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MATTHEW C. MCDONNELL MMcDonnell@dickinsonwright.com

November 2, 2022

Ms. Tanowa Troupe, Secretary Ohio Power Siting Board Docketing Division 180 East Broad Street, 11th Floor Columbus, Ohio 43215-3797

Re: Case No. 22-269-EL-BTX - In the Matter of the Application of Grover Hill Wind, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Transmission Line in Paulding County, Ohio.

Response to Fourth 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 Fourth Data Request from the staff of the Ohio Power Siting Board ("OPSB Staff"). The Applicant provided this response to OPSB Staff on November 2, 2022.

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

Respectfully submitted,

<u>/s/ Matthew C. McDonnell</u> Matthew C. McDonnell (0090164) (Counsel of Record) Christine M.T. Pirik (0029759) Terrence O'Donnell (0074213) Dickinson Wright PLLC 180 E. Broad Street, Suite 3400 Columbus, Ohio 43215 Phone: (614) 591-5461 mmcdonnell@dickinsonwright.com cpirik@dickinsonwright.com todonnell@dickinsonwright.com *Attorneys for Grover Hill Wind, LLC*

Cc: Jim O'Dell Theresa White Randall Schumacher Jon Pawley Grant Zeto Ms. Tanowa Troupe Grover Hill Wind, LLC Case No. 22-269-EL-BTX

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 2nd day of November, 2022.

<u>/s/ Matthew C. McDonnell</u> Matthew C. McDonnell (0090164)

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Administrative Law Judge:

Jesse.davis@puco.ohio.org

4877-2814-3676 [73809-23]

BEFORE THE OHIO POWER SITING BOARD

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In the Matter of the Application of Grover Hill Wind, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Transmission Line in Paulding County, Ohio.

Case No: 22-269-EL-BTX

<u>GROVER HILL WIND, LLC 'S</u> <u>RESPONSE TO THE FOURTH DATA REQUEST</u> FROM THE STAFF OF THE OHIO POWER SITING BOARD

On May 2, 2022, as supplemented on May 13, June 8, August 31, and September 8, 2022, Grover Hill Wind, LLC ("Applicant" or "Grover Hill Wind") filed an application ("Application") with the Ohio Power Siting Board ("OPSB") proposing to construct a Transmission Line in Paulding County, Ohio ("Project").

On October 28, 2022, the Staff of the OPSB ("OPSB Staff") provided the Applicant with OPSB Staff's Fourth Data Request. Now comes the Applicant providing the following Response to the Fourth Data Request from the OPSB Staff.

Buildings within 60 feet Right-of-Way

1. Referencing Table 12 in the Application and Table 4 (Building Locations) from Exhibit E (EMF Study Report), it appears that buildings "L" and "N" are less than 60 feet from the proposed transmission line. Please explain the current status of these building and Grover Hill Wind, LLC plans for these buildings.

<u>Response</u>: Structure "L" is a commercial structure located 20 feet from the proposed transmission line. This structure is not an occupied residence. The proposed transmission line route is far enough removed from the structure to meet National Electric Safety Code ("NESC") guidelines for setbacks (see response for #3 below).

Structure "N" is an abandoned residential structure that was located 30 feet from the proposed transmission line. This structure has since been demolished and will not be replaced.

2. Referencing Table 12 in the Application and Table 4 (Building Locations) from Exhibit E (EMF Study Report), the coordinates for building "N" are latitude 41° 1'7.50"N and longitude 84°29'18.63"W. Page 4 of Figure 2 (Facility Layout Map) does not show a building at that location. Please confirm if there is a building at this location or accurate coordinates for Building "N".

<u>Response</u>: Structure "N" was included in the original EMF study as it was understood to be standing at the time the study was initiated. The structure has since been demolished and no replacement structure is anticipated.

3. According to page 34 of the Application, Grover Hill Wind, LLC would comply with NESC for the design of this proposed transmission line. What is the minimum distance required by the NESC for this proposed transmission line to an occupied building?

<u>Response</u>: According to the NESC, the minimum distance for the proposed 138 kV transmission Line is 7.5 feet.

Respectfully submitted,

<u>/s/ Matthew C. McDonnell</u> Matthew C. McDonnell (0090164) (Counsel of Record) Christine M.T. Pirik (0029759) Terrence O'Donnell (0074213) Dickinson Wright PLLC 180 E. Broad Street, Suite 3400 Columbus, Ohio 43215 Phone: (614) 591-5486

Attorneys for Grover Hill Wind, LLC

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Case No(s). 22-0269-EL-BTX

Summary: Response - Response to Fourth Data Request from Staff of the Ohio Power Siting Board electronically filed by Mr. Matthew C. McDonnell on behalf of Grover Hill Wind, LLC