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November 15, 2022

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

**Re:** Case No. 22-122-EL-BLN - In the Matter of the Application of Pleasant Prairie Solar Energy LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Transmission Line in Franklin County, Ohio.

### Response to First Data Request from Staff of the Ohio Power Siting Board

Dear Ms. Troupe:

Attached please find Pleasant Prairie Solar Energy LLC's ("Applicant") Response to the Fifth Data Request from the staff of the Ohio Power Siting Board ("OPSB Staff"). The Applicant provided this response to OPSB Staff on November 15, 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) Matthew C. McDonnell (0090164) Dickinson Wright PLLC 180 E. Broad Street, Suite 3400 Columbus, Ohio 43215 (614) 591-5461 cpirik@dickinsonwright.com mmcdonnell@dickinsonwright.com

Attorneys for Pleasant Prairie Solar Energy LLC

Cc: Allison Renick Theresa White Randall Schumacher Jon Pawley Ms. Tanowa Troupe Pleasant Prairie Solar Energy LLC Case No. 20-122-EL-BLN Page 2

### **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 15<sup>th</sup> day of November, 2022.

<u>/s/ Christine M.T. Pirik</u> Christine M.T. Pirik (0029759)

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4879-5389-1389 v1 [39579-53]

### BEFORE THE OHIO POWER SITING BOARD

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In the Matter of the Application of Pleasant Prairie Solar Energy LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Transmission Line in Franklin County, Ohio.

Case No. 22-122-EL-BLN

### PLEASANT PRAIRIE SOLAR ENERGY LLC'S RESPONSE TO THE FIRST DATA REQUEST FROM THE STAFF OF THE OHIO POWER SITING BOARD

On September 6, 2022, Pleasant Prairie Solar Energy LLC ("Pleasant Prairie" or "Applicant") filed an application ("Application") with the Ohio Power Siting Board ("OPSB") proposing to construct a Transmission Line in Franklin County, Ohio ("Project").

On November 3 and 8, 2022, the Staff of the OPSB ("OPSB Staff") provided the Applicant with OPSB Staff's First Data Request. Now comes the Applicant providing the following Response to the First Data Request from the OPSB Staff.

#### 1. Does any portion of this project cross any FEMA 100-year floodplains?

**Response:** Yes, per the Federal Emergency Management Agency ("FEMA") map 39049C0279K, the transmission line cables cross Flood Zones AE, which is defined as a Special Flood Hazard Area ("SFHA"), or a '100-year floodplain,' at the Stream 1 (McCoy Ditch) and the location is noted on Appendix B.1 of Exhibit C of the Application, the Ecological Assessment. However, it is noted that the Applicant does <u>not</u> intend to perform any earthwork or earthmoving activities within this area, nor install any transmission pole structures within the designated SFHA as this would require a 'Letter of Map Change' or similar approval permit from FEMA. As noted within Exhibit C of the Application, a National Pollutant Discharge Elimination System ("NPDES") General Permit processed by the Ohio Environmental Protection Agency ("OEPA") would need to be obtained for the Project, which would include all applicable Riparian Setbacks noted within the Scenic Rivers Program. Additionally, as noted in the Applicant's Response filed in this docket on October 17, 2022, the Applicant has coordinated with OEPA to avoid installation of structures within the floodplain, as well as avoid any heavy construction equipment to be located in the floodplain, where compaction may occur.

2. Will this project require a Notice of Intent submittal to Ohio EPA for authorization of construction stormwater impacts under the National Pollutant Discharge Elimination System General Permit?

**<u>Response</u>**: As noted on page 55 of Exhibit C to the Application, yes, the Applicant will need to obtain this permit.

3. Please describe the size and style of conductor planned for the transmission line, such as 795 kcmil ACSR 26/7 "Drake".

**Response:** It will be a two conductor bundle 795 kcmil ACSR 26/7 "Drake."

## 4. What system upgrades or reinforcements will be needed to the Cole Road Substation or other AEP assets to complete the connection of the solar facility to the interconnection?

**Response**: According to the System Impact Study report for AE2-214 & AF1-275 provided by PJM Interconnection, LLC, the following scopes will be needed to facilitate interconnection: expansion of the Cole Rd 345 kilovolt ("kV") substation to include one additional circuit breaker and associated work; line protection and controls upgrades at the Beatty Rd 345kV and Hayden Rd 345kV substations; 345kV revenue metering; and a transmission owner build of the first span out of the point of interconnection ("POI") station.

