

**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.)	

**JOINT 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. (“Icebreaker”), the Staff of the Ohio Power Siting Board (“OPSB”), Business Network for Offshore Wind, Inc., the Sierra Club, Indiana/Kentucky/Ohio Regional Council of Carpenters, and the Ohio Environmental Council (herein referred to as “Joint Movants”) respectfully move the OPSB or its Administrative Law Judge (“ALJ”) for an extension of the procedural schedule in this case to May 15, 2019. Currently, the parties are to submit a revised stipulation or, in the alternative, a proposed revised briefing schedule by May 8, 2019.

The Joint Movants have consulted with counsel for all of the parties to this case and no party opposes this motion.

Therefore, the Joint Movants submit 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,

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**MEMORANDUM IN SUPPORT OF
JOINT 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. The ALJ has granted several extensions of time of the briefing schedule and, currently, May 8, 2019, is the due date for the filing of a revised stipulation or a proposed revised briefing schedule.

The parties have met several times since conclusion of the hearing and continued their discussions on a possible revised settlement in this matter. As a result of those discussions, the Joint Movants have reached an agreement in principle that resolves all issues in this matter amongst those parties. In order to finalize and file the revised stipulation, the Joint Movants respectfully request a one-week extension of time, until May 15, 2019, to file the executed agreement.

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

Respectfully submitted,

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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 May, 2019.

/s/ Christine M.T. Pirik

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Summary: Motion - Joint Motion filed by Icebreaker, OPSB Staff, Business Network, Sierra Club, OEC, and Council of Carpenters for Extension of Procedural Schedule electronically filed by Christine M.T. Pirik on behalf of Icebreaker Windpower Inc.