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March 9, 2023

Via Electronic Filing

Ms. Tanowa Troupe
Administration/Docketing
Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, OH 43215-3793

**Re: Powell Creek Solar, LLC,
OPSB Case No. 20-1084-EL-BGN**

Dear Ms. Troupe:

Based on the current market availability of solar panels and tracking equipment, it has become necessary to modify the project layout. Although final engineering is not yet complete, we have been able to develop an updated preliminary project layout (the Updated Layout) that lies fully within the originally certificated fenceline boundaries while further minimizing impacts associated with the layout depicted in the approved certificate (the Certificated Layout). In some areas, setbacks from non-participating neighbors have been increased. Additionally, setbacks from some roadways, in particular the intersection of State Route (SR) 108 and SR 613, have been increased. Some access road entrance locations have been adjusted to areas further from non-participating residences. Overall, we believe the Updated Layout fully complies with the requirements of the Certificated Layout, while providing the benefits of additional impact minimization.

Additionally, engineering review has progressed on the point of interconnection (POI) with the American Electric Power (AEP) transmission system. Because of the configuration of the existing AEP transmission line, as well as the goal of avoiding transmission line crossings, it has become necessary to adjust the POI location approximately 200 feet to the north of the location approved in the Certificated Layout. This adjusted location, which overlaps with the Certificated Layout location, does not involve any new properties. However, it does move the POI somewhat closer to a residence that is north of the POI. This residence was previously a participating residence, but was sold to non-participating homeowner. The current owner of this residence has recently signed a good neighbor agreement to become a participating property with Powell Creek. The owner of the residence is fully aware of the current plans regarding the location of the POI.

Although we understand that it would not be possible to provide any approvals at this stage, we would appreciate OPSB Staff's acknowledgement that the adjustments presented in the Updated

Layout are consistent with the kinds of adjustments to certificated project layouts that are normally considered in the review of final engineering adjustments in preparation for the commencement of construction. With OPSB Staff's acknowledgement, it would be our intention to proceed with preparation for construction under the terms of the existing certificate. It would also be our intention to formally withdraw the application for amendment pending in case number 22-0915-EL-BGA.

Included with this letter are a table summarizing the changes from the Certificated Layout to the Updated Layout and figures depicting these changes.

Table 1. Layout Comparison Summary

Layout Element	Change from Certificated Layout to Updated Layout	Impact
General Project Setbacks	The Updated Layout is entirely within the footprint of the Certificated Layout. As such, the Updated Layout meets or exceeds the setbacks considered in the design of the Certificated Layout, including a setback of 100 feet from the edge of public roads to PV panels. Additionally, the Updated Layout includes increased setbacks from the intersection of SR 108 and SR 613, based on local input.	This change represents a reduction in overall impact, as the footprint of the Facility has decreased. Additionally, the increased setback around the intersection of SR 108 and SR 613 results in a reduced impact.
POI Substation	The size of the POI substation area has decreased slightly. The northern boundary of the POI substation area has moved northward by approximately 160 feet, and the southern boundary has moved northward by approximately 215 feet. See Figure 5 for a depiction of this change.	This change presents a reduction in impacts, as the POI substation is shifted slightly further from Road 12 and from the nearest non-participating residences. There is a residence to the north of the updated POI substation location, and the owner of that residence has signed a good neighbor agreement and is fully aware of the current plans regarding the location of the POI substation.
Access Roads	The total length of access roads has been reduced by approximately 5%. See Figure 4 for a depiction of this change.	This change represents a reduction in impacts.
	The access point nearest to Miller City has been shifted from SR 108 to Van Buskirk Street.	This change moves an access point off of a state highway and moves the access point further from non-participating residences. Furthermore, all residences on Van Buskirk Street are participants, and as such this represents a reduction in impacts.

