



*Forging a partnership between farmers and consumers.
•Working together for Ohio's farmers•*

January 27, 2016

Matt Butler
Ohio Power Siting Board
180 East Broad Street
Columbus, OH 43215-3793

RE: Stakeholder Workshop on OPSB Wind Rules, Case Number: 12-1981-GE-BRO

Dear Sir:

The Ohio Farm Bureau Federation (OFBF) would like to thank the Ohio Power Siting Board (OPSB) for providing a stakeholder workshop concerning wind powered electric generation facility rule revisions as detailed in Ohio Administrative Code 4906-4-08. The workshop is scheduled for January 29, 2016.

We understand that this session gives interested parties an opportunity to provide input, revisions and recommendations on issues identified in OPSB's Finding and Order in case #12-1981-GE-BRO, finding (18), paragraphs (a) through (p), filed on November 12, 2015. Later this year, OPSB staff will initiate a new rulemaking docket for the purpose of issuing formal comment on proposed revisions resulting from stakeholder input.

Participants have the opportunity to make brief comments and are encouraged to submit written suggestions/language in greater detail for later consideration. Please be advised that I am OFBF's spokesperson at this workshop.

New regulatory language OFBF would like to see considered is highlighted below (in bold):

4906-4-08 (A)(5) The applicant shall provide a map of suitable scale showing the proposed facility, geological features of the proposed facility site, topographical contours, existing gas, **oil, injection and storage wells and related support infrastructure; existing and permitted interstate transmission pipelines, intrastate distribution and transmission pipelines, utility service pipelines, production gathering lines and related support infrastructure.**

4906-4-08 (D) Public responsibility. The applicant shall:

- 1. Describe the applicant's program for public interaction for the siting, construction, and continued operation of the proposed facility, i.e., public information, education and community outreach programs.**
- 2. Describe the applicant's program to establish and maintain a complaint resolution process.**
- 3. Describe any insurance or other programs for providing liability compensation for damages to the public resulting from construction or operation of the proposed facility.**

4. Describe the applicant's plan for decommissioning the proposed facility, including financial arrangements designed to assure requisite financial resources.

OFBF is a member organization whose mission is to forge partnerships between producers and consumers. Next to labor, energy is the largest single cost input in many farm and small business operations. Consumers living in rural, suburban and urban neighborhoods are looking for opportunities to control their energy costs, too. Farm Bureau members support the development of a diversified energy portfolio that employs a variety of fuels and technologies (advanced coal, nuclear, oil & gas and renewables) that help consumers create options to control their energy costs.

OFBF uses its extensive policy development process to explore and discuss a variety of issues impacting rural communities. A full copy of these resolutions is available at: <https://ofbf.org/app/uploads/2014/12/2015OFBFPolicyDocument.pdf>. Relevant positions concerning this issue include:

OFBF Policy 143 – Wind and Solar:

We support Ohio Power Siting Board (OPSB) rules, regulations, stipulations, orders and amendments that provide landowner friendly, reasonable and uniform statewide procedures for siting, placement, construction and operation of utility-scale wind and solar farms.

These should include:

- 1. A pre-application conference with local public officials that addresses the environmental compatibility and public need for a proposed facility;*
- 2. An initial public meeting to advise affected persons of the upcoming project and to gather initial public input and concerns that are used by the applicant to aid in preparation of an application;*
- 3. Continued developer education/outreach activities ensuring dialogue between the company and members of the community;*
- 4. Establishment of an accessible local office by the developer, ensuring community members have access to company representatives to discuss development issues and possible concerns;*
- 5. Creation of an application that evaluates economic, environmental, and aesthetic impacts on the community as defined in the Ohio Revised Code, Chapter 4906, and the Ohio Administrative Code (OAC), Chapter 4906. The application is to be posted as a matter of public record on the OPSB website, with electronic and hard copies available at all public libraries in the county, the office of the county commissioners and through the township trustees in township within the project area; and*
- 6. Scheduling of adjudicatory and local public hearings, enabling citizens, interest groups, and governmental entities to present testimony and included in the case as evidence.*

We encourage continued research and development in wind and solar generation technology and expansion of Ohio Development Services Agency efforts to help Ohio-based companies participate in supply chain programs to manufacture wind turbine and solar parts.

We encourage increased cooperation between state and federal agencies in minimizing and/or preventing delays in approval and construction of wind turbine projects due to the concerns for migratory birds, bats or other wildlife.

We support education and outreach activities for local government leaders and community planners as they work to create county, municipal and township zoning ordinances supporting use of on-site wind turbine and solar technology for farm, business and home use.

We support wind turbine setback requirements that ensure safety and are based on scientific research.

OFBF has extensive experience working with regulators, local government leaders, project developers and community stakeholders on energy development issues, including wind energy projects. The organization provided comments for establishing the original rules concerning siting and placement for electric generating wind facilities as detailed in OPSB case number 08-1024-EL-ORD.

Moreover, Farm Bureau has been involved as a party of record in close to twenty OPSB cases concerning initial permits and amendments on wind energy development projects. The organization appreciates how OPSB rules govern the application process, set guidelines for negotiations creating effective stipulations and recommendations, as well as provide the foundation for adjudicatory proceedings and review.

We look forward to working with the Ohio Power Siting Board and all interested parties in this rule review process.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "DALE R. ARNOLD -". The signature is written in a cursive style with a horizontal line at the end.

Dale Arnold
Director, Energy, Utility
and Local Government Policy