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www.allencountyohio.com

May 10, 2022

Ohio Power Siting board
180 E. Broad Street
Columbus, Ohio 43215

Re: Comment on Birch Solar 1 Pending Case, Case Number 20-1605-EL-BGN

Dear Ohio Power Siting Board:

As the evidentiary hearing approaches for the Birch Solar 1 project, we, as some of the elected officials in Allen County, believe it is very important to provide an update on the actions taken in Allen County that would prohibit future applications like this project, and to share our thoughts on requiring a DRUMA/RUMA Agreement.

On June 28, 2021, the Ohio General Assembly passed Senate Bill 52 ("SB 52") which placed new requirements on renewable energy developments in Ohio and changed the application process through the Ohio Power Siting Board ("OBSP"). As you likely know, SB 52 allows a county board of commissioners to designate all or part of an unincorporated area of the county as a "restricted area," prohibiting large utility facility projects from being constructed.

The Allen County Board of Commissioners worked with each of the twelve (12) Allen County Townships and received recommendations from each relating to restricting areas for the development of large utility facilities. On April 4, 2022, the Allen County Board of Commissioners conducted the required public meeting according to SB 52 and unanimously passed a resolution adopting a map restricting the development of these facilities from all unincorporated areas in Allen County, except for the industrial parks in two townships. A copy of said resolution is attached for your convenience.

This collaborative action taken on April 4th is a testament to our shared concerns that these large projects pose to Allen County. It is important to note that if it were not for the grandfather provisions of SB 52, the Birch Solar 1 project would not be eligible for consideration, as it is located in an area that is now restricted for the development of such facilities.

In addition to sharing Allen County's actions related to SB 52, we believe it is important to share our concerns on developing a DRUMA/RUMA for a project that is still pending with the OPSB. Undoubtedly, the construction, operation, and decommissioning of the Birch Solar 1 project will be detrimental to both the county and township infrastructure. Not only to roads and bridges, but also

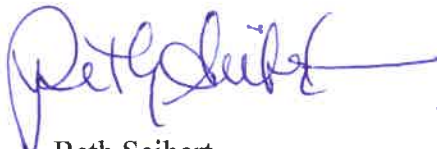
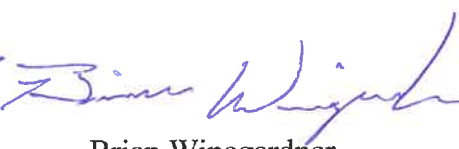

to surface and subsurface drainage facilities. With these concerns, one must appreciate the time and expertise it will take to ensure our county is protected with a proper agreement.

We firmly believe it is in the county's best interest to have a DRUMA agreed to prior to the start of construction of the proposed project. However, the time and effort needed to review and negotiate a DRUMA would not be necessary in the event that this project is rejected by the OPSB. Thus, we call on the OPSB to build upon the Staff Report, and to not only require permits prior to construction, but to also require Birch Solar 1 to enter into a DRUMA with the county, if the project were approved.

We believe it is important to restate that on April 4, 2022, Allen County took action pursuant to SB 52 to restrict applications such as the Birch Solar 1 project. Without the grandfather clause of that legislation, the Birch Solar 1 project would not be eligible for consideration, as it is located in an areas that is now restricted for such developments. We also believe it is important to note the necessity of a DRUMA agreement in the event that the project would be approved by the OPSB, and therefore ask that it be made a requirement if so approved.

We respectfully request that the OPSB consider this collaborative action taken by Allen County along with the concerns outlined in our June 2021 letter as your review the Birch Solar 1 project application. The June 2021 letter has been attached for your reference.

Respectfully Submitted,

		
Beth Seibert Allen County Commissioner	Brian Winegardner Allen County Commissioner	Cory Noonan Allen County Commissioner

		
Rachael Gilroy Allen County Auditor	Krista Bohn Allen County Treasurer	Brion Rhodes Allen County Engineer

Enclosures

STATE OF OHIO)

) ss:

COUNTY OF ALLEN)

On this 10th day of May, 2022, before me, a Notary Public, in and for said County and State, personally came the above-named, **Brion Rhodes, Allen County Engineer**, and acknowledged the signing of this instrument to be her voluntary and authorized act and deed.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed my official seal on the day and year last aforesaid.

