

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Icebreaker)	
Windpower Inc., for a Certificate to Construct a Wind-)	Case No: 16-1871-EL-BGN
Powered Electric Generation Facility in Cuyahoga)	
County, Ohio.)	

**ICEBREAKER WINDPOWER INC.'S
MOTION FOR AN EXTENSION OF THE PROCEDURAL SCHEDULE,
REQUEST FOR EXPEDITED RULING
AND MEMORANDUM IN SUPPORT**

Pursuant to Ohio Administrative Code (“O.A.C.”) Rules 4906-2-07 and 4906-2-27, Icebreaker Windpower Inc. (“Applicant” or “Icebreaker”) respectfully moves the Ohio Power Siting Board (“OPSB”) or its Administrative Law Judge (“ALJ”) for an extension of the procedural schedule in this case to January 15, 2019. Currently, the parties are to submit a revised stipulation or, in the alternative, a proposed revised briefing schedule, by December 7, 2018.

The Applicant has consulted with counsel for the OPSB Staff, as well as all of the parties to this case, and no party opposes this motion, or the revised January 15, 2019 filing date.

Therefore, the Applicant submits that, for the reasons more fully set forth in the following memorandum in support, good cause exists to grant this motion on an expedited basis, in accordance with O.A.C. Rule 4906-2-27(C).

Respectfully submitted,

/s/ Christine M.T. Pirik
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**MEMORANDUM IN SUPPORT OF
MOTION FOR AN EXTENSION OF THE PROCEDURAL SCHEDULE AND
REQUEST FOR EXPEDITED RULING**

On February 1, 2017, as supplemented, Icebreaker filed an application for a certificate of environmental compatibility and public need for the Icebreaker Project to be located in Lake Erie eight miles off the shore of Cleveland, Ohio in Cuyahoga County.

On September 4, 2018, Icebreaker, Business Network for Offshore Wind, Inc., the Sierra Club, Indiana/Kentucky/Ohio Regional Council of Carpenters, and the Ohio Environmental Council filed a Joint Stipulation and Recommendation for adoption by the OPSB. The evidentiary hearing in this matter commenced on September 24, 2018. At the conclusion of the hearing, the ALJs determined that the initial and reply briefs should be filed by November 30, 2018, and January 8, 2019, respectively. On November 21, 2018, the ALJ granted the Applicant's motion for an extension of time of the briefing schedule and established December 7, 2018, as the due date for the filing of a revised stipulation or a proposed revised briefing schedule.

Icebreaker commenced discussions with the parties on November 19, 2018, and received proposals from OPSB Staff late on both Friday, November 30, 2018, and Tuesday, December 4, 2018.

The Applicant is currently reviewing and considering the proposals presented and is still hopeful that settlement discussions will prove fruitful. However, given that the Applicant will be out of the country next week, the upcoming holidays, and the vacation schedules of the parties between now and mid-January, it is necessary that the Applicant request additional time for review and discussion on possible settlement.

Therefore, the Applicant proposes that the OPSB grant an extension and require the parties to submit a revised stipulation or, in the alternative, a proposed revised briefing schedule, by January 15, 2019.

Given the short time frame, Icebreaker requests that this motion be granted on an expedited basis for good cause shown.

Respectfully submitted,

/s/ Christine M.T. Pirik

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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 is also being served upon the persons listed below via electronic mail this 7th day of December, 2018.

/s/ Christine M.T. Pirik

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Summary: Motion for an Extension of the Procedural Schedule, Request for Expedited Ruling and Memorandum in Support electronically filed by Christine M.T. Pirik on behalf of Icebreaker Windpower Inc.