

BEFORE
THE OHIO POWER SITING BOARD

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

**LOCAL RESIDENTS' UNOPPOSED MOTION
FOR LEAVE TO FILE DIRECT TESTIMONY**

The Local Residents move for leave to file the amended direct written testimony of witnesses Ira Sasowsky, Crystal Hoepf, and Rob Chappell. Counsel for all other parties have indicated that they do not object to this motion, except for Sandusky County (which has not responded to my inquiry).

Although the texts of this testimony were filed before the filing deadline of 5:30 pm on October 28, 2019, some exhibits to that testimony were not assembled and attached to the testimony in time due to computer system problems. My office had a complete computer outage for part of the morning of October 28 and constant connection interruptions for the rest of the day. The exhibits to Ira Sasowsky's testimony and some exhibits to the testimony of Crystal Hoepf and Rob Chappell were not included with the versions of their testimony filed by 5:30 pm.

Another copy of this testimony with all exhibits was e-filed with the Board and transmitted by email to the other parties' counsel by 7:30 pm on October 28, 2019. Other than the added exhibits, the testimony is identical to what was filed before 5:30 pm. The Local Residents request that the hearing officers grant them leave to file this amended testimony.¹

¹ After filing the amended testimony of Rob Chappell, counsel discovered that the wrong document was attached as Exhibit A. Rather than waiting until the hearing to make this correction, counsel for the Local Residents has provided counsel for the other parties with a corrected version with the right exhibit and will file the corrected version so that it is available to everyone to review prior to the hearing.

Respectfully submitted,

/s/ Jack A. Van Kley
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CERTIFICATE OF SERVICE

On October 30, 2019, the docketing division's e-filing system will electronically serve notice of the filing of this document on the following counsel for the parties: Sally W. Bloomfield (sbloomfield@bricker.com), Dylan Borchers (dborchers@bricker.com), Joshua D. Clark (jclark@senecapros.org), Leah F. Curtis (lcurtis@ofbf.org), Chad A. Endsley (cendsley@ofbf.org), Miranda Leppla (mleppla@theoec.org), Amy M. Milam (amilam@ofbf.org), Mark Mulligan (mulligan_mark@co.sandusky.oh.us), Devin D. Parram (dparram@bricker.com), Chris Tavenor (ctavenor@theoec.org), Trent Dougherty (theoec.org), Dane Stinson (dstinson@bricker.com), Derek Devine (dwd@senecapros.org), and Jodi Bair (jodi.bair@ohioattorneygeneral.gov). On the same date, I served a copy of this filing by electronic mail on the above-listed counsel, Dennis Hackenburg at Dennyh7@frontier.com, and Mike and Tiffany Kessler at mkessler7@gmail.com.

/s/ Jack A. Van Kley
Jack A. Van Kley

This foregoing document was electronically filed with the Public Utilities

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in

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

Summary: Motion for Leave to File Amended Testimony electronically filed by Mr. Jack A Van Kley on behalf of Local Resident Intervenors