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Layout Element	Change from Certificated Layout to Updated Layout	Impact
	An additional access road coming off Road 13 is proposed near the collection substation, the O&M footprint, and permanent Facility laydown yard. Additionally, access to the collection substation is proposed from SR 613.	A slight increase in temporary impacts during construction of the Facility. This change does not place access roads closer to a non-participant compared to the access roads present in the Certificated Layout.
	An additional access point is proposed at the POI substation.	No increase of impacts is expected, this access point will be located immediately adjacent to the other at the POI and the impacts will be similar.
Laydown Yards	Eight additional temporary laydown yards have been identified. The Certificated Layout contains one permanent laydown yard near the O&M area and one temporary laydown yard to the south on Road 13. The additional temporary laydown yards are depicted on Figure 6.	These additional laydown yards are located within the fenceline area presented in the Certificated Layout. Because construction activities at these temporary laydown yards are similar to anticipated construction activities within PV panel areas, no new impacts are anticipated.
PV Panel Area	PV panel area has decreased by approximately 20%. PV panel areas are depicted on Figure 3.	This change represents a reduction in impacts. All PV panels are location within the fenceline area presented in the Certificated Layout.
Facility Fenceline	The footprint of the Facility fenceline has decreased by approximately 15%. Figure 6 depicts this change.	This change represents a reduction in impacts. The fenceline of the Updated Layout is entirely within the fenceline area presented in the Certificated Layout.

Please contact me if you have any questions.

