

**COMMONWEALTH OF KENTUCKY**

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

IN THE MATTER OF:

<b>THE ELECTRONIC APPLICATION OF</b>	)	
<b>WEIRS CREEK SOLAR, LLC FOR A</b>	)	
<b>CERTIFICATE TO CONSTRUCT AN</b>	)	
<b>APPROXIMATELY 150 MEGAWATT</b>	)	
<b>MERCHANT SOLAR ELECTRIC</b>	)	<b>CASE NO.</b>
<b>GENERATING FACILITY IN WEBSTER</b>	)	<b>2024-00099</b>
<b>COUNTY AND HOPKINS COUNTY,</b>	)	
<b>KENTUCKY PURSUANT TO KRS 278.700</b>	)	
<b>ET SEQ. AND 807 KAR 5:110</b>	)	

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**WEIRS CREEK SOLAR LLC'S  
RESPONSE TO THE SITING BOARD CONSULTANT'S REPORT**

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Comes now Weirs Creek Solar, LLC (“Weirs Creek” or “Applicant”), by counsel, and hereby requests the Kentucky State Board on Electric Generation and Transmission Siting (“Siting Board”) to allow Ebone-Alexandria Ross, battery engineer for NextEra Energy, Inc., to adopt Weirs Creek’s September 9, 2024, response to Siting Board Staff’s Second Request for Information (“Staff’s Second Request”), Item 7, Item 8, Item 9, Item 10, and Item 11. Weirs Creek respectfully states as follows:

During the preparation of Staff’s Second Request several responses required details about the proposed battery energy storage system (“BESS”). At the time, several employees collaborated on the responses to the request, but ultimately Lester Morales was the sponsoring witness. Weirs Creek believes Ms. Ross can provide a more detailed response to any questions asked regarding battery storage. Additionally, Ms. Ross is providing an updated response to Staff’s Second Request, Item 9 that contains additional information regarding the BESS.

WHEREFORE, Weirs Creek respectfully requests that Ms. Ross be permitted to adopt the Responses to Staff's Second Request Items 7-11 and participate in the hearing to be cross examined on the issue of battery storage to be utilized within the Project.

This the 27<sup>th</sup> day of September 2024.

Respectfully submitted,

*Heather S. Temple*

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*Counsel for Weirs Creek Solar, LLC*

**CERTIFICATE OF SERVICE**

This is to certify that the electronic filing was transmitted to the Commission on September 27, 2024, and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085 no paper copies of this filing will be made.

*Heather S. Temple*

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*Counsel for Weirs Creek Solar, LLC*