COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION AND TRANSMISSION SITING

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In the Matter of:

| ELECTRONIC APPLICATION OF | |
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| THOROUGHBRED SOLAR, LLC FOR A | |
| CERTIFICATE OF CONSTRUCTION FOR | |
| AN APPROXIMATELY 50 MEGAWATT | |
| MERCHANT ELECTRIC SOLAR | |
| GENERATING FACILITY IN HART | |
| COUNTY, KENTUCKY PURSUANT TO | |
| KRS 278.700 AND 807 KAR 5:110. | |

Case No. 2022-00115

THOROUGHBRED SOLAR, LLC'S MOTION FOR HYBRID VIRTUAL AND IN-PERSON ATTENDANCE

Comes now Applicant Thoroughbred Solar, LLC ("Thoroughbred"), by and through counsel, and moves the Kentucky State Board on Electric Generation and Transmission Siting ("Siting Board") to allow a hybrid form of participation, both virtual and in-person, for two Thoroughbred witnesses at the February 21, 2023 formal hearing.

Specifically, Thoroughbred requests the Siting Board to allow virtual participation for witnesses Andrew Lines and Taylor Gosman to appear virtually. Mr. Lines, Principal – Valuation with CohnReznick, prepared the Property Value Impact Study (Application Exhibit 12 at Attachment J) and can respond to questions regarding the impacts or lack thereof upon property values from large-scale solar electric generation facilities. Mr. Gosman, Senior Director of Project Management with Leeward Renewable Energy, LLC, can respond to questions regarding construction project management, construction processes, traffic and road use, and other similar topics.

The proposed virtual attendance of witnesses Andrew Lines and Taylor Gosman will not prejudice the Siting Board, and there are no other parties to this proceeding. Messrs. Lines and Gosman are equipped with the necessary technology to participate remotely. Furthermore, Thoroughbred's counsel and remaining witnesses will appear in person at the hearing.

Accordingly, Thoroughbred respectfully requests the Siting Board to allow witnesses Andrew Lines and Taylor Gosman to participate virtually at the hearing and the remaining witnesses and counsel to appear in person.

Respectfully submitted,

Jommer L. Sheety

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