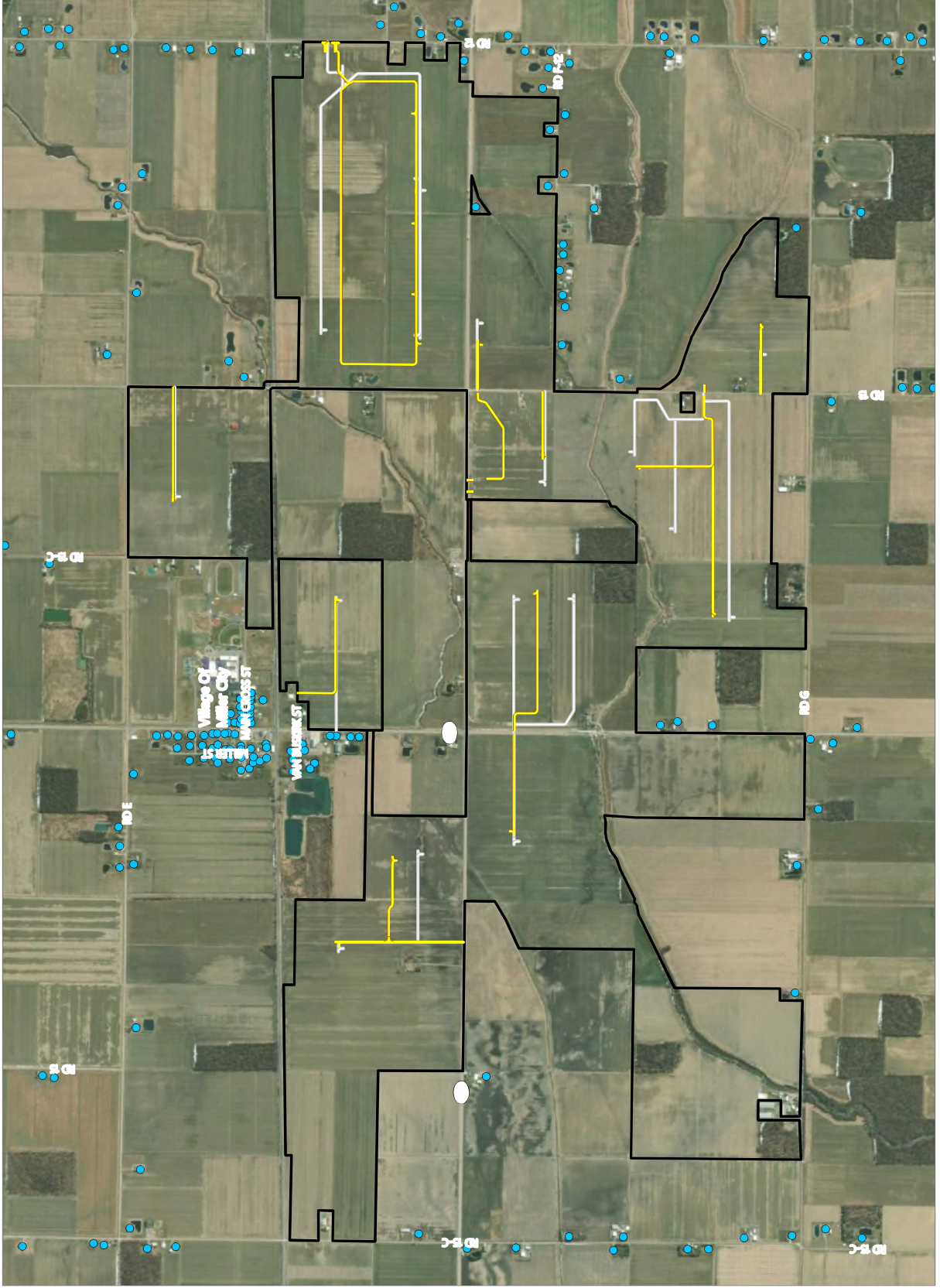
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