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September 6, 2022

Ms. Tanowa Troupe, Secretary
Ohio Power Siting Board
Docketing Division
180 East Broad Street, 11th Floor
Columbus, Ohio 43215-3793

Re: Letter of Notification Application
Case No. 22-122-EL-BLN
In the Matter of the Letter of Notification Application of Pleasant Prairie Solar Energy LLC to Construct the Pleasant Prairie Solar Energy Center Transmission Line.

Dear Ms. Troupe:

Attached please find a copy of the Letter of Notification ("LON") Application for the above-referenced Project by Pleasant Prairie Solar Energy LLC. The filing and notice of this LON is in accordance with Ohio Administrative Code ("O.A.C.") Chapter 4906-6.

This LON was electronically filed and copies of the filing were provided to the Board's Docketing Division. In addition, a hard copy was provided to the Executive Director of the Board and the Board Staff.

Thank you for your assistance in this matter.

Respectfully submitted,

/s/ Christine M.T. Pirik
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cc: Theresa White
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Jon Pawley
Grant Zeto

4886-7760-5653 v1 [39579-53]

BEFORE
THE OHIO POWER SITING BOARD

In the Matter of the Letter of Notification Application of Pleasant Prairie Solar Energy LLC to Construct the Pleasant Prairie Solar Energy Center Transmission Line.	**)** **)** **)** **)**	**Case No. 22-122-EL-BLN**

LETTER OF NOTIFICATION

Submitted by Pleasant Prairie Solar Energy LLC
September 2022

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LIST OF FIGURES

LIST OF EXHIBITS

Ohio Administrative Code Rule 4906-06-05: Accelerated Application Requirements

(A) Form and Content Requirements

The materials contained herein and attached hereto constitute Pleasant Prairie Solar Energy LLC's (Applicant or Pleasant Prairie) submittal for a Letter of Notification Application (LON) to construct the Pleasant Prairie Solar Energy Center Transmission Line (Project or Transmission Line Project). The Applicant is an affiliate of Invenergy Solar Development North America LLC.

This LON is prepared in accordance with the requirements for the filing of an accelerated application prescribed in Ohio Administrative Code (OAC) Chapter 4906-6 and complies with the form and content requirements outlined in OAC Chapter 4906-2.

(B) Letter of Notification Requirements

(1) Project Summary

The name of the Project and Applicant's reference number, names, and reference number(s) of resulting circuits, a brief description of the Project, and why the Project meets the requirements for a letter of notification or construction notice application.

The Pleasant Prairie Solar Energy Center Transmission Line is located in Prairie Township, Franklin County, Ohio and is associated with the Pleasant Prairie Solar Energy Center, which filed its certificate to construct a solar-powered electric generation facility from the Ohio Power Siting Board (Board) on February 19, 2021, in Case No. 20-1679-EL-BGN. The Project represents the proposed construction of an electric power transmission line of approximately 1.2 miles in length, which will connect the Pleasant Prairie Solar Energy Center to American Electric Power's (AEP's) Cole Road 345 kilovolt (kV) substation. The Project, in conjunction with the Pleasant Prairie Solar Energy Center, will contribute renewable solar energy to the Ohio bulk transmission grid operated by PJM Interconnection LLC (PJM) or under a power purchase agreement.

The Pleasant Prairie Solar Energy Center is under review by the Board and includes a project substation to step up the power output of the solar facility from 34.5 kV to 345 kV. The Project will then transmit this power 1.2 miles north to the Cole Road 345 kV substation. Figure 1 shows an overview of the facility, including the existing Cole Road 345 kV substation, the Pleasant Prairie Solar Energy Center substation, and the proposed 1.2-mile transmission line. Figure 2 is an aerial map overview of the Project. The Project is expected to utilize wooden or steel monopole structures up to 100 feet in height with the power carrying conductors arranged in a horizontal configuration.

The Project meets the requirements for a letter of notification application under OAC 4906-1-01, Appendix A(1)(b) because it is new construction of a single electric power transmission line "greater than 0.2 miles in length but not greater than 2 miles in length."

(2) Project Need

If the proposed Project is an electric power transmission line…, the Applicant shall provide a statement explaining the need for the proposed facility.

Pleasant Prairie Solar Energy Center submitted an application with the Board on February 19, 2021, in Case No. 20-1679-EL-BGN, and the parties to that case have entered into a Joint Stipulation and Recommendation, which is currently under consideration by the Board. The proposed transmission line is needed to facilitate the injection of power generated by the solar facility into the local grid operated by AEP.

