

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)	

WITNESS LIST

Comes now MYSO, LLC (the “Applicant” or “Mayfield”), by and through counsel, pursuant to 807 KAR 5:110, §6 and other applicable law, and does hereby give its intent to make the following witnesses available for examination at the hearing in the above-captioned matter, which is scheduled for 9:00 a.m. on Wednesday, June 10, 2026.

Jacqui Kitchen, Senior Director, Development, BrightNight, LLC, will be available to provide testimony regarding the development and construction planning of the proposed electric generation facility (“Project”) including but not limited to overall Project design, security, scheduling, delivery, and logistics; public outreach and communications; and other general matters relating to Project design and management.

Bob Roy, Director, Permitting, BrightNight, LLC, will be available to provide testimony regarding Project permitting, vegetative screening and management, stormwater drainage, and environmental surveys.

Ryan Turner, Director, Project Engineering, BrightNight, LLC, will be available to provide testimony regarding the Project’s geotechnical studies and engineering design related to fencing, cabling, internal roadways, and similar activities.

Matthew Batdorf, Natural Resources and Planning Manager at Tetra Tech, Inc., will be available to provide testimony regarding the Project's acoustic assessment (Application Exhibit H, SAR Attachment D), glare hazard analysis (Application Exhibit H, SAR Attachment E), traffic assessment (Application Exhibit H, SAR Attachment F), and decommissioning plan (Application Exhibit I). Mr. Batdorf has worked for Tetra Tech, Inc., for the past three years and has 13 years of relevant industry experience. His qualifications are attached hereto.

Fletcher Mangum, Mangum Economics, will be available to provide testimony regarding his report on the Project's economic impact at both local and state levels (Application, Exhibit G). Mr. Mangum has over three decades of experience in quantitative analysis and policy development at both the state and federal levels. Mr. Mangum earned his Ph.D. in Economics from George Mason University in 1995 where he specialized in applying economic insights to public policy questions. Dr. Mangum's qualifications are attached hereto.

Richard C. Kirkland Sr., of Kirkland Appraisals, LLC, will be available to provide testimony regarding his report on the Project's impact on the value of adjoining properties (Application Exhibit H, SAR Attachment B). Mr. Kirkland has worked as a commercial property appraiser since 1996 and has specific experience in analyzing property value impacts related to development of merchant electric generating facilities in Kentucky. Mr. Kirkland's qualifications are included in his property value impact assessment, located in Application Exhibit H, SAR Attachment B.

Respectfully submitted,

/s/ Kathryn A. Eckert

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EXPERIENCE SUMMARY

Matthew Batdorf serves as Tetra Tech’s local natural resources and planning manager for Tetra Tech’s Glen Allen, Virginia office. He has 13 years of environmental consulting experience supporting the energy industry (transmission, distribution, solar, etc.) in development and review of federal, state, and local regulatory approvals, including Virginia Water Protection permits (general and individual permits), Virginia Marine Resource Commission (VMRC) permits, and Nationwide Permits (NWPs), and Erosion and Sediment Control (ESC) plans as well as permit compliance during construction. In addition to his permitting experience, he has spent much of his career completing natural resources surveys, biological monitoring, and environmental compliance modelling on energy projects in support of permitting efforts. His experience completing these studies and working on projects during the construction phase have allowed him to gain a wealth of experience related to how projects are designed and constructed, so he is able to provide valuable feedback to engineers and designers to inform their designs and minimize permitting.

Specific to Dominion, Matthew has been supporting Dominion’s Distribution program within the Dominion Energy Environmental & Sustainability group across its portfolio of projects. His leadership role within this program has included managing and mentoring junior staff, and providing technical QA/QC review and guidance on greater than 15 environmental due diligence and environmental permitting projects. As a result of this work with Dominion, he has gained a strong understanding of how Dominion delivers its projects and its standard operating procedures.

