



921 College Street • Phoenix Place
Post Office Box 3100 • Bowling Green, Kentucky 42102-3100

ATTORNEYS at LAW

David F. Broderick
Christopher T. Davenport
R. Taylor Broderick
Brandon T. Murley
Kate E. Payton
Kaitlyn S. Embry

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Kentucky Public Service Commission

RE: Request for Intervention - Case No. 2020-000417

To Whom It May Concern:

My office represents John Pitt and Steve Baldwin, who both have interest in property that is in direct proximity to the proposed site of the solar photovoltaic panels and racking project near the City of Franklin in Simpson County, Kentucky, which has gone through the application process and is proceeding.

These individuals would like to intervene in this matter and understand that the application process requires a statement of compliance with any local zoning regulations. In this matter, as it relates to this project, there is currently one appeal pending before the Simpson Circuit Court, Civil Action No. 21-CI-00064, as it related to the granting of a conditional use permit and several alleged violations of zoning ordinances. Further, there will be a second appeal filed very soon concerning a later granting of a conditional use permit on this project.

The project changes the character and nature of the agricultural use of the property and has affected, injured and aggrieved my clients as individuals with interest/ownership of property in direct proximity to the project. These injuries are being addressed with the Simpson Circuit Court and this project does not conform with the surrounding properties. For these reasons, my clients object to this application process moving forward, and request leave to intervene to assert their interests in this matter and have their objections heard before this Commission. Please contact my office with any questions or concerns.

Very truly yours,

BRODERICK & DAVENPORT, PLLC

/s/ David F. Broderick

DAVID F. BRODERICK
BRANDON T. MURLEY

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