(3) Project Location

The Applicant shall provide the location of the Project in relation to existing or proposed lines and substations shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the Project area.

The Project will transmit the output from the Pleasant Prairie Solar Energy Center substation 1.2 miles north to AEP's Cole Road 345 kV substation. Figures 1 and 2 show the proposed location of the Project between the substations.

(4) Alternatives Considered

The Applicant shall describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility. The discussion shall include, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the Project.

The Applicant reviewed a number of possible routes to connect to the Cole Road substation, including a route that would utilize the cleared right-of-way (ROW) co-locating a portion of the line with an existing AEP transmission line. However, due to the proposed location of the Pleasant Prairie Solar Energy Center's project substation, that route would require an extra stream crossing, additional tree trimming, likely impacts to recently restored wetlands and additional poles from the longer length. In addition to representing the shortest distance to the point of interconnection, the proposed route is best suited for the Pleasant Prairie Solar Energy Center because it will result in minimal environmental, cultural, archaeological, and visual impacts.

(5) Public Information Program

The Applicant shall describe its public information program to inform affected property owners and tenants of the nature of the Project and the proposed timeframe for Project construction and restoration activities.

For over two years, during development of the Pleasant Prairie Solar Energy Center, the Applicant has been working in Franklin County, the townships, and meeting with landowners. Throughout this time, the Applicant has formed strong relationships with local landowners, as well as county and township officials.

Prior to the initial filing with the Board for the Pleasant Prairie Solar Energy Center, the Applicant posted a notice in the *Columbus Dispatch* to announce a public

information meeting, which was held on December 14, 2020. Pursuant to OAC requirements, Pleasant Prairie notified all adjacent landowners of the proposed solar project, including the separate transmission facilities and those adjacent landowners.

Specifically, with regard to the Pleasant Prairie Solar Energy Center Transmission Line, the Applicant will inform affected property owners and tenants along and contiguous to the site about the Project through several different mediums. In accordance with OAC Rule 4906-6-07, coincident with the filing of this LON, the Applicant will: serve a copy of the LON on the chief executive officer of each municipal corporation, county, township, and the head of each public agency in the area charged with protecting the environment or of planning (Franklin County Commissioners, Franklin County Soil and Water Conservation District, Franklin County Development Department, Prairie Township Trustees, and the Franklin County Engineer); serve a copy of the LON on the main public library in the area (Columbus Metropolitan Library); and maintain information on how to request a copy of the LON on its website (www.pleasantprairiesolar.com). In addition, within seven days of filing the LON, the Applicant will comply with OAC Rule 4906-6-08 by: publishing notice of the filing of the LON in a newspaper of general circulation in the Project area; and sending a letter describing the proposed facility to each property owner and affected tenant. The Applicant will file proof of compliance with these rules with the Board.

During the construction period, the Applicant's contractor will have a 24/7 "hot line" for emergency and complaint notices. During operations, site staff will be qualified to attend to requests and complaints with the necessary corporate support. Surrounding landowners will be provided with contact information for site staff.

Further, in accordance with the complaint resolution process approved by the Board for Pleasant Prairie Solar Energy Center, Case No. 20-1679-EL-BGN, the

landowners surrounding the Project area will be mailed information about construction activities and provided with complaint resolution contact information at least 7 days prior to construction.

(6) Project Schedule

The Applicant shall provide an anticipated construction schedule and proposed in-service date of the Project.

It is anticipated that construction of the transmission line will commence as early as the first quarter of 2023. The Pleasant Prairie Solar Energy Center will be placed in service as early as the fourth quarter of 2024.

(7) Facility Map

The Applicant shall provide a map of at least 1:24,000 scale clearly depicting the facility with clearly marked streets, roads, and highways, and an aerial image.

Figure 1 identifies the location of the Project on an Environmental Systems Research Institute world street base map with coverage of the Project area. Attached Figure 2 shows the location of the Project and depicts the Project with clearly marked streets, roads, and highways on an aerial image.

(8) Property Agreements

The Applicant shall provide a list of properties for which the Applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.

The Transmission Line Project is proposed to be located on approximately five parcels of land in Prairie Township, Franklin County (240-006613, 240-001689, 240-000064, 240-000261, 240-006626). Pleasant Prairie Solar Energy LLC has final form agreements with the landowners whose property is planned to host the proposed transmission line. One such landowner being AEP.

(9) Technical Features

The Applicant shall describe the following information regarding the technical features of the Project:

(a) Operating Characteristics

Operating characteristics, estimated number and types of structures required, and ROW and/or land requirements.

