



The Ohio Economic Development Association (OEDA) appreciates this opportunity to comment on the Ohio Power Siting Board's (OPSB) proposed rulemaking pertaining to Ohio Administrative Code (OAC) 4906-1 through 4906-7.

OEDA believes all policy-setting efforts at the state and local levels, whether driven by legislative or administrative means, must support economic development and growth. OEDA's policy priorities¹ focus on policies designed to advance Ohio's statewide and local economies. Among the top economic development priorities facing Ohio, access to affordable and reliable energy is a critical for economic development projects of all size. This includes the supply of energy from both traditional and renewable energy sources. Consistent with OEDA's identified policy priorities, OEDA provides the following comments for your consideration.

Definition change to Associated Electric Transmission Lines

The OPSB proposes changing the definition of "associated facilities" within OAC 4906-1-01(F)(2)(b), which specifically addresses equipment and infrastructure associated with electric power transmission lines. The prior definition of "associated facilities" limited the OPSB's jurisdiction to substations that changed line voltage from transmission voltage to another transmission voltage. Under the revised definition of "associated facilities", substations that step-down transmission voltage to distribution voltage would also fall under the OPSB's jurisdiction. OEDA members are concerned expanding the OPSB's jurisdiction over substations that step-down to distribution voltage could negatively impact economic development in Ohio by increasing a project's completion time, cost, risk, and regulatory uncertainty. Both new projects and business expansion projects may see increased construction costs and delays, which will negatively impact Ohio's ability to drive economic growth. This would also hinder Ohio's ability to compete for business with other states that have less burdensome regulatory structures. Because of the potential harmful impact to economic development the proposed revision to OAC 4906-1-01(F)(2)(b) presents, OEDA respectfully requests that the OPSB retain language within the current rule.

Solar development requirements

OEDA members know that more companies, of all sizes, list access to affordable, clean energy as a top priority when considering where to locate. The current OPSB process offers centralized siting regulation, which is a net positive for Ohio compared to other state's regulatory scheme, and helps attract energy generation facilities of all types, including renewable generation like solar. OEDA encourages the OPSB to craft solar development standards that promote renewable energy development while providing reasonable and appropriate regulation. As currently constructed, OEDA members are concerned that the rules may impose additional costs and burdens on solar energy developers that could hinder development. For example, the OPSB should consider revising the proposed requirements for setbacks and screening to give developers varied means to lessen the visual impacts of projects.

¹ <https://ohioeda.com/policy/>

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Summary: Comments of The Ohio Economic Development Association
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Ohio Economic Development Association