

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

In the Matter of:

ELECTRONIC APPLICATION OF WOOD DUCK)	
SOLAR LLC FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY)	
100 MEGAWATT MERCHANT ELECTRIC SOLAR)	Case No. 2024-00337
GENERATING FACILITY AND NONREGULATED)	
TRANSMISSION LINE IN BARREN COUNTY,)	
KENTUCKY PURSUANT TO KRS 278.700 AND 807)	
KAR 5:110)	

MOTION TO INTERVENE

Nancy West (“Movant”), by counsel, hereby moves to intervene in this matter pursuant to 807 KAR 5:110 § 4.

Wood Duck Solar LLC (“Wood Duck Solar”) seeks to construct an approximately 100-megawatt merchant electric solar facility and nonregulated transmission line in Barren County, Kentucky. Movant is an adjoining landowner who will be impacted by the proposed construction.

Pursuant to 807 KAR 5:110 § 4(2), “A motion to intervene shall be granted if the movant has shown (a) That he has a special interest in the proceeding; or (b) That his participation in the proceeding will assist the board in reaching its decision and would not unduly interrupt the proceeding.” Movant seeks to intervene in this matter in order to protect substantial property rights that are at issue. She also seeks intervention to raise economic, environmental, and conservation issues that will be associated with the proposed construction,

which otherwise may not be adequately protected. Currently, there appears to be no person or entity involved as a party to this proceeding to assert these interests and raise these issues.

Here, Movant satisfies the aforementioned criteria because she has a special interest in Wood Duck Solar's construction of a solar energy generating facility in Barren County. Movant resides in Park City, Barren County, Kentucky. The Movant's property was identified in Attachment B of Wood Duck Solar's Site Assessment Report as an adjoining parcel to the proposed solar facility. (*See*, Wood Duck Solar Application and Exhibits for Certificate of Construction, Site Assessment Report (Exhibit H), Attachment B). Kirkland Appraisals, LLC represents in its report that solar panels will be placed 345 feet from the Movant's residence. (*Id.*) If granted, the solar facility will place a substantial burden on Movant and other similarly situated landowners. Absent intervention, no party to these proceedings will adequately protect the Movant's interests. Wood Duck Solar does not represent the interests of the Movant.

Accordingly, Movant requests the Kentucky State Board on Electric Generation and Transmission Siting enter the attached proposed Order allowing her to intervene in this matter.

NOTICE OF HEARING

The foregoing motion will come on for hearing before the Kentucky State Board on Electric Generation and Transmission Siting at the convenience of the Board.

Respectfully submitted this 19th day of June, 2025.

/s/ Harold Mac Johns

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CERTIFICATE OF SERVICE

This is to certify that on June 19, 2025, a true and accurate copy of the foregoing document was electronically filed to the PSC site with a copy electronically mailed to the following:

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