

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Cadence Solar )  
Energy LLC for a Certificate of Environmental )  
Compatibility and Public Need to Construct a ) Case No: 20-1677-EL-BGN  
Solar-Powered Electric Generation Facility in )  
Union County, Ohio. )

---

**MOTION FOR  
EXTENSION OF TESTIMONY DUE DATE FOR APPLICANT  
REQUEST FOR AN EXPEDITED RULING AND  
MEMORANDUM IN SUPPORT**

---

Pursuant to Ohio Administrative Code (“O.A.C.”) Rules 4906-2-07 and 4906-2-27, Cadence Solar Energy, LLC (“Applicant”) respectfully moves the Ohio Power Siting Board (“Board”) or its Administrative Law Judge (“ALJ”) for an extension of the due date for the filing of the Applicant’s testimony, which is currently set for Tuesday, July 6, 2021, pursuant to the ALJ’s April 15, 2021 Entry.

The Applicant has consulted with the Board’s Staff, as well as counsel for the Union County Commissioners, the Union Soil and Water Conservation District, the Ohio Farm Bureau Federation, and the Board of Trustees of York, Taylor, and Liberty Townships, and they do not oppose this motion.

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  
Christine M.T. Pirik (0029759)  
(Counsel of Record)  
William Vorys (0093479)  
Matthew C. McDonnell (0090164)  
Dickinson Wright PLLC  
150 East Gay Street, Suite 2400  
Columbus, Ohio 43215  
(614) 591-5461  
[cpirik@dickinsonwright.com](mailto:cpirik@dickinsonwright.com)  
[wvorys@dickinsonwright.com](mailto:wvorys@dickinsonwright.com)  
[mmcdonnell@dickinsonwright.com](mailto:mmcdonnell@dickinsonwright.com)

*Attorneys for Cadence Solar Energy, LLC*

---

**MEMORANDUM IN SUPPORT OF  
MOTION EXTENSION OF TESTIMONY DUE DATE FOR APPLICANT  
AND REQUEST FOR AN EXPEDITED RULING**

---

On February 1 and 2, 2021, as supplemented on February 12 and March 16, 2021, the Applicant filed an application with the Board for a certificate to construct a solar-powered electric generation facility in Union County, Ohio.

On April 15, 2021, the Board issued an entry establishing the procedural schedule in this case, which, among other things, set: Tuesday, June 29, 2021, as the date for the local public hearing in this case; and Tuesday, July 6, 2021, as the due date for the filing of Applicant's testimony in this case.

The Applicant believes that settlement discussion will lead to a stipulation resolving all issues in this matter. While the Applicant had been preparing a proposed stipulation, the Applicant held off on presenting the proposal to all of the parties until after the local public hearing was held so that the stipulation could reflect any relevant comments presented at the local hearing and allow the parties to take any comments made at the hearing into consideration during their settlement deliberations.

In light of the fact that the Applicant's testimony supporting the Application is due Tuesday, July 6, 2021, the Applicant is filing this request for a brief extension of time to file its testimony. Specifically, the Applicant requests that the Board or ALJ schedule allow the Applicant to file its testimony on or before Tuesday, July 13, 2021. All other deadlines and the procedural schedule established by the ALJ's April 15, 2021 Entry would remain the same as set forth in the Entry.

Given the short time frame before the Applicant's testimony is currently due, the Applicant requests that this motion be granted on an expedited basis for good cause shown.

Respectfully submitted,

/s/ Christine M.T. Pirik  
Christine M.T. Pirik (0029759)  
William Vorys (0093479)  
Matthew C. McDonnell (0090164)  
Dickinson Wright PLLC  
[cpirik@dickinsonwright.com](mailto:cpirik@dickinsonwright.com)  
[wvorys@dickinsonwright.com](mailto:wvorys@dickinsonwright.com)  
[mmcdonnell@dickinsonwright.com](mailto:mmcdonnell@dickinsonwright.com)

*Attorneys for Cadence Solar Energy, LLC*

## 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 these cases. In addition, the undersigned certifies that a copy of the foregoing document is also being served upon the persons below this 2<sup>nd</sup> day of July, 2021.

*/s/ Christine M.T. Pirik*

Christine M.T. Pirik (0029759)

Counsel:

[robert.eubanks@ohioAGO.gov](mailto:robert.eubanks@ohioAGO.gov)  
[thomas.shepherd@ohioAGO.gov](mailto:thomas.shepherd@ohioAGO.gov)  
[tboggs@fbtlaw.com](mailto:tboggs@fbtlaw.com)  
[tgray@unioncountyohio.gov](mailto:tgray@unioncountyohio.gov)  
[amilam@ofbf.org](mailto:amilam@ofbf.org)  
[cendsley@ofbf.org](mailto:cendsley@ofbf.org)  
[lcurtis@ofbf.org](mailto:lcurtis@ofbf.org)

Administrative Law Judge:

[sarah.parrot@puco.ohio.gov](mailto:sarah.parrot@puco.ohio.gov)  
[jesse.davis@puco.ohio.gov](mailto:jesse.davis@puco.ohio.gov)

4832-9798-0144 v1 [39579-45]

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**7/2/2021 12:47:15 PM**

**in**

**Case No(s). 20-1677-EL-BGN**

Summary: Motion for Extension of Testimony Due Date for Applicant Request for an Expedited Ruling and Memorandum in Support electronically filed by Christine M.T. Pirik on behalf of CADENCE SOLAR ENERGY LLC