

BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of Birch)
Solar 1, LLC, for a Certificate of Environmental)
Compatibility and Public Need to Construct a) Case No. 20-1605-EL-BGN
Solar-Powered Electric Generation)
Facility in Allen and Auglaize Counties, Ohio)

NOTICE OF LIST OF ISSUES AND CONCERNS OF
ALLEN AND AUGLAIZE COALITION FOR REASONABLE ENERGY

The Allen and Auglaize Coalition for Reasonable Energy (the “Coalition”) submits this Notice of List of Issues and Concerns with the Ohio Power Siting Board in the within captioned matter pursuant to the Entry filed on November 19, 2021. The Coalition will wish to address issues of local benefits resulting from the proposed solar project, energy supply reliability, benefits of the project in combating climate change and reducing pollution, local employment impacts, impacts to archaeological resources within the project boundary, historic oil and gas wells, noxious weed prevention, and the decommissioning of the affected parcels upon the expiration of the useful life of the project. Specifically the areas of concern for the Coalition are as follows:

- Local Benefits – Whether the residents of Allen and Auglaize Counties will receive any tax or similar benefits as a result of the solar project; benefits of employment (including union jobs, apprenticeship programs, and employment and training of racial minorities); benefits to the local economy; and other tangible benefits related to the solar project specific to the residents of Allen and Auglaize Counties.
- Property Rights – Whether the project will support the rights of local property owners to exercise their rights to put their land to highest and best uses.
- Energy Reliability – Whether the project will reduce electrical service interruptions; whether the solar project will increase energy supply reliability for the local communities.

- Pollution and Climate Change – Whether the project will have an impact in reducing emissions related to Allen and Auglaize Counties’ energy use and production; would local residents benefit from reduced air and water pollution associated with production of energy from traditional sources.
- Archaeological Resources – Whether the completion of the archaeological survey and other permit conditions are sufficient to mitigate the project’s impacts on cultural resources; the project’s plan for if construction uncovers cultural resources.
- Historic Oil and Gas Wells – Whether the project has adequate plans to locate and avoid or otherwise mitigate impacts arising from historic oil and gas wells; whether the project will address any potential ecological impacts related to construction around these wells.
- Noxious Weed Prevention, Pollinators, and Native Plants – Whether the project will take measures to avoid and control noxious weeds and invasive species, support pollinators, and support native plants.
- Decommissioning – Whether the project will restore agricultural lands to preconstruction condition; whether sufficient funds or sureties exist to ensure the project is properly decommissioned.

Respectfully submitted,

/s/Eric L. Christensen

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¹ Motion to admit *pro hac vice* will be filed as soon as possible

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 19th day of November, 2021.

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Case No(s). 20-1605-EL-BGN

Summary: Notice Notice of List of Issues and Concerns electronically filed by Mr.
Jonas Reagan on behalf of Allen Auglaize Coalition for Reasonable Energy