At Tetra Tech, Matthew’s technical experience has led to his role as a natural resources and planning manager for our Glen Allen, Virginia office. In that role, he supervises, manages, and mentors a team of project managers, subject matter experts, and junior staff on permitting strategies, regulatory interpretation, and best practices to build technical expertise and confidence. He has played an integral role in updating standard operating procedures and report templates to optimize his team’s time and improve deliverable quality. He routinely works with multiple stakeholders and coordinates with multiple government agencies. He has been a participant in the Chesapeake Bay Preservation Act stakeholder advisory group for developing climate change and adaptation guidelines, a member of the technical review team for revising local regulations, the chair for the water resources subcommittee of the Henrico Environmental Action Resource Team, and the secretary for the Virginia Water Monitoring Council.

CORPORATE PROJECT EXPERIENCE

Project Manager, January 2024-Present **Dominion Energy, Wetland Delineations and Permitting, VA**

Responsibilities include: Managing, mentoring junior staff, and providing technical QA/QC review and guidance on greater than 15 environmental due diligence and environmental permitting projects for the Distribution group within Dominion Energy Environmental & Sustainability. Tasks have consisted of wetland delineations and

EDUCATION

BS, Biology, Christopher Newport University 2012

AREA OF EXPERTISE

Environmental Permitting
Project Management
Chesapeake Bay Preservation Act permitting and compliance
Wetland Delineations
Stream assessments and delineations
Threatened and Endangered Species
Environmental Compliance

REGISTRATIONS/ CERTIFICATIONS

WPIT, 2020

TRAINING

Aquatic Insect Ecology; 2022
Grasses, Sedges, Rushes; 2021
Winter Botany; 2020
40-hour Wetland Delineation Training; 2019

OFFICE

Glen Allen, VA

YEARS OF EXPERIENCE

13

YEARS WITHIN FIRM

3

successful permit acquisition for VWP permits, VMRC permits, and NWP, as well as ESC plans, Stormwater Pollution Prevention Plans (SWPPP), and Construction General Permits (CGP).

Environmental Lead, August 2025-Present

Mountain Valley Pipeline, LLC, Environmental Permitting, Montgomery, VA

Responsibilities include: Providing technical QA/QC review and guidance to junior staff of environmental due diligence deliverables, approved jurisdictional determination requests, state surface water determination request, isolated wetland of minimal ecological value request, and a Joint Permit Application for a VWP General Permit WP4 and a NWP 12 for a confidential compressor station project.

Project Manager, January 2024-January 2026

AES, Environmental Permitting, Isle of Wight, VA

Responsibilities included: Managing, performed wetland delineations; provided technical guidance to junior staff and QA/QC review of environmental due diligence deliverables, approved and preliminary jurisdictional determination requests, and state and federal environmental permitting for 85-megawatt alternating current utility scale Windsor Solar project. Successfully acquired the first Individual VWP permit for a solar project that went through the Permit By Rule process and a NWP 51 and NWP 57.

Project Manager, January 2024-July 2025

AES, Environmental Permitting, Dundas, VA

Responsibilities included: Managing, providing technical guidance to junior staff and QA/QC review of environmental due diligence deliverables, preliminary jurisdictional determination request, and state and federal environmental permitting for a 47-megawatt alternating current utility scale solar project. Successfully acquired a VWP WP-4 and a NWP 18.

Project Manager, December 2025-April 2026

AES, Environmental Permitting, Frederick, VA

Responsibilities included: Managing, providing technical guidance to junior staff and QA/QC review of environmental due diligence deliverables such as Phase I ESA, wetland delineation, and a threatened and endangered species habitat survey for a 170-megawatt alternating current utility scale solar project.

Environmental Lead, January 2024-Present

Sun Tribe/Terraform, Environmental Permitting, Cumberland, VA

Responsibilities include: Providing technical guidance to junior staff and QA/QC review of environmental due diligence deliverables, jurisdictional determination requests, and state and federal environmental permitting for a confidential 100-megawatt alternating current utility scale solar project. Successfully acquired a VWP General Permit WP4 and a NWP 14.