Kayla Meshelle Campbell

NOTARY PUBLIC-STATE OF OHIO

MY COMMISSION EXPIRES: Never



KAYLA MESHELLE CAMPBELL
Attorney-at-Law
Notary Public, State of Ohio
Non-expiring commission

STATE OF OHIO)

) ss:

COUNTY OF ALLEN)

On this 10th day of May, 2022, before me, a Notary Public, in and for said County and State, personally came the above-named, **Krista Bohn, Allen County Treasurer**, and acknowledged the signing of this instrument to be her voluntary and authorized act and deed.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed my official seal on the day and year last aforesaid.

Kayla Meshelle Campbell

NOTARY PUBLIC-STATE OF OHIO

MY COMMISSION EXPIRES: Never



KAYLA MESHELLE CAMPBELL
Attorney-at-Law
Notary Public, State of Ohio
Non-expiring commission

STATE OF OHIO)
) ss:
COUNTY OF ALLEN)

On this 10th day of May, 2022, before me, a Notary Public, in and for said County and State, personally came the above-named, **Beth Seibert, Allen County Commissioner**, and acknowledged the signing of this instrument to be her voluntary and authorized act and deed.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed my official seal on the day and year last aforesaid.

Lori Baldauf



LORI BALDAUF
Notary Public, State of Ohio
My commission expires October 21, 2024

STATE OF OHIO)
) ss:
COUNTY OF ALLEN)

On this 10th day of May, 2022, before me, a Notary Public, in and for said County and State, personally came the above-named, **Cory Noonan, Allen County Commissioner**, and acknowledged the signing of this instrument to be her voluntary and authorized act and deed.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed my official seal on the day and year last aforesaid.

Kayla Meshelle Campbell

NOTARY PUBLIC-STATE OF OHIO
MY COMMISSION EXPIRES: NEVER



KAYLA MESHELLE CAMPBELL
Attorney-at-Law
Notary Public, State of Ohio
Non-expiring commission

STATE OF OHIO)
) ss:
COUNTY OF ALLEN)

On this 10th day of May, 2022, before me, a Notary Public, in and for said County and State, personally came the above-named, **Brian Winegardner, Allen County Commissioner**, and acknowledged the signing of this instrument to be her voluntary and authorized act and deed.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed my official seal on the day and year last aforesaid.

Lori Baldauf

NOTARY PUBLIC-STATE OF OHIO
MY COMMISSION EXPIRES:



LORI BALDAUF
Notary Public, State of Ohio
My commission expires October 21, 2026

STATE OF OHIO)
) ss:
COUNTY OF ALLEN)

On this 10th day of May, 2022, before me, a Notary Public, in and for said County and State, personally came the above-named, **Rachael Gilroy, Allen County Auditor**, and acknowledged the signing of this instrument to be her voluntary and authorized act and deed.

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and affixed my official seal on the day and year last aforesaid.

Kayla Meselle Campbell

NOTARY PUBLIC-STATE OF OHIO
MY COMMISSION EXPIRES: Never



KAYLA MESHELLE CAMPBELL
Attorney-at-Law
Notary Public, State of Ohio
Non-expiring commission

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County Commissioners' Office
Allen County, Ohio
April 4, 2022

Resolution # 238- 22

RE: A RESOLUTION DECLARING PORTIONS OF THE UNINCORPORATED AREAS OF ALLEN COUNTY, OHIO TO BE RESTRICTED AREAS PROHIBITING CONSTRUCTION OF ECONOMICALLY SIGNIFICANT WIND FARMS, LARGE WIND FARMS, AND LARGE SOLAR FACILITIES.

The Board of County Commissioners of Allen County, Ohio met in regular session on the 4th day of April, 2022 with the following members present: Beth Seibert, Cory Noonan and Brian Winegardner

Commissioner Noonan moved for the adoption of the following:

RESOLUTION

WHEREAS, on June 28, 2021 the Ohio General Assembly adopted Senate Bill 52 ("SB 52") which amends the process for siting certain wind-powered and solar-powered electric generation facilities in the State of Ohio; and

WHEREAS, SB 52 took effect October 11, 2021, and became ORC 303.57, *et. seq.*; and

WHEREAS, SB 52, now ORC 303.57 - 303.62, gives Boards of County Commissioners the power to adopt a resolution designating all or part of the unincorporated areas of the county as a restricted, prohibiting the construction of certain wind farms and solar facilities;