The proposed transmission line will have approximately 40 structure locations, each composed of approximately 40 individual steel or wooden monopole structures braced together for support. The height of the poles will be up to 100 feet above ground level, but may potentially increase to clear existing lines or to span down the hill to the point of interconnection, the Cole Road 345 kV substation. The ROW needed for the transmission line is 120 feet. The Project area has two wooded corridors, trees will need to be trimmed but no trees will be removed. The ROW will be maintained free of large woody vegetation that may interfere with the operation and maintenance of the transmission line. The structure diagrams are presented in Exhibit A.

(b) Electric Magnetic Fields

For electric power transmission lines that are within 100 feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line. The discussion shall include:

(i) Calculated electric and magnetic field strength levels at one meter above ground under the lowest conductors and at the edge of the ROW for:

(a) Normal maximum loading

The Project is not located within 100 feet of an occupied residence or institution.

(b) Emergency line loading

The Project is not located within 100 feet of an occupied residence or institution.

(c) Winter normal conductor rating

The Project is not located within 100 feet of an occupied residence or institution.

(ii) A discussion of the Applicant's consideration of design alternatives with respect to electric and magnetic fields and their strength levels, including alternate conductor configuration and phasing, tower height, corridor location, and ROW width.

The Project is not located within 100 feet of an occupied residence or institution.

(c) Estimated capital cost of the Project

The estimated capital cost of this Project is approximately $1,200,000.

(10) Social and Economic Impacts

The Applicant shall describe the social and ecological impacts of the Project.

Initially, the Applicant notes that, from an environmental perspective, the Applicant analyzed a broad area. Then, following that diligence, the Applicant honed in on the proposed Project area for the transmission line. The cultural work for the Project is specific to the final planned location of the transmission line; however, the other studies associated with the Transmission Line Project looked at a broader area that encompassed the other optional transmission line routes.

(a) Operating Characteristics

Provide a brief, general description of land use within the vicinity of the proposed Project, including a list of municipalities, townships, and counties affected.

The land within the vicinity of the proposed Project was formerly used for agricultural row crops. Currently, it is used for agriculture, stream enhancement and wetland restoration, and a small riparian corridor is forested. However, the construction will take place in and poles will be placed in the agricultural areas and avoid any impacts to streams or wetlands. There are no parks, cemeteries, wildlife management areas, or nature preserves within 1,000 feet of the centerline of the Project. Cardno conducted a Visual Resource Assessment for the Project, which is included as Exhibit B to the LON.

The township and county affected are Prairie Township and Franklin County, with no municipal designation.

(b) Agricultural Land Information

Provide the acreage and a general description of all agricultural land, and separately all agricultural district land, existing at least 60 days prior to submission of the application within the potential disturbance area of the Project.

The area of potential effects (APE) for this Project encompasses approximately 22.1 acres of agricultural land. Within this area is 1.2 miles of transmission line connecting the Pleasant Prairie Solar Energy Center to the Cole Road 345 kV substation. This area has been previously impacted by past agricultural activity and construction of the AEP Cole Road substation. There are no agricultural districts within the Project area.

(c) Archaeological and Cultural Resources

Provide a description of the Applicant's investigation concerning the presence or absence of significant archeological or cultural resources that may be located within the potential disturbance area of the Project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

The Applicant hired Cardno to conduct cultural resource studies for the Pleasant Prairie Solar Energy Center Transmission Line. Cardno conducted a desktop analysis of cultural resources, which is included as an attachment to the analysis of cultural resources filed with the Pleasant Prairie Solar Energy Center application (See February 19, 2021 application, Case No. 20-1679-EL-BGN, Exhibit I). Cardno subsequently studied two previous cultural investigations conducted on the two parcels within the Project area for the transmission line. A summary of the finding of those previous investigations, as well as the Phase I Cultural Resources Survey for the Hellbranch Run Wetland Mitigation Site, are provided as Exhibit D to this LON.

The Applicant coordinated its review with the Ohio State Historic Preservation Office (SHPO). By correspondence dated July 8, 2021, after review of the archaeological report (Exhibit E), SHPO agreed that the findings of the surveys indicated that no previously documented sites (98 total) potentially eligible for the National Register of Historic Places (NRHP) will be affected by the Project. In addition, the Project will have no effect on above ground historic properties. (See Exhibit E).

Further, in June 2022, the Applicant entered into a Memorandum of Understanding with SHPO for the transmission line, which is included as Exhibit F to this Application.

(d) Local, State, and Federal Agency Correspondence

Provide a list of the local, state, and federal governmental agencies known to have requirements that must be met in connection with the construction of the Project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the Project.