Environmental Lead, January 2024-Present

Sun Tribe/Terraform, Environmental Permitting, Cumberland, VA

Responsibilities include: Providing technical guidance to junior staff and QA/QC review of environmental due diligence deliverables, jurisdictional determination requests, state surface water determination requests, and state and federal environmental permitting for a confidential 115-megawatt alternating current utility scale solar project. Successfully acquired a VWP General Permit WP4 and a NWP 57.

Environmental Lead, May 2024-Present

Torch Clean Energy, Environmental Permitting, Greensville, VA

Responsibilities include: Providing technical guidance to junior staff and QA/QC review of environmental due diligence deliverables, a bald eagle survey, and state and federal environmental permitting for a confidential 49-megawatt alternating current utility scale solar project. Successfully acquired a VWP General Permit WP4 and a NWP 57.

Environmental Lead, January 2024-Present

Torch Clean Energy, Environmental Permitting, Amelia, VA

Responsibilities include: Providing technical guidance to junior staff and QA/QC review of environmental due diligence deliverables, approved and preliminary jurisdictional determination requests, isolated wetland of minimal ecological value request, and a Joint Permit Application for a VWP General Permit WP4 and a NWP 57 for a confidential 106-megawatt alternating current utility scale solar project.

Project Manager, January 2025-Present**Apex Clean Energy, Environmental Compliance, Eagle Rock, VA**

Responsibilities include: Managing, providing technical guidance to junior staff, QA/QC review of technical documents, environmental compliance monitoring, client coordination, ensuring adherence to federal (NWP 14), state (VMRC and VWP GP3), and local permits, scheduling, financial reviews, daily compliance report reviews, and updating daily compliance tracker.

Project Manager, April 2024 – January 2026**6GM Portfolio, Permitting and Site Design, Illinois**

Responsibilities included: Managing the approximately \$310 thousand portfolio contract for eight Distributed Generation solar facilities throughout Illinois. The projects included wetland delineations, USACE coordination, local permitting, threatened and endangered species habitat surveys with federal and state coordination, ALTA surveys, site plan designs, decommissioning plans, cultural surveys with SHPO coordination, and acoustic surveys.

Project Manager, March 2024 – October 2025**Hexagon, Permitting and Due Diligence, Knox, Illinois**

Responsibilities included: Managing and providing technical guidance on a 100-megawatt solar project. Tasks included wetland delineations, USACE coordination, threatened and endangered species habitat surveys with federal and state coordination, ALTA surveys, Phase I ESAs, decommissioning plans, cultural surveys with SHPO coordination, and acoustic surveys. Successfully acquired a Preliminary Jurisdictional Determination with the USACE.

Project Manager, March 2024 – October 2025**Hexagon, Permitting and Due Diligence, Clay, Illinois**

Responsibilities included: Managing and providing technical guidance on a 100-megawatt solar project. Tasks included wetland delineations, jurisdictional determination requests, USACE coordination, threatened and endangered species habitat surveys with federal and state coordination, ALTA surveys, Phase I ESAs, decommissioning plans, cultural surveys with SHPO coordination, and acoustic surveys.

Environmental Lead, January 2025-Present**Recurrent, Environmental Due Diligence, Chesterfield, VA**

Responsibilities include: Providing technical guidance to junior staff; QA/QC review of wetland delineations, preliminary jurisdictional determination request, and threatened and endangered species habitat assessments; provided technical permitting guidance to the client; and coordinated with the USACE. Successfully acquired a preliminary jurisdictional determination.

Environmental Lead, February 2024 – February 2026**Recurrent, Permitting and Due Diligence, Greene, NC**

Responsibilities included: Providing technical guidance to junior staff; QA/QC review of wetland delineations, preliminary and approved jurisdictional determination request, Phase I ESAs, and threatened and endangered species habitat assessments; provided technical permitting guidance to the client; and coordinated with the USACE.