WHEREAS, the Board of Commissioners, Allen County, Ohio ("Board") has responsibility for preserving the general health, safety, and welfare within the territory of Allen County, Ohio; and

WHEREAS, the development of "economically significant wind farms" as defined in ORC 4906.13, "large wind farms" and "large solar facilities" as both are defined in ORC 4906.13 (collectively referred to as "large utility facilities") and subject to restriction pursuant to ORC 303.57, *et. seq.*, has numerous potential impacts on users and property owners in the vicinity of such developments; and

WHEREAS, the Board has considered the potential impacts of development as well as the interests of property owners in making their land available for development; and

WHEREAS, utilizing the above considerations, and considerations from all twelve townships within the unincorporated areas of the County, the Board has prepared a map containing the proposed restricted areas within the unincorporated areas of Allen County, Ohio; and

WHEREAS, pursuant to ORC 303.58, said map has been posted at all public libraries within Allen County, Ohio for a period of least thirty (30) days; and

WHEREAS, pursuant to ORC 303.58, public notice of this meeting has been given to all school districts, municipal corporations, and boards of township trustees located in whole, or in part, within the boundaries of the proposed restricted areas; and

NOW, THEREFORE, BE IT RESOLVED, BY THE BOARD OF COMMISSIONERS, ALLEN COUNTY, OHIO THAT:

1. The Board of Commissioners hereby designates all unincorporated areas of Allen County, Ohio as a restricted area for construction of "economically significant wind farms" as defined in ORC 4906.13, "large wind farms" and "large solar facilities" as both are defined in ORC 4906.13, otherwise known as "Large Utility Facilities" except for:
 - a. Areas zoned Industrial in Shawnee Township, Allen County, Ohio, and
 - b. Areas zoned General Industrial in Perry Township, Allen County, Ohio.
 - c. In the two areas described above, Large Utility Facilities may be permitted to be constructed, subject to the parameters of ORC 303.57, *et. seq.*, and all other applicable law.
2. That a map documenting the restricted areas of the unincorporated areas of Allen County, Ohio be attached hereto and marked as Exhibit "A".

3. This Resolution shall be in full force and effect thirty (30) days after its adoption, pursuant to ORC 303.59, unless it is timely petitioned for a referendum by the requisite number of registered electors in the county.

4. The Board of Commissioners hereby finds and determines that all formal actions relative to the adoption of this resolution were taken in an open meeting of the Board of Commissioners, and that all deliberations by this Board, if any, which resulted in formal action, were taken in meetings open to the public, in full compliance with applicable legal requirements, including ORC 121.22.

Commissioner Seibert seconded the resolution and upon the roll being called, the vote resulted as follows: Commissioner Seibert, yes; Commissioner Noonan, yes; Commissioner Winegardner, yes.

Adopted this 4th
day of April, 2022

**BOARD OF COUNTY COMMISSIONERS
ALLEN COUNTY, OHIO**




Beth Seibert



Cory Noonan



Brian Winegardner



Brittany N. Woods
Assistant Clerk of the Board

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204 North Main St. P.O. Box 1243 Lima, Ohio 45802-1243 . 419-228-3700 Ext 8725 . www.allencountyohio.com

June 30, 2021

Ohio Power Siting Board
180 E. Broad Street
Columbus, OH 43215

Re: Comment on Birch Solar 1 Pending Case Number 20-1605-EL-BGN

Dear Ohio Power Siting Board:

Imagine that you just walked out of your beautiful home, situated in the country, on a property of your dreams that you invested a significant amount of your hard earned dollars, surrounded by fields, farms, woods and wildlife. You come to the end of your driveway, look out over the fields, reach into your mailbox and receive a letter that states a solar project by Birch Solar 1 will encompass approximately 2,345 acres of land, with the area needed for Project infrastructure including solar modules, trackers, inverters, internal access roads, and a Project substation totaling approximately 1,410 acres.

Up until information was released on this proposed solar project, 217 rural family homes, surrounded by fields, farms, woods, and wildlife were primarily concerned with when the surrounding fields may be harvested or when manure may be applied. This is a densely populated area that attracts families who want to live in a rural, agricultural setting and see strong home values, one of the highest valued communities within Allen County. Residents of this area have told the Board of Allen County Commissioners that they reject 1,410 acres of solar panels, as being marketed to them as continued agricultural on the basis that pollinators will be planted and sheep may be grazing.

