

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Republic)	
Wind, LLC for a Certificate of Environmental)	
Compatibility and Public Need for a Wind-)	Case No. 17-2295-EL-BGN
Powered Electric Generating Facility in)	
Seneca and Sandusky Counties, Ohio.)	

**UNOPPOSED JOINT MOTION TO SUSPEND THE PROCEDURAL SCHEDULE AND
TO EXTEND THE DEADLINE FOR STAFF REPORT
AND REQUEST FOR EXPEDITED TREATMENT**

Pursuant to Ohio Administrative (“OAC”) Rule 4906-2-27(A) and (C), Republic Wind, LLC (“Republic” or “Applicant”) and the Staff of the Ohio Power Siting Board (“Staff”) (collectively the “Joint Movants”) hereby request that the Ohio Power Siting Board (“OPSB” or “Board”), suspend the procedural schedule and extend the deadline for the Staff Report by ninety (90) days. Joint Movants submit this motion to allow additional time for Republic to provide Staff with information they need to complete their Report of Investigation. The Staff Report is currently due on April 29, 2019. Joint Movants contacted counsel for the other parties in this proceeding regarding this motion. The other parties indicated that they do not oppose this motion and do not oppose expedited treatment of this motion.

Respectfully submitted,



Sally W. Bloomfield (0022038)
Dylan F. Borchers (0090690)
Devin D. Parram (0082507)
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227-2300
Facsimile: (614) 227-2390
E-Mail: sbloomfield@bricker.com
dborchers@bricker.com
dparram@bricker.com

Dave Yost
Ohio Attorney General

John H. Jones
Assistant Section Chief

/s/ Jodi J. Bair

Jodi J. Bair
Assistant Attorneys General
Public Utilities Section
30 East Broad Street, 16th Floor
Columbus, OH 43215-3414
Telephone: (614) 466-4397
Facsimile: (614) 644-8764
E-mail: jodi.bair@ohioattorneygeneral.gov

Counsel for Staff of the Ohio Power Siting Board

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MEMORANDUM IN SUPPORT

On February 2, 2018, and as amended on March 27, 2018, Republic Wind filed an application with the Board for a certificate of environmental compatibility and public need to construct a wind-powered electric generating facility in Seneca and Sandusky Counties, Ohio. By Entry issued July 18, 2018, the effective date of the filing of the Republic application was established as July 18, 2018, and the administrative law judge (“ALJ”) established a procedural schedule. On August 29, 2018, Republic filed a motion to suspend the procedural schedule. By Entry issued September 4, 2018, the ALJ granted Republic’s motion to suspend the procedural schedule. On December 26 and 27, 2018, Republic filed an amended application. Republic also filed a motion for a procedural schedule, which was granted in part and denied in part by Entry issued February 15, 2019. The procedural schedule was further revised by Entry dated March 13, 2019.

Pursuant to OAC Rule 4906-2-27, Joint Movants request that the Board suspend the procedural schedule and extend the deadline for the Staff Report 90 days from April 29, 2019. Tolling of the current procedural schedule will provide Republic sufficient time to submit additional information to Staff which is needed to complete their investigation. Nothing in this motion shall preclude Staff and/or Republic from subsequently filing a motion to establish an

earlier Staff Report deadline if the information needed to complete the Staff Report is obtained earlier than expected. The movants are also requesting a stay discovery during this tolling period.

Joint Movants request expedited treatment of this motion because the Staff Report is due on April 29, 2019. This motion is not submitted for purposes of delay. Rather, Joint Movants seek suspension of the procedural schedule to ensure that Republic will have sufficient time to provide Staff the information needed to complete its report.

Joint Movants contacted the other parties in this proceeding regarding this motion. The other parties indicated that they do not oppose this motion and do not oppose expedited treatment of this motion. Accordingly, Joint Movants request that the ALJ or Board to grant this motion.

Respectfully submitted,



Sally W. Bloomfield (0022038)
Dylan F. Borchers (0090690)
Devin D. Parram (0082507)
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227-2300
Facsimile: (614) 227-2390
E-Mail: sbloomfield@bricker.com
dborchers@bricker.com
dparram@bricker.com

Counsel for Republic Wind, LLC

Dave Yost

Ohio Attorney General

John H. Jones

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/s/ Jodi J. Bair

Jodi J. Bair

Assistant Attorneys General

Public Utilities Section

30 East Broad Street, 16th Floor

Columbus, OH 43215-3414

Telephone: (614) 466-4397

Facsimile: (614) 644-8764

E-mail: Jodi.bair@ohioattorneygeneral.gov

Counsel for Staff of the Ohio Power Siting Board

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion was served upon the following parties listed below by electronic mail, this 26th day of April 2019.



Devin D. Parram

jstock@beneschlaw.com

rhaffke@beneschlaw.com

cendsley@ofbf.org

lcurtis@ofbf.org

amilam@ofbf.org

jclark@senecapros.org

jvankley@vankleywalker.com

cwalker@vankleywalker.com

mulligan_mark@co.sandusky.oh.us

mleppla@theoec.org

tdougherty@theoec.org

ctavenor@theoec.org

mjsettineri@vorys.com

glpetrucci@vorys.com

mwtaylor@vorys.com

jodi.bair@ohioattorneygeneral.gov

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Summary: Text Unopposed Joint Motion to Suspend the Procedural Schedule and to Extend the Deadline for Staff Report and Request for Expedited Treatment electronically filed by Teresa Orahod on behalf of Devin D. Parram for Republic Wind, LLC