

BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of)	
Ross County Solar, LLC for a)	
Certificate of Environmental)	Case No. 20-1380-EL-BGN
Compatibility and Public Need)	

**JOINT MOTION TO CONTINUE DEADLINES, MEMORANDUM IN SUPPORT,
AND REQUEST FOR EXPEDITED RULING**

Pursuant to Ohio Adm.Code 4906-2-07, Ross County Solar, LLC (“Applicant”), Staff of the Ohio Power Siting Board (“Staff”), the Boards of Trustees of Buckskin and Paint Townships (“Trustees”), and the Ohio Farm Bureau Federation (“OFBF”) respectfully request, as explained further below, the April 21, 2021 deadline for Staff and intervenor testimony and the April 22, 2021 deadline for a stipulation established in January 20, 2021 Entry be extended. Additionally, the parties also request that the April 27, 2021 evidentiary hearing be called and continued.

Pursuant to Ohio Adm.Code 4906-2-27(C), the parties request an expedited ruling on this Motion. Good cause exists for granting this Motion and ruling on an expedited basis, as set forth in the accompanying Memorandum in Support.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT OF
JOINT MOTION TO CONTINUE DEADLINES AND REQUEST FOR EXPEDITED
RULING**

Ross County Solar, LLC (“Applicant”), Staff of the Ohio Power Siting Board (“Staff”), the Boards of Trustees of Buckskin and Paint Townships (“Trustees”), and the Ohio Farm Bureau Federation (“OFBF”) respectfully request an extension with regard to the April 21, 2021 deadline for Staff and intervenor testimony and the April 22, 2021 deadline for a stipulation. Additionally, the parties also request that the April 27, 2021 evidentiary hearing be called and continued. The parties in this proceeding are engaged in discussions regarding a possible stipulation in this proceeding but those discussions will likely not be complete prior to the end of April. To allow time for continued negotiations of a stipulation, the parties propose that the deadline for filing a stipulation be extended to May 7, 2021. Furthermore, the parties request the Administrative Law Judge call the case, as scheduled, on April 27, 2021, but continue the case to the week of May 17, 2021 to allow the parties to continue to negotiate and reach a potential stipulation. Finally, the parties anticipate Staff and intervenor testimony and supplemental testimony in support of the stipulation can be filed the week of May 10, 2021. The parties will work towards identifying specific dates for testimony filing and hearing as they continue negotiations and will inform the Administrative Law Judge on April 27, 2021 during the call and continue session.

Accordingly, there is good cause for continuing the deadlines for filing Staff and intervenor testimony, filing the stipulation, and the evidentiary hearing. First, the parties are currently engaged in settlement discussions regarding certain issues and conditions presented in the Staff Report, and continuing the deadlines and hearing would allow the parties the opportunity to not only continue their settlement discussions, but also, to the extent a settlement is reached, to address

the settlement in their filed testimony. Second, no prior continuance has been requested and there will be no harm by granting this request.

Prior to the filing of this Motion, Applicant contacted the other parties in this proceeding, and no party opposes the Motion. Additionally, no party objects to an expedited ruling on the Motion, given the current Staff and intervenor testimony deadline of April 21, 2021. Thus, good cause exists to grant the Motion and to do so on an expedited basis.

WHEREFORE, for the above reasons, the Applicant, Staff, the Trustees, and OFBF request that the Administrative Law Judge grant this Motion to continue the deadlines as identified above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being sent via electronic mail on April 20, 2021 to:

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Summary: Motion Joint Motion to Continue Deadlines, Memorandum in Support, and Request for Expedited Ruling electronically filed by Mr. Michael J. Settineri on behalf of Ross County Solar, LLC