

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of)	
Chipmunk Solar LLC for a Certificate of)	Case No. 21-960-EL-BGN
Environmental Compatibility and Public)	
Need)	

**CHIPMUNK SOLAR LLC’S MEMORANDUM IN OPPOSITION - REQUEST TO
CONSOLIDATE WITNESS EXAMINATION, PRESENTATION OF TESTIMONY, AND
FILING OF BRIEFS**

Pickaway County Citizens Against Industrial Solar on Farmland (“PCC”), 22 named adjacent landowners, and two corporate entities filed a joint Petition for Leave to Intervene and Memorandum in Support of Petition for Leave to Intervene (the “Joint Petition”) on June 1, 2022 in this proceeding. In the Joint Petition, the joint petitioners make claims about “protecting themselves, their homes, and their land against damage from the Project.” *See* Joint Petition at 4. The joint petitioners also state that they “should be granted intervention so that they can address these and other problems with the Project as currently designed.” *Id.* In all statements, it is evident that the interests of each of the individual petitioners and the interests of PCC are aligned. Nowhere does the Joint Petition differentiate between PCC, the adjacent landowners, and the corporate entities. Notably, the joint petitioners are represented by the same counsel.

Given these facts, and if leave to intervene is granted, the Board should order the 25 petitioners to consolidate their examination of witnesses, presentation of testimony, and filing of briefs in this proceeding. Ohio Adm.Code 4906-2-12(D)(2) provides that the Board may “[r]equire intervenors with substantially similar interests to consolidate their examination of witnesses or presentation of testimony.” The 25 signatories to the Joint Petition are jointly represented and filed a single petition. They have substantially similar interests. Therefore, if the Board grants

leave to intervene, the Board should order the 25 petitioners to consolidate their examination of witnesses, presentation of testimony, and filing of briefing in this proceeding.

Respectfully submitted,

/s/ Anna Sanyal

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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 in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail on June 16, 2022.

s/ Anna Sanyal

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6/16/2022 3:17:14 PM

in

Case No(s). 21-0960-EL-BGN

Summary: Memorandum Memorandum in Opposition - Request to Consolidate
Witness Examination, Presentation of Testimony, and Filing of Briefs electronically
filed by Ms. Anna Sanyal on behalf of Chipmunk Solar LLC