Environmental Lead, November 2024 – February 2026**Zelestra, Permitting and Due Diligence, Pike and Gibson, IN**

Responsibilities included: Providing technical guidance to junior staff; QA/QC review of wetland delineations, No Permit Required letter, and threatened and endangered species habitat assessments; and provided technical permitting guidance to the client.

Staff Coordinator, April 2025 – Present**Dominion Energy, Invasive Species Monitoring, VA**

Responsibilities include: Coordinating staff for bi-annual invasive species monitoring of the CVOW-C onshore route. Project purpose is to provide up to 3,000-megawatts of energy to Virginia and North Carolina residents and consists of approximately 14 miles of right-of-way corridors that require invasive species monitoring and control. Duties included subconsultant coordination, scheduling, and staff coordination.

Staff Coordinator, September 2024 – January 2026
Mountain Valley Pipeline, LLC, Environmental Monitoring, WV and VA

Responsibilities include: Coordinating staff for annual environmental monitoring of the Mountain Valley Pipeline for permitted wetland and stream crossings. Project included approximately 545 stream crossings and approximately 420 wetland crossings. Duties included project financial reviews, scheduling, and client coordination.

PREVIOUS EXPERIENCE

Water Quality Analyst, 2020–2024
The County of Henrico, Henrico Co., VA

Reviewed and assisted with the application of Nationwide Permits for linear projects, maintenance projects, and stream stabilization projects. Interpreted and implemented County and Virginia State ordinances/regulations related to the Chesapeake Bay Preservation Act through the technical review of Erosion and Sediment Control (ESC) plans and reviewed and approved Water Quality Impact Analysis reports for impacts to Resource Protection Areas and Resource Management Areas. Routine work included interagency coordination, stream assessment, and surface water biological monitoring.

Environmental Compliance Monitor, 2019
AECOM, META Data Center, Henrico Co., VA

Services included assessing the Project area to ensure construction activities complied with all federal, state, and local environmental permit requirements. Assessments included monitoring erosion and sediment controls, monitoring for sediment discharges, data collection, GIS mapping, monthly DEQ reports, and bi-annual DEQ reports.

Environmental and Permitting Task Lead
AECOM, Confidential Fossil Fuel Energy Project, Chesterfield Co., VA

Services included the collection of data points involving soil, vegetation, and hydrological characterization, the demarcating and GPS tracking of wetland boundaries, identification of Waters of the United States using the Atlantic and Gulf Coast regional supplement to the U.S. Army Corps of Engineers Wetland Delineation Manual, post-processing of GPS data files, building of geographic information system maps of delineated areas, Jurisdictional Determination Requests, Chesapeake Bay Preservation Act (Resource Protection and Resource Management Areas) delineations and confirmations with counties and Department of Environmental Quality, permitting (Joint Permit Application and Nationwide Permits), and client consultation.

Environmental and Permitting Task Lead
AECOM, Henrico County Public Works Road and Sidewalk Improvement Projects, Henrico Co., VA

Services included the collection of data points involving soil, vegetation, and hydrological characterization, the demarcating and GPS tracking of wetland boundaries, identification of Waters of the United States using the Atlantic and Gulf Coast regional supplement to the U.S. Army Corps of Engineers Wetland Delineation Manual, stream assessments (NCDWQ, Fairfax Method, Unified Stream Method), Jurisdictional Determination Requests, Chesapeake Bay Preservation Act (Resource Protection and Resource Management Areas) delineations and confirmations with counties and Department of Environmental Quality, permitting (Joint Permit Application and Nationwide Permits), and client consultation.

