

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Clean Energy)	
Future-Oregon, LLC for a Certificate of)	
Environmental Compatibility and Public Need for an)	Case No. 17-530-EL-BGN
Electric Generating Facility, Oregon Energy Center, in)	
Lucas County, Ohio)	

REPLY TO MOTION TO INTERVENE

Pursuant to Ohio Administrative Code (“OAC”) Rule 4906-7-12(B)(1), Clean Energy Future-Oregon LLC (“CEF-O”) respectfully submits a reply to the Ohio Power Siting Board (“Board”) in response to the Motion to Intervene of Oregon Clean Energy, LLC (“OCE”) filed on July 24, 2017.

OCE developed and constructed the Oregon Clean Energy Center, a 940 MW natural gas combined cycle power plant located in the City of Oregon, Ohio. As of July 1, 2017, this facility is now commercially operational. As stated by OCE in its motion to intervene, the Oregon Clean Energy Center is located on a 30-acre tract immediately adjacent to property upon which CEF-O proposes to construct its new facility, known as the Oregon Energy Center.

CEF-O does not oppose OCE’s intervention in this proceeding. CEF-O intends to work collaboratively and cooperatively with OCE to resolve any issues that arise. Importantly, the same individuals who are developing the CEF-O facility are the same owners who originally developed the Oregon Clean Energy Center. In fact, the owners of CEF-O retain a minority ownership stake in OCE. When developing the OCE facility, care and attention was exercised to not have a future CEF-O facility interfere with the OCE facility because the owners of CEF-O

also have a direct vested ownership interest in OCE's long term success. However, while both projects are neighbors, they remain independent of one another.

For all the foregoing reasons, CEF-O has no objection to intervention by OCE and reiterates its commitment to work with OCE in this process.

Respectfully submitted on behalf of
CLEAN ENERGY FUTURE-OREGON LLC



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Reply to Motion to Intervene has been served upon the following parties listed below by electronic mail, this 8th day of August 2017.



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Summary: Reply of Clean Energy Future-Oregon LLC to Motion to Intervene electronically
filed by Teresa Orahod on behalf of Sally W. Bloomfield