

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Buckeye Wind LLC for a Certificate to Construct Wind-powered Electric Generation Facilities in Champaign County, Ohio))))))	Case No. 08-0666-EL-BGN
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In the Matter of the Application of Buckeye Wind LLC to Amend its Certificate Issued in Case No. 08-666-EL-BGN)))))	Case No. 13-360-EL-BGA
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**BUCKEYE WIND’S REPLY TO MEMORANDUM CONTRA BY INTERVENORS
UNION AND GOSHEN TOWNSHIPS TO BUCKEYE WIND’S MOTION TO EXTEND
CERTIFICATE**

On August 8, 2014, Union Township and Goshen Township (the “Townships”) filed a memorandum contra to Buckeye Wind’s July 14, 2014 request to extend its Certificate of Environmental Compatibility and Public Need issued in Case No. 08-666-EL-BGN (the “Certificate”). The Townships adopted the arguments raised by Champaign County and Urbana Township in their July 29, 2014 joint memorandum contra. For its reply to the Townships, Buckeye Wind adopts its August 5, 2014 reply to the memorandum contra by Champaign County and Urbana Township.

Buckeye Wind emphasizes that there is no basis for the Townships’ claim that Buckeye Wind “chose not to include the extension in its filing of amendment to the certificate in February 2013.” (Township’s August 8, 2014 Memo. in Opp. at Ex. A, p.3.) When Buckeye Wind filed its amendment application in Case No. 13-360-EL-BGA, the deadline to commence construction was more than two years away. The Townships and other intervenors opposed the amendment and a hearing was not held until earlier this year, on January 6, 2014. Any claim that Buckeye

Wind should have asked for an extension when it filed the application for amendment in early 2013 – or should have added the request to its amendment application at the eleventh hour before the hearing on the application – lacks merit and has no bearing on the reasons supporting the certificate extension.

Accordingly, for good cause shown, the Board should grant Buckeye Wind's July 14, 2014 motion to extend its certificate to the same date currently set for the Buckeye Wind II project which is May 28, 2018.

Respectfully submitted,

s/ Michael J. Settineri

M. Howard Petricoff (0008287)

Michael J. Settineri (0073369)

Scott M. Guttman (0086639)

VORYS, SATER, SEYMOUR AND PEASE LLP

52 East Gay Street

P.O. Box 1008

Columbus, Ohio 43216-1008

(614) 464-5462

(614) 719-5146 (fax)

mhpetricoff@vorys.com

mjsettineri@vorys.com

smguttman@vorys.com

Attorneys for Buckeye Wind LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon the following parties of record via U.S. Mail and via electronic mail on this 12th day of August, 2014.

Jack A. VanKley
VanKley & Walker, LLC
132 Northwoods Blvd., Suite C-1
Columbus, Ohio 43235
jvankley@vankleywalker.com

Christopher A. Walker
VanKley & Walker, LLC
137 North Main Street, Suite 316
Dayton, Ohio 45402
cwalker@vankleywalker.com

Chad A. Endsley
Ohio Farm Bureau Federation, Inc.
280 N. High Street, 6th Floor
Columbus, Ohio 43218
cendsley@ofbf.org

Breanne Parcels, Director of Law
City of Urbana
205 S. Main Street
Urbana, OH 43078
Breanne.Parcels@ci.urbana.oh.us

Gene Park
Piqua Shawnee Tribe
1803 Longview Drive
Springfield, OH 45504
Ewest14@woh.rr.com

Werner Margard
John Jones
Assistant Attorney General
180 East Broad Street, 9th Floor
Columbus, Ohio 43215
werner.margard@puc.state.oh.us
john.jones@puc.state.oh.us

Daniel A. Brown
Brown Law Office LLC
204 S. Ludlow St., Suite 300
Dayton, Ohio 45402
dbrown@brownlawdayton.com

Jane A. Napier
Assistant Prosecuting Attorney
Champaign County
200 N. Main Street
Urbana, OH 43078
jnapier@champaignprosecutor.com

Sarah Chambers
Thompson Hine LLP
41 South High Street, Suite 1700
Columbus, OH 43215-6101
Sarah.Chambers@ThompsonHine.com

s/ Michael J. Settineri

Michael J. Settineri

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Summary: Reply by Buckeye Wind to Memorandum Contra by Intervenors Union and Goshen Townships to Buckeye Wind's Motion to Extend Certificate electronically filed by Mr. Michael J. Settineri on behalf of Buckeye Wind LLC