Environmental and Permitting Task Lead
AECOM, Hampton Roads Sanitation District, City of Newport News, City of Suffolk, and York Co., VA

Services included the collection of data points involving soil, vegetation, and hydrological characterization, the demarcating and GPS tracking of wetland boundaries, identification of Waters of the United States using the Atlantic and Gulf Coast regional supplement to the U.S. Army Corps of Engineers Wetland Delineation Manual, stream assessments (NCDWQ, Fairfax Method, Unified Stream Method), post-processing of GPS data files, building of geographic information system maps of delineated areas, Jurisdictional Determination Requests, Chesapeake Bay Preservation Act (Resource Protection and Resource Management Areas) delineations and confirmations with counties and Department of Environmental Quality, permitting (Joint Permit Application and Nationwide Permits), and client consultation.

Environmental and Permitting Task Lead
AECOM, Confidential Solar Project, Prince George Co., VA

Services included the collection of data points involving soil, vegetation, and hydrological characterization, the demarcating and GPS tracking of wetland boundaries, identification of Waters of the United States using the Atlantic and Gulf Coast and Eastern Mountains regional supplements to the U.S. Army Corps of Engineers Wetland Delineation Manual, stream assessments (NCDWQ, Fairfax Method, Unified Stream Method), post-processing of GPS data files, building of geographic information system maps of delineated areas, Jurisdictional Determination Requests, U.S. Army Corps of Engineers site visits, Chesapeake Bay Preservation Act (Resource Protection and Resource Management Areas) delineations and confirmations with counties and Department of Environmental Quality, permitting (Joint Permit Application, Nationwide Permits, and Individual Permits), threatened and endangered species habitat surveys, and client consultation.

Biologist and Environmental Task Lead
AECOM, NASA Wallops Flight Facility Biological Assessment, Accomack Co., VA

Services included the collection of data points involving soil, vegetation, and hydrological characterization, the demarcating and GPS tracking of wetland boundaries, identification of Waters of the United States using the Atlantic and Gulf Coast regional supplement to the U.S. Army Corps of Engineers Wetland Delineation Manual, Endangered Species Act section 7 consultation with U.S. Fish and Wildlife Service and state wildlife/natural resource agencies, and threatened and endangered species surveys which included habitat suitability through pedestrian transects.

Biologist and Environmental Task Lead
AECOM, RVA Bald Eagle and Migratory Bird Nesting Survey, Henrico Co., VA

Services included desktop and field assessments for the presence/absence of bald eagles and migratory birds and their nests, and Endangered Species Act section 7 consultation with U.S. Fish and Wildlife Service and state wildlife/natural resource agencies.

Biologist and Environmental Task Lead
ESGI, Inc., North Anna Nuclear Power Station Fish and Benthic Macroinvertebrate Monitoring, Louisa Co., VA

Services included the implementation and monitoring of gill nets to collect and analyze fish population diversity and abundance within and around the facility. Other duties included the collection and analysis of gastropods around the facility intakes to monitor for potential fouling.

Biologist
ESGI, Inc., Roanoke Rapids Eel Passage and Monitoring, Halifax Co., NC

Services included the monitoring, collection, and location tracking of eels caught in an eel ladder to determine abundance, age, and areas inhabited.

Biologist and Environmental Field Lead, Inc. 2016–2017
ESGI, Inc., Confidential Fossil Fuel Energy Projects, VA and WV

Services included surface water and groundwater grab and composite sampling using multi-volume and low flow sampling methods (peristaltic pump, bladder pump, bailer), monitoring water quality parameters to identify stable conditions for sampling, data management including documentation of water quality parameters, sampling data logs, and chain of custody, quality assurance/quality check of field team data, and coordination with environmental compliance directors.

Environmental Lead, 2014–2016
Pollard Environmental, Rockville, VA

Services included groundwater grab sampling using multi-volume sampling methods, monitoring water quality parameters to identify stable conditions for sampling, data management including documentation of water quality parameters, sampling data logs, and chain of custody, quality assurance/quality check of field team data, and coordination with environmental compliance directors. Other duties included soil sampling and analysis for the presence/absence of diesel range organics and gasoline range organics.

Environmental Lead, 2012–2013
Holistic Wildlife Services, Hampton, VA

Services included biological monitoring surveys and threatened and endangered species surveys, which included the assessment of quantity and quality of species populations, habitat suitability, and/or presence/absence surveys. Survey methods included mist netting, radio telemetry, and pedestrian surveys within abandoned mines.