To put the expansive footprint of this proposed project in perspective, two examples are offered:

- The *Walt Disney World Resort* (Florida) is made up of 47 square miles of land.... or about 30,000 acres. Only about 1,100 acres of that land is devoted to the 4 theme parks.
Source - <https://www.wdwradio.com/2005/02/wdw-history-101>
- The Ohio State University, Columbus Campus covers 1,674 total acres (Autumn 2020)
Source - https://www.osu.edu/osutoday/stuinfo.php/historical_osu_statistical_summary

Of the many issues residents have expressed to our office, the Board of Allen County Commissioners would like to provide eight specific concerns regarding the pending Birch Solar 1 project. There are 1,278 residences, 4 schools and 6 churches within one mile of the project area. Over the last six plus months, we have viewed or listened to presentations, received emails, phone calls and met personally with many residents who have shared numerous questions and concerns regarding the Birch Solar Project. To our constituents who shared questions and concerns, we committed to review Lightsource BP's application once submitted to the OPSB. Through that review and our study of many sources of information, the following represent eight of the concerns explicitly outlined by our local constituents:

1. The energy from this project is not available for local development, as it has been sold to an out-of-state entity.

The energy produced from this large project is not benefitting local economic growth and development. One understands that most energy projects that come before the OPSB, first and foremost, tout the increase of energy resources to support local development. It is important to point out that this \$330 million investment is by a company, Lightsource BP, that is NOT a local business and that the recipient of all the power generated is located in New Jersey. Therefore, the electricity provided by this project will be sold to the grid and outsourced from our area, thus not supporting current nor future economic development.

2. Local zoning regulations and the Shawnee Township Comprehensive Plan were deemed irrelevant to the process, which is unacceptable considering the 1,410 acre footprint of the project.

Lightsource BP would like one to believe that the true intent behind the Shawnee Township's Comprehensive Plan is being taken into consideration as:

“The Applicant maintained the agricultural aesthetic of the Project by incorporating cedar farm fencing and allowed for grazing within the Project to further the increase the agricultural use of the Facility area. The life of the Project corresponds with the long-term goals of the Comprehensive Plan, maintaining long-term agricultural use rather than industrial or residential zoning.” (Page 72)

Residents of Shawnee Township view this as an assault on the township's zoning regulations and their comprehensive plan that these land management rules have been bypassed and that once the solar panels go up, 1.62 square miles in Allen County will no longer be classified as agricultural, but as commercial/utility.

3. The timing of 2021 property sexennial full valuation updates could unfairly be used to the advantage of the Birch Solar 1 project, as increases in property values would incorrectly have the appearance to have occurred after the project start.

One of the top concerns expressed is to what effect this proposed project will have on the value of the 1,278 residences within a mile and the 217 homes in close vicinity. During LightsourceBP public meeting on November 23, 2020, when addressing concerns about property values, Ms. Shanelle Montana stated “each location is different.” The property owners near the proposed project have serious concerns as to the negative effects the proposal will have on their land values. In an October, 30, 2020 Carolina Journal publication, “Are Counties Taking the Lead in Solar Plant Pushback” it is explained,

“Property owners have seen their land values drop when a solar plant is installed adjacent to their land.”

The only assurance the landowners surrounding the proposed project receive from the Birch Solar is that:

“Additionally, the proposed Project will not significantly impact schools, housing, and transportation...” (Page 73)

Property values are primarily set using sales from similar properties. Like most rural settings in northwest Ohio over the last couple of years, the area of the proposed project has been highly

desired for families. Homes receive an updated valuation based on sales every three years and for Allen County, the sexennial full valuation will occur during this tax year (2021) to be paid in 2022. While the "Home Value Agreement" offered for homes in closest proximity of the project has not been reviewed, there are concerns as to what may be offered. As explained, the desire to live in this rural setting undoubtedly has an increased effect on the values of the properties. It is estimated the average home value for residences within Allen County will increase. The average increase for tax year 2021Pay2022 for residences within this project area are likely to be significantly higher than the average within Allen County. The real concern is that property owners may not be truly informed as to the current value of their homes, as the state will not release those approved increased rates until later in the summer of 2021. If owners are asked to sign the contracts prior to receiving their new values from the County Auditor, they will not be fully informed in their assent and the consequences of that assent.

