

**BEFORE THE
OHIO POWER SITING BOARD**

**In the matter of the Application of)
Clean Energy Future – Lordstown,)
LLC for a Certificate of)
Environmental Compatibility and)
Public Need for the Lordstown Energy)
Center)**

Case No. 14-2322-EL-BGN

**PROPOSED INTERVENORS AMERICAN TRANSMISSION
SYSTEMS, INCORPORATED AND OHIO EDISON
STATEMENT OF ISSUES FOR CROSS EXAMINATION**

Pursuant to the Order and Entry of the Administrative Law Judge issued on May 26, 2015, proposed Intervenor American Transmission Systems, Incorporated (“ATSI”) and Ohio Edison (“OE”), FirstEnergy companies (collectively, “Proposed FirstEnergy Intervenor”), state that as of the date of filing of this Statement of Issues, there are no issues for which they will seek cross examination of any witness at the adjudicatory hearing, if granted intervention. Both ATSI and OE are working cooperatively with Staff and the Applicant and hope to have all issues resolved prior to the adjudicatory hearing.

However, as noted in Proposed FirstEnergy Intervenor’s Motion to Intervene, the Proposed FirstEnergy Intervenor are requesting that the Board include a condition in the Certificate requiring Applicant to secure the approval of Proposed FirstEnergy Intervenor for any use of existing easements or crossing existing transmission lines. Since Applicant and Proposed FirstEnergy Intervenor have not reached agreement on such a condition, Proposed FirstEnergy Intervenor reserve the right to call witnesses and to seek cross examination on this issue, as well as any other issue that remains outstanding at the time of the adjudicatory hearing.

Respectfully submitted,

s/Robert J. Schmidt

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Statement of Particular Issues for Cross Examination* was served upon the following persons by electronic filing and by emailing a copy on July 24, 2015 to:

Sally W. Bloomfield
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s/Robert J. Schmidt

Robert J. Schmidt

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Summary: Correspondence regarding Statement of Issues for Cross-Examination of Proposed Intervenor electronically filed by Mr. Robert J Schmidt on behalf of American Transmission Systems Inc. and Ohio Edison