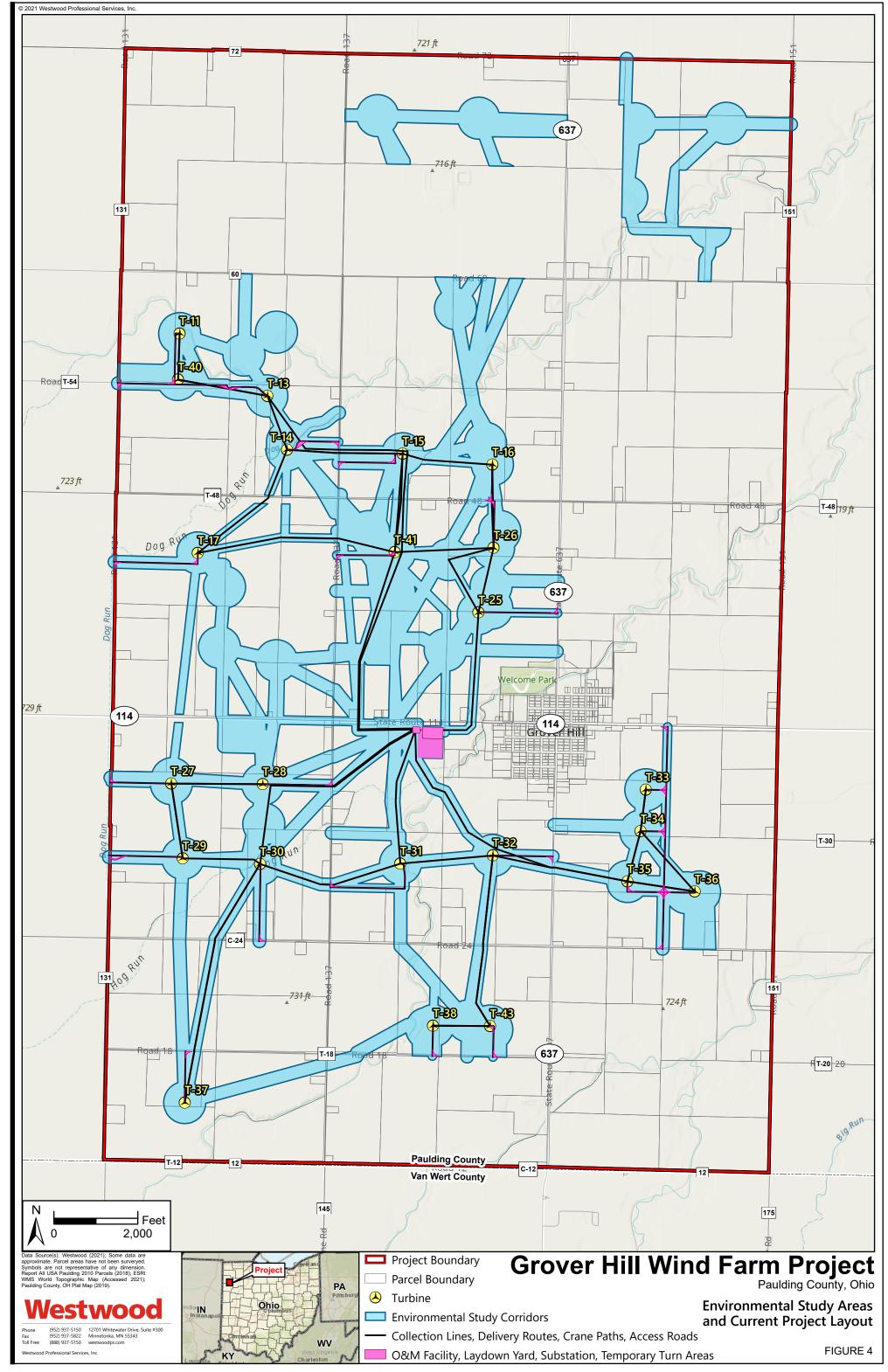
4839-8969-1888 v1 [73809-23]

Grover Hill Wind, LLC Response to Fourth Data Request from the Ohio Power Siting Board Case No. 20-417-EL-BGN

Attachment A

Illustrations and Map





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Case No(s). 20-0417-EL-BGN

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