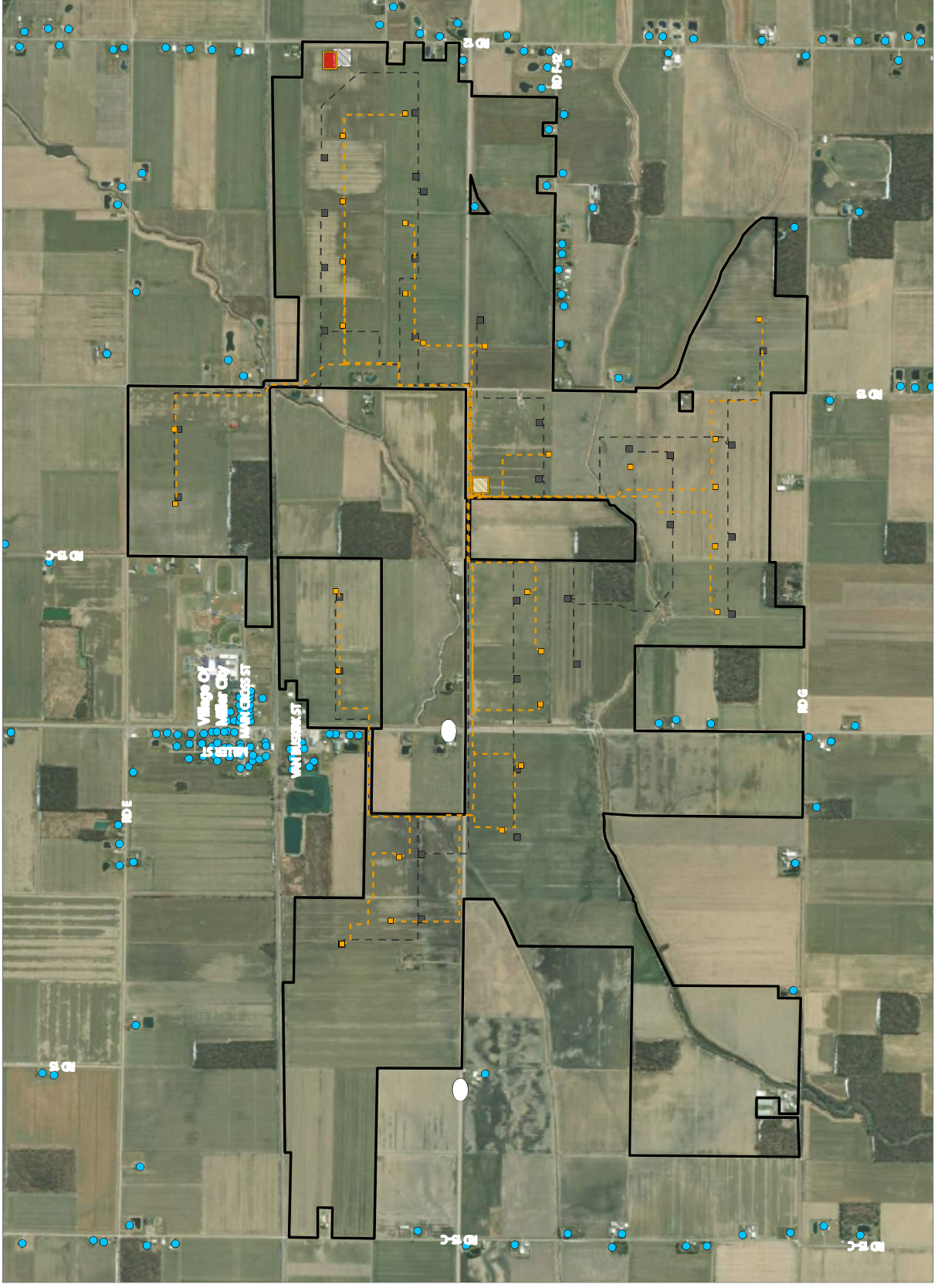


