

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Application of	)	
Generation Pipeline LLC for a Letter	)	
of Notification for Two Route Shifts of	)	Case No. 16-1095-GA-BLN
the Oregon Lateral Pipeline in	)	
Wood County, Ohio per Condition 27	)	
of the Certificate Previously Issued in	)	
Case No. 14-1754-GA-BLN.	)	

**MOTION FOR EXPEDITED PROCESSING OF AN ACCELERATED  
CERTIFICATE APPLICATION AND REQUEST FOR IMMEDIATE  
REVIEW OF THE LETTER OF NOTIFICATION**

Pursuant to Rule 4906-6-04 of the Ohio Administrative Code, Generation Pipeline LLC (“Generation Pipeline”) respectfully requests that the Ohio Power Siting Board (“the Board”) grant expedited processing of this accelerated certificate application and approval within twenty-one days or sooner and to commence an immediate review of the Letter of Notification Application submitted in the above-captioned proceeding without observing the five day waiting period of Rule 4906-6-03(A) of the Ohio Administrative Code. Good cause exists for both requests and is set forth in the accompanying memorandum in support.

WHEREFORE, Generation Pipeline LLC respectfully requests that the Board grant expedited processing and approval for the Letter of Notification Application and that it proceed with an immediate review of the Letter of Notification Application.

Respectfully submitted,

s/ Michael J. Settineri

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Attorneys for Generation Pipeline LLC

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**MEMORANDUM IN SUPPORT**

Through this motion, Generation Pipeline LLC (“Generation Pipeline”) respectfully requests that the Board grant expedited processing of the accelerated certificate application submitted in this proceeding (the “Letter of Notification Application”) and approve it within twenty-one days or sooner, and commence an immediate review of the Letter of Notification Application without observing the five day waiting period of Rule 49096-6-03(A) of the Ohio Administrative Code. Good cause for this immediate review is warranted because construction is underway for the project and Generation Pipeline intends to commence construction of the pipeline shifts immediately upon approval of the Letter of Notification Application.

The Oregon Lateral will be approximately twenty-two miles in total length and will provide natural gas from two different sources in Maumee for the operation of the Oregon Clean Energy Center (“OCEC”) in Oregon, Ohio. Construction of the pipeline is currently underway. Recently, during negotiations, certain landowners requested shifts in the pipeline route to allow for future use of their properties. Generation Pipeline seeks to accommodate those requests through the Letter of Notification Application that is the subject of this proceeding.

Both route modifications are within Wood County. The first routing modification is identified as the “Henry Re-Route”, which will add approximately 1,258 feet to the original

project length. The second routing modification is identified as the “Hirzel Re-Route” and will add approximately 386 feet to the length of the original project.

To expedite the approval of the route modifications and support construction of the pipeline, Generation Pipeline is filing for an expedited review of the Letter of Notification Application. Although Generation Pipeline has not provided Staff with written 5-day advance notice as required by Rule 49096-6-03(A) of the Ohio Administrative Code, Rule 4906-6-03(C) allows an applicant to request a shorter automatic approval date than the twenty-eight day requirement for an expedited processing of the application. Given the current construction schedule and need to avoid unnecessary costs and/or delays, Generation Pipeline seeks a shorter automatic approval date of no more than 21 days from the date of filing the Letter of Notification Application.

To support this approval timeframe, Generation Pipeline also seeks a waiver, as necessary, from the 5-day advance notice requirement. Generation Pipeline has had multiple discussions with the Board’s Staff regarding the proposed route modifications. These discussions, which included a review of the proposed route modifications, should assist Staff in the expedited processing review and avoid the need for a 5-day wait until expedited processing of the application can begin.

Accordingly, Generation Pipeline submits that the foregoing facts and information constitute good cause for granting the request to expeditiously process and approve the Letter of Notification Application within 21 days of its filing or sooner, and that good cause exists for the Board’s Staff to commence immediate review of the Letter of Notification Application. As always, Generation Pipeline will remain available to quickly answer any questions the Board’s Staff has during its review.

WHEREFORE, Generation Pipeline LLC respectfully requests that the Board or the Administrative Law Judge grant Generation Pipeline's request and expeditiously process and approve the Letter of Notification Application within twenty-one days of its filing or sooner and that the Board's Staff commence immediate review of the Letter of Notification Application.

Respectfully submitted,

s/ Michael J. Settineri

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Summary: Motion for Expedited Processing and Request for Immediate Review electronically filed by Mr. Michael J. Settineri on behalf of Generation Pipeline LLC