### 5. When would the final form agreements with affected landowners be in place and completed?

**<u>Response</u>**: Land agreements have been 100% secured for this transmission line.

## 6. Page 9 of 15 of the Application states that the estimated cost of the Project is approximately \$1,200,000. Would this be the responsibility of Pleasant Prairie Solar, LLC?

Response: Yes.

### 7. What is the Class or accuracy of this cost estimate?

**<u>Response</u>**: The internal conceptual estimate done by the Pleasant Prairie's Project estimating team, consisting of construction professionals and cost estimating information.

8. Page 6/20 of the System Impact Study for AE2-214 has the cost of Attachment Facilities as \$1,600,000 and that for Non-Direct Connection Network Upgrades as \$3,200,000; should these be included with the cost estimate reported in the Application?

**<u>Response</u>**: The \$1,200,000 figure represents the Pleasant Prairie Solar's cost to construct the transmission line the solar project for which this Application covers. The AE2-214 cost of Attachment Facilities figure represents facilities needed at the POI at/on AEP's facilities, and the Non-Direct Connection Network Upgrades represents other area network upgrades to allow for the injection of Pleasant Prairie's solar energy in this area of the transmission grid. These costs will be coordinated, finalized, and paid between Pleasant Prairie Solar LLC and the PJM. The Project's bonding and decommissioning scope and responsibilities would be for the transmission line facilities constructed and owned by Pleasant Prairie Solar LLC - other improvements on other property, such as AEP, that would be paid for by Pleasant Prairie Solar LLC, would be for the use and benefit of those other entities.

# 9. Page 6/29 of the System Impact Study for AF1-275 has the cost of Non-Direct Connection Network Upgrades as \$45,000 and the Contribution to Previously Identified Upgrades as \$448,000; should these be included with the cost estimate in the Application?

**<u>Response</u>**: The \$1,200,000 figure represents the Pleasant Prairie's cost to construct the transmission line the solar project for which this Application covers. The AF1-275 cost of Attachment Facilities figure represents facilities needed at the POI at/on AEP's Facilities, and the Non-Direct Connection Network Upgrades represents other area network upgrades to allow for the injection of Pleasant Prairie's solar energy in this area of the transmission grid. All of these costs will be coordinated, finalized, and paid between Pleasant Prairie Solar LLC and the PJM. The Project's bonding and decommissioning scope and responsibilities would be for the transmission line facilities constructed and owned by Pleasant Prairie Solar LLC- other improvements on other property, such as AEP property, that would be paid for by Pleasant Prairie Solar LLC, would be for the use and benefit of those other entities.

10. The System Impact Studies have the costs of \$4,800,000 and \$448,000 for the two queue positions, and state that these would be the responsibility of AE2-214 and AF1-275 projects, respectively. What factors make these estimates so very different from the \$1,200,000 of the Application?

**<u>Response</u>**: The \$1,200,000 figure represents Pleasant Prairie Solar LLC's cost to construct the transmission line for the solar project for which this Application covers. The AF1-275 and AE2-214 cost of Attachment Facilities figure represents facilities needed at the POI at/on AEP's facilities, and the Non-Direct Connection Network Upgrades represents other area network upgrades to allow for the injection of Pleasant Prairie's solar energy in this area of the transmission grid. All of these costs will be coordinated, finalized, and paid between Pleasant Prairie Solar LLC and the PJM. The Project's bonding and decommissioning scope and responsibilities would be for the transmission line facilities constructed and owned by Pleasant Prairie Solar LLC - other improvements on other property, such as AEP, that would be paid for by Pleasant Prairie Solar LLC, would be for the use and benefit of those other entities.

Respectfully submitted,

/s/ Christine M.T. Pirik Christine M.T. Pirik (0029759) Matthew C. McDonnell (0090164) Dickinson Wright PLLC 180 E. Broad Street, Suite 3400 Columbus, Ohio 43215 (614) 591-5461 cpirik@dickinsonwright.com mmcdonnell@dickinsonwright.com

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### Case No(s). 22-0122-EL-BLN

Summary: Response - Response to First Data Request from Staff of the Ohio Power Siting Board electronically filed by Christine M.T. Pirik on behalf of PLEASANT PRAIRIE SOLAR ENERGY LLC