

**BEFORE
THE OHIO POWER SITING BOARD**

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

**PETITION TO INTERVENE OF ADDITIONAL SENECA COUNTY RESIDENTS
CANTU & SCHEELE**

Pursuant to R.C. 4906.08(A)(3) and O.A.C. 4906-2-12, Seneca County residents Rita & Jerry Cantu (the “Cantus”) and Tom & Lori Scheele (the “Scheeles”) hereby petition the Ohio Power Siting Board for an order granting their intervention as parties in this proceeding.

The Cantus and Scheeles join in the Petition to Intervene of Seneca County Residents, and the memorandum in support of that Petition, filed in this case on Tuesday, June 19, 2018. This petition to intervene also is supported by the short memorandum in support set forth below.

Respectfully submitted,

/s/ John F. Stock
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MEMORANDUM IN SUPPORT OF
PETITION TO INTERVENE

A. INTRODUCTION

The Cantus and the Scheeles are long-time residents of Seneca County. They own property and live in Seneca County. They pay Seneca County property taxes. They are consumers of electricity. Their homes will be subjected to excessive noise emitted by Applicant's wind turbines. They watch and enjoy the birds, bats, and bald eagles that will be harmed and killed by Applicant's wind turbines. Applicant's wind turbines will diminish the value of their homes. They seek to intervene in this proceeding to protect these personal interests that will be detrimentally affected if Applicant is permitted to construct its Project in close proximity to their homes, as Applicant proposes in its Application. They are entitled to intervene in this proceeding.

The facts and law that support this petition to intervene are set forth in detail in the June 19, 2018 Petition to Intervene of Seneca County Residents and the accompanying memorandum in support. The Cantus and Scheeles incorporate by reference herein that Petition to Intervene and memorandum in support, and will not repeat the content of those filings here. The Cantus and Scheeles possess the same legally-protectable interests as the Seneca County Residents who already have sought intervention in this case. The Cantus' and Scheeles' interests, like the interests of the Seneca County Residents, will be adversely affected by Applicant's proposed Project. For these reasons, the Cantus and Scheeles are entitled to intervene in this proceeding pursuant to R.C. 4906.08(A)(3) and O.A.C. 4906-2-12.

B. THE CANTUS AND SCHEELES ARE ENTITLED TO INTERVENE

1. The Cantus and Scheeles Have Real And Substantial Interests In This Proceeding

The Cantus and Scheeles are long-time residents of Seneca County. The important interests they are entitled to protect in this proceeding are the same as the Seneca County Residents set forth in their pending Petition to Intervene.

2. The Cantus' and Scheeles' Interests Are Not Already Adequately Represented

Like the Seneca County Residents, the Cantus' and Scheeles' interests are not adequately represented by the existing parties in this case. Absent intervention, the Cantus and Scheeles will have no effective means to protect their vital interests in this proceeding.

3. The Cantus and Scheeles Will Contribute To A Just And Expeditious Resolution Of Issues

The Cantus' and Scheeles' intervention will contribute to a just and expeditious resolution of the issues in this proceeding. They have unique, independent perspectives on the issues before the Board in this case. They possess direct, personal interests that only they, "on the ground" in Seneca County, can adequately protect. Their participation is crucial to an informed, balanced, and fair disposition of the interests of all parties who will be affected by the Board's findings and determinations in this proceeding. They will be bound by all of the Board's determinations in this case.

4. The Cantus' and Scheeles' Intervention Will Neither Delay This Proceeding Nor Prejudice Parties

The Cantus' and Scheeles' intervention will neither unduly delay this proceeding nor unjustly prejudice any existing party. They will abide by all Board deadlines and present their evidence in a clear and concise manner.

For the foregoing reasons, the Cantus and Scheeles request the Board to grant this Petition to Intervene.

Respectfully submitted,

/s/ John F. Stock

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CERTIFICATE OF SERVICE

The Ohio Power Siting Board's e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a copy of the foregoing document also is being served upon the persons below via electronic mail this 22nd day of June, 2018.

/s/ John F. Stock

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Summary: Petition to Intervene of Additional Seneca County Residents Cantu & Scheele electronically filed by John F Stock on behalf of Rita Cantu and Jerry Cantu and Tom Scheele and Lori Scheele