On behalf of the Pleasant Prairie Solar Energy Center (including the Transmission Line Project), Cardno submitted an Environmental Review request to the Unites States Fish and Wildlife Service (USFWS) on October 12, 2020, with the USFWS providing a response on November 13, 2020, expressing concern over the potential impact of tree clearings. Cardno and Pleasant Prairie followed up with USFWS via phone conference January 15, 2021, and provided additional details on the proposed Project tree clearing and Pleasant Prairie's commitment to only clear woody vegetation between October 1 and March 31. USFWS replied on January 26, 2021, that no anticipated adverse impact to rare, threatened, and endangered (RTE) species are expected from the construction and operation of the Project. As this follow up consultation did not include the Transmission Line Project, Cardno provided additional information to USFWS on June 24, 2021, to obtain additional comments. USFWS responded on July 7, 2021, indicating that, since no tree clearing is proposed in the Transmission Line Project area, the position of the USFWS, that the Project is not anticipated to have adverse impacts to RTE species, is still valid.

In addition, on behalf of the Transmission Line Project, Cardno submitted an Environmental Review request to the Ohio Department of Natural Resources (ODNR) on October 12, 2020. ODNR responded on December 7, 2020. ODNR solicited comments from additional organizations, including the Ohio Scenic Rivers Program for considerations on ecological and hydrological protection and enhancement, as well as considerations for siting and best management practices, due to the proximity to Big Darby

Creek and its watershed, Battelle Darby Creek Metro Park to the west, and the Hellbranch Meadows restoration project to the east. ODNR found that the Transmission Line Project area was included in this original solicitation, and, therefore, no further coordination is required.

Agency correspondence, including an Indiana bat buffer map, as well as further guidance on protection measures for the above-mentioned species, is provided in the Ecological Assessment Exhibit C, Appendix B, to this LON.

(e) Federal and State Designated Species

Provide a description of the Applicant's investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the potential disturbance area of the Project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

The Applicant hired Cardno to prepare a Site Characterization Study Report as part of the environmental studies conducted for the Pleasant Prairie Solar Energy Center Transmission Line (See Exhibit G). The study area for the transmission line comprised 22.1 acres.

Using data from ODNR and USFWS, Cardno found that there are no records of wildlife species of concern within the study area.

Tables of potential listed species is provided in Section 3.5 of the Site Characterization Study Report, provided as Exhibit G of this LON.

(f) Areas of Ecological Concern

Provide a description of the Applicant's investigation concerning the presence or absence of areas of ecological concern (including national

and state forests and parks, floodplains, wetlands, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that may be located within the potential disturbance area of the Project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

Cardno prepared a Wetlands and Other Waters of the U.S. Delineation Report as part of the environmental studies conducted for the Pleasant Prairie Solar Energy Center Transmission Line (See Exhibit H). Similar to the Site Characterization Report, the wetland delineation study area for the transmission line also comprised 22.1 acres.

Two Streams (McCoy Ditch and Hamilton Ditch) were delineated, as both streams cross through the proposed Transmission Line Project area. No impacts to these streams are anticipated from the construction or operation of the transmission line. Further details of this stream are provided in the Wetland Delineation Report provided as Exhibit H to this LON.

Based on correspondence with both USFWS and ODNR, outside the wooded riparian corridor that may be habitat for RTE bats, the agencies did not identify any other critical habitat or sensitive areas. Pleasant Prairie has committed to only conducting tree trimming between October 1 and March 31 to avoid any potential impact to listed bats. No other unique ecological sites, geological features, animal assemblages, scenic rivers, state wildlife areas, national wildlife refuges, or other protected natural areas were noted in the vicinity of the transmission line ROW.

(g) Unusual Conditions

Provide any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.

As stated previously, the Project is required to deliver power to the regional electric grid from the Pleasant Prairie Solar Energy Center. Thus, the Transmission Line Project will enable the economic benefits of the solar facility.

The Applicant estimates that county, township, city, and school district tax revenue will significantly increase as a result of the Applicant's planned payment in lieu of taxes (PILOT) under Ohio Revised Code 5727.75. See Exhibit O, Economic Impact Study for the Pleasant Prairie Solar Project filed February 21, 2021, in Case No. 20-1679-EL-BGN.

Additionally, the Pleasant Prairie Solar Energy Center would create roughly 1,067 new local jobs during construction and would generate over $70 million through new taxes and landowners' payments over the life of the Project. For these reasons, the Project enjoys strong support from the community.