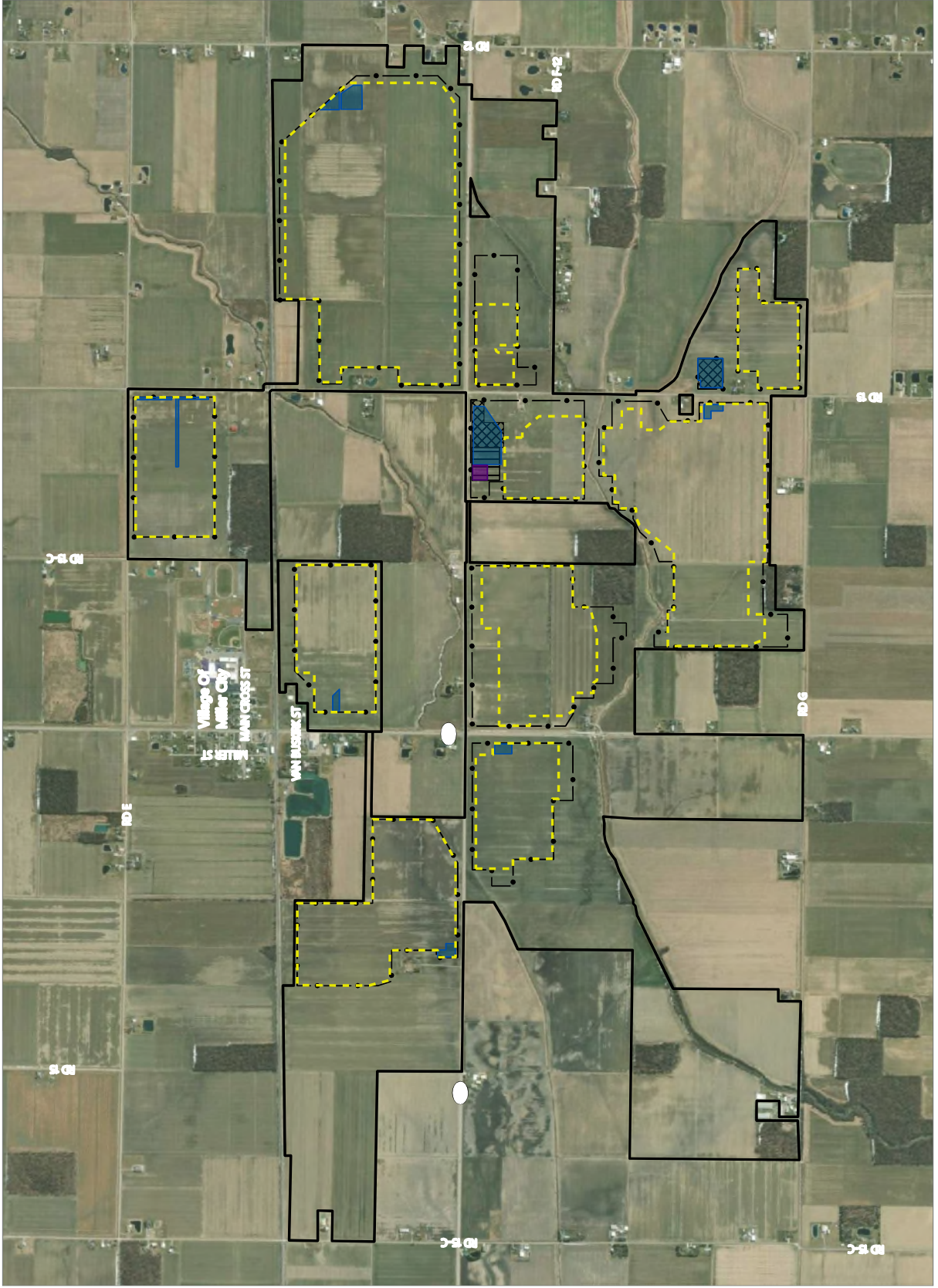
Kara Herrnstein

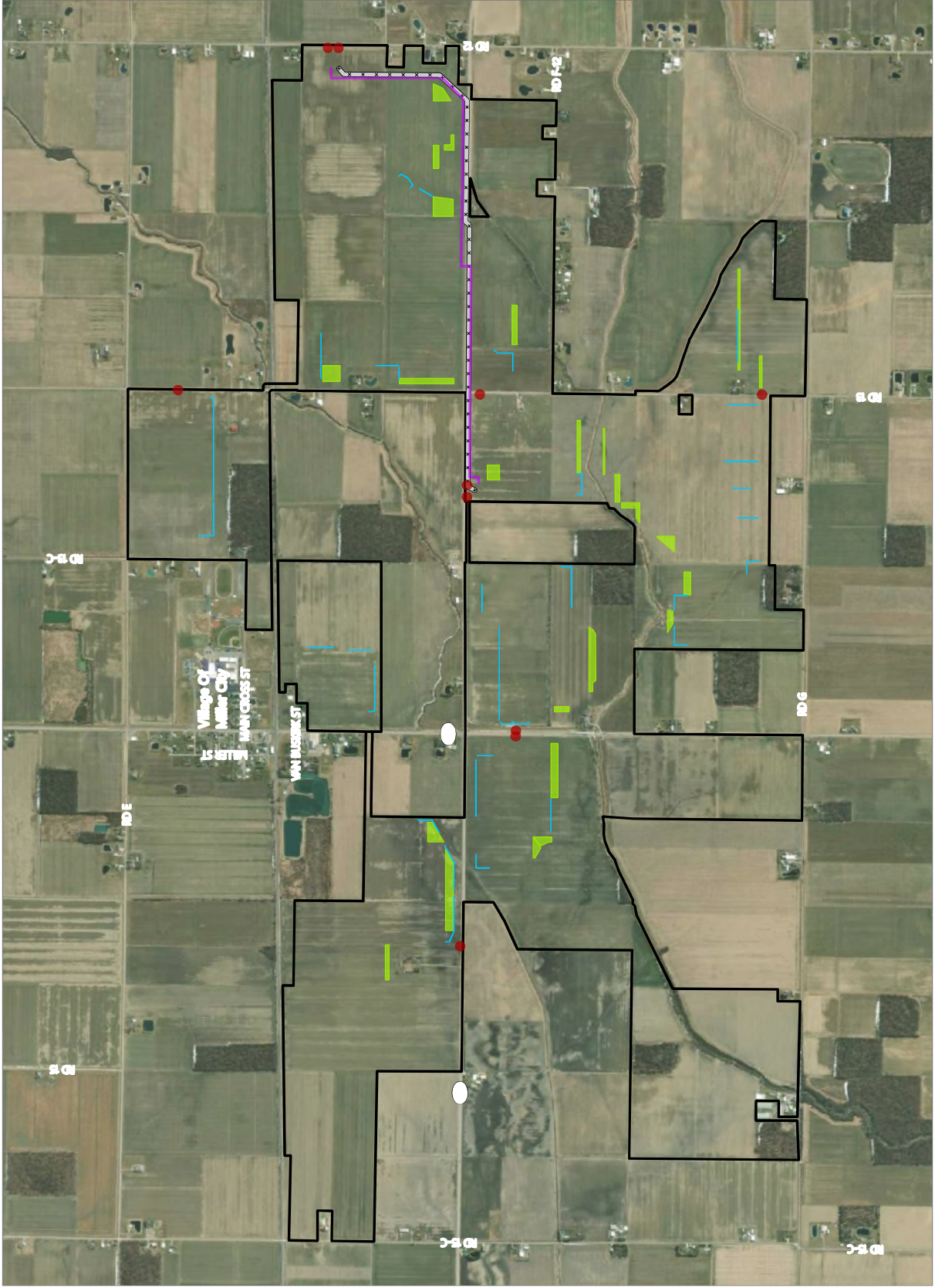
