

- “Third, as indicated on page 43 of South Field’s Application, the “... switching Switchyard will be developed and constructed by SFE in cooperation with First Energy [sic]; it is anticipated that ownership and operation of the switchyard will be transferred to First Energy[sic] upon completion and testing.”

The Petitioner concludes that it “seeks leave to intervene in these proceedings so that it may have input with respect to the location of, access to, and construction of the [Interconnection Facilities], as well as any conditions the Board may impose with respect to constructing, routing, laying out the switching substation.”²

SFE does not object to Petitioner’s participation in this proceeding, but requests that the Board limit that participation to only the pertinent issues raised in Petitioner’s motion. The Board may grant limited participation under Rule 4906-2-12(D)(1). Here, the Petitioner has no real and substantial interest beyond its ownership, operation, and safety of its existing ATSI 345kV transmission circuit. Petitioner has no direct interest outside of the proposed interconnect at the switchyard, and the Board should not allow Petitioner to intervene on unrelated aspects of the Interconnection Facilities including the design and routing of the transmission line.

Petitioner’s participation in this proceeding, therefore, should be limited to only its pertinent interests in its existing 345 kV transmission circuit and the compatibility of the switchyard layout with Petitioner’s existing facilities. Petitioner should not be allowed to participate on issues unrelated to impacts on its existing 345 kV transmission circuit including

² Petitioner Motion to Intervene at 2.

any issues related to the routing and design of the transmission line that will be part of the Interconnection Facilities.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Settineri", is written over a horizontal line.

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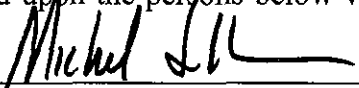
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CERTIFICATE OF SERVICE

The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 3rd day of March 2016.



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