

**BEFORE THE OHIO POWER SITING BOARD**

In the Matter of the Application of  
Kingwood Solar I LLC for a Certificate of  
Environmental Compatibility and Public Need

Case No. 21-0117-EL-BGN

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**INTERVENORS, XENIA TOWNSHIP, MIAMI TOWNSHIP, CEDARVILLE  
TOWNSHIP, AND CITIZENS FOR GREENE ACRES, INC.'S, MEMORANDUM IN  
OPPOSITION TO JOINT MOTION TO CONTINUE DEADLINES, MEMORANDUM IN  
SUPPORT AND REQUEST FOR EXPEDITED RULING FILED BY APPLICANT,  
KINGWOOD SOLAR I, LLC**

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Intervenors, Xenia Township, Miami Township, Cedarville Township (the “Townships”) and Citizens for Greene Acres, Inc. (“CGA”), oppose the Joint Motion to Continue Deadlines, Memorandum in Support and Request for Expedited Ruling filed by the Applicant, Kingwood Solar I, LLC (“Kingwood”) (the “Motion”).

The Townships and CGA have reviewed the proposed Stipulations and related offers presented by Kingwood in settlement discussions. The residents of the Townships have expressed significant opposition to the Kingwood project to their elected representatives. No stipulation or other offer submitted by Kingwood effectively counters this widespread opposition. It is unlikely that the Townships, CGA and Kingwood can reach any agreement that will alter the negative view of the project held by the Townships’ residents and the members of CGA. Given this fact, the Townships and CGA believe that there is no benefit to continuing the deadlines in this matter. Extending the deadlines will only increase expenses for the Townships and CGA without providing them any benefit.

The Townships and CGA respectfully request that the Ohio Power Siting Board deny Kingwood’s Motion.

Respectfully submitted,

/s/ David Watkins

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### **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was filed electronically with the Ohio Power Siting Board on February 15, 2022. The Ohio Power Siting Board'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.

/s/ David Watkins

David Watkins (0059242)

**This foregoing document was electronically filed with the Public Utilities  
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**2/15/2022 6:38:34 PM**

**in**

**Case No(s). 21-0117-EL-BGN**

Summary: Objection Memo in Opposition to Motion to Continue Deadlines,  
Memorandum in Support and Request for Expedited Ruling Filed by Applicant  
electronically filed by David Watkins on behalf of XENIA TOWNSHIP TRUSTEES,  
BOARD OF TRUSTEES OF XENIA TOWNSHIP OHIO TRUSTEES