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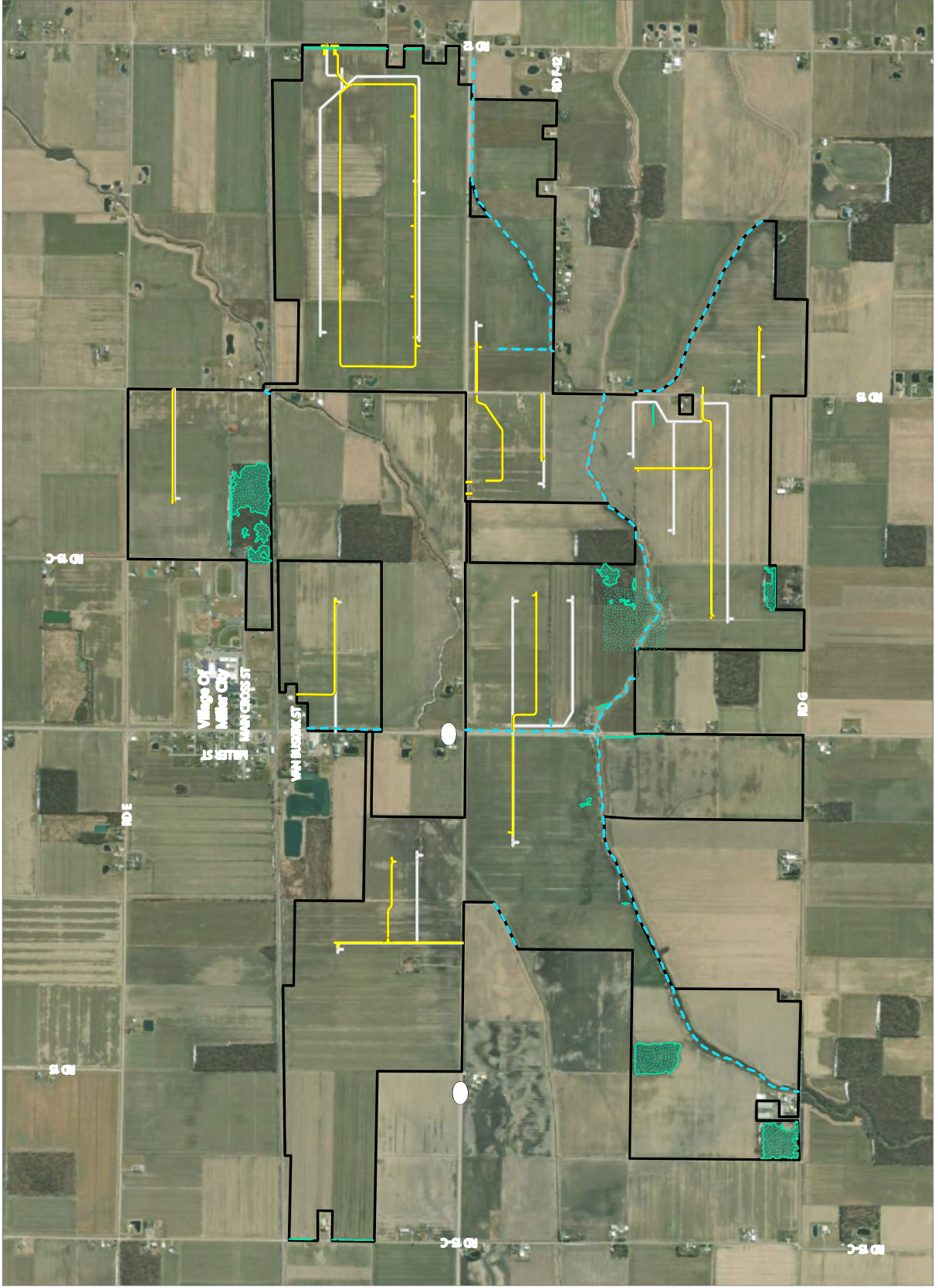
Cc: Jonathan Pawley (w/Attachment)

