

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Application of Oak Run Solar )  
Project, LLC for a Certificate of Environmental )  
Compatibility and Public Need to Construct a ) Case No. 22-549-EL-BGN  
Solar-Powered Electric Generation Facility in )  
Madison County, Ohio. )

In the Matter of the Application of Oak Run Solar )  
Project, LLC for a Certificate of Environmental ) Case No. 22-550-EL-BTX  
Compatibility and Public Need to Construct a )  
Transmission Line in Madison County, Ohio. )

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**MOTION FOR SUBPOENA TO COMPEL  
THE TESTIMONY OF MARK FORREST**

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Pursuant to Rule 4906-2-23 of the Ohio Administrative Code (“O.A.C.”), Oak Run Solar Project, LLC (“Oak Run”) respectfully requests the issuance of a subpoena compelling intervenor, Madison County Commissioner Mark Forrest, to testify at the Ohio Power Siting Board (“OPSB”) hearing for the above-captioned proceedings set to commence on May 15, 2023, at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11<sup>th</sup> Floor, 11-A, Columbus, Ohio 43215-3793.

Respectfully submitted,

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

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Matthew C. McDonnell (0090164)

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*Attorneys for Oak Run Solar Project, LLC*

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**MEMORANDUM IN SUPPORT**

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On December 23, 2022, the Board of County Commissioners of Madison County (“Board of County Commissioners”) filed a Motion to Intervene in this Proceeding.<sup>1</sup> On April 7, 2023, the Administrative Law Judge assigned to the case granted the Board of County Commissioners’ Motion to Intervene.

Oak Run Solar requests a subpoena pursuant to O.A.C. Rule 4906-2-23 to command intervenor, County Commissioner Mark Forrest to appear during the OPSB hearing on May 15, 2023, and provide testimony. Given that Mr. Forrest serves as a County Commissioner in Madison, County his testimony will further clarify his understanding of the Oak Run Solar Project as an elected official representing the interests of Madison County. As such, his testimony falls within the scope of discovery set forth in O.A.C. Rule 4906-2-14.

Respectfully submitted,

/s/ Christine M.T. Pirik

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***Attorneys for Oak Run Solar Project, LLC***

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<sup>1</sup> Mark Forrest, Chris Wallace, and Dr. Tony Xenikis currently serve on the Board of the Madison County Commissioners.

## CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion for Subpoena and the Subpoena were served upon Mark Forrest and Nick Adkins, counsel for intervenor Madison County Commissioners and upon each person below via electronic mail this 4<sup>th</sup> day of May 2023.

/s/ Christine M.T. Pirik

Christine M.T. Pirik (0029759)

### Counsel:

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BEFORE THE  
OHIO POWER SITING BOARD

SUBPOENA

TO:

The Honorable, Mark Forrest  
Madison County Commissioner  
1 North Main Street  
London, Ohio 43140

RECEIVED-DOCKETING DIV  
2023 MAY -3 PM 3:09  
PUCO

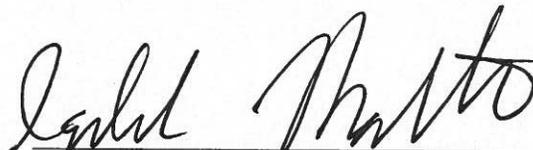
Upon application of Oak Run Solar Project, LLC, you are hereby required to appear before the Ohio Power Siting Board as a witness in the following proceeding:

Case No. 22-549-EL-BGN and Case No. 22-550-EL-BTX

Case Titles: In the Matter of the Application of Oak Run Solar Project, LLC for a Certificate to Construct a Solar-Powered Electric Generation Facility in Madison County, Ohio, and In the Matter of the Application of Oak Run Solar Project, LLC for a Certificate of Environmental Compatibility and Public Need to Construct a Transmission Line in Madison County, Ohio.

You are to appear at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11<sup>th</sup> Floor, Columbus, Ohio 43215, on the 15<sup>th</sup> day of May, 2023 at 10:00 a.m., in Hearing Room 11-A.

Dated at Columbus, Ohio, this 3<sup>rd</sup> day of May, 2023.

  
\_\_\_\_\_  
Administrative Law Judge

Notice: If you are not a party or an officer, agent, or employee of a party to this proceeding, then witness fees for attending under this subpoena are to be paid by the party at whose request the witness is summoned. Every copy of this subpoena for the witness must contain this notice.

**This foregoing document was electronically filed with the Public Utilities  
Commission of Ohio Docketing Information System on**

**5/4/2023 1:58:37 PM**

**in**

**Case No(s). 22-0550-EL-BTX, 22-0549-EL-BGN**

Summary: Motion - MOTION FOR SUBPOENA TO COMPEL THE TESTIMONY OF  
MARK FORREST electronically filed by Christine M.T. Pirik on behalf of Oak Run  
Solar Project, LLC.