

 **FILE**

I am writing to express my opposition of the Oak Run Solar Project (22-0549-EL-BGN).

Below are quotes from the applicant's second data request to the Ohio Power Siting Board

"Would the batteries be charged by the solar facility and possibly the grid during the day?"

Response: The facility will have the capability to charge from both the solar facility and the grid. It is doubtful that the facility will typically charge from the grid during the day due to higher pricing during daylight hours, however, if local daytime pricing changes, this will still be an option. The implications of recently passed regulations as part of the Inflation Reduction Act of 2022, H.R. 5376 ("IRA"), are still being evaluated and will inform the facility's charging strategy.

Would the batteries be charged by the grid at night as necessary?

Response: It is assumed that most grid charging will occur during nighttime hours. The implications of recently passed regulations as part of the IRA, are still being evaluated and will inform the facility's charging strategy.

Would the batteries discharge day and night as needed?

Response: The facility will have the capability to discharge during both daytime and nighttime hours. It is assumed that most discharging will occur during the daytime and early evening when solar output is below peak output but local load demand is still high."

This alone should be reason enough to deny approval of the project. They are going to take (and waste electricity since moving energy to and from batteries always results in lost energy) energy from the grid when it is cheap and sell it back during peak hours. I can only imagine that those costs will be passed to the consumers. At the very least the applicant should add an asterisk to the words "clean" and "green" every time they use them to promote this terrible project.

I am also opposed to the project being located on agriculturally productive soils. The following are excerpts from the applicant's first data request to the Ohio Power Siting Board.

"Exhibit N speaks to the potential use of lime or geogrid material for the purpose of stabilizing portions of the subgrade for 44 miles of access proposed. When comparing the two methods, is one favorable to the other when considering overall soil impact? e.g. would the introduction of lime impact the soil pH which could impact future agricultural activity?"

Response: The addition of lime will increase the soil pH to +12 and decrease the soil electrical resistivity. Since the lime treatment should be limited to access road alignments, it is not expected that the lime treated soil will impact adjacent soil areas

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more than a few feet laterally. Both methods are suitable for purposes of stabilization. The geogrid option may provide greater flexibility by reserving its use for portions of the alignment that develop instability during construction or that are anticipated to be exposed to increased traffic loads or frequency.

For the soils that will be disturbed, does the Applicant anticipate these soils when restored post-construction and at decommissioning will contain the same organic content? Would this be measured and confirmed? i.e., If test pits were dug in the exact same locations after the earthwork, would the organic content be expected to be the same?

Response: The Applicant anticipates that disturbed soils, that will be restored postconstruction and at decommissioning, will contain the same organic content or more as compared to current conditions. During the operational phase of the Project, when the land is left to rest and recover under permanent vegetative cover as opposed to the current rowcrop agriculture, organic content will remain consistent or increase

As the life of the Project is 30 years or more, soil organic carbon percentages could increase even more than those documented in the study, resulting in more organic content than currently is present."

Elevating the soil pH to 12 is not good for plant life and many soil microbes. Also, I would like to know what actual data they are basing their claim that soil organic carbon and organic could increase? I understand that land under the Natural Resource Conservation Service Conservation Reserve Program can result in increased organic content. However, that data was not collected from near a solar array and the vast majority of the current scientific literature that looks at these types of soil quality measurements where solar panels are located show the opposite. They show decreased organic content and typically, degradation of other soil properties as well. Makes me wonder how many of their other claims are conjecture based on cherry-picked data.

This applicant is proving to be anything but straightforward. I feel this applicant is untrustworthy, will not make a good neighbor, and provides zero benefits when accounting for the land that could be degraded.

Sincerely,

William A Drake