

**BEFORE
THE OHIO POWER SITTING BOARD**

In the Matter of the Application	*	
of Republic Wind, LLC, for a		
Certificate to Site Wind-Powered	*	Case No. 17-2295-EL-BGN
Electric Generation Facilities in		
Seneca and Sandusky Counties	*	

**MEMORANDUM IN SUPPORT OF
PREVIOUSLY FILED MOTION TO INTERVENE**

I. York Township has a real and substantial interest in this matter that is not adequately represented by existing parties.

York Township, Sandusky County, Ohio comprises of the area in which part of the 58-turbine wind powered electric generation facility is to be constructed. York Township has a real and substantial interest in providing for orderly development within their township to provide for a harmonious atmosphere for its constituents. York Township's interest is not and cannot be represented by another party existing or otherwise because York Township presents a unique geographical area with an interest that is divergent.

II. York Township's involvement will contribute to a just and expeditious resolution of the issues and will not unduly delay the proceedings.

York Township, Sandusky County, Ohio does not seek to duly delay the proceedings by arguing conclusions of other parties but merely seeks to present those arguments that are unique to York Township.

III. Conclusion

For the foregoing reasons, York Township of Sandusky County requests that its motion to intervene be granted and that it be made a full party of the record.

Respectfully submitted,

/s/ Mark E. Mulligan
Mark E. Mulligan (0024891)
Assistant Sandusky County Prosecutor
100 N. Park Avenue, Suite 220
Fremont, Ohio 43420
(419) 334-6222
(419) 334-6232- Fax
Attorney for Petitioner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served on the following this 14th day of August, 2018 pursuant to OAC 4901-1-05 by regular U.S. mail on:

Republic Wind, LLC
300 S. Wacker Dr., Suite 1500
Chicago, IL 60606

And the PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

John F. Stock
Benesch Friedlander Coplan & Aronoff LLP
41 S. High St., Suite 2600
Columbus, OH 43215

Teresa Orahood
Bricker and Eckler
100 S. Third St.
Columbus, OH 43215

Devin D. Parram
Bricker and Eckler
100 S. Third St.
Columbus, Ohio 43215

Docketing Staff
Docketing
180 E. Broad St., 11th Floor
Columbus, OH 43215

/s/ Mark E. Mulligan
Mark E. Mulligan (0024891)
Assistant Sandusky County Prosecutor

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Case No(s). 17-2295-EL-BGN

Summary: Memorandum Memorandum in Support of Previously Filed Motion to Intervene electronically filed by Mr. Mark Mulligan on behalf of York Township, Sandusky County, Ohio