

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of NRG Ohio)	
Pipeline Company, LLC, for a Letter of)	
Notification to Construct, Own, and Operate)	Case No. 14-1717-GA-BLN
a Natural Gas Pipeline to be Located in Lorain)	
County, Ohio)	

**LORAIN COUNTY PROPERTY OWNERS' RESPONSE
TO NRG OHIO PIPELINE COMPANY'S REPLY MEMO**

I. The Property Owners' Response

The Property Owners¹ appreciate NRG's stated "continued commitment to working with [them]."² The Property Owners also agree with NRG's position that this proceeding is separate from and should not be conflated with the possible eminent domain actions that might be brought against the Property Owners.³ Consistent with that, the Property Owners would have preferred that NRG's counsel in these proceedings had not seen fit to raise issues concerning the eminent domain action in its Reply. Suffice it to say, NRG's counsel's statements concerning events related to those negotiations are inaccurate, likely due to NRG's counsel having not been a party to or participant in those negotiations.

¹ The Lorain County Property Owners that are a part of this intervention are: Lawrence R. Plas; Mary B. Miller; Richard & Carol Petersen; Richard & Ellen Braatz; Thomas & Johanna Julius; Louis & Gale Betzel; Fathers of St. Joseph Church; and K. Hovnanian Oster Homes, LLC. Since these property owners have substantially similar interests as described in Rule 4906-7-04(D)(2), and in the interest of judicial economy, these property owners have respectfully submitted their petition for collective intervention in this proceeding.

² Reply at 1.

³ Reply at 2.

II. Conclusion

In light of the fact that NRG does not oppose the Property Owners' intervention and NRG's continued commitment to working with the Property Owners, undersigned counsel respectfully requests that the Property Owners' Petition to Intervene be granted, and that a meeting with all interested parties and the Board be set at the earliest convenience of the Board.

Respectfully submitted,

/s/ Michael Braunstein

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing *Response* has been filed with the Public Utilities Commission of Ohio and has been served upon the following parties via electronic mail this 29th day of January 2015.

/s/ Michael Braunstein

Michael Braunstein (0060898)

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/29/2015 4:50:38 PM

in

Case No(s). 14-1717-GA-BLN

Summary: Reply OF LORAIN COUNTY PROPERTY OWNERS TO NRG OHIO PIPELINE COMPANY'S REPLY MEMO electronically filed by Mr. MICHAEL BRAUNSTEIN on behalf of Betzel, Louis & Gale and Borling, Charles & David and Braatz, Richard & Ellen and Carter, Edmund & Angie and Conlin, Gary & Kathleen and Dennis, Samuel and Julius, Thomas & Johanna and K. Hovnanian Oster Homes LLC and Kurianowicz, Edward and Llado, Carlos & Sonia and Miller, Mary B. and Parker, Wesley A. and Petersen, Richard & Carol and Plas, James A. and Plas, Lawrence R. and Fathers of St. Joseph and Thorne, Brandon & Mary and Unger, Stephanie K. and Vajda, Sheryl L.