

To whom it may concern,

Please review the attached documents in reference to Case No. 18-1024-EL-BGN

Sincerely,  
Timothy J. Brinker  
978 US Hwy 62  
Winchester Ohio 45697

7017 1450 0001 7832 7546

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 OH  
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 3831640922

01/10/2019 (800)275-8777 11:33 AM

Product Description	Sale Qty	Final Price
PM 2-Day Window FR Env (Domestic) (AUSTIN, TX 78702) (Flat Rate) (Expected Delivery Date) (Saturday 01/12/2019) (USPS Tracking #) (9505 5161 6466 9010 0635 71)	1	\$6.70
Insurance (Up to \$50.00 Included)	1	\$0.00
First-Class Mail Letter (Domestic) (COLUMBUS, OH 43215) (Weight: 0 Lb 0.30 Oz) (Estimated Delivery Date) (Saturday 01/12/2019)	1	\$0.50
Certified (USPS Certified Mail #) (70171450000178327500)	1	\$3.45
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Certified (USPS Certified Mail #) (70171450000178327562)	1	\$3.45
First-Class Mail Letter (Domestic) (COLUMBUS, OH 43215) (Weight: 0 Lb 0.30 Oz) (Estimated Delivery Date) (Monday 01/14/2019)	1	\$0.50
Certified (USPS Certified Mail #) (70171450000178327555)	1	\$3.45
First-Class Mail Letter (Domestic) (COLUMBUS, OH 43215) (Weight: 0 Lb 0.30 Oz) (Estimated Delivery Date) (Saturday 01/12/2019)	1	\$0.50
Certified (USPS Certified Mail #) (70171450000178327548)	1	\$3.45
First-Class Mail Letter (Domestic) (COLUMBUS, OH 43215) (Weight: 0 Lb 0.30 Oz) (Estimated Delivery Date) (Saturday 01/12/2019)	1	\$0.50
Certified (USPS Certified Mail #) (70171450000178327531)	1	\$3.45
First-Class Mail Letter (Domestic) (COLUMBUS, OH 43215) (Weight: 0 Lb 0.30 Oz) (Estimated Delivery Date) (Saturday 01/12/2019)	1	\$0.50
Certified (USPS Certified Mail #) (70171450000178327524)	1	\$3.45



**BEFORE THE OHIO POWER SITTING BOARD on February 5, 2019**

**In the Matter of the Application of Willowbrook Solar I, LLC for a certificate of environmental compatibility and Public need.**

**Case No. 18-1024-EL-BGN**

**Memorandum Contra response to the Memorandum Contra of Willowbrook Solar 1, LLC to the petition to intervene of Timothy J. Brinker by Mr. MacDonald W. Taylor dated January 30, 2019.**

- I. INTRODUCTION: Mr. Taylor's Memorandum Contra Dated January 30, 2019 fails to present all of the facts of my petition to intervene which result in false arguments, improper judgement of intent and erroneous conclusions as to my justification for intervention.**
- II. ARGUMENT:**
  - A. Mr. Taylor's statement: "While Mr. Brinker does reside near the project area, his position to intervene relies upon Mr. Brinker's desire to have His property used, in some way, as part of the project." My statement: " I would like to take the most positive approach for the benefit of myself and those around me". Mr. Taylor's statement paints a selfish motive. Furthermore He misses the intent found in my following sentence: "of equal, fair, just, opportunity for all parties" ....for the Company he represents as well.**
  - B. Mr. Taylor's statement: "Mr. Brinker raises no issue or concern about the impact of the project on his property leaving only his desire to benefit economically from the property." Mr. Taylor fails to recognize paragraph 1 and 2 of my petition to intervene which clearly states my motive to investigate matters of the Farm that would affect my property. As stated, and as of public record, there are questions of concerns that I have not received answers for. It is impossible to state concerns that have not been validated as true concerns. This is a result of time restraints.**
  - C. Mr. Taylor's comment of; this not being the proper venue to address the adequacy of the Board's rules with respect to notice, does have validity perhaps. However, it is because of the weakness of this process that I lack facts as to the effects of the Solar farm on my property and gained confidence, by actions, that I and my close neighbors have not been discriminated against in the just and fair opportunity with all parties in the project. My petition to intervene is simply a lifeline for my voice to be heard. I do not understand why Mr Taylor and the Company he represents would not embrace this aspect since the essence of the law has the ability to create untimely and costly delays in progress.**
  - D. Concerning Mr. Taylor's concern that I have not submitted timely submission to intervene: I have attached the receipts of mail that show USPS expected delivery dates to be on January 12<sup>th</sup>. I believe it is extraordinary circumstances beyond my control that any of these letters would not have arrived at least by the 14<sup>th</sup> of January, 2019.**

- III. **Conclusion: Mr. Taylor's memorandum contra of Willowbrook Solar I is a poor interpretation of my petition to intervene. Mr. Taylor's statements has shaken my confidence in his Company who states:**

**Our highly experienced team is on a mission to make the promise of clean energy and economic security a reality for communities across the country. We understand that large renewable projects are a new idea for many communities. We have had the good fortune of working collaboratively with many communities and stakeholders on these kinds of projects. We listen to our local partners and take a thoughtful approach to project design that addresses their views.**

- IV. **Final thoughts**

**I will continue to willingly, diligently and unselfishly seek the best for all parties concerned in the Willowbrook Solar I project.**

**Though I may have a right to petition to intervene, I would rather be viewed as one who is offering a voice that can offer collaborative, constructive, and helpful views form the unique perspective of a landowner's experience. If you think I can be of help in your future hearings and or review of policy and procedures, I would be happy to assist.**

**Respectfully submitted,  
Timothy J. Brinker**

### Certificate of Service

The Public Utilities Commission of Ohio'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 sent via electronic mail on February 5, 2019 to:

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Hard copy to be delivered to Doug Herling of Willowbrook Solar I LLC

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**2/5/2019 4:28:42 PM**

**in**

**Case No(s). 18-1024-EL-BGN**

Summary: Public Comment received via website electronically filed by Docketing Staff on behalf of Docketing.