

BEFORE THE OHIO POWER SITING BOARD

			•
In the Matter of the Application of South Field)	\circ	
Energy LLC for a Certificate of Environmental)	0	
Compatibility and Public Need for a 345kV)	Case No. 15-1717-EL-BTX	
Transmission Line in Columbiana County,)		
Ohio)		

SOUTH FIELD ENERGY LLC'S RESPONSE TO ATSI MOTION TO INTERVENE

South Field Energy LLC ("SFE" or "the Applicant") filed an application to construct a 1,105 megawatt natural gas-fired electric generation facility (the "Generation Facility") in Case No. 15-1716-EL-BGN. To deliver this new source of electricity to the transmission grid, SFE intends to construct an approximately three and one-half mile generator lead line, switchyard and related facilities in Madison and Yellow Creek Townships, Columbiana County, Ohio (collectively, the "Interconnection Facilities"). Ultimately, the Interconnection Facilities will interconnect the Generation Facility with the existing American Transmission System, Incorporated ("ATSI") 345kV transmission circuit. The Interconnection Facilities are the subject of this proceeding.

On February 17, 2016, American Transmission Systems, Inc. (a FirstEnergy company referred to as the "Petitioner") filed a motion to intervene in this proceeding. Petitioner claims intervention is warranted because:

- "First, the Project will interconnect with existing ATSI transmission lines."
- "Second, the proposed switching substation will be located adjacent to ATSI's existing 345kV transmission lines."

This is to certify that the images appearing are as accurate and complete reproduction of a complete document delivered in the regular course of the Technician Date Processed MAR 0 3 2016

¹ Petitioner Motion to Intervene at 2.

• "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,

Michael J. Settineri (0073369)

Stephen M. Howard (0022421)

Scott M. Guttman (0086639)

VORYS, SATER, SEYMOUR AND PEASE LLP

52 East Gay Street

P.O. Box 1008

Columbus, Ohio 43216-1008

(614) 464-5462

(614) 719-5146 (fax)

misettineri@vorys.com

smhoward@vorys.com

smguttman@vorys.com

Attorneys for South Field Energy LLC

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.

Michael J. Settineri

John Jones Assistant Attorney General Public Utilities Section 180 East Broad St., 6th Floor Columbus, Ohio 43215-3793 john.jones@puc.state.oh.us

Robert J. Schmidt
L. Bradford Hughes
PORTER WRIGHT
MORRIS & ARTHUR, LLP
41 South High Street
Columbus, Ohio 43215
rschmidt@porterwright.com
bhughes@porterwright.com

Attorneys for American Transmission Systems, Incorporated