

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY STATE BOARD ON ELECTRIC GENERATION  
AND TRANSMISSION SITING

In the Matter of:

ELECTRONIC APPLICATION OF CALDWELL	)	
SOLAR, LLC FOR A CERTIFICATE OF	)	
CONSTRUCTION FOR AN APPROXIMATELY 200	)	CASE NO.
MEGAWATT MERCHANT ELECTRIC SOLAR	)	2020-00244
GENERATING FACILITY IN CALDWELL	)	
COUNTY, KENTUCKY	)	

SITING BOARD STAFF'S SECOND REQUEST FOR INFORMATION  
TO CALDWELL SOLAR, LLC

Caldwell Solar, LLC (Caldwell Solar), pursuant to 807 KAR 5:001, is to file with the Siting Board an electronic version of the following information. The information requested is due on January 7, 2022. The Siting Board directs Caldwell Solar to the Kentucky Public Service Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> 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 response on behalf of the entity that the

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<sup>1</sup> 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 is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Caldwell Solar shall make timely amendment to any prior response if Caldwell Solar 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 Caldwell Solar fails or refuses to furnish all or part of the requested information, Caldwell Solar 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Caldwell Solar shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Caldwell Solar's response to Siting Board Staff's First Request for Information (Staff's First Request), Item 23. Provide a copy of the geologist consultant's report.

2. Refer to Amended Exhibit J, which does not include karst features in the legend. Describe the different types of karst features that have been located and the location on the site plan.

3. Refer to Amended Exhibit J, which has a designation for floodplain in the legend. Describe the setback for the floodplain.

4. Refer to Caldwell Solar's response to Staff's First Request, Item 6. Confirm that Figure A refers to the document Caldwell\_Amended\_Ex\_I\_Fig\_2.pdf.

5. Refer to Caldwell Solar's response to Staff's First Request, Item 28(a). Confirm that construction is expected to occur over a 16-month period.

6. Refer to Caldwell Solar's response to Staff's First Request, Items 28(b) and (c).

a. Describe the flow of construction activities across the Project site.

b. Explain whether separate construction activities, such as pile driving, will flow like a wave across the site.

c. If construction activities flow like a wave, explain whether construction would start on the south end of the Project site and move northward. For example, that site preparation/grading would begin on the south end and move north.

7. Refer to Caldwell Solar's response to Staff's First Request, Items 28(f) and (h). Confirm that, over the entire construction period, the average number of workers on-site is expected to be approximately 120 people, ranging from a minimum of 60 to a maximum of 225.

8. Refer to Caldwell Solar's response to Staff's First Request, Items 29(a). State whether the O&M Building will be located near the substation/switchyard or if not, state where the O&M Building will be located.

9. Refer to Caldwell Solar's response to Staff's First Request, Item 31.

a. Confirm that Structures ID 02C and ID 02D are associated with the Lafarge Quarry.

b. Describe the type of business associated with Structure ID 12A.

c. Describe the type of business associated with Structure ID 69A.

d. Confirm that the term “Outbuilding” refers to barns, warehouses and other ancillary structures.

10. Refer to Caldwell Solar’s response to Staff’s First Request, Item 50(b). Confirm that large truck deliveries will use local county roads in addition to US 641 and KY 91.

11. Refer to Caldwell Solar’s response to Staff’s First Request, Items 50(d), (e), and (h).

a. Explain whether construction vehicles will all be concentrated in a single part of the project or spread out across the full project area at a given time during the construction period.

b. If construction traffic will be spread out across the site during any given construction period, please describe how construction vehicles would be distributed across individual local roads on an average day. For example, if a total of 82 vehicles were to access different areas of the Project site on an average day, explain how many vehicles are assumed to use each local County road.

c. If construction traffic will be spread out across the site during any given construction period, please describe how construction vehicles would be distributed across individual local roads on a peak day. For example, if a total of 267 vehicles were to access different areas of the Project site on a peak day, explain how many vehicles are assumed to use each local County road.

d. Describe the traffic management strategies to be implemented on Old Quarry Road specifically to reduce construction phase impacts to local residents and businesses along that road. For example, avoiding construction activity in that area during the plant sale season to protect that local business.

e. Explain how Caldwell Solar will coordinate its traffic with that of the Lafarge Quarry on Fredonia Quarry Road.

