

BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of)	
Ross County Solar, LLC for a)	Case No. 20-1380-EL-BGN
Certificate of Environmental)	
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 May 11, 2021 deadline for a stipulation and the May 14, 2021 deadline for Applicant testimony supporting the stipulation, as well as Staff and intervenor testimony, be extended. Additionally, the parties also request that the May 19, 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 that the procedural schedule established in the May 3, 2021 Entry be modified. Specifically, the parties request that the Administrative Law Judges (“ALJs”) extend the May 11, 2021 deadline for a stipulation and the May 14, 2021 deadline for Applicant testimony supporting the stipulation, as well as Staff and intervenor testimony, by one week each. Additionally, the parties also request that the May 19, 2021 evidentiary hearing be called and continued.

As the ALJs are aware, the parties in this proceeding continue to be engaged in discussions regarding a possible stipulation in this proceeding. The ALJs previously granted an extension via the May 3, 2021 Entry; however settlement discussions are still ongoing. To allow time for continued negotiations of the stipulation, the parties now propose that the deadline for filing a stipulation be extended to May 18, 2021. The parties also propose that Applicant testimony in support of the stipulation and Staff and intervenor testimony be filed on May 21, 2021. Furthermore, the parties request the ALJs call the case, as scheduled, on May 19, 2021, but continue the case to allow the parties to continue to negotiate and reach a potential stipulation. The parties will work towards identifying specific dates for the evidentiary hearing as they negotiate and will inform the ALJs of these dates on May 19, 2021 during the call and continue session.

Accordingly, there is good cause for continuing the deadlines for filing the stipulation, filing Applicant testimony in support of the stipulation, Staff and intervenor testimony, and the evidentiary hearing. The parties continue to be 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. Though a prior continuance has been granted, no harm will occur as a result of this second extension.

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 stipulation filing deadline today, May 11, 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 May 11, 2021 to:

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Summary: Motion Joint Motion to Continue Deadlines, Memorandum in Support, and Request for Expedited Ruling electronically filed by Ms. Anna Sanyal on behalf of Ross County Solar, LLC