

**COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY STATE BOARD
ON ELECTRIC GENERATION AND TRANSMISSION SITING**

**In the Matter of the Application of SR Turkey Creek,)
LLC, for a Construction Certificate to Construct a) Case No. 2020-00040
Merchant Electric Generating Facility)**

MOTION FOR DECISION

SR Turkey Creek, LLC (“Turkey Creek”),¹ by counsel, hereby respectfully submits this Motion for Decision in light of certain upcoming project deadlines. In support of the motion, Turkey Creek states as follows:

On March 20, 2020, Turkey Creek filed an application with the Siting Board for a certificate to construct a solar energy project (the “Project”). No person sought intervention in this matter or filed comments in opposition to the siting of the Project.² On September 23, 2020, the Siting Board approved a certificate to construct the Project. As a part of its Order, the Siting Board required Turkey Creek to comply with certain mitigation measures.

After evaluating the Siting Board’s mitigation measures, on October 19, 2020, Turkey Creek filed a Petition for Reconsideration and Clarification related to certain mitigation measures. By Order entered December 15, 2020, the Siting Board agreed to further investigate the issues raised by Turkey Creek. In that Order the Siting Board established a procedural schedule with two additional rounds of written discovery requests. Turkey Creek filed its responses to the last set of discovery requests on February 15, 2021.

¹ On March 1, 2021, Turkey Creek filed an Amended Certificate of Authority indicating a change in name from Turkey Creek Solar, LLC, to SR Turkey Creek, LLC.

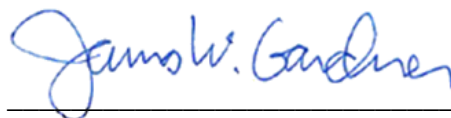
² In light of Turkey Creek’s extensive public outreach efforts, it is significant that no one has opposed the project.

Turkey Creek is nearing the end of the development phase, where the Project has been substantially cleared of environmental, interconnection, site control, and permitting risks. It has selected a contractor to construct the Project. In order to finalize an Engineering, Procurement and Construction (“EPC”) contract on schedule with the EPC contractor, the deadline for changes to the EPC agreement, including the Project’s design, has been set for April 9, 2021.

There are currently multiple conditions pending with the Siting Board that will impact the Project’s final design and EPC contract, including setback requirements, construction hours, tamping restrictions, and vegetative buffer requirements. Turkey Creek will be unable to formalize an EPC contract with the contractor until there has been resolution on the outstanding conditions and proposed amendments. In addition, Silicon Ranch Corporation (the sole owner of Turkey Creek) plans to close on the purchase of the solar project property by April 9, 2021, and would prefer a decision from the Siting Board prior to closing.

In order to evaluate the Siting Board’s ultimate decision and make any necessary changes to the design of the project for the third-party contractor by April 9, 2021, Turkey Creek would respectfully request a decision by the Siting Board no later than Wednesday, April 7, 2021.

Respectfully submitted,



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