## COMMONWEALTH OF KENTUCKY

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

In the Matter of	:
------------------	---

CASE NO.
2020-00040

## SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION ON REHEARING TO TURKEY CREEK SOLAR, LLC

Turkey Creek Solar, LLC (Turkey Creek), pursuant to 807 KAR 5:001, is to file with the Siting Board an electronic version of the following information. The information requested herein is due on February 15, 2021. The Siting Board directs Turkey Creek to the March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085 regarding filings with the Siting Board. The Siting Board expects the original documents to be filed within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered

<sup>&</sup>lt;sup>1</sup> Case No. 2020-00085, Electronic Emergency Docket Related to the Novel Coronavirus COVID-19 (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, Electronic Emergency Docket Related to the Novel Coronavirus COVID-19 (Ky. PSC Mar. 24, 2020), Order at 1–3.

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 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.

Turkey Creek shall make timely amendment to any prior response if Turkey Creek obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Turkey Creek fails or refuses to furnish all or part of the requested information, Turkey Creek shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied 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 filing a paper containing personal information, Turkey Creek shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

- Refer to Turkey Creek's response to Siting Board Staff's First Request for Information on Rehearing (Staff's First Request), Item 3.c.
- a. State whether there is an industry best practice standard as it relates to mitigation of noise and visual impacts at solar sites in general.

- b. State whether there is an industry best practice standard as it relates to mitigation of noise associated with the tamping process during construction at solar sites.
  - 2. Refer to Turkey Creek's response to Staff's First Request, Item 3.e.
- a. Provide the estimated total cost of the non-mature vegetative buffers that will be implemented as indicated on the preliminary site layout plan.
- b. Provide the estimated total cost of planting mature vegetative buffers if those buffers were implemented as marked on the preliminary site layout plan.
- 3. Refer to Turkey Creek's response to Staff's First Request, Item 3.f(3). Provide the estimated total cost of the alternate buffer configuration assuming that the vegetative buffer would be located as indicated in the preliminary site layout plan.
- 4. Refer to Turkey Creek's response to Staff's First Request, Item 4. Provide the estimated total cost of the green slats and temporary canvas fencing.
- 5. Refer to Turkey Creek's response to Staff's First Request, Item 6.b. State whether construction work on Sundays is similar to construction work done that is typically done during the nighttime hours of 6 p.m. to 9 p.m., i.e., work that is reserved to make up for delays or limited to electrical work once the project is energized.
  - 6. Refer to Turkey Creek's response to Staff's First Request, Appendix A.
- a. Confirm that the reference at the top of the schedule to 70 MWdc is equivalent to 50 MWac.
- b. Regarding the Pile Install, which is expected to last 105 days from March 15, 2022, until August 7, 2022, provide a detailed estimate of the number of days and estimated dates of when the actual tamping process will occur.

Linda C. Bridwell, PE
Executive Director
Public Service Commission on behalf
of the Kentucky State Board on
Generation and Transmission Siting
P.O. Box 615

Frankfort, KY 40602

DATED JAN 28 2021

cc: Parties of Record

\*Turkey Creek Solar, LLC 400 West Main Street Suite 503 Durham, NORTH CAROLINA 27701

\*James W Gardner Sturgill, Turner, Barker & Moloney, PLLC 333 West Vine Street Suite 1400 Lexington, KENTUCKY 40507

\*M. Todd Osterloh Sturgill, Turner, Barker & Moloney, PLLC 333 West Vine Street Suite 1400 Lexington, KENTUCKY 40507