#### BEFORE THE OHIO POWER SITING BOARD

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

# NOTICE OF INTERVENTION AS A PARTY OF THE BOARD OF COUNTY COMMISSIONERS OF SENECA COUNTY, OHIO

The Board of County Commissioners of Seneca County, Ohio was served with the Amended Application of Republic Wind, LLC for a Certificate of Environmental Compatibility and Public Need to site wind-powered generation facilities in Seneca and Sandusky Counties, Ohio. Pursuant to Ohio Revised Code Section 4906.08 and Ohio Administrative Code Rule 4906-2-12, the Board of County Commissioners of Seneca County, Ohio, files notice of its intervention and states as follows:

- 1. The Board of County Commissioners of Seneca County, Ohio is the duly elected body authorized to act for Seneca County and has taken the required action to intervene, as certified by the attached resolution taken from the minutes of the regular meeting of September 4, 2018.
- 2. That the proposed facility, as reflected in the amended application, is to be located at least in part in Seneca County, Ohio.
- 3. The Board of County Commissioners of Seneca County, Ohio intends to intervene because it has extensive interest in the amended proposed project and proceedings as the elected representatives of the citizens of Seneca County, Ohio.
- 4. The interests of the Board of County Commissioners of Seneca County, Ohio, are not and cannot be represented by another party; the Board of County Commissioners of Seneca County, Ohio will contribute to a just and expeditious resolution; and the Board of County Commissioners of Seneca County, Ohio will not unduly delay the proceedings or unjustly prejudice any party.

## Respectfully submitted,

## /s/ Michael J. Settineri

Michael J. Settineri (0073369), Counsel of Record Gretchen L. Petrucci (0046608)

MacDonald W. Taylor (0086959)

Vorys, Sater, Seymour and Pease LLP
52 E. Gay Street
P.O. Box 1008

Columbus, Ohio 43216-1008
614-464-5462
614-719-5146 (fax)

mjsettineri@vorys.com
glpetrucci@vorys.com
mwtaylor@vorys.com

Attorneys for the Board of County Commissioners of Seneca County, Ohio

#### **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 on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) or otherwise via U.S. regular mail on this 25<sup>th</sup> day of January 2019 upon all persons/entities listed below:

Sally W. Bloomfield Dylan Borchers Devin D. Parram Bricker & Eckler LLP 100 South Third Street Columbus, OH 43215 sbloomfield@bricker.com dborchers@bricker.com dparram@bricker.com

John F. Stock
Mark D. Tucker
Benesch Friedlander Coplan & Aronoff LLP
41 S. High St., Suite 2600
Columbus, OH 43215
jstock@beneschlaw.com
mtucker@beneschlaw.com

Mark Mulligan Assistant Sandusky County Prosecutor 100 North Park Avenue, Suite 220 Fremont, Ohio 43420

Jodi Bair
Robert Eubanks
Assistant Attorney General
Public Utilities Section
30 East Broad Street, 16<sup>th</sup> Floor
Columbus, OH 43215
jodi.bairt@ohioattorneygeneral.gov
robert.eubanks@ohioattorneygeneral.gov

Chad A. Endsley
Leah F. Curtis
Amy M. Milam
Ohio Farm Bureau Federation
280 North High Street, P.O. Box 182383
Columbus, OH 43218-2383
cendsley@ofbf.org
lcurtis@ofbf.org
amilam@ofbf.org

Miranda Leppla
Trent Dougherty
Chris Tavenor
Ohio Environmental Council
1145 Chesapeake Avenue, Suite I
Columbus, OH 43212
mleppla@theoec.org
tdougherty@theoec.org
ctavenor@theoec.org

Jack A. Van Kley Van Kley & Walker, LLC 132 Northwoods Blvd., Suite C-1 Columbus, Ohio 43235 jvankley@vankleywalker.com

Christopher A. Walker (0040696) Van Kley & Walker, LLC 137 North Main Street, Suite 316 Dayton, Ohio 45402 <a href="mailto:cwalker@vankleywalker.com">cwalker@vankleywalker.com</a>

/s/ Gretchen L. Petrucci
Gretchen L. Petrucci

This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

1/25/2019 11:33:05 AM

in

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

Summary: Notice of Intervention as a Party electronically filed by Mr. Michael J. Settineri on behalf of Board of County Commissioners of Seneca County, Ohio