

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Chestnut Solar, LLC for a Certificate of Environmental Compatibility and Public Need to Construct and Operate the Chestnut Solar Project)
Case No. 22-0988-EL-BGN
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**CHESTNUT SOLAR, LLC'S RESPONSE TO
STAFF'S FOURTEENTH SET OF DATA REQUESTS**

Chestnut Solar, LLC hereby responds to the fourteenth set of data requests from Staff.

RESPONSES TO DATA REQUESTS

Fourteenth Set of Data Requests – Panel Cleaning and Construction Waste

- 1) Should manual cleaning of the panels become necessary, how many gallons of water does the Applicant anticipate needing? What would be the source for this water?

RESPONSE: According to the National Oceanic and Atmospheric Administration, Marion County, Ohio, receives precipitation on 129 days annually, with an average yearly rainfall of 38 inches. Chestnut Solar has determined, based on this weather pattern and general operations-and-maintenance guidelines for the panels, that regular/routine or scheduled washing of the panels is not necessary. See Response to Eighth Set of Data Requests – Groundwater Wells. Therefore, Chestnut Solar can only speculate in response this data request. Should the rare hypothetical circumstance occur in which manual cleaning of certain panels were to become necessary, Chestnut Solar would rely on the analysis of a licensed contractor regarding the amount of water required and what the source(s) could be.

- 2) How many cubic yards of waste does the Applicant anticipate generating during the construction of the project?

RESPONSE: Construction of the Facility will generate minimal debris and solid waste, such as wood, plastic, metal and cardboard packing materials and construction scrap. All recyclable materials will be separated for recycling, while any remaining waste will be disposed of in accordance with proper procedures as provided by applicable state or federal law. In terms of organic and inorganic landfill waste, Chestnut Solar estimates that approximately 10,000 cubic yards of will be generated during the construction phase of the Project.

Respectfully submitted,

/s/ Devan K. Flahive

Devan K. Flahive (0097457)

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CERTIFICATE OF SERVICE

I certify that on this 21st day of March 2024, I caused a true and correct copy of this document to be filed with the Board using the docketing division's e-filing system, which will electronically serve notice of the filing of this document on parties referenced on the service list of the docket card who have electronically subscribed to the case.

I further certify that on this 21st day of March 2024, I caused a true and correct copy of the foregoing to be served on the below identified counsel via email:

<p>Ambrosia Wilson Ashley Wnek Assistant Attorneys General Public Utilities Section 30 East Broad St., 16th Floor Columbus, Ohio 43215 Ambrosia.Wilson@OhioAGO.gov Ashely.Wnek@OhioAGO.gov <i>Counsel for Staff of the Power Siting Board</i></p> <p>Jack Van Kley Van Kley Law, LLC 132 Northwoods Blvd. Suite C-1 Columbus, Ohio 43235 jvankley@vankley.law <i>Counsel for Board of County Commissioners of Marion County</i></p> <p>Jay Agranoff Isabel Marcellefti Jay.agranoff@puco.ohio.gov Isabel.marcellefti@puco.ohio.gov <i>Administrative Law Judges</i></p>	<p>Chad A. Endlsey Chief Legal Counsel Leah F. Curtis Leah M. Hetrick 280 North High Street, P.O. Box 182383 Columbus, Ohio 43218 cendsley@ofbf.org lcurtis@ofbf.org lhetrick@ofbf.org <i>Attorneys for Ohio Farm Bureau Federation</i></p> <p>Kevin Dunn David Watkins 411 E. Town Street, Flr 2 Columbus, Ohio 43215 kdd@planklaw.com dw@planklaw.com <i>Attorneys for Concerned Citizens of Pleasant Township LLC, et al.</i></p>
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/s/ Devan K. Flahive

Devan K. Flahive

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Case No(s). 22-0988-EL-BGN

Summary: Response to Fourteenth Set of Data Requests from Staff - Panel
Cleaning and Construction Waste electronically filed by Ms. Devan K Flahive on
behalf of Chestnut Solar, LLC.