

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of NRG Ohio)	
Pipeline Company, LLC, for a Letter of)	
Notification to Construct, Own, and Operate)	Case No. 14-1717-GA-BLN
a Natural Gas Pipeline to be Located in Lorain)	
County, Ohio)	

**PETITION FOR LEAVE TO INTERVENE
BY
LORAIN COUNTY PROPERTY OWNERS**

For the reasons set forth in the accompanying Memorandum in Support, various property owners¹ in Lorain County (“Property Owners”) collectively petition the Ohio Power Siting Board (“Board”) for leave to intervene in the above-captioned case pursuant to Ohio Revised Code 4906, Ohio Administrative Code 4906-7-04 and the Administrative Law Judge’s (“ALJ”) April 10, 2015 Entry in this matter (“Entry”), and to grant to the Property Owners the full powers and rights specifically authorized by statute or by the provisions of the Ohio Administrative Code in order to protect their interests in this case.

[SIGNATURE ON NEXT PAGE]

¹ The Lorain County Property Owners that are a part of this intervention are: Barbara & Thomas Demaline; Matthias & Joanne Helfrich; Mark & Darlene Julius; Marty & Irene Kaulins; Thomas Oster, President, Avon Development, LLC.; Robert & Debra Kubasak; George Mekker & Irene Noster; Joan Kerecz; Albert Kelling; William & Anna Marie Holt; and Theresa M. Wukie. Since these property owners have substantially similar interests as described in Rule 4906-7-04(D)(2), and in the interest of judicial economy, these property owners now respectfully submit their petition for collective intervention in this proceeding.

Respectfully submitted,

GOLDMAN & BRAUNSTEIN, LLP

/s/ Michael Braunstein

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**MEMORANDUM IN SUPPORT OF PETITION FOR LEAVE TO INTERVENE
BY
LORAIN COUNTY PROPERTY OWNERS**

I. Introduction

On January 9, 2015 fifteen Lorain County property owners petitioned the Board, through the undersigned counsel, to intervene in this matter (“Petition”). On March 3, 2015 the ALJ granted the property owners’ intervention. Since the filing of the Petition the eleven additional herein-listed Property Owners have retained the undersigned counsel in relation to this matter. Pursuant to the ALJ’s Entry, which instructs the Property Owners to petition to intervene no later than April 15, 2015, the Property Owners hereby seek to intervene for the reasons and basis stated below as well as those set forth in the Petition, which is hereby incorporated by reference.

II. Additional Facts in Support of Intervention

As stated above, the Property Owners were unrepresented by counsel at the time the Petition was filed on January 9, 2015 and did not have the opportunity to join the

collective intervention petitioned for therein. The Property Owners raise no novel issues to be addressed by the Applicant. However, for the reasons stated in the Petition the Property Owners believe it is imperative they be granted the opportunity to be heard in this matter.

Because the Property Owners raise no novel issues and are seeking to join a group of property owner intervenors already established as parties to this matter, the current intervention will not unduly delay this proceeding or prejudice any existing party. Furthermore, the Property Owners agree to be bound by any and all, agreements, arrangements and other matters previously made in this proceeding per Ohio Adm. Code 4906-7-04(C)(2).

Additionally, and pursuant to the ALJ's Entry, the Property Owners are filing this petition within the April 15, 2015 deadline as instructed by the ALJ.

III. Conclusion

For the foregoing reasons, the Property Owners respectfully request that this Petition to Intervene be granted, and the Property Owners be authorized to participate as a full party to this proceeding.

Respectfully submitted,

GOLDMAN & BRAUNSTEIN, LLP

/s/ Michael Braunstein

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/s/ William A. Goldman

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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing *Petition for Leave to Intervene by Lorain County Property Owners and the Memorandum in Support* has been filed with the Public Utilities Commission of Ohio and has been served upon the following parties via electronic mail and hard copy via U.S. Mail on April 13, 2015.

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Case No(s). 14-1717-GA-BLN

Summary: Petition FOR LEAVE TO INTERVENE BY LORAIN COUNTY PROPERTY OWNERS electronically filed by Mr. MICHAEL BRAUNSTEIN on behalf of Demaline, Thomas and Barbara and Helfrich, Matthias & Joanne and Julius, Mark and Darlene and Kaulins, Marty & Irene and Oster, Thomas and Kubasak, Robert & Debra and Mekker, George and Irene Noster and Kerecz, Joan and Kelling, Albert and Holt, William and Anna and Wukie, Theresa