

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

In the Matter of:

<i>Electronic Application of Caldwell Solar, LLC</i>)	
for Certificate of Construction for an up to 200)	Case No.
Megawatt Merchant Electric Solar Generating)	2020-00244
Facility in Caldwell County, Kentucky)	

**Applicant’s Motion for Extension of Time
to Respond to Siting Board Staff’s Initial Data Requests**

Caldwell Solar, LLC (“Caldwell” or “Applicant”), hereby moves for an extension of time by which to respond to the Siting Board Staff’s Initial Data Requests. In support of this Motion, the Applicant states as follows:

1. Pursuant to the Appendix of the Siting Board’s November 1, 2021 scheduling order, the deadline for the Applicant’s Response to initial Requests for Information is December 3, 2021.
2. Applicant needs additional time to prepare appropriate responses and verify several of the remaining Initial Data Requests (Nos. 5, 28, 50, 52, 66, 80, 83-85, 88, 91-92). Applicant was provided ninety-nine data requests on November 19, 2021, with the Thanksgiving holiday the following week interfering with its ability to obtain all the necessary information to provide responses to the extensive number of requests by the listed deadline. Applicant will still provide responses on December 3, 2021, to the other data requests; it has identified those twelve requests which will require additional time. Applicant requests an extension of seven (7) days, to be due on December 10, 2021.

3. This extension would allow the Applicant to fully satisfy its obligations in responding to the requests for information in time for the hearing to be scheduled in the Siting Board's investigation of the proposed construction certificate.

WHEREFORE, Applicant respectfully requests that the Siting Board grant an extension of seven (7) days, up until and on Friday, December 10, 2021, for Applicant to respond to certain of the Siting Board Staff's initial data requests.

Respectfully submitted,

/s/ Jason R. Bentley

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