

August 30, 2022

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 Seventeenth 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 Seventeenth Data Request from the staff of the Ohio Power Siting Board ("OPSB Staff"). The Applicant provided this response to OPSB Staff on August 30, 2022.

We are available, at your convenience, to answer any questions you may have.

Respectfully submitted,

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)
(Counsel of Record)

Terrence O'Donnell (0074213)

William V. Vorys (0093479)

Matthew C. McDonnell (0090164)

Dickinson Wright PLLC

180 E. Broad Street, Suite 3400

Columbus, Ohio 43215

Phone: (614) 591-5461

cpirik@dickinsonwright.com

todonnell@dickinsonwright.com

wvorys@dickinsonwright.com

mmcdonnell@dickinsonwright.com

Attorneys for Grover Hill Wind Project, LLC

Cc: Jim O'Dell
Theresa White
Randall Schumacher
Jon Pawley
Grant Zeto

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 30th day of August, 2022.

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

Counsel:

werner.margard@OhioAGO.gov

Administrative Law Judge:

greta.see@puco.ohio.gov

david.hicks@puco.ohio.gov

4862-4170-2192 [73809-23]

**BEFORE
THE OHIO POWER SITING BOARD**

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) Case No. 20-417-EL-BGN
Electric Generation Facility in Paulding County, Ohio.)

**GROVER HILL WIND, LLC 'S
RESPONSE TO THE SEVENTEENTH DATA REQUEST
FROM THE STAFF OF THE OHIO POWER SITING BOARD**

On May 3, 2021, as supplemented on June 7, 202, December 21, 2021, and January 24, 2022, May 26, 2022, July 13, 2022, and July 21, 2022, 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 August 26, 2022, the Staff of the OPSB (“OPSB Staff”) provided the Applicant with OPSB Staff’s Seventeenth Data Request. Now comes the Applicant providing the following Response to the Seventeenth Data Request from the OPSB Staff.

1. **It is Staff’s understanding that the Applicant is considering backfilling and remediation of the prior wind turbine excavation sites (T-1, T-26/T-2, T-31, T-34, T-40E, T-42, and Northwest Ohio Wind’s T55) during the civil construction phase. Also, Grover Hill Wind, LLC has considered completing that work for all seven sites, by the earlier of (a) the project’s commercial operation date, (b) 12 months of commencement of construction activities, or (c) by the end of the first quarter 2025. Please explain the practical implementation of when these seven wind turbine excavation sites would be restored and the anticipated timing of when that work would be performed and completed.**

Response: The Applicant will backfilled the seven production tax credit (“PTC”) excavations during the construction of the wind farm. This will minimize additional impacts to the local community by utilizing equipment that is already onsite for the

civil work during construction. The Applicant commits to backfill the PTC excavations and to complete remediation of these sites within twelve months following the beginning of construction of the wind farm but not later than March 31, 2025.

Respectfully submitted,

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

(Counsel of Record)

Terrence O'Donnell (0074213)

William V. Vorys (0093479)

Matthew C. McDonnell (0090164)

Dickinson Wright PLLC

180 E. Broad Street, Suite 3400

Columbus, Ohio 43215

Attorneys for Grover Hill Wind, LLC

4868-7933-5728 [73809-23]

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

8/30/2022 11:45:54 AM

in

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

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