

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Border Basin I,)
LLC for a Certificate of Environmental Compatibility)
and Public Need to Construct a Solar-Powered) Case No: 21-277-EL-BGN
Electric Generation Facility in Hancock County, Ohio.)

**MOTION
FOR ADDITIONAL EXTENSION OF COMPLETENESS REVIEW
AND REQUEST FOR EXPEDITED RULING
AND MEMORANDUM IN SUPPORT**

In accordance with Ohio Administrative Code (“O.A.C.”) Rule 4906-2-27, Border Basin I, LLC (“Applicant”) respectfully moves the Ohio Power Siting Board (“Board”) for an extension of the completeness review required under O.A.C. Rule 4906-3-06(A). Specifically, the Applicant is requesting an additional 14-day extension, until September 7, 2021, for the Board’s Staff (“Staff”) to file its completeness recommendation. On August 11, 2021, the Administrative Law Judge (“ALJ”) granted Applicant’s motion to extend the time period for Staff’s completeness review of the Application from August 16, 2021 to August 23, 2021 to allow the Applicant to hold a voluntary second public information meeting and to file a summary of comments received during the meeting to the docket in this proceeding.

On August 9, 2021, the Applicant filed a response to the Staff’s First Data Request received on July 26, 2021. Currently, the Applicant is working to compile additional information to further supplement its response to Staff’s First Data Request. Staff has stated that it needs this information prior to submitting its recommendation on completeness. Therefore, the Applicant is requesting additional time for the completeness review.

The Applicant asserts 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). The Applicant has contacted Staff regarding this motion, and Staff have indicated that they are not opposed to this motion.

Respectfully submitted,

/s/ Christine M.T. Pirik

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**MEMORANDUM IN SUPPORT OF
MOTION FOR ADDITIONAL EXTENSION OF COMPLETENESS REVIEW AND
REQUEST FOR EXPEDITED RULING**

On June 15, 2021, as supplemented on July 21, 2021, the Applicant filed an application for a certificate to construct a solar-powered electric generation facility in Hancock County, Ohio (“Application”). In accordance with the ALJ’s August 11, 2021 Entry, Staff is to file its completeness recommendation by August 23, 2021. The Applicant requests that the ALJ grant a 14-day extension to this time and permit Staff to file its recommendation on or before September 7, 2021.

On August 9, 2021, the Applicant filed a response to the Staff’s First Data Request received on July 26, 2021. On August 13, 2021, the Applicant filed a supplemental response to the Staff’s First Data Request. Currently, the Applicant is working to compile additional information to further supplement its response to Staff’s First Data Request. Staff has stated that it needs this information prior to submitting its recommendation on completeness. Accordingly, the Applicant is requesting additional time for the completeness review in order to allow sufficient time for the Applicant to assemble and submit this information and the Staff to review this information before it issues its completeness recommendation.

As directed by the ALJ, Staff is to file its completeness recommendation by August 23, 2021. The Applicant requests that the ALJ grant a 14-day extension to this time and direct Staff to file its recommendation on or before September 7, 2021.

In light of the tight time frame between now and when Staff is to file its completeness recommendation, the Applicant submits that good cause exists to grant this motion on an expedited basis, in accordance with O.A.C. Rule 4906-2-27(C), and requests that the Board consider this motion as expeditiously as possible.

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 these cases. In addition, the undersigned certifies that a copy of the foregoing document is also being served upon the persons below this 23rd day of August, 2021.

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Summary: Motion for Additional Extension of Completeness Review and Request for Expedited Ruling and Memorandum in Support electronically filed by Christine M.T. Pirik on behalf of BORDER BASIN I LLC, GALEHEAD DEVELOPMENT LLC CEO