

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

In the Matter of:)
)
APPLICATION OF RUSSELLVILLE SOLAR LLC)
FOR CERTIFICATE OF CONSTRUCTION FOR: AN) **Case No. 2021-00235**
APPROXIMATELY 173-MEGAWATT MERCHANT)
ELECTRIC SOLAR GENERATING FACILITY IN
LOGAN COUNTY, KENTUCKY PURSUANT TO
KRS 278.700, ET SEQ., AND 807 KAR 5:110

**MOTIONS FOR: (I) HYBRID VIRTUAL AND IN-PERSON PARTICIPATION, (II) TO
EXCUSE PARTICIPATION, AND (III) TO ALLOW WITNESS SUBSTITUTION**

Russellville Solar LLC (“Russellville Solar”) respectfully moves the Kentucky State Board on Electric Generation and Transmission Siting (“Siting Board”): (I) to allow a hybrid form of participation, both virtual and in-person, for Russellville Solar witnesses and counsel at the June 30, 2022, hearing; (II) to excuse a witness from participation at the hearing; and (III) to approve the substitution of a witness who sponsored a written response to a request for information.

- (I) Russellville Solar witnesses Stefan Eckmann, Michael Baute, Harriet Richardson Seacat, and Russellville Solar counsel will appear in-person at the hearing. Additionally, Russellville Solar moves the Siting Board to allow virtual participation for witnesses: David Weise, Tim Casey, Paul Coomes and, if required to attend (see II and III below), Richard Kirkland and Joshua Smith. The witnesses’ proposed virtual attendance will not prejudice the Siting Board or any party. They are equipped with the necessary technology to participate remotely.

- (II) Russellville Solar respectfully moves the Commission to excuse witness Richard Kirkland from appearance at the hearing. Mr. Kirkland has submitted his extensive appraisal of the Project's economic impact on surrounding property values to the Siting Board, and his testimony at the hearing would not differ from that report. Further, BBC Research & Consulting's assessment of the Project did not raise any substantial concerns regarding property values. Further, Mr. Kirkland has not been asked any questions at recent Siting Board hearings that he has attended and has been available for cross-examination.
- (III) Russellville Solar also moves the Siting Board to permit Stefan Eckmann to appear at the hearing in place of Joshua Smith. Mr. Smith sponsored a response to Item 2 of the Siting Board's Second Request for Information. Mr. Eckmann will adopt the answer as his own and will assume responsibility for providing testimony related to Mr. Smith's written submission.

Accordingly, Russellville Solar respectfully requests the Commission allow witnesses Stefan Eckmann, Michael Baute, Harriet Richardson Seacat, and counsel to appear in person for the hearing; and witnesses Weise, Casey and Coomes to participate virtually at the hearing. Additionally, Russellville Solar requests that Richard Kirkland be excused from attending the hearing, or alternatively, that he also be permitted to attend remotely; and that Stefan Eckmann appear at the hearing in place of Joshua Smith.

RESPECTFULLY SUBMITTED,

STURGILL, TURNER, BARKER & MOLONEY, PLLC



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