OTHER INFORMATION

ADDITIONAL TRAINING

Adult First Aid/CPR and AED; 2026

Perennial Stream Identification; 2019

Intermediate Botany; 2018

A. FLETCHER MANGUM

Founder & CEO

Mangum Economics

EDUCATION

Ph.D., Economics

George Mason University. 1995

M.A., Economics

George Mason University, 1990

B.A., Economics

College of William and Mary, 1978

PROFESSIONAL EXPERIENCE

Founder & CEO

Mangum Economics

Adjunct Professor

Virginia Commonwealth University

Associate Director for Governance and Accountability & Chief Economist

State Council of Higher Education for Virginia

Senior Economic Analyst

Department of Planning and Budget, Commonwealth of Virginia

Senior Economist

Federal Judicial Center, U.S. Courts

Director

Billcast

BOARD MEMBERSHIPS & APPOINTMENTS

- Board Member, VA Governor's and General Assembly's Joint Advisory Board of Economists (2010–2025)
- Chair & Board Member, Virginia Council on Economic Education (2016–present)
- President, Virginia Association of Economists (2010–2011)
- Member, Governor-Elect McDonnell's Transition Team (2009–2010)
- Member, Governor-Elect Gilmore's Transition Team (1997–1998)

PUBLICATIONS

Authored or contributed to over 300 reports, including:

- The Impact of Right to Work laws on State Economies (January 2026)
- Mayfield Solar (August 2025)
- Skill Games and Virginia (January 2025)
- Starfire Solar (December 2024)
- The Economic Impact of Virginia Exports (November 2024)
- Frontier Solar (March 2024)
- National Civil War Museum (April 2023)
- Blue Moon Solar (October 2021)
- Potential Impact of Development of the Offshore Wind Energy Industry on Hampton Roads and Virginia (Sept 2020)
- The Economic and Fiscal Contribution that Data Centers Make to Virginia (Dec 2015, Jan 2018, Jan 2020)
- Potential Impact of Large Data Center Development in Maryland (March 2020)
- Morgnec Road Solar (July 2019)
- Potential Impact of a Data Center Incentive in Illinois (Nov 2018)
- Economic and Fiscal Contribution of Volvo Group North America to Multiple States (April 2018)
- Economic Development Potential of the Virginia Beach Cable Landings (Jan 2017)

EXPERT TESTIMONY HIGHLIGHTS

Provided testimony before state boards and commissions in multiple U.S. states, including:

- Potential Effect of Electric Rate Increase on Data Center Development in Florida – Florida Public Service Commission (October 2025)
- Economic Impact of Starfire Solar – Kentucky Electric Generation and Transmission Siting Board (June 2025)
- Economic Impact of Frontier Solar – Kentucky Electric Generation and Transmission Siting Board (April 2024)
- Economic Impact of Blue Moon Solar – Kentucky Electric Generation and Transmission Siting Board (June 2022)
- Economic Impact of Data Centers in Georgia – GA House Appropriations Committee (Feb 2022)
- Economic Impact of Morgnec Road Solar – Maryland Public Service Commission (Nov 2021)
- Economic Impact of Black Rock Wind – West Virginia Public Service Commission (Sept 2019)
- Economic Impact of Dan’s Mountain Wind Project – Maryland Public Service Commission (Sept 2016)
- Economic Impact of Mills Branch Solar – Maryland Public Service Commission (June 2016)
- Economic Contribution of Data Centers in Virginia – Senate Finance Committee, VA (Jan 2016)
- Telecom Service Quality Regulations – Virginia State Corporation Commission (April 2009)
- Mandated Coverage for Prosthetic Devices – VA Senate Commerce & Labor Committee (Jan 2009)
- Single Sales Factor Apportionment in Virginia – VA General Assembly (Oct 2008)