4. The decommissioning plan is inadequate and needs to be bonded based on the number of modules and disposal.

It is estimated that approximately 635,584 modules will be utilized to generate the 300-MW nameplate capacity Project during its 30 plus years. In the Deseret News article "The Dark Side of 'Green Energy' and its Threat to the Nations Environment" it is explained that there are long term consequences of how to dispose of solar systems. The current growth of solar waste already straining recycling and disposal capabilities with some ending up in municipal landfills and stocking up in warehouses. In said article, a Solid Waste Manager for the Utah Department of Environmental Quality explained that he "is hopeful that research being done by the US Department of Energy and US Environmental Protection Agency will provide an environmentally safe pathway for proper disposal." He further states, "The capacity issue is one we hope is answered before the need arrives." For the health and safety of Allen County residents, it is imperative that we have an answer to this important question before our community is inundated with 635,584 modules.

The applicant states that it is "committed to recycling all solar panels from the Project, which includes any panels damaged during construction, operations, and all panels at the end of life/decommissioning," they also explain that their panels "have passed TCLP testing to ensure the modules are categorized as non-hazardous under federal law and could be disposed of in regular landfills just like household garbage." (Page 42). After reading the above referenced article, this is not the assurance our community is seeking.

Just as much of this application is looking into a crystal ball and our community being asked to trust an entity for over 30 years, there is great concern with the decommissioning plan outlined in the application:

"Decommissioning costs for the Project, based on the final site design and selected equipment, will be recalculated prior to commencing construction. If the decommissioning costs exceeds the salvage value of the solar components and therefore, the Net Decommissioning Cost is a positive value, then the Applicant will post decommissioning funds in the form of a performance bond." (Page 32)

Just as the aforementioned Solid Waste Manager for the Utah Department of Environmental Quality is "hopeful that research being done by the US Department of Energy and US Environmental Protection Agency will provide an environmentally safe pathway for proper disposal" it seems unrealistic to trust a number placed on projected salvage cost. For our community, it seems more appropriate for a performance bond in the amount of the total

estimated cost of decommissioning to be held by a third party. The salvage cost would be available to cover any additional cost above the bonded amount for the cost of decommissioning decades down the road. Any salvage funds remaining after FULL decommissioning of the site would be available for the Applicant.

5. Annual drinking water assessment of private wells needs to be provided to the 338 homes surrounding the project due to serious concerns about groundwater impacts.

Our community has serious concerns over groundwater as a nonrenewable natural resource that supplies drinking water to the entire project area through private wells.

“Because the Project is not expected to require excavation for construction, the posts for the trackers will only be installed to a depth of approximately 7.5 feet, it is not expected that groundwater resources will be impacted.” (Page 49)

This is in conflict with the findings found a few pages back in the application:

“Groundwater was observed in 14 geotechnical soil test borings and two of ten test pit explorations conducted by Kleinfelder as part of the geotechnical investigations for the Project. The depth of the groundwater was approximately 3.5 to 18 feet below ground surface.” (Page 39)

Further, the USDA, Soil Survey for Allen County, Ohio identifies the seasonal high water table for the predominant soils map units over the entire project area to be at 0-12 inches.

With the 338 water wells and three drinking water source protection areas located within a one-mile radius of the Project area (page 50 of the application), it is imperative for Lightsource BP to work with the OEPA’s Division of Drinking and Groundwater to identify measures to be implemented to protect our groundwater. Locally, it has been discussed that an annual assessment of heavy metals should be conducted for each of these wells over the life of the project. A plan should further prompt specific actions based on any results with levels of concern.

Lightsource BP does not have to look far to find an accredited drinking water testing facility. Located in Allen County, *Alloway is a full-service environmental laboratory specializing in analyses on drinking water, wastewater, and solid and hazardous waste. Alloway has more than 30 years of experience as being the resource for defensible data (www.alloway.com).*

6. A road use and maintenance agreement is not defined in the OPSB application and does not exist between the applicant and Allen County, Ohio as of the date of this letter.

