

BEFORE
THE OHIO POWER SITING BOARD

In the Matter of the Application)	
of Kingwood Solar I LLC, for a)	
Certificate of Environmental)	Case No. 21-0117-EL-BGN
Compatibility and Public Need)	

MEMORANDUM OF CITIZENS FOR GREENE ACRES, INC., JENIFER ADAMS, P. CHANCE BALDWIN, JACOB CHURCH, VERITY DIGEL, JED HANNA, KRAJICEK FAMILY TRUST, JAMES JOSEPH KRAJICEK, KAREN LANDON, NICOLE MARVIN, CHAD MOSSING, KAREN MOSSING, NICHOLAS PITSTICK, KYLE SHELTON, MARLIN VANGSNESS, JEAN WEYANDT, AND JERALD WEYANDT IN RESPONSE TO MOTION TO STRIKE OF APPLICANT KINGWOOD SOLAR I LLC

Intervenor Citizens for Greene Acres, Inc. (“CGA”) and its above-named members (collectively with CGA, the “Citizens”) hereby file their response to Kingwood Solar’s motion to strike. The motion seeks to strike a sentence from the Citizens’ initial brief that quoted from Section 400.1 of the Xenia Township Zoning Resolution about the importance to the township of preserving farm land, which resolution had been attached to Robert Rand’s direct testimony. While drafting this sentence, Citizens’ counsel did not notice that this exhibit had been struck during the hearing. The Citizens note that their initial brief at Page 9 also cited the Direct Testimony of Xenia Township Trustee Stephen Combs, p. 2, lines 16-24, which conveys the same message as the resolution’s sentence that Kingwood Solar wants to strike. Accordingly, the sentence that Kingwood Solar’s motion seeks to strike is unnecessary for the Citizens’ argument, and the Citizens consent to striking it.

Respectfully submitted,

/s/ Jack A. Van Kley
Jack A. Van Kley (0016961)
Van Kley & Walker, LLC
132 Northwoods Blvd., Suite C-1
Columbus, Ohio 43235
(614) 431-8900 (telephone)
(614) 431-8905 (facsimile)
Email: jvankley@vankleywalker.com
(Willing to accept service by email)

CERTIFICATE OF SERVICE

I hereby certify that, on August 26, 2022, a copy of the foregoing memorandum was served by electronic mail on the following: Jodi Bair at Jodi.Bair@ohioattorneygeneral.gov; Daniel A. Brown at dbrown@brownlawdayton.com; Kevin Dunn at kdd@planklaw.com; John Hart at jehartlaw@gmail.com; Nathaniel B. Morse at nbmorse@vorys.com; Werner.Margard@ohioattorneygeneral.gov; Michael Settineri at mjsettineri@vorys.com; Lee Slone at ls lone@mdllp.net; Charles Swaney at cswaney@woh.rr.com; David Watkins at dw@planklaw.com; Anna Sanyal at aasanyal@vorys.com; Thaddeus Boggs at tboggs@fbtlaw.com; Chad A. Endsley at cendsley@ofbf.org; Amy M. Milam at amilam@ofbf.org; and Leah F. Curtis at lcurtis@ofbf.com.

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

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Case No(s). 21-0117-EL-BGN

Summary: Memorandum in Response to Kingwood Solar Motion to Strike
electronically filed by Mr. Jack A. Van Kley on behalf of Citizens for Greene Acres &
Its Member Intervenors