

**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) Case No. 20-1605-EL-BGN
Need to Construct a Solar-Powered Electric)
Generation Facility in Allen and Auglaize)
Counties, Ohio)

**THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL
UNION 32’s LIST OF ISSUES AND CONCERNS FOR CROSS-EXAMINATION**

Pursuant to the November 12, 2021 Entry amending the procedural schedule, the International Brotherhood of Electrical Workers, Local Union 32 (“IBEW Local 32” or “Local 32”), gives notice that they may pursue cross-examination on any part of the filed testimony, including exhibits, by any party to this proceeding. Local 32 further submits this list of issues and concerns they may pursue upon cross-examination at the evidentiary hearing.

1. Issues relating to job creation and economic development including the Community Impacts referenced in the October 20, 2021 Staff Report.
2. Issues related to the construction, operation, and maintenance of the proposed project.
3. Issues related to the Public Interest, Convenience, and Necessity including but not limited to Safety from the Staff Report filed October 20, 2021.
4. Recommended Conditions 1-14, 28-31, and 41 from the Staff Report filed October 20, 2021.

IBEW reserves the right to amend or supplement this list of issues based upon direct testimony and issued raised during cross-examination.

/s/Robert Dove

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Local 32**

CERTIFICATE OF SERVICE

I certify that The Ohio Power Siting Board'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. An electronic courtesy copy will be sent to the parties listed below on this 19th day of November 2021.

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/s/ Robert Dove
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Case No(s). 20-1605-EL-BGN

Summary: Text List of Issues and Concerns for Cross-Examination electronically
filed by Mr. Robert Dove on behalf of International Brotherhood of Electrical
Workers, Local Union 32