

**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 FIFTEENTH SET OF DATA REQUESTS**

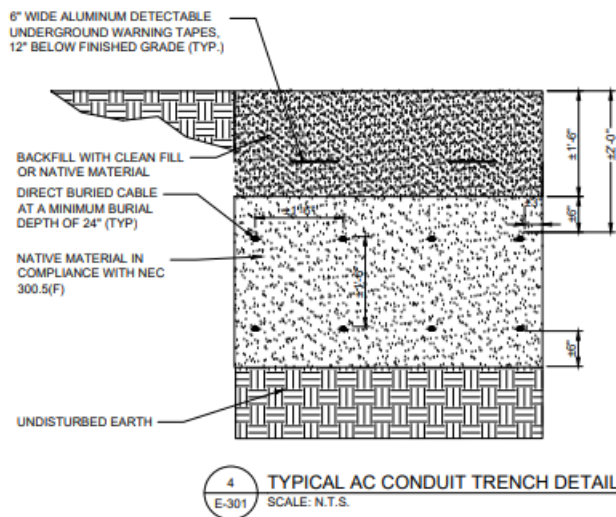
Chestnut Solar, LLC hereby responds to the fifteenth set of data requests from Staff.

RESPONSES TO DATA REQUESTS

Fifteenth Set of Data Requests – Trenching and Traffic Details

- 1) Staff has seen the direct burial method and the plow trench method used for installation of underground electric collection lines. Please further describe, or include photographs from similar construction projects, the trenching installation method and anticipated trench dimensions that would be used at Chestnut Solar.

RESPONSE: Chestnut Solar will primarily use the “direct burial” method (exemplar diagram depicted below), which is most effective for nesting multiple wires and conduits and thus optimizes this specific Project site; the plow trench method is utilized for single line runs of medium voltage cables.



- 2) Please describe the amount of solar farm traffic that would be expected to travel on Maple Grove Road.

RESPONSE: Maple Grove Road will be crossed but not traversed with solar farm traffic because there are ample other access points for both entry to and exit from the site. Best practices dictate traffic patterns follow one direction through the site. Exhibit I demonstrates

the access points and traffic routes. Chestnut Solar intends to further address this during a pre-construction conference based on feedback from ODOT and the County.

- 3) Would any improvements (e.g., curb cuts) need to be made to the intersection of Owens Road NE and Marion-Waldo Road to accommodate solar farm construction traffic? If so, please describe.

RESPONSE: None anticipated. Based on the radial estimates of the equipment used for hauling, geospatial analysis of the intersections in Exhibit I, and reviews of comparable construction sites and intersections, the initial conclusion is there will not be a need for any pre-Project road improvements. This supposition will be subject to further evaluation through Chestnut Solar's engagement with the County Engineer's Office regarding whether any road repairs or reinforcement will be necessary prior to use of haul routes for construction traffic.

- 4) Would any improvements (e.g., curb cuts) need to be made to the intersection of Somerlot Hoffman Road W and Marion-Waldo Road to accommodate solar farm construction traffic? If so, please describe.

RESPONSE: None anticipated. Based on the radial estimates of the equipment used for hauling, geospatial analysis of the intersections in Exhibit I, and reviews of comparable construction sites and intersections, the initial conclusion is there will not be a need for any pre-Project road improvements. This supposition will be subject to further evaluation through Chestnut Solar's engagement with the County Engineer's Office regarding whether any road repairs or reinforcement will be necessary prior to use of haul routes for construction traffic.

Respectfully submitted,

/s/ Devan K. Flahive

Devan K. Flahive (0097457)

Counsel of Record

Nelson Mullins Riley & Scarborough LLP

1100 Superior Avenue, Suite 2000

Cleveland, Ohio 44114

Telephone: (216) 304-5211

Email: devan.flahive@nelsonmullins.com

(Willing to accept service by e-mail)

Attorney for Chestnut Solar, LLC

CERTIFICATE OF SERVICE

I certify that on this 2nd day of April 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 2nd day of April 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 Marcelletti Jay.agranoff@puco.ohio.gov Isabel.marcelletti@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 Fifteenth Set of Data Requests from Staff - Trenching and
Traffic Details electronically filed by Ms. Devan K Flahive on behalf of Chestnut
Solar, LLC.