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November 7, 2024

Planning Commission of Norman, Oklahoma
c/o Planning and Community Development Department
P.O. Box 370
225 N. Webster Ave.
Norman, OK 73069
Lora.Hoggatt@normanok.gov

RE: Western Farmers Electric Cooperative Special Use Permit Application;
Responses to Protestor Concerns

To whom it may concern:

My name is Joe Krodel, and I represent Western Farmers Electric Cooperative (“WFEC”) with regard to their application for a Special Use Permit to operate an electric substation near the intersection of 72nd Ave. SE and Etowah Road.

At the pre-development meeting, surrounding landowners and a legal representative of one of those landowners raised concerns regarding this project and its potential impact on their surrounding properties. Some concerns were addressed, some were deferred to later so that more information could be gathered. In order to fully address all surrounding landowner concerns, I requested that the legal representative, Mr. Shawn Fulkerson, provide me with the list of questions he was referring to when addressing WFEC so that I can fully answer their questions and address their concerns. He was agreeable at pre-development, but after numerous contact attempts, our requests for those questions have been ignored. Further, to fully address neighboring property owner concerns, WFEC offered to make itself available a second time for an in-person meeting to be scheduled through counsel for those landowners. Because all contact has been ignored, that second meeting has yet to be scheduled and will unlikely occur.

While this may not address every concern or question raised at pre-development, I believe it captures the most pressing issues that were left unanswered.

The surrounding landowners asked whether this project is compliant with FERC and other federal regulations. WFEC is required to comply with FERC, NERC, and any other federal regulations on public electric utilities. Further, compliance with all FERC and NERC regulations is a condition of receiving funding from the Rural Utilities Service (RUS) used to make this project possible. This substation project is in compliance with all applicable regulations.

Concerns were raised regarding stormwater runoff, particularly by Mr. King, the neighboring landowner directly north of WFEC's property. WFEC has studied this issue and, as with all substation projects, has included stormwater runoff diversion tactics in their site plan. The interior surface of the substation will be gravel, providing a permeable surface to absorb storm and rainwater to minimize the potential for runoff. On the perimeter of the substation, vegetation will be left in place as a buffer between the substation and neighbors (both are acceptable Best Management Practices (BMPs) under the Stormwater Construction General Permit (OKR10)).

Some surrounding landowners expressed health concerns regarding the proximity to a substation to their homes. These claims, while common, have been studied and are unfounded. Living near a substation like the one proposed by WFEC poses no known health risk. Further concerns regarding noise at this site are also unfounded. This electric substation will produce extremely minimal noise, most of which may come from small fans. However, the substation components itself will not produce any noticeable amount of noise. Protestors are encouraged to observe the numerous other WFEC substations in Norman for an idea of what they sound like (nothing). WFEC currently has at least four substations within city limits (Acme, West Norman, Liddell, and Franklin). At least two of which are in highly residential areas.

Some concerns about "high capacity" power lines were raised as well. The existing lines running through the proposed site, located between the proposed substation and the neighboring property owner to the north's boundary, are the lines that will tie into this substation. No plans for additional lines of any higher capacity are in place for this substation. Additional lines of the same capacity and character of those that already exist may be added. However, the multiple concerns regarding "high capacity" lines at this site are unfounded. There are currently 69 and 138 kv transmission lines serving the four substations identified above (OU-Franklin, Canadian-Paoli, Canadian-Franklin) located in Norman, OK. Additionally, the City of Norman recently approved a project for a 345 kv project within the City of Norman, which is a much higher voltage than the existing lines that will tie into this substation.

Page 3
Planning Commission of Norman, Oklahoma
November 7, 2024

WFEC is taking the concerns of surrounding landowners seriously and wants to make sure they will be a good neighbor. Accordingly, WFEC looks forward to addressing you at the Planning Commission Meeting on November 14, 2024, and discussing this project.

Respectfully,

A handwritten signature in black ink that reads "Joe Krodel". The signature is written in a cursive style with a large initial "J" and "K".

Joseph P. Krodel
For the Firm

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