

parkdist.petition-intervene.republic  
(townships)

**BEFORE  
THE OHIO POWER SITING BOARD**

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

---

**PETITION TO INTERVENE BY SENECA COUNTY  
PARK DISTRICT, SENECA COUNTY, OHIO**

---

Pursuant to Ohio Administrative Code (“OAC”) Rule 4906-12(A)(2), the Board of Park Commissioners of the Seneca County Park District, Seneca County, Ohio (“Park Board”), respectfully petitions the Ohio Power Siting Board (“OPSB”) or its Administrative Law Judge (“ALJ”) for an order granting their intervention as a party in the proceedings.

A memorandum of support of this petition is attached.

Respectfully submitted,

DEREK W. DeVINE  
PROSECUTING ATTORNEY

By \_\_\_\_\_  
Joshua D. Clark (#0097037)  
Assistant Prosecuting Attorney  
79 S. Washington St.  
Tiffin, OH 44883  
Telephone 419-448-4444  
Fax 419-443-7911  
jclark@senecapros.org

## MEMORANDUM IN SUPPORT

On July 16, 2018, Seneca Wind LLC filed its application for a certificate of environmental compatibility and public need to construct a wind-powered electric generation facility in Seneca County, Ohio. On October 15, 2018 the OPSB filed a notice deeming the Application to be complete. Seneca Wind, LLC was also directed to serve the completed Application pursuant to OAC 4906-3-07, with their Certificate of Service being filed on October 22, 2018. It is from this notice that the Park Board files their petition.

The proposed facility and wind turbines to be located in Seneca County, Ohio are near nature preserves maintained by the Seneca County Park District. See **Exhibit “A”** attached hereto and incorporated by reference. Based on the information presented in the attached letter from Seneca County Park District Executive Director Sarah Betts (attached here to as **Exhibit “B”**), the Park Board requests permission to intervene in the proceedings on the grounds that it has extensive interest in the proceedings; that said Park Board’s interest is not and cannot be represented by another party, existing or otherwise, that its contribution of presenting to the Board the costs and benefits of the project is essential to a just and expeditious resolution of the issues involved in the proceeding and that it would not unduly delay the proceeding or unjustly prejudice an existing party.

Respectfully submitted,

DEREK W. DeVINE  
PROSECUTING ATTORNEY

By \_\_\_\_\_  
Joshua D. Clark (#0097037)  
Assistant Prosecuting Attorney  
79 S. Washington St.  
Tiffin, OH 44883  
Telephone 419-448-4444  
Fax 419-443-7911  
[jclark@senecapros.org](mailto:jclark@senecapros.org)

## **CERTIFICATE OF SERVICE**

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties referenced in the service list of the docket who have electronically subscribed to this case.

---

Joshua D. Clark (#0097037)  
Assistant Prosecuting Attorney