

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Icebreaker)
Windpower Inc., for a Certificate to Construct a) Case No: 16-1871-EL-BGN
Wind-Powered Electric Generation Facility in)
Cuyahoga County, Ohio.)

**ICEBREAKER WINDPOWER INC.'S
MOTION FOR AN EXTENSION OF TIME TO FILE A STIPULATION
AND REQUEST FOR EXPEDITED RULING**

Pursuant to Ohio Administrative Code (“O.A.C.”) Rules 4906-2-07 and 4906-2-27, Icebreaker Windpower Inc. (“Applicant” or “Icebreaker”) respectfully moves the Ohio Power Siting Board (“Board”) or its Administrative Law Judge (“ALJ”) for an extension of time from August 24, 2018, to August 31, 2018, to file a stipulation in this case.

The Applicant has consulted with counsel for the OPSB Staff, as well as all of the parties to this case and no party has stated that they oppose this motion.

Therefore, the Applicant submits that, for the reasons more fully set forth in the following memorandum in support, good cause exists to grant this motion on an expedited basis, in accordance with O.A.C. Rule 4906-2-27(C).

Respectfully submitted,

/s/ Christine M.T. Pirik

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MEMORANDUM IN SUPPORT

On February 1, 2017, as supplemented, Icebreaker filed an application for a certificate of environmental compatibility and public need for the Icebreaker Project to be located in Lake Erie eight miles off the shore of Cleveland, Ohio in Cuyahoga County.

On August 1, 2018, the ALJ issued an entry setting forth the procedural schedule in this case, which, among other things, established August 17, 2018, as the date that any stipulation and recommendation should be filed in this matter. On August 17, 2018, the ALJ granted the Applicant's motion for an extension of time, until August 24, 2018, to file any stipulation or recommendation.

The parties in this case have met several times to discuss possible settlement of the issues in this matter and have shared several proposals, the most recent proposal for consideration was shared the afternoon of August 23, 2018.

Therefore, in light of the fact that any stipulation to be filed in this matter is due Friday, August 24, 2018, and the parties need additional time to consider and discuss potential settlement options, the Applicant is filing this request for an extension of time. Specifically, the Applicant requests that the Board or ALJ grant an extension of time until August 31, 2018, for the filing of any stipulation and recommendation in this matter. All other deadlines established in the ALJ's August 1, 2018 entry would remain unchanged by this request.

Given the short time frame before any stipulation is currently due, Icebreaker requests that this motion be granted on an expedited basis for good cause shown.

Respectfully submitted,

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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 copy of the foregoing document is also being served upon the persons listed below via electronic mail this 24th day of August, 2018.

/s/ Christine M.T. Pirik

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Summary: Motion for an Extension of Time to File a Stipulation and Request for Expedited Ruling electronically filed by Christine M.T. Pirik on behalf of Icebreaker Windpower Inc.