

**BEFORE  
THE OHIO POWER SITING BOARD**

In The Matter of The Application of **Scioto Farms Solar Project, LLC**, for a Certificate of Environmental Compatibility and Public Need )  
For The Construction of a Solar Powered ) Case No. 21-868-EL-BGN  
Electric Generation Facility in Wayne )  
Township, Pickaway County, Ohio )

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**NOTICE OF SCIOTO FARMS SOLAR PROJECT, LLC TO TAKE VIDEO  
DEPOSITION OF INTERVENOR WAYNE TOWNSHIP**

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Pursuant to Ohio Administrative Code 4906-2-18, please take notice that Applicant Scioto Farms Solar Project, LLC (“Scioto Farms”) will take the videotaped oral deposition under oath of Intervenor, Board of Trustees of Wayne Township (“Wayne Township”).

The deposition will be videoed and take place beginning at 9 a.m. on February 14, 2023 at 203 South Scioto Street, Circleville, Ohio 43113 and continue day-to-day until completed. The deposition will be taken upon oral examination (as if on cross-examination) before an officer authorized by law to administer oaths and to take depositions. Parties are invited to attend and cross-examine.

Pursuant to Ohio Administrative Code 4906-2-18(E), Wayne Township is to name one or more of its officers, agents, employees, or other persons duly authorized to testify on its behalf regarding the matters set forth in Exhibit A. Wayne Township’s counsel has advised its designee is Trustee Brenna Gibson. To the extent Wayne Township determines any additional or other designee(s) is/are required, it shall notify Scioto Farms at least on the business day prior to the deposition.

Respectfully submitted on behalf of:

**SCIOTO FARMS SOLAR PROJECT, LLC**



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## **EXHIBIT A**

### **SUBJECT MATTERS OF EXAMINATION**

1. The potential impacts of the Project<sup>1</sup> on Wayne Township, residents, and properties within Wayne Township.
2. The Project's consistency or lack thereof with local land use plans.
3. The local public's opposition to or support of the Project and stated reasons therefore.
4. The process for holding and the content of any and all public meetings held in which the Project was discussed.
5. Township Resolution 3-1-22, adopted on March 9, 2022, including but not limited to all the facts stated in the WHEREAS clauses.
6. The facts and circumstances supporting the information stated in the Township Resolution 3-1-22, adopted on March 9, 2022 WHEREAS clauses.
7. The substance of communications between Wayne Township and other individuals and entities regarding the Project.
8. Inquires made by Wayne Township regarding the Project and corresponding responses.
9. Investigations of the Project on behalf of Wayne Township.
10. Communications received by Wayne Township regarding favor and/or support of the Project.
11. Wayne Township's communications to the public regarding the Project, including the date of each communication.
12. Wayne Township's attempts, if any, to solicit input from the public regarding the Project.

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<sup>1</sup> "Project" refers to Scioto Farms Solar's proposed construction and operation of a solar generation facility which is the subject of this case.

13. Meetings and communications among Wayne Township and third parties, including but not limited to Pickaway County Commissioners, regarding the Project.
14. Meetings and communications among Wayne Township and any Intervenor regarding the Project.
15. Comments submitted by Wayne Township to the Ohio Power Siting Board (“OPSB”).
16. Communications by or among Wayne Township and any member of the OPSB or its Staff.
17. The content of the documents produced by Wayne Township in response to Scioto Farms’ document requests.
18. Wayne Township’s responses and supplemental responses to Scioto Farms’ First Set of Discovery Requests to Wayne Township.
19. The content of any studies, articles, references materials and the link relied upon by Wayne Township in opposing the Project.
20. Communications with the Project and/or its counsel.
21. The systems and policies for the Wayne Township Trustees’ maintenance and retention of documents and records.
22. Any personal interest any of the Wayne Township Trustees have in the Project or property in or adjacent to the Project Area.

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Notice of Deposition was served via electronic mail upon the parties of record listed following parties listed below by electronic mail, this 10<sup>th</sup> day of February 2023.



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

**2/10/2023 4:38:36 PM**

**in**

**Case No(s). 21-0868-EL-BGN**

Summary: Notice of Deposition of Scioto Farms Solar Project, LLC to Take  
Deposition of Intervenor, Board of Trustees of Wayne Township electronically filed  
by Teresa Orahod on behalf of Sommer Sheely