

COMMONWEALTH OF KENTUCKY

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

IN THE MATTER OF:

THE ELECTRONIC APPLICATION OF)
SEBREE SOLAR II, LLC FOR A CERTIFICATE)
TO CONSTRUCT AN APPROXIMATELY 150)
MEGAWATT MERCHANT SOLAR ELECTRIC) CASE NO. 2022-00131
GENERATING FACILITY IN HENDERSON)
COUNTY, KENTUCKY PURSUANT TO)
KRS 278.700, ET SEQ. AND 807 KAR 5:110)

MOTION TO ALLOW WITNESS TO ADOPT RESPONSE

Comes now Sebree Solar II, LLC, by counsel, and hereby requests the Kentucky State Board on Electric Generation and Transmission Siting (“Board”) to allow Erin C. Bowen, MAI, to adopt Sebree II’s Response 14 to the Board’s First Information Request, filed on June 16, 2023 (“Response 14”). Andrew R. Lines, MAI and Erin C. Bowen, MAI are co-authors, along with Patricia L. McGarr, MAI, CRE, FRICS, of the report filed with Sebree II’s Application at Exhibit 12- Attachment A, Exhibit 1-P-A, Property Value Impact Studies, prepared by CohnReznick, Valuation Advisory Services, Chicago, Illinois. Response 14 was prepared by the team at CohnReznick, which included both Mr. Lines and Ms. Bowen, however due to logistics issues, the response was only verified by Mr. Lines. Sebree II requests the Siting Board grant its request that Ms. Bowen be allowed to adopt Response 14 and excuse Andrew R. Lines, MAI from appearing at the hearing in this matter. As grounds for this motion, Sebree II states as follows:

Ms. Bowen has worked with Mr. Lines and the team that submitted the property valuation study relied upon for the Application and responses to the Board’s first and second requests for information. Ms. Bowen has been involved in all aspects of the development of the Property Value Impact Studies Report and has first-hand knowledge of the information contained in Response 14

and in Application Exhibit 12 – Attachment A. Ms. Bowen is prepared to respond to questions regarding Response 14 at the hearing in this matter. Mr. Lines will be out of the country on the date of the hearing and did not realize this at the time he was listed as the responsible party for Response 14. Mr. Lines’ only subject matter that he solely verified is Response 14 and the content was prepared by Ms. Bowen, as well. Sebree II has attached an updated Response 14 as attachment A to this Motion, along with a verification of Ms. Bowen.

Therefore, Sebree II requests that Mr. Lines be excused from participation at the hearing on this matter, and Ms. Bowen be permitted to adopt Response 14 and participate in the hearing to be cross-examined as an expert consultant on property valuation based upon the report attached to the Application and the responses to the Board’s First and Second Information Requests.

Done this 28th day of July, 2023.

Respectfully submitted,



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**ATTACHMENT A: VERIFICATION
AND RESPONSE 14 TO SITING
BOARD STAFF'S FIRST REQUEST
FOR INFORMATION**

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

In the Matter of:

ELECTRONIC APPLICATION OF SEBREE)
SOLAR II, LLC FOR A CERTIFICATE TO)
CONSTRUCT AN APPROXIMATELY 150)
MEGAWATT MERCHANT SOLAR ELECTRIC) CASE NO. 2022-00131
GENERATING FACILITY IN)
HENDERSON COUNTY, KENTUCKY AND)
WEBSTER COUNTY, KENTUCKY PURSUANT)
TO KRS 278.700 AND 807 KAR 5:110)

VERIFICATION OF ERIN BOWEN

STATE OF ARIZONA)

COUNTY OF MARICOPA)

Comes now Erin Bowen of CohnReznick, Consultant for Sebree Solar II, LLC, being first duly sworn, and states that she has supervised the preparation of certain responses of Sebree Solar II, LLC to the Siting Board Staff's First Request for Information in the above-referenced case dated May 31, 2023, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.



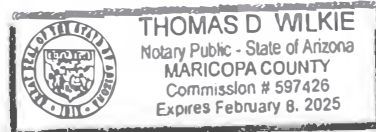
Erin Bowen

Subscribed and sworn to before me on this 27 day of July 2023.



Notary ID: 597426

Expires: 02/08/2025



**SEBREE SOLAR II, LLC
CASE NO. 2022-00131
RESPONSE TO INFORMATION REQUEST**

SITING BOARD STAFF'S FIRST REQUEST FOR INFORMATION DATED 5/31/2023

REQUEST 14

RESPONSIBLE PARTY: Erin Bowen

Request 14. Describe the potential for cumulative effects on property values and land uses from the construction and operation of the four projects.

Response 14.

CohnReznick has prepared a Property Value Impact Study report, provided in the Application as Exhibit 12, Attachment A, Exhibit 1. In summary, the report includes the following conclusions: Based on a review of other academic studies noted within the Report, as well as interviews with assessors and market participants familiar with sales of property adjacent to solar farms, and the conclusions of the eleven solar farm studies CohnReznick conducted and summarized within the Report, CohnReznick concludes that there is no measurable and consistent evidence that solar farms are negatively impacting adjacent real estate property values. Given this conclusion, and CohnReznick's review of elements of the application of Sebree Solar II, LLC, CohnReznick does not expect there to be any negative impact to the real estate surrounding the applicant's Proposed Project.