

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF CRAB RUN
SOLAR, LLC FOR A CERTIFICATE OF
CONSTRUCTION FOR AN UP TO 45
MEGAWATT ELECTRIC SOLAR GENERATING
FACILITY IN MARION COUNTY, KENTUCKY

CASE NO.
2025-00276

APPLICANT CRAB RUN SOLAR PROJECT, LLC'S FIRST REQUEST FOR
INFORMATION TO INTERVENOR OLIVIA THOMAS

Intervenor Olivia Thomas ("Intervenor"), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on April 17, 2026. Intervenor is directed to the Kentucky Public Service Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8)

response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Intervenor shall make timely amendment to any prior response if Intervenor obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Intervenor fails or refuses to furnish all or part of the requested information, Intervenor shall provide a written explanation of the specific grounds for the failure to completely and precisely respond.

Careful attention shall be given to copied or scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Intervenors shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Identify each reason you oppose the Crab Run Solar Project.
2. Explain the basis for each reason you oppose the Crab Run Solar Project.
3. Identify each person, if any, you may call to testify as a witness at the evidentiary hearing in this matter, including their name, address, and telephone number and/or email address.
4. For all person(s) identified in No. 3, describe in detail the substance, subject matters, issues, positions, and/or opinions of the expected testimony.
5. Identify and provide copies of all exhibits, if any, you intend to introduce at the evidentiary hearing in this matter.

6. Identify and provide copies of all communications you have had with Kentucky Public Service Commission or Electric Generation and Transmission Siting Board regarding this matter or the Crab Run Solar Project.

7. Identify and provide copies of all communications you have had with any other Intervenor(s) regarding this matter or the Crab Run Solar Project.

8. Identify each and every individual and entity who has communicated with you regarding the Crab Run Solar Project.

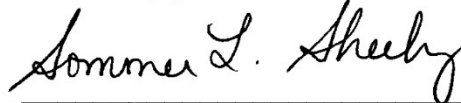
9. Provide copies of all communications identified in response to No. 8 above.

10. Identify each and every individual and entity you met with regarding the Crab Run Solar Project, including the date of each such meeting.

11. Provide all communications and documents produced, generated, sent, and/or issued by you that relates in any manner to the Crab Run Solar Project.

12. Provide any and all documents, reports, analyses, or studies in your possession regarding the local public's opposition to or support of the Project.

Respectfully submitted,



Sommer L. Sheely
Kara H. Herrnstein
Lila M. Appaya
BRICKER GRAYDON WYATT LLP
100 South Third Street
Columbus, OH 43215-4291
Telephone: (614) 227-2300
Facsimile: (614) 227-2390
E-mail: ssheely@bricker.com
kherrnstein@bricker.com
lappaya@bricker.com

Counsel for Crab Run Solar Project, LLC