

**BEFORE THE OHIO POWER SITING BOARD**

<b>In the Matter of the Application of</b>	)	
<b>South Field Energy LLC for a</b>	)	
<b>Certificate of Environmental</b>	)	
<b>Compatibility and Public Need to</b>	)	<b>Case No. 15-1716-EL-BGN</b>
<b>Construct an Electric Generation</b>	)	
<b>Facility in Columbiana County, Ohio</b>	)	
	)	
<b>In the Matter of the Application of</b>	)	
<b>South Field Energy LLC for a</b>	)	
<b>Certificate of Environmental</b>	)	<b>Case No. 15-1717-EL-BTX</b>
<b>Compatibility and Public Need for a</b>	)	
<b>345kV Transmission Line in</b>	)	
<b>Columbiana County, Ohio</b>	)	

**MOTION TO CONSOLIDATE AND REQUEST FOR EXPEDITED RULING**

Pursuant to Rules 4906-2-27 and 4906-2-28 of the Ohio Administrative Code, South Field Energy LLC moves the Ohio Power Siting Board (the “Board”) to consolidate the two above-captioned cases for purposes of all public hearings, evidentiary hearings and public notices, and for any other reason deemed necessary and helpful by the Board. Good cause exists to grant this motion because the sole purpose of the transmission line project is to interconnect the South Field Energy electric generation facility and the existing FirstEnergy ATSI 345kV transmission circuit. Pursuant to Rule 4906-2-27, South Field Energy LLC also requests an expedited ruling on this Motion. South Field Energy LLC has contacted counsel for Staff, American Transmission Systems, Inc. (“ATSI”) and Ohio Edison (both FirstEnergy companies), Ohio Valley Jobs Alliance and Kenneth Johnson and none oppose issuance of an expedited ruling.

Accordingly, for good cause shown, South Field Energy LLC respectfully requests, that the Board grant its motion, on an expedited basis, to consolidate the two above-captioned cases for purposes of all public hearings, evidentiary hearings and public notices, and for any other reasons the Board views consolidation as being helpful or necessary.

Respectfully submitted,

/s/ Michael J. Settineri

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## **MEMORANDUM IN SUPPORT**

South Field Energy LLC (“SFE” or “the Applicant”) filed an application to construct a state-of-the-art natural gas-fired combined-cycle electric generation facility in Yellow Creek Township, Columbiana County, Ohio (the “Generation Facility”). The Generation Facility, docketed at Case No. 15-1716-EL-BGN, will have a nominal net output of 1,105 megawatts. In addition to the Generation Facility application, SFE filed an application for an approximately three and one-half mile generator lead line and related facilities in Madison and Yellow Creek Townships, Columbiana County, Ohio (the “Transmission Line”). The Transmission Line is docketed at Case No. 15-1717-EL-BTX. The Applicant is constructing the Transmission Line to connect the Generation Facility to the existing ATSI 345kV transmission circuit.

These two projects are interrelated – the Transmission Line’s single function will be to transmit electricity generated by the Generation Facility to the transmission grid. Consolidation of these matters promotes efficiency, conserves the Board’s resources, and permits the public to participate in a single proceeding related to the entire project instead of participating in two separate hearings. Consolidation will also avoid separate evidentiary hearings, separate landowner mailings and multiple, separate public notices. In sum, consolidation of these related projects reduces the resources expended by all parties; ensures consistency in evidentiary rulings, timing, and decisions issued by the Board on the two certificates; and avoids any public confusion resulting from separate hearings.

Given the upcoming required public notice, South Field Energy also requests an expedited ruling on this motion pursuant to Ohio Administrative Code Rule 4906-2-27(C). An expedited ruling will allow consolidation to occur prior to Applicant’s required public notices and hearing. Counsel for Staff, American Transmission Systems, Inc. and Ohio Edison, Ohio

Valley Jobs Alliance and Kenneth Johnson have been contacted regarding the request for expedited treatment of the motion and do not object to an expedited ruling. Accordingly, for good cause shown, South Field Energy respectfully requests, pursuant to Rule 4906-2-27 that the Board grant this motion to consolidate the two above-captioned cases for purposes of all public hearings, evidentiary hearings and public notices, and for any other reasons the Board views consolidation as being helpful or necessary.

Respectfully submitted,

/s/ Michael J. Settineri

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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 24<sup>th</sup> day of March 2016.

/s/ Stephen M. Howard

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Summary: Motion Motion to Consolidate and Request for Expedited Ruling electronically filed by Mr. Michael J. Settineri on behalf of South Field Energy LLC