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June 8, 2022

The Honorable Jeffrey Jones
Ohio Power Siting Board
180 East Broad Street, 12th Floor
Columbus, OH 43215-3793

Re: Staff's Response to Motion for Waiver
and Request to File Joint Generation and
Transmission Application,
Case Nos: 22-0549-EL-BGN and
22-0550-EL-BTX

Dear Honorable Jeffrey Jones:

On May 26, 2022, Oak Run Solar Project, LLC ("Applicant") filed a Motion for Waiver and Request to File Joint Generation and Transmission Application. This letter serves as Staff's response to that motion.

Staff's Response to Applicant's Motion for Waiver

As stated above, on May 26, 2022, the Applicant filed a Motion for Waiver of Ohio Administrative Code (Ohio Adm.Code) 4906-3-04(B). In its motion, the Applicant requested that the Ohio Power Siting Board allow Applicant to file a joint application addressing both the generation and transmission line requirements in Ohio Adm.Code Chapters 4906-4 and 4906-5. Applicant's project involves project collector substations located within solar arrays and connected to above-ground transmission lines, which pass through areas where the solar arrays are located. The results of the studies for this Application would be documented in reports that cover both the generation and transmission line facilities. While the reports will distinguish between the locations of the generation facility components and the transmission line facilities, the overall review and analysis for each study will be combined into one report. Applicant avers that it would be most beneficial and efficient to file one application that includes all reports for both generation and transmission line facilities. Applicant also avers that processing the generation and transmission line applications jointly will cause notifications for both

applications to a more inclusive list of individuals, resulting in a more community-friendly package that encompasses the reality of the entire project.

Staff feels that the Applicant's reasoning is sufficient and that the rules should be waived in this case. Staff does not object to the requested waivers. However, Staff reserves the right to require the results from the Applicant in the area covered by the requested waivers if Staff determines such information to be necessary during the course of its investigation.

Respectfully submitted,

/s/ Sarah Feldkamp

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**On behalf of Staff of the
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Summary: Response to Motions for Waiver electronically filed by Mrs. Tonnetta Y.
Scott on behalf of OPSB