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August 28, 2015

Ms. Barcy F. McNeal, Secretary  
Ohio Power Siting Board  
180 E. Broad St., 11th Floor  
Columbus, OH 43215-3793

Re: Case No. 14-1754-GA-BLN  
Response to August 13, 2015 Filing by Michael Tiller

Dear Ms. McNeal:

This correspondence is submitted on behalf of North Coast Gas Transmission LLC ("North Coast") in response to non-party Michael J. Tiller's August 13, 2015 filing captioned as "Michael Tiller's Second Supplement to Michael Tiller's Verified Motion for an Order to Show Cause." North Coast is filing this correspondence because Mr. Tiller's August 13, 2015 filing supplements his June 1, 2015 supplement and his May 14, 2015 motion, to which North Coast responded on June 10, 2015 and May 27, 2015, respectively.

Two claims in Mr. Tiller's Second Supplement merit a response. First, North Coast, through counsel, was and is still open to discussions with Mr. Tiller regarding options to shift the pipeline. To date, however, no agreement has been reached to change the pipeline route and North Coast has never agreed to relocate the pipeline from its present location on Mr. Tiller's property.

Second, it is neither necessary nor proper for this Board to second guess or oversee the proceedings of the Perrysburg Township Zoning Commission as Mr. Tiller is asking. At a June 8, 2015 meeting of the Zoning Commission, Mr. Tiller testified in support of his April 15, 2015 application for a Site Plan seeking approval to build two new storage lockers in the middle of the already-approved pipeline route. North Coast representatives were at that zoning meeting but, before they even had a chance to speak, Mr. Tiller was examined at length by Zoning Commission members who were skeptical of his reasons for seeking a new site plan and doubted his credibility. *See, e.g.,* June 8, 2015 Zoning Commission Meeting Minutes, Ex. H. to Second Supplement, at 2 ("Mr. Kelsey stated that the applicant hasn't complied with things they have requested in the past and he would be very cautious about approving anything until certain steps are taken. ... Mr. Black agreed with each and every one of those concerns.") ; *id.* at 7

Ms. Barcy F. McNeal, Secretary  
August 28, 2015  
Page 2

(“Mr. Hanna stated that his point is and the reason he is asking the question is because Mr. Tiller ... hasn’t fulfilled what was said seven or eight years ago why should Mr. Hanna believe that Mr. Tiller will fulfill what you say you are going to do now.”) Mr. Tiller was given a full opportunity to participate at that meeting and his application remains pending, subject to the unanimous vote of the Zoning Commission that “that Mr. Tiller must meet all the conditions that were passed in 2006 on the prior Site Plan before the Commission acts on the present application....” Id. at 8.

Like his May 14 motion and his June 1 supplement, Mr. Tiller’s August 13, 2015 Second Supplement has nothing to do with North Coast’s compliance with Condition 27. His motion should be denied for that reason and also because he is a non-party, has not presented any legal authority to support his motion, and has misrepresented the facts of his negotiations with North Coast to the Board.

Very truly yours,

s/ Michael J. Settineri

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Summary: Response Response to August 13, 2015 Filing by Michael Tiller electronically filed by Mr. Michael J. Settineri on behalf of North Coast Gas Transmission LLC