On March 9, 2021 which was after the application was submitted to the OPSB, Lightsource BP representative Shanelle Montana reported in a virtual meeting conducted by the Auglaize County Commissioners that a “baseline road agreement has not been delved into yet, but will be in place before construction”. On April 13, 2021 the Allen County Engineer, Brion Rhodes reported to the Allen County Commissioners that no such agreement is yet being worked on between his office and Lightsource BP. Based on his research of the topic, the Allen County Engineer is inclined to require a RUMA (Road Use Maintenance Agreement) and bonding during construction and through disassembly. Typical concerns are not overweight trucks, but rather the number of loaded trucks damaging the local roads. He is working on a draft RUMA, which will specify the routes to which the companies plan to use and requires the developer to maintain them in their current state. This RUMA will specify how this is to be done through

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bonding both during construction and through disassembly. The pressures placed on this County and Township infrastructure by the Birch Solar 1 project will be repeated at the end of the project life and should be addressed at the project start. And the OPSB application consideration should not omit this important agreement.

7. **Existing drainage issues to be exacerbated with the addition of solar panels.** The County Engineer is concerned with the impacts this project will have to our local drainage systems and our petition projects under maintenance. Since we currently experience areas of flash flooding during bigger rain events, the County Engineer is concerned that the installation of 635,584 panels (1,410 acres) and 22.46 miles of service roads will create additional hard surface runoff, more concentrated flows and exacerbate any existing flooding, erosion and water quality issues. At this point, there has not been enough information presented to address these concerns.
8. **Alternative Energy Tax Exemption (Preferential Tax Treatment)**

There are concerns with how Lightsource BP mislead the public at their November 18, 2020 public information meeting regarding the status of a PILOT request. During the meeting, Ms. Montana stated that the "PILOT is still being discussed and negotiated." At the time of the above mentioned meeting, the only information received by Allen County from Lightsource BP was that the company would be applying for a PILOT and a general table that showed the company's prepared breakdown of how \$81 Million would be distributed. This misleading statement is very concerning as the county had not been and to this day, have not negotiated a PILOT agreement with Lightsource BP. After the November 18th statement made by Ms. Montana, the county had to answer questions regarding the integrity of the Allen County Board of Commissioners. For example, a November 19th email from a constituent opens with:

"I am a bit confused and hoping you can provide clarity as comments which were made last night by Lightsource BP seem to be in direct conflict from the messaging you have been relaying to the public and in private correspondence with constituents.

Last night, Shanelle Montana stated that Lightsource BP (or Birch Solar 1, LLC) is in current negotiations with county commissioners regarding a PILOT agreement for this specific project (to paraphrase her, yes, we are 100% in negotiations with county commissioners). Publicly, I understood each of your positions to be that you were waiting until an official application was made to the OSPB and then begin evaluating this project to reach a position either in favor or in opposition.

It appears that one of the two parties involved are being less than truthful and I am hoping you can help me better understand who."

Contained on page 28 of the application it is expressly stated:

"The Applicant anticipates entering into a PILOT in Allen and Auglaize Counties..."

Anticipate is defined as: regard as probable; expected or predicted.

Questions have arisen regarding the tactics being used by LightsourceBP as they seem to be in conflict with their stated approach on page viii of the application's Executive Summary.

“Birch Solar’s approach is to work with the local community and neighbors to ensure that it develops and constructs the Project as a good neighbor and long-term member of the local community.”

We understand that the authority regarding the issuance of a permit resides with the Ohio Power Siting Board. We would request that the Ohio Power Siting Board considers these concerns expressed by constituents in your review of the application for the Birch Solar 1 project. We believe that if these concerns are not properly addressed prior to the permitting of the project by Ohio Power Siting Board, they will never be addressed to the satisfaction of Allen County.

Respectfully Submitted,

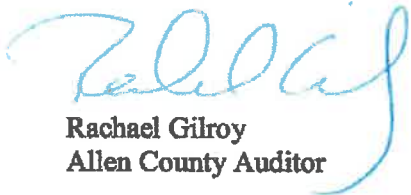


Beth Seibert
Allen County Commissioner



Brian Winegardner
Allen County Commissioner


Cory Noonan
Allen County Commissioner



Rachael Gilroy
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Krista Bohn
Allen County Treasurer



Brion Rhodes
Allen County Engineer



**This foregoing document was electronically filed with the Public Utilities
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in

Case No(s). 20-1605-EL-BGN

Summary: Public Comment of Allen County Elected Officials, via website,
electronically filed by Docketing Staff on behalf of Docketing