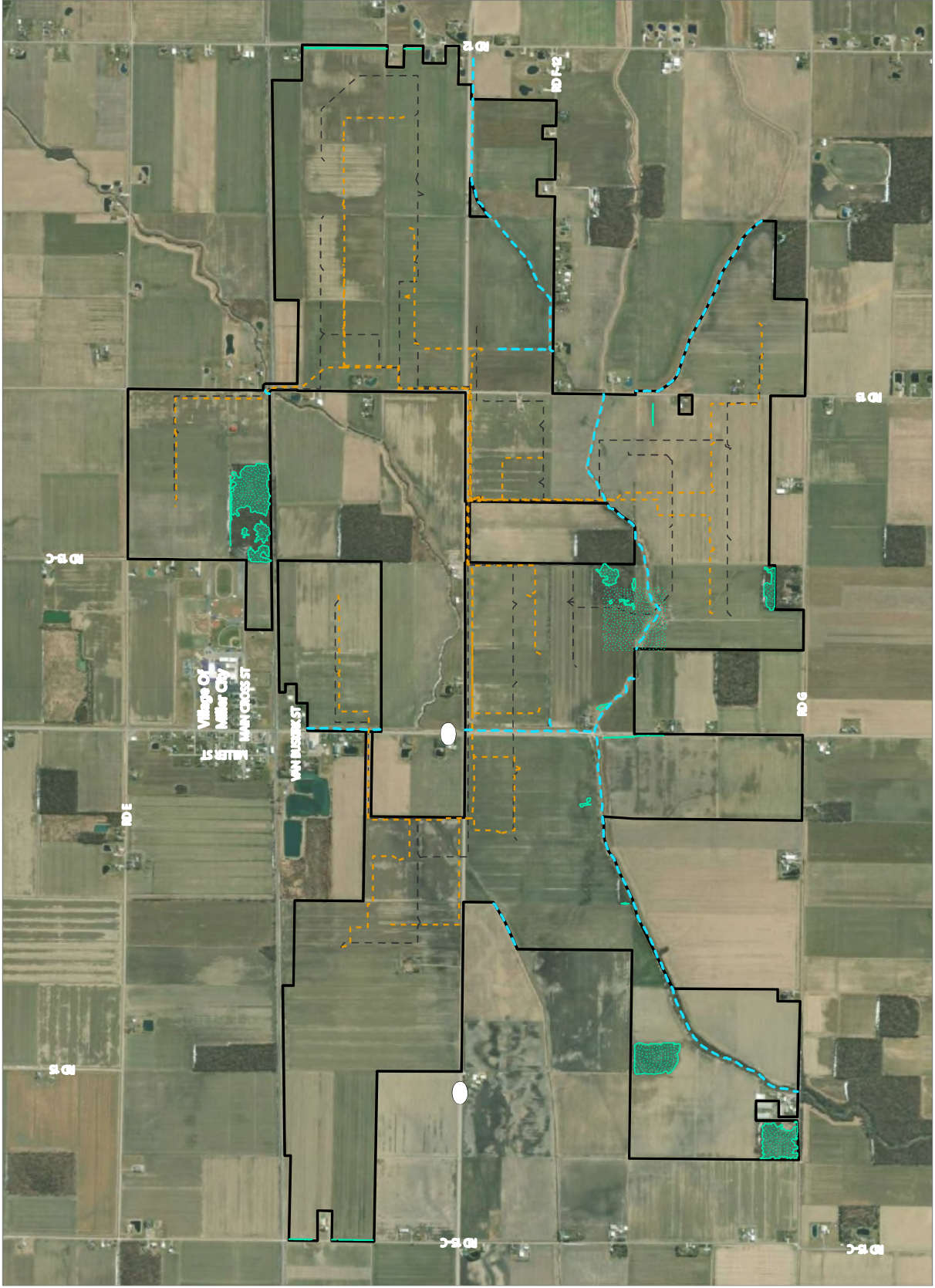












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Case No(s). 20-1084-EL-BGN

Summary: Correspondence Updating the Project Layout electronically filed by
Teresa Orahood on behalf of Herrnstein, Kara