

**BEFORE  
THE OHIO POWER SITING BOARD**

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

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**ISSUES LIST OF KINGWOOD SOLAR I LLC**

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Kingwood Solar I, LLC (“Kingwood Solar” or “Applicant”) submits this list of issues which it may be interested in pursuing cross-examination of Staff witnesses and other witnesses relating to certain conditions contained in the October 29, 2021 Staff Report of Investigation (“Staff Report”). In addition to the specific concerns identified below in the Staff Report, Kingwood Solar may also pursue cross-examination of any witnesses appearing on behalf of any intervenor in support of or regarding any issue identified in their petitions or motions to intervene, or with respect to any testimony or evidence presented by any witnesses.

The specific issues concerning the Staff Report, designated by the applicable condition but also including the relevant section of the Staff Report, are as follows:

1. Condition 6, regarding the unanticipated discovery plan;
2. Condition 8, regarding karst feature;
3. Condition 11 regarding submittal of permits;
4. Condition 12, regarding the jurisdiction of local, state, or federal agencies and their enforcement of applicable rules and regulations;
5. Condition 14 regarding submittal of PJM ISA and ICSA;
6. Conditions 15 and 36 regarding project fencing;
7. Condition 16 regarding the preparation of the landscape and lighting plan;
8. Condition 17 regarding state and federal listed species;

9. Condition 18 regarding new listed plant or animal species or habitat;
10. Condition 19, regarding the incorporation of post construction stormwater management.
11. Condition 20 regarding Staff-approved environmental specialist;
12. Condition 21 regarding seasonal cutting dates for trees;
13. Condition 22, regarding noxious weeds;
14. Condition 24, regarding water wells;
15. Condition 25, regarding emergency response plan;
16. Condition 26, regarding location of solar and substation equipment;
17. Condition 27, regarding installation of solar panels and TCLP test;
18. Condition 28, regarding complaint resolution program and project notice;
19. Condition 29, regarding construction activity limitations;
20. Condition 30, regarding the submission of an updated noise study to account for the selected inverters and substation transformer.
21. Conditions 31 and 32, regarding potential drainage issues, benchmarking and mitigation.
22. Condition 33, regarding decommissioning plan and bonding.
23. Condition 34, regarding OHPO MOU;
24. Condition 35, regarding the disposal of solar panels;
25. Condition 37 regarding road setbacks; and
26. Pages 40 to 44, Section titled Considerations for R.C. 4906.10(A)(6).

The Applicant reserves the right to amend this issues list as necessary and to pursue cross-examination on any additional issues discovered or raised as to the Staff Report or any intervenor testimony.

Respectfully submitted,

/s/ Nathaniel B. Morse

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## **CERTIFICATE OF SERVICE**

I hereby certify that, on November 22, 2021, a copy of the foregoing document was served by electronic mail on the following:

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

Summary: Notice Issues List of Kingwood Solar I LLC electronically filed by  
Nathaniel Morse on behalf of Kingwood Solar I LLC