12. Refer to Caldwell Solar's response to Staff's First Request, Item 54(b). According to the Kentucky Transportation Cabinet's Bridge Data Miner map, it appears that as many as 12 bridges in the area could be used in order to access the Project site.

a. Provide a list of all the bridges in the Project area (by numerical identification number and location) that could potentially be used by Project construction or operational vehicles.

b. Provide the bridge weight limit for each of the bridges listed.

c. Explain whether overweight vehicles will access the Project site using any of the bridges listed.

d. Describe the plans to avoid or improve or mitigate damage to any of the bridges listed to accommodate overweight vehicles.

13. Describe the plans to improve local roads within or adjacent to the Project site.

14. Describe actions to be taken to protect local cemeteries from damage related to truck or other vehicle traffic, i.e., blowing dirt or gravel.

15. Describe the actions to be taken to mitigate Project noise at local cemeteries, both during construction and during operations.

16. Refer to Caldwell Solar's response to Staff's First Request, Item 61. State the number of days or months during which the road building phase will occur.

17. Explain where road-building activities are found within the schedule/tasks listed in the response to Item 28(a).

18. State the number of days or months during which the trenching phase will occur.

19. Explain where trenching activities are found within the schedule/tasks listed in the response to Item 28(a).

20. State the number of days or months over which the laydown yard construction will occur.

21. Explain where laydown yard construction is found within the schedule/ tasks listed in the response to Item 28(a).

22. Confirm that the “installation phase” refers to the racking installation and module installation, as listed in the response to Item 28(a).

23. Describe, and provide sound level data for any other equipment used for the substation construction, besides the grader and the front-end loader listed in the response.

24. Confirm that “usage factor” is the percentage of the day in which the piece of equipment would be in operation for each phase. For example, trenching requires the use of a backhoe and has a 40 percent usage factor. Confirm this means that a backhoe would be in operation for 40 percent of each workday during the trenching phase.

25. Confirm that the usage factors noted in Table N-5 are representative of the likely usage for the Caldwell Solar Project specifically.

26. In reference to the usage factors, state whether a typical workday is an eight-hour day. Based on an eight-hour day, a backhoe would be in operation for about 3 to 3.5 hours per day during the trenching period.

27. Refer to Table N-5. Explain whether different equipment used for the same phase would operate at the same time during the day or whether equipment operation would be sequential within the same day.

28. Refer to Table N-5. State whether the Total Sound Power Level for each phase assumes that multiple pieces of equipment are operating at the same time. If it does not, provide cumulative noise effects.

29. Refer to Caldwell Solar's response to Staff's First Request, Items 72(h) and (i). Provide the visual renderings noted.

30. Refer to Caldwell Solar's response to Staff's First Request, Item 73. Explain the potential for glare to affect adjacent or nearby residences and confirm that glare may potentially affect adjacent residences or provide additional analyses addressing glare for nearby residences.

31. Refer to Caldwell Solar's response to Staff's First Request, Item 74. Confirm that the preliminary layout map provided in the response (Caldwell PIM prelim layout-map) is the earlier version of the site layout and that the current site layout is reflected in the Amended Exhibit I and Amended Exhibit J.

32. Refer to Caldwell Solar's response to Staff's First Request, Item 77. Provide any comments provided by representatives of the White Sulphur Church.

33. Refer to Caldwell Solar's response to Staff's First Request, Item 78. Explain the process for addressing complaints during the 20- to 25-year operational period.

34. The recently permitted Ashwood Solar Project will be located in Lyon County to the west of the Caldwell Solar Project site, on the east and west sides of US 641.

a. Explain whether Caldwell Solar has reviewed the Ashwood Solar application and subsequent materials to understand that Project in terms of construction activities, traffic levels, noise, etc.

b. Explain whether Caldwell Solar has contacted the Ashwood Solar Project managers to discuss potential cumulative effects or to coordinate construction activities in order to minimize traffic, noise, or other impacts.

c. Explain whether Caldwell Solar has evaluated the cumulative effects of the two Projects, if construction were to occur at the same time. If so, provide any analyses prepared.

d. Explain whether both projects would use US 641 to access areas of their respective Project sites.

e. If both Projects were to use US 641, explain how the costs associated with the mitigation or repair of road damage would be assigned to each Project.

35. If an application is submitted to the Siting Board, the Golden Solar Project will be proposed for a location immediately to the north and east of the Caldwell Solar Project site.



a. Explain whether the construction periods of those Projects may overlap.

b. Explain any mitigation measures that would be put in place to reduce the impacts of traffic, noise or other construction phase impacts, if construction of those two Projects were to overlap.



Linda C. Bridwell, PE  
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Public Service Commission *on behalf*  
of the Kentucky State Board on  
Generation and Transmission Siting  
P.O. Box 615  
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DATED DEC 21 2021

cc Parties of Record

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