

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

In the Matter of:

ELECTRONIC APPLICATION OF MYSO, LLC)	
(MAYFIELD) FOR A CERTIFICATE OF)	
CONSTRUCTION FOR AN APPROXIMATELY)	
200 MEGAWATT MERCHANT SOLAR ELECTRIC)	Case No. 2025-00395
GENERATING FACILITY IN GRAVES COUNTY,)	
KENTUCKY PURSUANT TO KRS 278.700 AND)	
807 KAR 5:110)	

MOTION TO SUBSTITUTE APPLICANT WITNESS

Comes now MYSO, LLC (the “Applicant” or “Mayfield”), by and through counsel, hereby moves the Kentucky State Board on Electric Generation and Transmission Siting (“Siting Board” or “Board”) pursuant to the Siting Board’s Order issued on February 10, 2026 to substitute Matthew Batdorf for Jessica Hodges in the above-captioned matter. In support thereof, Mayfield respectfully states as follows:

I. BACKGROUND

On January 29, 2026, Mayfield filed an application for a Certificate to Construct an approximately 200 megawatt utility-scale solar-powered merchant electric generating facility in unincorporated Graves County (the “Mayfield Solar Project” or “Project”). On February 10, 2026, the siting Board issued its scheduling order in Mayfield’s construction certificate case (“Scheduling Order”). The Scheduling Order includes certain directives for the Applicant including participation of sponsoring witnesses in the case’s evidentiary hearing, which is scheduled for June 10, 2026. Regarding substitution of a witness, paragraph 13 of the Scheduling Order provides:

“The Siting Board does not look favorably upon motions to substitute witnesses or excuse witnesses from testifying at Siting Board hearings. Accordingly, motions to substitute witnesses or excuse a witness from testifying at a Siting Board hearing or from testifying in person at a Siting Board hearing shall be made in writing at least 14 days prior to the hearing and will be granted only upon a showing of good cause.”

II. REQUEST FOR SUBSTITUTION

The Applicant respectfully requests the Board grant its requested substitution of Matthew Batdorf for Jessica Hodges in connection with Mayfield’s construction certificate Application. Ms. Hodges was inadvertently listed as the sponsoring witness in place of Mr. Batdorf on Applicant’s Responses to Siting Board Staff’s First Request for Information, response Nos. 12 and 49. These are the only responses Mr. Hodges has sponsored. Good cause exists for the requested substitution, as Mr. Batdorf was intended to be listed as the responding witness for responses No.12 and 49 and Mr. Batdorf is more qualified to testify on the topics addressed by responses No. 12 and 49. While Ms. Hodges and Mr. Batdorf are both employed by Tetra Tech and critical members of the team preparing materials in support of the Application, Mr. Batdorf is likely to be the most helpful to the Board if it has any questions regarding the materials covered in responses No. 12 and 49. Mr. Batdorf is Natural Resources and Planning Manager at Tetra Tech, the company acting as technical consultant to the Applicant for the Project, and is thus prepared to adopt Ms. Hodges’ prior discovery responses, sponsor responses to data requests on the same topics going forward, and testify at the evidentiary hearing in this matter.

Additionally, the Applicant’s request to substitute a witness is timely, as there are still 20 days before the Board’s hearing.

Wherefore, MYSO, LLC, respectfully requests that the Board:

1. Grant the Applicant’s request to substitute Matthew Batdorf for Jessica Hodges as a witness;

2. Allow Matthew Batdorf to adopt discovery responses previously sponsored by Jessica Hodges; and
3. Excuse Jessica Hodges from participating in the June 10, 2026 evidentiary hearing in the above-styled case.

Respectfully submitted,

/s/Pierce T. Stevenson _____
Gregory T. Dutton
Pierce T. Stevenson
FBT GIBBONS LLP
400 West Market Street, Suite 3200
Louisville KY 40202
502-589-5400
502-581-1087 (Fax)
gdutton@fbtgibbons.com
pstevenson@fbtgibbons.com

and

Kathryn A. Eckert
FBT GIBBONS LLP
325 West Main Street, Suite 301
Lexington, KY 40507
(859) 231-0000
(859) 231-0011 (Fax)
keckert@fbtgibbons.com
Counsel for MYSO, LLC